



**Recycle My Cell
Stewardship Plan for the Recycling of
Cellular Phones in
Newfoundland and Labrador
2019 to 2023**

January 2019

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1. Introduction

Recycle My Cell (RMC) was developed by the Canadian Wireless Telecommunications Association (CWTA) to meet the requirements of e-waste regulations across Canada.

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 administers Recycle My Cell on behalf of member brand owners that have assigned them as agent. The goal of this program is to minimize the number of handsets entering Canada's landfills. RMC became a regulated Stewardship Program within the province of Newfoundland and Labrador in April 2013. RMC has been operating within the province in good standing since that time.

While no substantive changes have been made to the Recycle My Cell program or its operations within the province, the **Recycle My Cell - Stewardship Plan for the Recycling of Cellular Phones in Newfoundland and Labrador – 2019 to 2022** outlines a revised performance measurement approach that more accurately reflects consumer attitudes towards cellular phones.

The RMC program will continue to:

- Inform consumers of their options for reusing and recycling their mobile devices;
- Ensure environmentally conscious management of end-of-life mobile devices;
- Ensure all work under the program is done by certified and responsible organizations;
- Operate in an economically efficient manner;
- Ensure consistency with Canadian regulations at all levels of government and comply with CCME's *Canada-Wide Principles for Electronics Product Stewardship*;
- Be open to all obligated and relevant brand owners;
- Assist in the processing of mobile devices which do not fall under the responsibility of any obligated brand owner (orphan, historic and imported); and
- Allow fair competition between this and non-affiliated third-party collection programs.

RMC is committed to achieving the objectives laid out in this revised Stewardship Plan, working cooperatively with other provincial stakeholders.

2. Executive Summary

Recycle My Cell is an established, free, national cellular phone recycling program with the objective of minimizing the introduction of mobile devices into the municipal waste stream.

Recycle My Cell deals specifically with mobile devices as identified within section 31.18(viii) of the Waste Management Regulations: "a cell phone and other wireless communication device but does not include a factory-installed communication device developed for embedded use in motor vehicles".

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Recycle My Cell accepts all orphaned, historic and imported mobile devices, as well as mobile devices from non-participating stewards, when consumers return such products to the Recycle My Cell drop-off locations.

These devices are collected through the following means:

- Return-to-retail steward locations;
- Third-party locations using the RMC-branded program; and
- Mail-back.

In 2017, there were 114 drop-off locations within Newfoundland and Labrador. Most citizens live near one of these locations. As an additional benefit to consumers, a postage-paid mail-back option that accepts any cellular phone is available.

A website has been developed (www.recyclemycell.ca and www.recyclemoncell.ca) to promote consumer awareness of recycling opportunities, to act as a reference guide for the program and provide an up-to-date list of collection sites. Also, a toll-free phone number (1-888-797-1940) is available to complement the website for those without internet access.

Responsible recycling and refurbishment of program material collected within Newfoundland and Labrador takes place with the assistance of processing partners. All of the processors involved hold multiple certifications, including ISO, R2 and/or verification under Electronic Products Recycling Association's (EPRA) Recycling Vendor Qualification Program (RVQP).

CWTA will report on the performance indicators included within this plan annually.

2. Historical Overview

Program Performance Overview

The tables below highlight program performance based on performance indicators that were approved in the previous Stewardship Plan.

PRODUCT DISTRIBUTED & RECOVERED	2013	2014	2015	2016	2017
Overall Recovery	12,585	9,562	7,728	10,904	7,133
> RMC Initiatives	8,484	7,087	4,179	5,329	6,370
> Of RMC collections: sent for refurbishment & reuse	5,237	4,309	2,516	3,930	4,811
> Of RMC collections: recycled	3,247	2,778	1,663	1,399	1,559
> RMC member internal initiatives	4,101	2,475	3,549	5,575	764
Product Distributed	55,498	135,674	42,475	85,983	19,975
> Directly to participating carrier locations	49,270	110,909	38,628	65,770	19,911
> By third-party retailers	6,228	24,765	3,847	20,213	64

DROP OFF LOCATIONS	2013	2014	2015	2016	2017
Number of Drop off Locations in Newfoundland & Labrador	70	72	103	114	114
> Number of RMC Branded Drop-offs	21	23	52	70	72
> Number of Communities	30	32	54	69	70

AWARENESS	2013	2014	2015	2016	2017
Aware of recycling programs for phones in general	52%	45%	N/A	N/A	N/A
Aware of specific cell phone recycling programs	N/A	N/A	38%	36%	27%
Aware that cell phones can be recycled	N/A	N/A	N/A	78%	82%

*Changed methodology for this question starting in 2015; additional question for general awareness added for 2016.

PUBLIC ENGAGEMENT	2013	2014	2015	2016	2017
Calls to Toll-Free from Newfoundland & Labrador	20	16	10	21	13
Web Searches for locations in Newfoundland & Labrador	589	436	485	295	238
Facebook Likes (NATIONAL)	1,627	2,111	2,111	4,666	7,557
Twitter Followers (NATIONAL)	N/A	364	441	492	565

CONSUMER DIVERSION FROM LANDFILL: What did consumers do with their last cell phone?	2013	2014	2015	2016	2017
Storage	42%	46%	39%	41%	52%
Reuse/Recycle	38%	36%	50%	52%	43%
Other (Lost, stolen, unsure, etc.)	10%	8%	7%	5%	3%
Garbage	8%	10%	4%	3%	2%

Barriers to Collection

Cell phone recovery is a challenging endeavour. Cell phones are very valuable, even at the end of their life and, in this way, are markedly different from other electronic materials. They are not a typical waste material and do not follow the collection patterns of waste material.

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, and also turned the collection of unwanted devices into a competitive activity that will often lead to pathways outside of Newfoundland and Labrador.

There are several barriers to collection as noted below. In all instances CWTA cannot quantify the amount of material this may constitute since these pathways fall outside of RMC's collection system.

Competition with other regulated programs – Recycle My Cell is not the only regulated program with a defined collection network within the province. EPRA has an established collection network for electronics and also collect cell phones.

CWTA has always supported fair competition between RMC and non-affiliated third-party collection programs. This has been one of the Program's principles since it began to operate in 2009. CWTA will continue to work cooperatively with any other program that collects and responsibly handles mobile devices. CWTA believes that there is great opportunity to leverage the networks and expertise of all regulated programs to collaboratively ensure mobile devices continue to be effectively managed. Cell phone recycling is a market-driven activity and competition ultimately provides consumer choice and reduces the volume of material that ends up in landfill.

Competition with other collectors and non-regulated programs – In addition to regulated programs, there are also multiple not-for-profit and for-profit organizations that recover devices outside of the regulated environment. This includes a wide variety of organizations, from charities, to processors, to big box stores and independent retailers.

