



Recycle My Cell Three Year Business Plan 2016 to 2019

Submitted to
Alberta Environment and Parks

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1. Accountability Statement

The Recycle My Cell (RMC) Business Plan for the period of January 1, 2016 through December 31, 2019 was prepared in accordance with: the Memorandum of Understanding in place between the Canadian Wireless Telecommunications Association (CWTA) and Alberta Environment and Parks; and the requirements of Section 16 of the *Designated Material Recycling and Management Regulation (Alberta Regulation 93/2004)*, as amended, which was enacted under the Environmental Protection and Enhancement Act.

The Business Plans and priorities of the Government of Alberta and Alberta Environment and Parks were taken into account in the development of the RMC Business Plan.

2. Introduction

Who We Are

The Canadian Wireless Telecommunications Association 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.

Recycle My Cell is a free, national, industry-led, recycling program for mobile devices. The goal of this program is to minimize the number of handsets entering Canada's landfills. RMC has recovered 525,169 devices within Alberta since its formal recognition in the province in 2011, and contributes to 96% of all cell phones being diverted from Alberta landfills.

RMC is supported by: Bell (including Aliant, The Source, Solo, and Virgin Mobile), BlackBerry, Eastlink, GEEP Inc., GREENTEC, LG Electronics Canada Inc., Lynx Mobility, Microsoft, MTS, Rogers Communications (including Rogers Wireless and FIDO), Samsung Electronics Canada Inc., SaskTel, Sony of Canada, TBaytel, TELUS (including TELUS Mobility, MiKE and Koodo), and Videotron.¹

Our Mandate

CWTA is a wireless industry association with membership from a distinct but varied sector of the telecommunications industry. CWTA receives its mandate from a Board of Directors and puts into action this direction via its committee structure.

In its role, CWTA manages the RMC program on behalf of the wireless industry, acting as a single point of contact for consumers, the provinces, municipalities and other stakeholders. It is also responsible for any joint administrative requirements such as consumer education and compliance with provincial reporting. Specific responsibilities include:

- Liaisons with governments, consumers, and other stakeholders;
- Public education and awareness;

¹ WIND Mobile has rejoined the CWTA and discussions are underway concerning participation in RMC.

- Regular reporting on approved performance indicators;
- Induction of all interested and obligated brand owners who are not already participating in the program; and
- Maintaining contracts and relationships as required.

Members of the CWTA Recycling Committee act as advisers to the Association on the operation and further development of the program.

RMC operates with no fees charged to consumers purchasing or recycling mobile devices.

3. Recovery of Mobile Devices within Alberta

Material Covered by RMC

RMC is a cell phone recovery program that deals specifically with mobile devices that are primarily manufactured to connect to a cellular or paging network. Examples of such devices include cellular phones, wireless smartphones, superphones, phablets, wireless PDAs, removable external aircards and pagers.

In addition, accessories such as headsets, chargers and rechargeable cell phone batteries are also recovered by the program.

Recycle My Cell accepts all orphaned, historic and imported mobile devices, as well as mobile devices from non-participating brand owners, regardless of brand or condition.

Consumers and RMC

Residents of Alberta who visit the bilingual Web site – www.RecycleMyCell.ca and www.Recyclemoncell.ca – can enter their postal code to locate the participating drop-off locations closest to them.

If a consumer is unable to get to a drop-off location, the Web site provides printable postage-paid labels to use for mailing their wireless devices.

The Web site also provides information about the program, and links to other provincial e-waste stewardship programs. Consumers can access information that explains how to clear their device of all personal data before dropping it off for recycling.

RMC Program Overview

Recycle My Cell has operated within Alberta since 2009 and was formally recognized in June 2011.

RMC leverages existing programs being operated by wireless service providers and handset manufacturers within the province. Under RMC, brand owners continue to operate their own corporate programs to collect, reuse and recycle mobile devices. Many of these programs were initiated and established well before regulated Extended Producer Responsibility (EPR) e-waste programs were in place in Canada, and have grown to meet changes in the environment.

