



March 20, 2015

Manitoba Conservation and Water Stewardship  
Recycling and Waste Reduction: A Discussion Paper  
1007 Century Street  
Winnipeg Manitoba R3H 0W4

Via email: [pollupreve@gov.mb.ca](mailto:pollupreve@gov.mb.ca)

**Re: Recycling and Waste Reduction – A Discussion Paper**

1. The Canadian Wireless Telecommunications Association (CWTA) is the authority on wireless issues, developments and trends in Canada. It represents wireless service providers as well as companies that develop and produce products and services for the industry, including handset and equipment manufacturers, content and application creators and business-to-business service providers. CWTA is pleased to provide its comments on the Province of Manitoba's recycling and waste reduction discussion paper.
2. CWTA administers Recycle My Cell (RMC), the free, national, industry-led, recycling program for mobile devices and accessories, and the Producer Responsibility Organization for cell phone recycling in Manitoba. As such, changes to Manitoba's waste reduction strategy directly impact CWTA and its members.
3. CWTA shares Manitoba's goal of preventing waste through increased reuse and recycling. RMC was established to increase consumer awareness of the recycling initiatives currently provided by wireless service providers and device manufacturers, with the ultimate objective of minimizing the number of handsets entering Canada's landfills. After six years of operating RMC, CWTA understands the value of reviewing and adjusting waste diversion strategies and practices to reflect and respond to market realities.
4. Our comments below focus on the province's plan priorities and options overall, and extended producer responsibility specifically, and are based on our experiences administering RMC. We believe our practical perspective can provide the province with valuable insight, particularly with respect to new and non-traditional materials. Specifically, waste diversion and EPR strategies should: recognize the unique and evolving lifecycles of each targeted product or material; focus on waste diversion as the objective; and continue to include the government as an important partner and leader.

### Recognize the unique and evolving lifecycles of each targeted product or material

5. When RMC launched there was very little practical experience available to help predict how the program would perform. Data from other already existing recycling programs provided little realistic guidance in terms of probable outcomes. Of course, cell phones are very different from beverage containers, organic waste, paint, tires and other materials that can be diverted from landfills. Moreover, today's cell phones are also very different from the ones most Canadians were using when RMC launched in 2009.
6. The increasing functionality of new mobile devices has expanded consumers' options and desire to extend the usefulness of a previous device. To consumers, a cell phone that is no longer used is not considered garbage or something that requires disposal. Many consumers designate their previous smartphone for any number of alternative uses, such as media storage, MP3 player, Wi-Fi device or camera. The resale value of previously owned devices has also increased as more consumers actively switch to the latest device. We estimate that Manitoba residents account for 1,700 queries per month of our IMEI look-up tool, which allows consumers buying a previously-owned device to check whether it has been reported lost or stolen.<sup>1</sup>
7. Consumers are also more reluctant to part with a device that originally cost more than \$700, even if they have no plans for it. In fact, according to the *2014 National Cell Phone Recycling Study*,<sup>2</sup> 52% of Manitobans keep their previous device – either stored away or for another use. An additional 18% give their device away or sell it and 6% return their previous device to a store or their cell phone company. Another 8% of Manitobans directly recycle their mobile devices. As a result, **only 7% of devices** are reported to be thrown away.
8. Mobile devices are just one example of recyclable products that have an ever-evolving lifecycle that differs greatly from traditional one-use materials like beverage containers or packaging. Many other existing or targeted materials will have their own unique lifecycles – influenced by existing consumer reuse and resale habits that would need to be recognized and incorporated into any waste diversion strategy.

### Focus on waste diversion

9. Due to their high reuse, and resale value, a very low percentage of cell phones end up in landfills. For the same reasons, overall recycling numbers are relatively low when compared to those for single-use items. That said, the goal of RMC in Manitoba is to focus on reducing the 7% of cell phones that end up in landfills, rather than attempting specifically to increase the total recycling rate. We submit that this should continue to be the goal of all recycling and EPR programs.

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<sup>1</sup> <http://www.protectyourdata.ca/check-the-status-of-your-device-in-canada/>

<sup>2</sup> Quorus Consulting Group, January 2015.

10. The very different second- and third-life reuse and resale opportunities of targeted products and materials will result in very different recycling rates.<sup>3</sup> For instance, it is appropriate and reasonable to strive for a high recycling rate or recovery rate for single-use materials that would otherwise go in the garbage. However, a high recovery rate is not appropriate for multi-life products like mobile devices that have a low probability of ending up in the garbage.
11. The most relevant success measurement for a recycling program and an overall strategy is therefore waste diversion. Appropriately, the Province's first two key objectives of the proposed actions in the discussion paper are 1. Zero waste; and 2. Cutting Waste in Half. Both are directly-related to the ultimate goal of keeping materials out of landfills.
12. Conversely, recycling targets are not necessarily linked directly to reduced waste. For instance, the recycling rate for a particular product could be increased merely by decreasing instances of reuse, without decreasing the volume that ends up in landfills. Diverting previously used cell phones that are currently used as MP3 players to the recycling channel would not reduce overall cell phone waste, for example. That is why the only relevant target for a recycling or EPR program is waste diversion.

#### **Continue to include the government as an important partner and leader**

13. CWTA commends the Government of Manitoba for identifying itself as a partner and leader in the recycling strategy by banning plastic water bottles in government buildings and by providing recycling and composting services. Not only can the government play an important role in leading by example, but it can also contribute significant resources to the waste diversion objective with minimal effort.
14. In the case of RMC, one of the greatest resources is collection sites. Hosting an RMC drop-off location in government buildings would greatly increase the opportunity to capture wireless devices that may otherwise end up in the garbage.
15. Also, the government issues a significant number of cell phones to its employees. It can therefore directly control whether these devices end up collected by the RMC program, or in the garbage. CWTA encourages the Government of Manitoba to continue its leadership and partnership efforts to enhance recycling and waste reduction, and we would be pleased to discuss any such opportunities for RMC.

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<sup>3</sup> Unlike many other EPR materials, cell phones have a market value whether sold for reuse or recycled. Cell phones are a sought after commodity by charitable organizations and for-profit businesses. As these programs fall outside of the regulated environment, it is difficult to determine the volume of material that flow through these initiatives. The lack of visibility makes recovery rates even more problematic to determine.

## Conclusion

16. CWTA and Manitoba share the goal of waste reduction. RMC has been pursuing the goal of minimizing the number of wireless handsets entering Canada's landfills for more than six years and we are always pleased to contribute to strategies what will help meet this objective. As outlined in this submission, we believe that practical perspectives can provide the province with valuable insight, particularly with respect to new and non-traditional materials. Specifically, we encourage the province to maintain waste reduction and EPR strategies that:

- Recognize the unique and evolving lifecycles of each targeted product or material;
- Focus on waste diversion; and
- Continue to include the government as an important partner and leader.

17. We appreciate the opportunity to participate in this process.

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