Processors will often develop programs that allow charities and other not-for-profit organizations to be “paid” for their collections as a means to fundraise.

From the perspective of a processor, a used phone, even at the end of its useful life, can be taken apart for its various elements and then sold as bulk lot, or further refined as a commodity. In both instances, these activities may begin in Canada (collection) but then tend to end elsewhere (occur across the globe). The final destination of these sales is market driven and based on market value. In addition, any newer devices can also be sold to buyers but for a higher price than devices that end up as commodity materials since they will often find a lucrative market in countries where the devices are highly sought by consumers.

For third-party organizations that collect used devices specifically for resale, there is a thriving market for refurbished devices that are either sold via on-line retail presences of these organizations, or via auction. In most instances, these activities occur in other markets outside of Canada. Much of this is determined by the device itself and its marketability.

Brand owners that fall outside RMC – Much as member brand owners have developed recovery programs intended to appeal to consumers, so have brand owners that fall outside of RMC. Many organizations will offer trade-in programs, or recover devices that have no value, that then are sent to processors and third-party organizations.

Landfill – Ultimately any device that makes its way in to a landfill will be unavailable for collection. However, based on self-reported data¹, the amount of material reported as being thrown out by consumers in Newfoundland and Labrador is small; only 2% of respondents note throwing away their device, which has declined steadily since 2013.

Based on landfill audits conducted in other jurisdictions (BC and Nova Scotia), the evidence shows that electronics as a broad category, and cell phones specifically, do not routinely end up in the garbage

Program Challenges

Alternative disposal mechanisms – Cell phones are very valuable, even at the end of their life and, in this way, are markedly different from other electronic materials. They are not a waste material and do not follow the collection patterns of waste material.

¹ Data from CWTA's 2017 Understanding Cell Phone Recycling Behaviours Study.

There are two primary barriers to collection: storage and alternative reuse activities:

- Storage: Cell phone “hoarding” is a known behaviour that has direct impact on collection volumes. 2017 study results note that when asked if they had any cell phones in storage, 52% of respondents reported that they did. This type of behaviour is not specific to Newfoundland and Labrador; in fact, the storage rates in both the US² (estimated between 50% and 62%) and Australia³ (42%) are in-line with those reported via the annual consumer survey that CWTA undertakes.
- Alternative “Reuse” activities were reported by nearly 43% of respondents, this includes activities like giving away or selling their device, reusing it for a different purpose (like an alarm clock), or returning their device to retail stores not affiliated with program stewards.

Consumer awareness vs. behaviour – When RMC launched there was very little practical knowledge available to anticipate program awareness levels. Over the years it has become clear that consumer awareness does not necessarily correlate with consumer behaviour.

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 online or with sources that they feel would have the information, when they are ready to part with their devices.

Based on the most recent survey results⁴, support for cell phone recycling is high (98%), as is awareness that cell phones can be recycled (82%).

The survey also suggests that there is a consumer perception gap as to what behaviour constitutes recycling. Because consumers don’t necessarily see how these activities fit their definition of recycling, they don’t see cell phones as part of the traditional recycling equation.

CWTA’s Understanding Cell Phone Recycling Behaviours Study shows there is often a high level of awareness of cell phone recycling amongst Canadians who diverted their phone from landfill using methods other than recycling as a deliberate choice.

Despite being armed with the knowledge that cell phones can be recycled, Canadians are not necessarily choosing to do so. Other options might be more appealing or a better fit for their needs (e.g. reusing as an alarm clock or giving to a family member).

² <https://www.sparefoot.com/self-storage/blog/5362-cellphone-hoarding/>; <http://www.ctpost.com/openhouse/article/Gadget-Hoarding-62-of-Consumers-Keep-Old-Cell-4252418.php>

³ http://www.mobilemuster.com.au/media/134587/annual_report.pdf

⁴ 2017 “Understanding Cell Phone Recycling Behaviours” survey results: <https://www.recyclemycell.ca/wp-content/uploads/2017-1097-CWTA-Recycling-Populated-report-Public-Version.pdf>

3. Program Structure Overview

Fees and Program Funding

Recycle My Cell is not funded by eco-fees.

The cost to operate the RMC program is borne directly by member brand owners running their individual corporate programs and by CWTA through fees paid by its members and affiliates (i.e., RMC is funded through CWTA's general budget, using CWTA staff and resources).

The cost of running individual corporate recycling programs is considered proprietary commercial information as each brand owner develops and implements individual communications and marketing programs. This information is not shared with CWTA.

CWTA believes that financial accountability should be shared with those incurring the costs. As such, financial reporting will occur between CWTA and the brand owners it represents. However, as no funds are to be collected from the public for any aspect of this program, these reports will not be made public.

Brand Owners Participating in the Program

The following member brand owners are covered by the CWTA Stewardship Plan in Newfoundland and Labrador:

- Bell (Including Aliant, The Source, Solo, and Virgin Mobile)
- Eastlink
- Rogers Communications (Including Rogers Wireless and FIDO)

Members in the RMC program are primarily wireless service providers that distribute and sell mobile devices via retail locations within the province; these producers serve approximately 71% of all wireless subscribers in Newfoundland and Labrador. This is based on an estimate of Bell and Rogers' subscriber share using publicly-available data. Eastlink subscribers were not tracked.⁵

In addition, manufacturers⁶ may opt to participate in the program on a voluntary basis if they so choose, as is the case with Samsung Electronics Canada Inc.

Brand Owner Induction

Non-member brand owners do not play any role in the RMC program. Participation in the program and decisions made concerning its direction are limited to those that fund the program's operations.

Non-member brand owners can join RMC by becoming Members or Associates of CWTA.

Program Roles and Responsibilities

CWTA – 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.

⁵ Source: CRTC's <http://www.crtc.gc.ca/eng/publications/reports/policymonitoring/2017/cmr5.htm#t511>. Data is specific to 2016, the most current year available.

⁶ In the majority of instances, a manufacturer is not an obligated producer and is not required to formally participate in a stewardship program. However, a manufacturer may opt to support a program and participate on a voluntary basis; CWTA allows for this to occur within RMC. This voluntary participation does not result in any formal obligation outside of data sharing where applicable.

In its role, CWTA manages the 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 complying with provincial reporting. Specific responsibilities include:

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

CWTA collaborates with other stakeholders in the province, including MMSB and other approved Stewards on issues of joint importance or interest.

CWTA shares the goal of harmonizing rules and regulations across the country with other Stewards operating programs that are multi-provincial or national in scope. Where possible, CWTA has aligned program rules across the provinces to ensure the program works toward achieving the highest standard. Harmonization also ensures that a consistent program is delivered to all Canadians as member brand owners are able to find operational efficiencies that allow them to provide RMC free of charge.