RMC uses three mechanisms for device recovery:

- Return-to-retail brand owner locations: Consumers can readily return mobile devices at all participating retail stores operated by member brand owners within the province during normal business hours.
- Voluntary third-party locations: Consumers are able to return devices to third-party locations (such as depots, municipal offices, etc.) that choose to participate as drop-off locations using the RMC-branded program.
- Mail-back: Consumers are able to mail back unwanted devices, via Canada Post, using postage-paid labels that they download from recyclemycell.ca/recyclemoncell.ca, when it is not convenient for them to return the devices to a drop-off location.

Using Canada Post ensures that even small and remote communities have access to the service.

Devices that have been collected by participating locations are sent to certified processors for proper handling. Processors typically sort the material into three categories: resalable devices; recyclable devices and accessories; and batteries.

When possible, as is consistent with established recycling and reuse practices of cell phone carriers and manufacturers around the world, damaged products are refurbished, and products that meet specific functionality requirements for resale are reintroduced into the market.

All batteries are sorted by chemistry (i.e., nickel-cadmium, nickel-metal-hydrate, lithium-ion, small-sealed-lead, mixed) and are sent to appropriate downstream processors where metals are reclaimed.

4. Strengthening RMC in Alberta

CWTA and its members are committed to the long-term feasibility of Recycle My Cell.

Objective 1: Improve Public Education and Awareness

Based on the 2014 National Cell Phone Recycling Study it was determined that 48% of Albertans knew about cell phone recycling programs in general; of these, 28% knew about programs run by member carriers. When asked, 14% of respondents said they were aware of the RMC brand. These results are not immaterial.

It is important to remember that consumer awareness is fluid, and does not serve as an indicator of use. Materials that are durable and are not “disposed” of for years may yield a lower level of awareness simply because a consumer does not need to make a decision about them as often as they would consumables. With such easy access to technology, most consumers will search out options on-line or with sources that they feel would have the information, when they are ready to part with their devices.

CWTA is committed to maintaining and improving upon the progress achieved to-date and will utilize the following strategies:

Event sponsorship/participation

1. CWTA will continue to sponsor events such as Waste Reduction Week in Canada and the Recycling Council of Alberta's annual conference. Both events attract a diverse audience that is able to help further the objectives of Recycle My Cell.
2. In addition, CWTA will investigate the potential options and benefits to purchasing booth space at the Alberta Urban Municipalities Association's and Alberta Association of Municipal Districts & Counties' conferences.

Grass-roots engagement

1. CWTA will review and revamp its grass-roots engagement activities in 2016. While previous initiatives were effective in terms of reaching non-profit and charity organizations, the up-take did not yield significant results.

Media engagement - advertising

1. The majority of CWTA's advertising efforts will continue to focus on alternate advertising methods, such as Google and Facebook ads. Both of these options offer a more targeted approach to providing information to those searching for it on-line.
2. In addition, CWTA will develop a radio PSA. The PSA will be provided to all members for their use, and can be used in support of province-specific initiatives.

Media engagement - editorial

1. CWTA will continue to use News Canada as a valuable tool for program promotion. News Canada is a paid service that provides articles, free of charge, for use by publications and Web sites. This has shown to be an effective way of including the Recycle My Cell story in community newspapers and on Web sites that often look for content from external sources.
2. CWTA will continue to develop and distribute both targeted and national press releases to coincide with activities RMC participates in.
3. In addition, CWTA will develop and distribute information to targeted media in Alberta. As an authority on the wireless industry, CWTA is best positioned to speak about the positive steps the industry has taken to properly deal with its end-of-life materials, and can also provide consumer tips.

RMC Web site and Toll-free number

1. Recyclemycell.ca and recyclemoncell.ca will continue to serve as the central hub for the program. The site will be updated regularly to reflect consumer impacting changes such as changes in participating member programs, or in drop-off locations.

The Web site provides:

- Information about the RMC recovery program, current collection sites, and steps to clear personal information from a device before it is recycled; and
 - Links to member programs, and available mail-back options.
2. Consumers with additional questions about the program may contact RMC representatives via an email address that has been established for this purpose (info@recyclemycell.ca /

info@recyclemoncell.ca). Consumers can also speak with a RMC representative via a toll-free phone number (1-888-797-1740).

Social Media

1. CWTA has developed a strategy to engage its current followers more fully by providing useful information about recycling in general, and highlighting the ease and benefit of recycling devices.
2. Twitter (@RecycleMyCell) and Facebook will be used to further promote messages about RMC to followers.