Member brand owners – Under Recycle My Cell, member brand owners continue to operate their own corporate programs to collect, reuse and recycle mobile devices.⁷ Consumer education and public awareness leverages the extensive retail and brand penetration of participating wireless service providers and device manufacturers operating in Newfoundland and Labrador. Consumers will readily be able to return mobile devices at any of the participating retail stores operated by brand owners within the province during normal business hours. In addition, consumers will be able to mail back unwanted devices using postage-paid labels when it is not convenient for them to return the devices to a drop-off location.

In their role, member brand owners provide an oversight and advisory role through their participation in the CWTA Recycling Committee. The Recycling Committee (comprising carriers, handset manufacturers and certified processors) was created by the CWTA Board of Directors in 2008 and is open to any member brand owner wishing to participate.

In addition, member brand owners also have responsibilities specific to their individual programs, including:

- Liaising with CWTA through participation in the Recycling Committee;
- Public education and awareness of corporate programs;
- Regular reporting to CWTA; and
- Maintaining internal contracts and relations with all levels of the program, including collection sites and sites of incidental waste as required.

⁷ More details regarding the corporate programs operated by RMC members can be found in *Appendix A*.

Canada's wireless carriers all partner with processors and third-parties to promote refurbishment whereby reusable mobile devices are repaired and resold to consumers in other markets, thus diverting devices from landfills and giving them a useable second life.

Program Compliance

CWTA and the represented member brand owners are committed to ensuring the highest level of program participation possible at each collection point.

This commitment is facilitated through employee training and retail auditing programs performed by each brand owner. Through these processes, member brand owners have the ability to influence compliance on the part of retail outlets with any and all corporate initiatives. Regular communications are also sent to retail outlets to remind stores of participation in corporate recycling programs.

In addition to these audits, carriers have implemented strict requirements for inclusion in their respective programs. If any staff member or outlet is found to be out of compliance with corporate policies or practices, corrective action is initiated.

Monitoring consumer complaints is another routine method of tracking compliance to corporate standards. CWTA will ensure that any consumer dissatisfaction as registered with the Association will be tracked and directed to the main contacts at the respective partner program for resolution. While audit and compliance processes already exist and efforts are made by member brand owners to ensure full retail participation in all corporate programs, human factors must be taken into account. CWTA cannot commit to a 100% level of perfection at the retail level, but assures the province and other stakeholders that existing processes have proven to minimize problems at retail locations.

Program Dispute Resolution Mechanisms

CWTA/Brand owner – RMC disputes are resolved through CWTA's committee structure; CWTA receives its mandate from a Board of Directors and puts into action this direction via its committees. Brand owner members that appoint RMC as their agency in Newfoundland and Labrador are eligible to participate in the CWTA Recycling Committee.

The Recycling Committee will provide guidance or make decisions on issues that are escalated to it by CWTA staff or one of the member brand owners.

When the Recycling Committee is asked to provide its guidance or decision on unresolved issues, the Committee will use a consensus-based decision-making model in its decision-making process. Relevant information will be gathered and provided to the Committee to facilitate the discussions concerning the issue to be resolved. If the dispute cannot be resolved at the Committee level, the matter will be taken forward to the CWTA Board of Directors for resolution.

Member brand owner collection sites – All return-to-retail collection sites identified as *participating* by each brand owner, do so on the basis of explicit requirements outlined by the producer. The brand owner determines which sites are to be included in any initiatives that it rolls out and has the final say concerning any element of the programs it operates.

Any dispute between a member brand owner and third party vendors or processors will be resolved by the dispute process they have put in place as a result of their contractual relationship. These are legally binding obligations with clear processes and follow defined business practices.

Third-party participants – All third-party locations that wish to become an Approved Site must complete a registration that requires them to follow Terms & Conditions. The Terms & Conditions outline the operational responsibility of both CWTA, as well as the collection site, however, does not form a legal contract.

Either party may terminate this agreement at any time.

4. Program Scope

Products Included in the Program

Recycle My Cell deals specifically with mobile devices as identified within section 31.18(viii) of the Waste Management Regulations: “a cell phone and other wireless communication device but does not include a factory-installed communication device developed for embedded use in motor vehicles”.

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-member brand owners, when consumers return such product to Recycle My Cell. That being said, under no circumstances should this willingness and openness to accept cellular product from non-member brand owners be utilized as an excuse to circumvent any applicable regulations and obligations or any future legislation or regulation as they pertain to the legality of selling a mobile device when the brand owner does not operate, or is not part of, an approved electronic Stewardship Plan.

Other Programs Operating in Newfoundland and Labrador

As noted, within Newfoundland and Labrador, there is one other regulated Stewardship Program that collects cell phones: Electronic Products Recycling Association (EPRA). In addition, other non-regulated programs also exist. The material collected via these programs falls outside the scope of RMC responsibility.

5. Process for Collection

Collection Network and Consumer Access

Recycle My Cell leverages existing programs being operated by wireless service providers and handset manufacturers within the province.⁸ Under RMC, member brand owners continue to operate their own corporate programs to collect, reuse and recycle mobile devices; many of these programs were initiated

⁸ Refer to Appendix A for a list of programs.

and established well before regulated 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:

1. 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.

These locations are included in the searchable database that can be found at RecycleMyCell.ca.

2. Third-party locations: Consumers are able to return devices to third-party locations where these locations have registered to participate as drop-off locations using the RMC-branded program. Participation in the program is voluntary and at the discretion of CWTA.

These locations are included in the searchable database that can be found at RecycleMyCell.ca.

RMC provides an easy and effective method for participation that can be specifically tailored to the nature of the organization, as well as volume of collected materials.

3. Mail-back: Consumers are able to mail back unwanted devices, via Canada Post, using postage-paid labels that they download from RecycleMyCell.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.

The Recycle My Cell network of collection sites is continually evolving. The recyclemycell.ca and recyclemoncell.ca Web sites provide the public with the most up-to-date list of available locations.

Locations

In 2017, there were 114 drop-off locations within Newfoundland and Labrador.⁹ Of these, seventy-two are RMC branded locations, and the remaining 42 are return-to-retail locations.

RMC also continues to offer a postage paid mail-back label via the program.

Mail-Back Option

Consumers who are unable to access a collection site will be able to recycle their devices and accessories using a postage-paid mail-back option from member brand owners. Mailing labels can be accessed through the recyclemycell.ca site and can be used for recycling all designated devices.

⁹ See Appendix B for a list of drop-off locations in Newfoundland and Labrador.

6. Managing Environmental Impacts

Processors

Program members use certified primary processors to manage their materials. All of the processors involved with the RMC program hold multiple certifications, including those that are nationally and internally recognized.

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 of the processors involved with the RMC program in Newfoundland and Labrador hold multiple certifications, including ISO, R2 and/or verification under Electronic Products Recycling Association's (EPRA) Recycling Vendor Qualification Program (RVQP).

Flow of Collected Materials

Devices that have been collected by participating locations are sent to certified processors for proper handling.

When a collection box is received at a processing location, devices are typically sorted into three categories:

1. Resalable devices;
2. Recyclable devices; and
3. Accessories and cell phone batteries.

Devices that are deemed reusable have their data wiped and are sold via auction to third-parties. It is important to note that there is a well-established market for refurbished phones in other countries and only those phones that meet defined criteria are shipped for reuse.

Devices intended for refurbishment and resale form a lucrative and growing business model that is profitable for many processors. Many of the current recovery programs (including Trade-in and Upgrade programs) have come about as a result of the competitive and free market, device recyclers will also determine best practices for environmental handling of devices to their economic benefit.

Devices destined for recycling are handled based on the general practices of the primary processor. In all instances the batteries are removed from the devices and the remaining material is either further dismantled, or shredded in entirety (minus the backing), before being sent to approved downstream processors.

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 and the circular economy.

Pollution Prevention Hierarchy

Products that are recovered through the RMC member programs are diverted from landfill as a result of reuse, recycling or recovery.

While it is understood that reuse is the preferred method for dealing with recovered product, in the case of wireless devices, the amount of product that can be refurbished for reuse is dependent on many factors that are not controllable, including the condition of the phone at time of recovery and the technology that is required for its use. As such, to reintroduce phones into the market that do not meet those criteria or that are not compatible with current technology in a given market do more harm than good. For this reason, phones that do not meet reuse criteria will continue to be sent for responsible recycling.

All processors that are 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.

Processors employ policies and processes to ensure that where possible, reusable devices are re-introduced into the market. When reuse is not possible, products are recycled using approved methods that facilitate the recovery of precious metals.

Designing for the Environment

The trend toward multi-functional devices which eliminate the need for multiple individual devices has continued within the wireless industry. This allows consumers to purchase only one item which provides multiple services in addition to the one the device is primarily used for – for instance the ability to access the internet, play music and take photos with a smartphone – that relieves the need to manufacture individual devices. These devices also tend to be smaller and more efficient than their individual counterparts.

In addition to providing multi-function devices, RMC handset manufacturers carry on their efforts to eliminate or to reduce the environmental impacts of a product throughout its life cycle. Given that handset manufacturers provide devices into global markets, changes made to products are experienced broadly. Handset manufacturers have worked as part of global initiatives (for example, the GSM Association and its work toward a universal charger) to implement cross-industry standards. These initiatives have the potential to bring direct benefit to the entire market.

Special Considerations

Removal of personal information – Unlike other regulated materials, wireless devices by their nature are used by consumers for a multitude of purposes and, as such, often become a repository for personal and private information. The proper management of this data becomes of utmost importance when the consumer decides to recycle their devices and CWTA has developed tools for consumer use to facilitate this process.

Consumers are responsible for the removal of any personal information contained in their device before they are returned to a drop-off location or mailed in. Information concerning what consumers need to do before recycling their devices, as well as instructions on how to clear their device of personal information is available on RecycleMyCell.ca.

In the event a phone enters the recovery process without having been erased, steps are taken by the processors to ensure that personal data is removed from the device as appropriate.

Carrier status as federally regulated entities – Canadian wireless service providers are regulated on a federal level by the CRTC. Many of the requirements placed on a carrier as it relates to specific business practices are the result of binding decisions and policy directions. Where these decisions and policy directions have an impact on mobile devices specifically, the cascading impact on items such as recycling is not always clear.

Low risk – Cell phones, for all intents and purposes, represent a low risk for landfilling. As noted previously, there is an active market that seeks out mobile devices for recycling and reuse opportunities. Commodity prices and a growing re-use market in other jurisdictions have increased the value of used and unwanted devices, and processors and third-party vendors compete for them in the open market.

7. Consumer Education and Public Awareness

CWTA will continue to undertake education and public awareness initiatives to ensure consumers and stakeholders are informed of the industry's recycling initiatives and aware of their options for reusing and recycling their mobile devices.

CWTA Initiatives

CWTA conducts an annual National Cell Phone Recycling Study (Recycling Survey) and reviews the results to ascertain trends in consumer awareness and behavior concerning cell phone recycling. Based on those results CWTA works to devise program promotion initiatives with the goal of increasing the level of awareness concerning cell phone recycling.

CWTA is committed to working with other stewards and stakeholders to minimize potential consumer confusion regarding the various recycling programs operating in the province.

Brand Owner Initiatives

In the past, the promotion of corporate recycling initiatives has included marketing campaigns, including paid advertisements (in print media, television and other venues), in-store marketing and competitive recycling drives.

Each brand owner will continue to have its own marketing plans in place, which may include promotional materials, advertisements, PSAs and corporate recycling web pages. The type of promotion that occurs will be dependent on the nature of the specific program.

Carriers will also continue to foster program awareness internally on an on-going basis with their front-line retail staff so that they are able to provide accurate information to their customers.

Cooperation with Other Stewardship Programs

CWTA is committed to working with other stewards and stakeholders to minimize potential consumer confusion regarding the various recycling programs operating in the province.

8. Performance Indicators and Reporting

Recycle My Cell focuses on two primary areas: (1) keeping product out of the municipal waste stream through collecting, reusing and recycling; and, (2) doing so in a socially, economically and environmentally responsible manner.

CWTA is committed to working with the MMSB, consumers, interested third-parties and other stewards, to ensure that discarded wireless products are managed in a responsible manner.

Performance Indicators

RMC represents EPR in its truest form. Each member brand owner is able to take responsibility for material in ways that make the most economic and logistic sense, while providing consumers with multiple options, at no cost.

CWTA is proposing an updated performance indicators based on the experiences of operating RMC in the province. The performance indicators proposed for the coming renewal period are identified below.

Specific activities that will be undertaken to support each indicator are included in Appendix C. These activities are subject to change as new data, and new opportunities, are identified.

Accessibility Forecast and Indicators

Program Accessibility: Maintain the current level of accessibility (either through access to a physical drop-off location or via mail-back), as a three-year rolling average, and work toward a 1%* increase per year from 2019 to 2022.

* The 1% increase per year target is harmonized with other jurisdictions however it is important to note that Newfoundland has seen significant growth in terms of participating locations and continuous growth may not be sustainable. As the network currently exists, it has shown itself to be robust, inclusive, and able to function adequately in providing suitable avenues to consumers.

Indicator: Absolute number of physical drop-off locations.

Method to Evaluate: Chart and/or map to highlight number of physical drop-off locations.

Reporting: Data will be reported as part of the Annual Report process.

Collection Indicators

Collections: Continue to report the number of devices that are recovered by the program.

Indicator 1: Absolute collection reported in units.

Method to evaluate: Devices collected on an aggregate provincial basis. This data will consist of two elements: the number of devices collected through a physical collection site and an estimate of the number of devices collected through the mail-back option.

Indicator 2: Absolute collection per capita reported in units.