Targeted stakeholder outreach

1. CWTA will continue to contact key stakeholders (including municipal and local government) via an outreach campaign.

The outreach campaign will inform stakeholders of the program and solicit their participation. Depending on the nature of the stakeholder, the involvement could range from providing promotional information to consumers at the point of sale, including program information on Web sites, or hosting a collection location in their community.

2. CWTA will continue to work with other stewardship organizations, recycling councils and interested third-parties to ensure relevant information is provided to consumers.
3. In addition, CWTA will engage depots (either directly or via larger organizational bodies). Third-party locations, such as municipal waste depots, non-profit organizations and other parties not affiliated with current RMC members, are encouraged to participate in the program.

Public Education and Awareness Targets

Target: Achieve an awareness rate as outlined in the table below.

Year	Cell Phone Recycling Awareness in Alberta		Recycle My Cell Awareness in Alberta	
	Target ⁺	Awareness Level as determined by consumer survey	Target ⁺	Awareness Level as determined by consumer survey
2009		54%		5%
2010		51%		10%
2011	64%	54%	11.50%	14%
2012	68%	49%	13%	16%
2013	72%	48%	14.50%	11%
2014	76%	48%	16%	14%
2015	80%		17.50%	

⁺ CWTA considers the targets noted in the table to be aggressive, but they are in-line with the national awareness targets that have been set for the program. The current national awareness level of cell phone recycling in general is 50%. Targets will be revisited in 2016 to take into account historical data and approaches utilized in other jurisdictions. Reporting on awareness of carrier programs will also be considered as these programs are integral part of the collection system.

- Indicator 1: Percentage of population aware of the program.
- Method to evaluate: Annual survey to gauge consumer awareness and propensity to participate in a mobile device recycling program.
- Indicator 2: Number of visitors to the recyclemycell.ca Web site.
- Method to evaluate: Tracking the number of visitors to the recyclemycell.ca Web site.

CWTA will report on its progress as part of its Annual Report obligation to Alberta Environment and Parks.

Objective 2: Ensure Continued Public Participation and Program Accessibility

All Alberta residents have access to the RMC program.

Return-to-retail partner locations: There are currently 494² drop-off locations across the province of Alberta.

Return-to-retail will remain the primary method by which cell phones are recovered through the program.

It is expected that the current retail network will continue to expand. Some of this expansion will be the result of member brand owners opening new locations and moving into areas where they currently do not have a presence, however some of that expansion may also result from the inclusion of non-member brand owners, or retailers not affiliated with current member brand owners. Regardless, this expansion will not be sustainable year over year as markets reach their saturation.

CWTA will continue to work with its members to ensure that the list of collection sites noted on recyclemycell.ca is updated on a regular basis to allow consumer access to the most current information available.

Voluntary third-party locations: Additional drop-off locations will be considered outside of the return-to-retail model to address a trend highlighted through consumer research. As noted in the ***Recycling Study***, many consumers identify depots (municipal and recycling) as mechanisms for cell phone recycling. Several depots currently participate in RMC voluntarily.

Recycle My Cell provides an easy and effective method for municipalities, community partners and other organizations to become involved in the recycling effort. Municipal locations, charity organizations and corporate/private initiatives that wish to act as a collection site are able to join the program at no cost to them.

Mail-back option: Recycle My Cell will continue to offer a postage-paid mail-back option for anyone currently unable to reach a drop-off location for any reason. The use of Canada Post ensures that even small and remote communities have access to the service.

² As of June 2015 Annual Report filing.

Program Accessibility and Public Participation Targets

Target: Increase the number of Recycle My Cell drop-off locations by 1% per year from 2012 to 2015.

Year	Recycle My Cell Drop-off Locations	
	Target	Actual
2011		456
2012*	461	446
2013*	465	516
2014*	470	494
2015*	475	

* Targets for 2012 to 2015 were revised in 2012 to take into account changes to the actual number of drop-off locations in 2011. CWTA has opted to maintain the targets at their current level and will work to bridge the current gap.

- Indicator: Accessibility of drop-off locations measured by the population within a certain proximity to drop-off location, or by the average travel distance to a drop-off depot.
- Method to evaluate: Map to highlight the number of drop-off locations.

Target: 100% customer satisfaction with the Recycle My Cell program.