Method to evaluate: Per capita break down of aggregate provincial volume. This data will be an estimate based on the total number of devices collected in the province/population of the province.

Indicator 3: Percentage of population that did not dispose of their previous cell phone by throwing it in the garbage.

Method to evaluate: Annual survey to measure cell phone disposal method, expressed as Consumer Diversion from Landfill (CDL).¹⁰ CDL identifies the ways that consumers self-identify dealing with old or unwanted devices; this data is not currently captured by any other mechanism and provides additional evidence to support the notion that devices not collected by the program do not end up in landfill.

Reporting: Data will be reported as part of the Annual Report process.

Should organizations wish to share their collection data, CWTA would be amenable to include it within its Annual Report in order to provide additional context for what is happening in the environment as it relates to mobile devices.

Section 31.23c of *Waste Management Regulations* notes a requirement for the brand owner to identify “expected performance target and timelines for both the recovery amounts of e-waste and the reuse or recycling rates of the collected e-waste”. While CWTA does not believe that a collection target/forecast provides a relevant measure of performance, it has included forecast information to meet the regulatory requirement. It should be noted that collection forecasts/targets are not used in other jurisdictions.

Activities to support Collection efforts are included in Appendix C.

Year	RMC Collection (Forecast) (units)	RMC Collection (Actual) (units)
2016	5,863	5,329
2017	5,980	6,370
2018	6,497	
2019	6,627	
2020	6,751	
2021	6,886	

¹⁰ The initial RMC plan did not include Consumer Diversion from Landfill (CDL) as a performance measure. It is, however, a useful measure of a program designed specifically to limit the volume of cell phones in landfills and has been included in Annual Reports as one of RMC’s program evaluation measures since 2015. The CDL measure identifies the number of consumers that report throwing away their previous device, and also identifies the various mechanisms that consumers report for end-of-life management including activities like reuse, resale and storage.

In 2017, 95% of consumers in Newfoundland and Labrador diverted their last device from landfill using a variety of methods including traditional recycling and various reuse activities.

A major contributing factor to mobile devices’ high CDL is the fact that they are such a high value and high utility item. In fact, the very thing that helps keep cell phones out of landfills also makes them more difficult to collect for recycling. A consumer ultimately decides what happens with their personal property once it is no longer used.

When it comes to deciding what to do with their last device, very few Newfoundlanders and Labradorians report throwing it in the garbage.

Diversion - Post-collection Management¹¹ of Material Indicators

Objective: Reuse: Continue to report on the aggregate volume of devices sent for reuse.

Objective: Recycle: Continue to report on the aggregate volume of devices sent for recycling.

Indicator: Post-collection fate of material.

Method to evaluate: Data provided from recyclers concerning the allocation of RMC recovered devices and their fates (reused, recycled), as well as any other requirements identified by regulation.

Reporting: Data will be reported as part of the Annual Report process.

Consumer Education & Public Awareness Indicators

Public Education and Awareness Objective: Continue to report on awareness levels determined via the *National Cell Phone Recycling Study* (entitled "Understanding Cell Phone Recycling Behaviours").

Indicator 1: Percentage of Newfoundland and Labrador respondents aware that cell phones can be recycled.

Method to evaluate: Annual survey to gauge consumer awareness.

Indicator 2: Percentage of Newfoundland and Labrador respondents aware that programs exist.

Method to evaluate: Annual survey to gauge consumer awareness.

Indicator 3: Number of database searches for recycling locations in Newfoundland and Labrador.

Method to evaluate: Tracking of visitors who search for a location via postal code on the RecycleMyCell.ca Web site.

Reporting: Data will be reported as part of the Annual Report process.

Activities to support Awareness efforts are included in Appendix D.

¹¹ From a program perspective, whether a device is re-used or recycled is based on many factors that are determined outside of the program.

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.¹¹ Devices intended for refurbishment and resale form a lucrative and growing business model that is profitable for many processors. Much as the current crop of recovery programs (including Trade-in and Upgrade programs) have resulted as a result of the competitive and free market, device recyclers will also determine best practices for environmental handling of devices to their economic benefit.

Determining which stream the material enters is based on several criteria that are not controllable by the program.

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 defined functionality requirements for resale are reintroduced into the market. Those that are not suitable for reuse are sent to approved downstream processors where they are either disassembled for harvesting spare parts or ground down for the recovery of precious metals.

Reports

CWTA will report on the performance indicators outlined in this plan in a manner consistent with what has been provided to the MMSB to-date.

Qualitative information will be provided through consumer surveys. Quantitative information will be collected from member brand owners and aggregated.

In addition, CWTA will also provide the amount of product “sold” within Newfoundland and Labrador by its member brand owners using the same process as outlined in Annual Reports.¹² This data will be provided as an aggregate.

9. Audits

All of the processors involved with the RMC program hold valid ISO certifications and/or are verified to Electronic Product Stewardship Canada’s (EPSC) Electronic Recycling Standards (ERS) meaning they have an environmental management system in place which ensures accountability and knowledge of the associated environmental impacts.

CWTA does not currently perform audits on the processors involved with the RMC program. The reporting relationship in place with processors is with their primary partner, in this case the carrier program. It is understood that in order to fall under the RMC umbrella the processor must commit to ensuring they meet relevant certifications as identified.

Given that the processors used by RMC members all hold valid certifications recognized by various provincial bodies, and are all legitimate businesses with reputations to protect, it is within reason to believe that the methods by which they deal with products collected through the RMC stream would be no different than those collected by other streams, nor across jurisdictions in which RMC operates. CWTA currently verifies several non-financial indicators via a third party audit in BC. Work on this component is ongoing and may provide reasonable assurance to MMSB concerning the program until such time that it can be transferred, in a harmonized manner, to other jurisdictions.

¹² For the purpose of this plan, and RMC annual reports, “Product Sold” is the estimated number of all mobile devices attributed to manufacturer members, whether resulting in an end sale to a consumer or not, that are distributed directly into the province by participating members.

It is important to note that this quantity represents the total amount of product that was reported as distributed into the province and does not reflect the actual quantity that was sold to an end user, or that might become available for collection in the future. Devices that are distributed by brand owners not covered by this plan (such as big box retailers), or covered by other stewardship plans, are not under the purview of RMC.

Data collected does not track inter-store (nation-wide) transfers, or what happens to unsold products, etc. Estimates are included where actual data is not available.

Information concerning actual sales is not reported to CWTA and, as such, is not available for reporting purposes.

10. Conclusion

Recycle My Cell helps minimize the introduction of mobile devices into the municipal waste stream, and thus the environmental effect of mobile device disposal, by promoting efficient collection, effective reuse strategies and responsible recycling and waste management.

CWTA and its members have enjoyed a positive and productive relationship within Newfoundland and Labrador and remain committed to providing consumers with a free, convenient, and accessible method to dispose of their unwanted wireless devices and accessories. Working together will ensure that the objectives outlined in this plan are achieved.

Appendix A

Participating programs

Brand Owner	Program	Location	Devices Accepted	Consumer Incentive
Bell	Bell: Blue Box	Accepted at any Bell Aliant or Bell store, The Source locations, Virgin Mobile stores and participating dealer locations. Mail-back label available on website.	All mobile devices as defined by this program from any manufacturer or carrier. Generally \$0-value devices.	Net proceeds from the program to support Canadian mental health initiatives.
	Bell: Bell Trade-in Program	Accepted at any Bell Aliant or Bell store, Virgin Mobile stores and participating dealer locations.	All mobile devices as defined by this program from any manufacturer or carrier.	Trade-in value to customer.
	The Source: The Source Trade-up Program	Accepted at all participating locations.	All mobile devices as defined by this program from any manufacturer or carrier.	Trade-in value to customer.
	Virgin Mobile: Recycle Me	Accepted at all participating locations, or via mail-in.	All mobile devices as defined by this program from any manufacturer or carrier. Generally \$0-value devices.	Net proceeds from the program to support Canadian mental health initiatives.
	Virgin Mobile: Trade-in Program	Accepted at all participating locations.	All mobile devices as defined by this program from any manufacturer or carrier.	Trade-in value to customer.
Rogers	Fido: FidoTRADE	Accepted at all participating locations.	All mobile devices as defined by this program from any manufacturer or carrier.	Trade-in value to customer.
	Rogers Recycling Program	Accepted at all participating locations.	All mobile devices as defined by this program from any manufacturer or carrier. Generally \$0-value devices.	
	Rogers: Trade Up Program	Accepted at all participating locations.	All mobile devices as defined by this program from any manufacturer or carrier.	Trade-in value to customer.

Appendix B Drop-off Locations

Targeted locations – Table 1

Target Community	Requirement Met?	Location(s)	Address/Proximity
<i>Bay Roberts</i>	Yes	In Proximity	Carbonear (2 locations) – approx. 23km/21 min drive Conception Harbour – approx. 23km/26 min drive
<i>Carbonear</i>	Yes	In Community In Proximity	Bell Aliant: 120 Columbus Drive The Source: 120 Columbus Drive RMC - Town of Salmon Cove - 11km/12 min drive
<i>Clareville</i>	Yes	In Community	Bell Aliant: 69 Manitoba Drive The Source: 69 Manitoba Drive Cellular Central: 263 Memorial Drive RMC: Clareville Transfer Station
<i>Conception Bay South</i>	Yes	In Community	The Source: 350 Conception Bay Highway Bell Aliant: 120 Conception Bay Highway
<i>Corner Brook</i>	Yes	In Community	Bell Aliant: 1 Mount Bernard Avenue Bell Aliant: 44 Maple Valley Road Virgin Mobile: 44 Maple Valley Road The Source: 54 Maple Valley Road Rogers: 4 Mount Bernard Avenue RMC - Corner Brook City Hall: 5 Park Street
<i>Deer Lake</i>	Yes	In Proximity	Cormack – approx. 18k/16 min drive Corner Brook (5 locations) – approx. 49km/30 min drive
<i>Gander</i>	Yes	In Community	Bell Aliant: 132 Bennett Drive The Source: 29 Roe Avenue Rogers: 141 Airport Boulevard
<i>Grand Falls-Windsor</i>	Yes	In Community	Bell Aliant: 19 Cromer Avenue Bell Aliant: 28 Cromer Avenue RMC - Public Works Depot: 1-3 Bayley Street RMC - Town Hall of Grand Falls-Windsor: 5 High Street The Source: 19 Cromer Avenue Rogers: 9 Hardy Avenue
<i>Happy Valley-Goose Bay</i>	Yes	In Community	RMC - HVGB Green Depot (Rodgers Recycling): 15 Churchill Street Bell Aliant - Iglutek Computers: 348 Hamilton River Road

			Bell Aliant - Labrador Specialty Services: 9 Loring Drive
<i>Labrador City</i>	Yes	In Community	The Source: 500 Vanier Avenue Officeworks Inc.: 135 Avalon Drive
<i>Lewisporte</i>	Yes	In Community	The Source: 465 Main Street
<i>Marystown</i>	Yes	In Community In Proximity In Proximity	Bell Aliant: 1544 Columbia Drive Burin - approx. 16km/17 min drive Fortune - approx. 60km/42 min drive
<i>Mount Pearl</i>	Yes	In Community	RMC - Mount Pearl City Hall: 3 Centennial Street RMC - Reid Community Centre: 3 Centennial Street The Source: 15 Merchant Drive
<i>Port Aux Basques</i>	Yes	In Community	The Source (Jim Crewe): 49 Main Street
<i>Port Au Choix</i>	Yes	In Proximity	Port Saunders – approx. 8km/19 min drive
<i>St. John's</i>	Yes	In Community	Bell Aliant: 10 Elizabeth Avenue Bell Aliant: 34 Pippy Place Bell Aliant: 430 Topsail Road Bell Aliant: 430 Topsail Road Bell Aliant: 48 Kenmount Road Bell Aliant: 48 Kenmount Road Bell Aliant: C-40 Aberdeen Highway RMC - Epilepsy NL: 351 Kenmount Road RMC - Ever Green Recycling: 79 Blackmarsh Road RMC - Ever Green Recycling: 92 Elizabeth Avenue RMC - Ever Green Recycling: 858-860 Torbay Road RMC - Ever Green Recycling: Cowan Avenue & Waterfort Bridge Road RMC - Gov't of NL Confederation Building Rogers: 22 Austin Street Rogers: 390 Topsail Road Rogers: 48 Kenmount Road Virgin Mobile: 48 Kenmount Road The Source: 430 Topsail Road The Source: 48 Kenmount Road The Source: 90 Aberdeen Avenue
<i>Stephenville</i>	Yes	In Community In Proximity	Bell Alliant: 42 Queen Street Port au Port East – approx. 9km/13 min drive

Complete list of drop-off locations in Newfoundland and Labrador (Dec. 31, 2017) – Table 2