Year	Recycle My Cell Consumer Satisfaction*	
	Target	Satisfaction Level as determined by consumer survey
2011	100%	92%
2012	100%	95%
2013	100%	96%
2014	100%	84%
2015	100%	

* Consumer satisfaction is measured at a national level. Data specific to Alberta is not available.

- Indicator 1: Target community and program partner satisfaction.
- Method to evaluate: Annual survey to gauge consumer awareness and satisfaction as well as the propensity to participate in a mobile device recycling program.
- Indicator 2: Number and nature of complaints.
- Method to evaluate: Keeping logs of calls to toll-free number as well as keeping track of emails sent to info@recyclemycell.ca to determine the number of and nature of complaints received, as well as the number that are resolved/unresolved.

CWTA will report on its progress as part of its Annual Report obligation to Alberta Environment and Parks.

Objective 3: Increase Collection Rates

While CWTA has collected data concerning the amount of devices that have been collected through the program, this does not lend itself to a forecasting of what will be recovered in following years. As the annual collection results attest, there is a great degree of variance in the number of devices collected via the program year-over-year. What is clear is that, even with the variance in collections, what falls outside of the program tends to remain outside of the landfill as well.

The results of the 2014 National Cell Phone Recycling Study indicate that 39% of Alberta respondents are simply storing their phone; 24% gave away or sold their previous cell phone; 12% of respondents recycled their last phone; and 9% returned their devices to a store or cell phone company. In 2014, 4% of respondents reported throwing out their old cell phone (as compared to 7% in 2013).

The increasing functionality of new mobile devices, coupled with their value, has increased consumers' options and desire to extend the usefulness of a previous device. Even when a new phone is purchased, the old one retains its value in some fashion whether it be through another use, emotionally (as a result of the content), or monetarily (as result of Trade-in or resale opportunities). To most consumers, a cell phone that is no longer used is not considered garbage or something that requires disposal. Its size also makes it convenient for easy storage until a consumer is willing to part with it.

In terms of collection, cell phones are very markedly different from other electronic materials, and other materials subject to EPR. Collectors do not view them as a waste material and for that reason they do not follow the collection patterns of waste material.

Cell phone recycling remains a lucrative endeavour, often used by for-profit and charitable organizations as a source of revenue. While efforts are made to funnel devices through the Recycle My Cell program the ability of other programs to continue their work is one of the basic tenants of the program.

Collection Rate Targets

Target: Achieve a collection rate as outlined in the table below.

CWTA Available for Collection, Estimated Collection Targets and Collection Rate for Alberta

Year	CWTA Available for Collection (units)	CWTA Estimated Collection (targets, unit)	Target Collection Rate	Actual Recovery (units) [#]	Actual Collection Rate	RMC Member Internal Initiatives ^{^^}
2006	262,131	19,383	7%	19,383	7%	
2007	293,541	35,984	12%	35,984	12%	
2008	326,961	37,926	12%	37,926	12%	
2009	361,336	45,827	13%	45,827	13%	
2010	393,650	59,048	15%	34,795	9%	27,025
2011	424,199	80,598	19%	30,958	7%	82,725
2012	453,370	108,809	24%	60,231	13%	102,226
2013	481,023	134,686	28%	82,761	17%	56,775
2014	509,884	168,262	33%	56,691	11% ³	52,795
2015	540,477	199,976	37%			

* For years 2006, 2007 and 2008, the CWTA Estimated Collection figure is based on actual national collection data; the resulting Alberta figures for each year are an estimate of the amount collected in Alberta based on Alberta's percentage of the national population.

** 2009 was the first year collections were reported by province instead of an estimate.

***Churn input into the LCM for 2010, 2011, 2012 and 2013 has been estimated, using a 6% growth rate year over year, in order to allow for the development of a full data set for the years 2012, 2013, 2014 and 2015.

[#]Actual Recovery represents the amount, in units, of cell phones collected each year through drop-off locations, the mail back option, trade-in programs (where applicable) and the RMC Waste Reduction Week Student Challenge.

^{^^}CWTA, with its members, has devoted a substantial amount of time investigating how to incorporate data regarding other diversion methods employed internally for devices that are returned to members by other means.