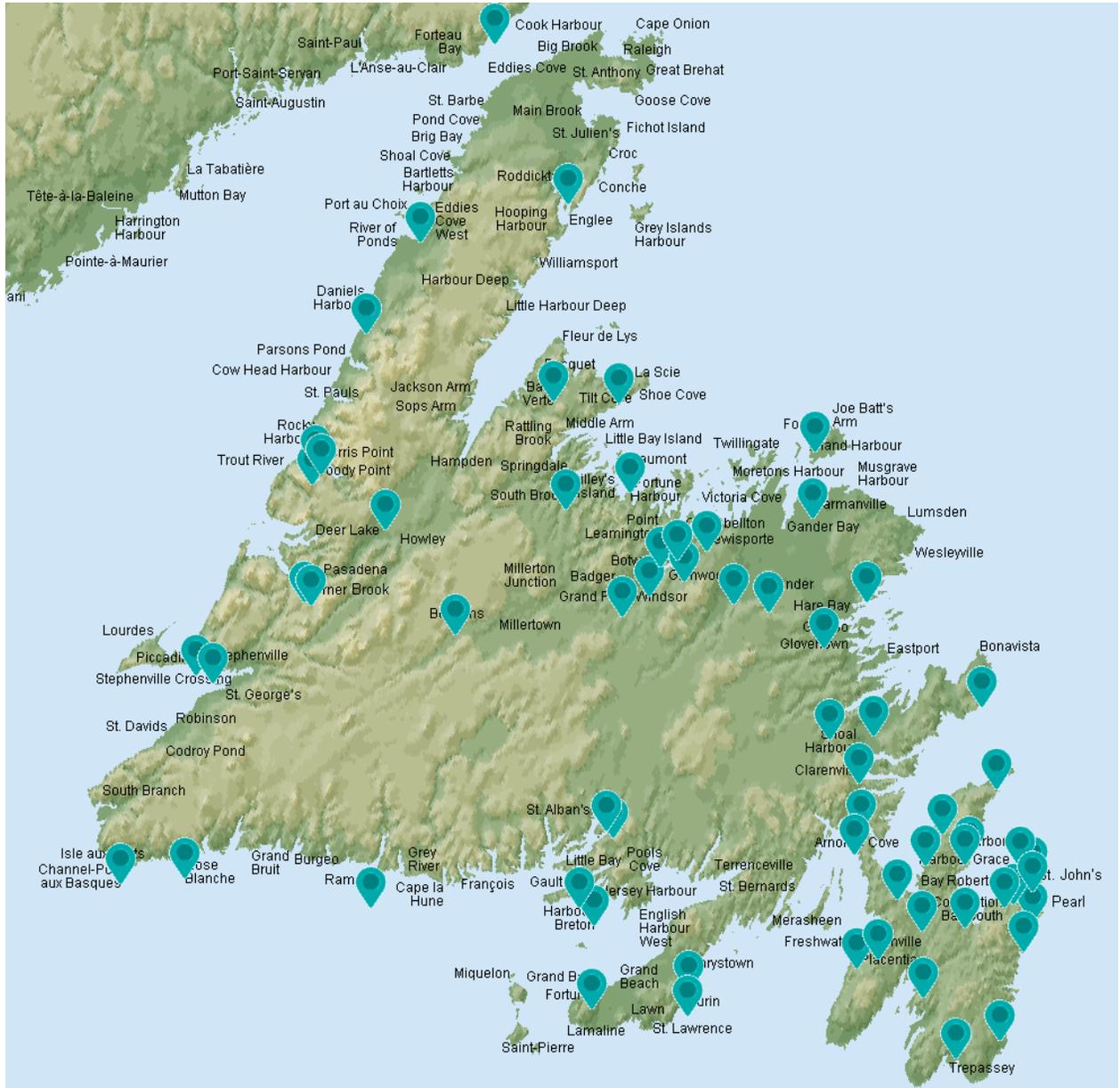
Program/Location Name		Community
Recycle My Cell	Town of Appleton	Appleton
Recycle My Cell	Town of Arnold's Cove	Arnold's Cove
Recycle My Cell	Town of Baie Verte	Baie Verte
Recycle My Cell	Town of Bauline	Bauline
Recycle My Cell	Eastern Waste Management	Bay Bulls
Recycle My Cell	Town of Glenburnie-Birchy Head-Shoal Brook	Birchy Head
Recycle My Cell	Town of Bishop's Falls	Bishop's Falls
Recycle My Cell	Town of Brent's Cove	Brent's Cove
Recycle My Cell	Town of Buchans	Buchans
Recycle My Cell	Town of Burin	Burin
Bell	Bell Aliant	Carbonear
Bell	The Source	Carbonear
Recycle My Cell	Town of Carmanville	Carmanville
Recycle My Cell	Eastern Waste Management	Cavendish
Recycle My Cell	Town of Centreville Wareham & Trinity	Centreville
Bell	Bell Aliant/The Source	Channel-Port aux Basques
Recycle My Cell	Churchill Falls Convenience Store (Lynx Mobility)	Churchill Falls
Bell	Cellular Central	Clarenville
Bell	The Source	Clarenville
Bell	Bell Aliant	Clarenville
Recycle My Cell	Eastern Waste Management	Clarenville
Bell	Bell Aliant	Conception Bay South
Bell	The Source	Conception Bay South
Recycle My Cell	Town of Conception Harbour	Conception Harbour
Recycle My Cell	Miawpukek Mi'kamawey Mawi'omi	Conne River
Recycle My Cell	Town of Cormack	Cormack
Bell	Bell Aliant	Corner Brook
Bell	Bell Aliant	Corner Brook
Bell	Virgin Mobile	Corner Brook
Bell	The Source	Corner Brook
Recycle My Cell	City of Corner Brook	Corner Brook
Rogers	Rogers	Corner Brook
Recycle My Cell	Town Of Daniel's Harbour	Daniel's Harbour
Recycle My Cell	Eastern Waste Management	Dunville
Recycle My Cell	Town of Fogo Island	Fogo Island
Recycle My Cell	Town of Fortune	Fortune

Recycle My Cell	Town of Gambo	Gambo
Bell	Bell Aliant	Gander
Bell	The Source	Gander
Rogers	Rogers	Gander
Bell	Bell Aliant	Grand Falls-Windsor
Bell	The Source	Grand Falls-Windsor
Bell	Bell Aliant	Grand Falls-Windsor
Recycle My Cell	Town of Grand Falls-Windsor	Grand Falls-Windsor
Recycle My Cell	Town of Grand Falls-Windsor	Grand Falls-Windsor
Rogers	Rogers	Grand Falls-Windsor
Bell	Iglutek Computers Inc	Happy Valley-Goose Bay
Bell	Labrador Speciality Services	Happy Valley-Goose Bay
Recycle My Cell	Rodgers Recycling	Happy Valley-Goose Bay
Recycle My Cell	Town of Harbour Breton	Harbour Breton
Recycle My Cell	Town of Heart's Content	Heart's Content
Recycle My Cell	Town of Hermitage-Sandyville	Hermitage-Sandyville
Bell	Officeworks (Bell Aliant)	Labrador City
Bell	The Source	Labrador City
Recycle My Cell	Laurenceton Local Service District	Laurenceton
Recycle My Cell	Lethbridge and Area Local Service District	Lethbridge
Bell	The Source	Lewisporte
Recycle My Cell	Mary's Harbour Town Council	Mary's Harbour
Bell	Bell Aliant	Marystown
Recycle My Cell	Town of Massey Drive	Massey Drive
Recycle My Cell	Town of Milltown - Head of Bay d'Espoir	Milltown
Bell	The Source	Mount Pearl
Recycle My Cell	City of Mount Pearl	Mount Pearl
Recycle My Cell	City of Mount Pearl	Mount Pearl
Recycle My Cell	Nain Inuit Community Government	Nain
Recycle My Cell	Town of Norman's Cove-Long Cove	Norman's Cove-Long Cove
Recycle My Cell	Town of Norris Arm	Norris Arm
Recycle My Cell	Town of Northern Arm	Northern Arm
Recycle My Cell	Eastern Waste Management	Old Perlican
Recycle My Cell	Town of Old Perlican	Old Perlican
Recycle My Cell	Town of Paradise	Paradise
Recycle My Cell	Town of Paradise	Paradise
Recycle My Cell	Town of Pinware	Pinware
Recycle My Cell	Town of Placentia	Placentia
Recycle My Cell	Town of Port au Port East	Port au Port East
Recycle My Cell	Town of Port Blandford	Port Blandford