- Indicator 1: Absolute collection
- Method to evaluate: Devices collected on an aggregate provincial basis. This data will consist of two elements: the amount of material that is collected through a physical collection site and an estimate of the material that is collected through the mail-back option.
- Indicator 2: Per capita breakdown of Aggregate Total of devices collected.
- Method to evaluate: Absolute collection can be further broken down to a per capita amount (percentage of product that has been collected relative to the size of the target community).

³ A review of collection/ recovery rates in other North American jurisdictions shows the following: the Environmental Protection Agency notes a recycling rate of 11% for the US as a whole in 2010; more recent data is not available. In California the recovery/collection rate, as reported for 2012, is estimated at 13%. Maine and New York State also have a regulation covering cell phones but do not report on collections.

CWTA will report on its progress as part of its Annual Report obligation to Alberta Environment and Parks.

Objective 4: Facilitate Proper Post-collection Management of Materials

Management of Material

At the most basic level, all phones that are collected by the program are diverted from landfill whether through reuse or recycling.

While it is understood that reuse is preferable over recycling, whether a phone can be reused is dependent on numerous factors. Mobile devices are a unique product; unlike other electronics, cell phones continue to have value which makes them a sought after commodity, whether for recycling or reuse.

Those devices destined for the recycling stream contain valuable amounts of precious metals (silver, gold, palladium, platinum, tin, copper and more) and contribute to the urban-mining phenomena.⁴

Devices intended for refurbishment and resale form a lucrative and growing business model that is profitable for many processors. Because of the thriving second hand market and the profitability in reselling devices, phones are reused whenever possible. However, it should be understood that phones that meet the criteria for refurbishment from a physical perspective (i.e. can power on, etc.) may not meet the criteria for marketability in that the handset technology is no longer seen as desirable by consumers, or the network technology is no longer supported. To reintroduce phones into the market purely to meet a defined volume target will prove to be harmful.

Processor Certifications

Brand owners participating in the program use certified third-party processors to manage their materials. Material recovered in Alberta is responsibly managed by GEEP Inc. and GREENTEC facilities located in Ontario. The nature of a wireless device, as well as the mechanisms by which they are collected across Canada, allows for the transfer of material to a central facility where it can be responsibly and economically managed.

All processors that have been involved with the RMC program hold valid ISO certifications and/or are verified to the Recycler Qualification Office's Electronic Recycling Standards (ERS), or international standards meaning they have an environmental management system in place which ensures accountability and knowledge of the associated environmental impacts.

All members of the recovery chain – from carrier to processor – have a vested interest in ensuring proper processes are followed at all times.

Post-collection Management of Materials Targets

Target: Reuse: Maintain the current diversion level from landfill of 100% for products that meet reuse criteria.

⁴ Urban-mining is the process of reclaiming compounds and elements from products, buildings and waste. Processors continually improve their processes to ensure that they are able to collect the maximum amount of precious metals from devices that are being recycled. These metals can be sold for the manufacturer of new products which minimizes the amount of virgin material that is required to be extracted.

- Indicator: Post-collection fate of material.
- Method to evaluate: Figures provided from recyclers concerning the allocation of RMC recovered devices that were destined for reuse.

Target: Recycle: Maintain the current level of recycling, reclamation and recovery for wireless products entering the recycling process.

- Indicator: Post-collection fate of material.
- Method to evaluate: Figures provided from recyclers concerning the allocation of RMC recovered devices that were recycled.⁵

Target: Ensure that certifications held by processors associated with RMC are valid and align with identified provincial requirements.

- Indicator: Valid certifications of processors.
- Method to evaluate: Copies of valid ISO certifications to show compliance with applicable regulations.
- Method to evaluate: Web site listings for provincial programs that use same processors as RMC to show compliance with program certification.

CWTA will report on its progress as part of its Annual Report obligation to Alberta Environment and Parks.

5. Conclusion

CWTA and its members have enjoyed a positive and productive relationship with Alberta and are committed to providing consumers with a free, convenient, and accessible method to dispose of their unwanted wireless devices and accessories. Working together – with Albertans, Alberta Environment and Parks and other stakeholders – will ensure that the objectives outlined in this plan are achieved.

⁵ CWTA is currently working on determining how to more effectively report on the post-collection management of materials so that the amount reused, recycled, recovered as energy and land-filled is better defined and understood. The NFI Audit work in BC is integral to this; it is expected that additional changes will be made to current processes to enhance efficiencies. CWTA will continue to provide updates on progress.