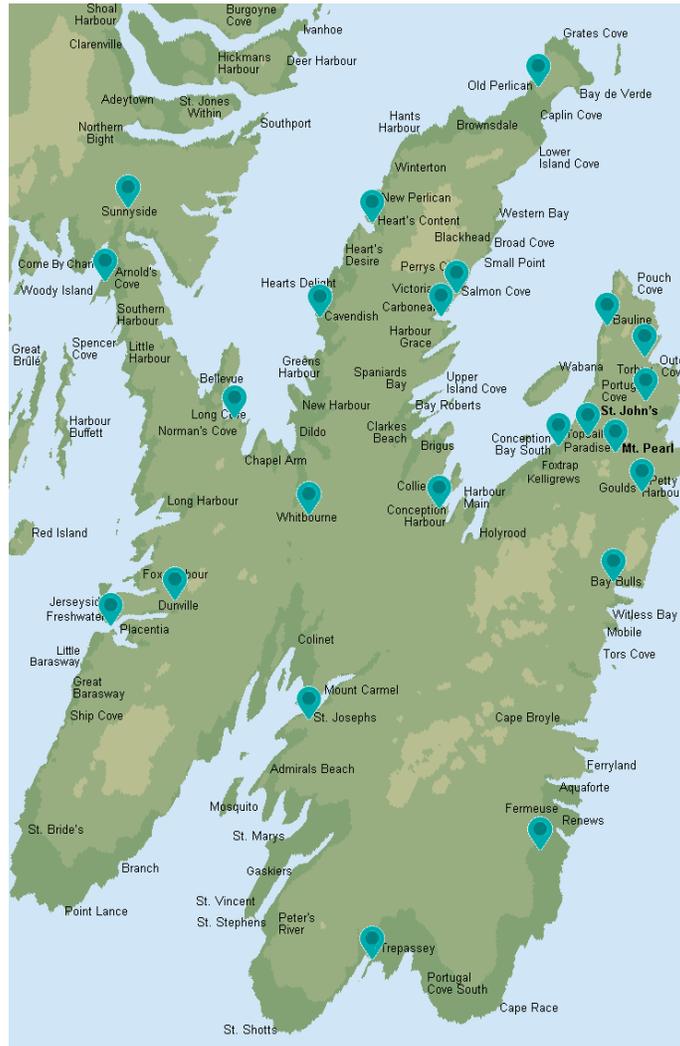
Recycle My Cell	Town of Port Saunders	Port Saunders
Recycle My Cell	Trinity Bay North	Port Union
Recycle My Cell	Town of Ramea	Ramea
Recycle My Cell	Eastern Waste Management	Renews-Cappahayden
Recycle My Cell	Town of Rocky Harbour	Rocky Harbour
Recycle My Cell	Town of Roddickton-Bide Arm	Roddickton
Recycle My Cell	Town of Rose Blanche-Harbour Le Cou	Rose Blanche
Recycle My Cell	Town of Salmon Cove	Salmon Cove
Recycle My Cell	Town of South Brook	South Brook
Bell	Bell Aliant	St. John's
Bell	Bell Aliant	St. John's
Bell	Bell Aliant	St. John's
Bell	Bell Aliant	St. John's
Bell	Bell Aliant	St. John's
Bell	The Source	St. John's
Bell	Bell Aliant	St. John's
Bell	Bell Aliant	St. John's
Bell	The Source	St. John's
Bell	Virgin Mobile	St. John's
Bell	The Source	St. John's
Recycle My Cell	Previously Loved Clothes and Things	St. John's
Recycle My Cell	Ever Green Recycling	St. John's
Recycle My Cell	Ever Green Recycling	St. John's
Recycle My Cell	Ever Green Recycling	St. John's
Recycle My Cell	Ever Green Recycling	St. John's
Recycle My Cell	Government of NL Department of Environment and Conservation	St. John's
Rogers	Rogers	St. John's
Rogers	Rogers	St. John's
Rogers	Rogers	St. John's
Recycle My Cell	Eastern Waste Management	St. Joseph's
Bell	Bell Aliant	Stephenville
Recycle My Cell	Eastern Waste Management	Sunnyside
Recycle My Cell	Town of Sunnyside	Sunnyside
Recycle My Cell	Town of Torbay	Torbay
Recycle My Cell	Town of Trepassey	Trepassey
Recycle My Cell	Town of Triton	Triton
Recycle My Cell	Eastern Waste Management	Whitbourne
Recycle My Cell	Town of Woody Point	Woody Point

Drop off locations in Newfoundland and Labrador – Maps

Newfoundland (all regions, excluding Labrador)



Avalon Region (including Isthmus of Avalon)



Community	Number of Locations	Community	Number of Locations
Arnold's Cove	1	Old Perlican	2
Bauline	1	Paradise	2
Bay Bulls	1	Placentia	1
Carbonear	2	Renews-Cappahayden	1
Cavendish	1	St. John's	20
Conception Bay South	2	St. Joseph's	1
Conception Harbour	1	Salmon Cove	1
Dunville	1	Sunnyside	2
Heart's Content	1	Torbay	1
Mount Pearl	3	Trepassey	1
Norman's Cove-Long Cove	1	Whitbourne	1

Notre Dame-Central Bonavista Bay



Community	Number of Locations	Community	Number of Locations
Appleton	1	Grand Falls-Windsor	6
Baie Verte	1	Laurenceton LSD	1
Bishop's Falls	1	Lethbridge LSD	1
Brent's Cove	1	Lewisporte	1
Buchans	1	Norris Arm	1
Carmanville	1	Northern Arm	1
Centreville-Wareham-Trinity	1	Port Blandford	1
Clarenville	4	South Brook	1
Fogo Island	1	Trinity Bay North/Port Union	1
Gambo	1	Triton	1
Gander	3		

South Coast-Burin Peninsula



Community	Number of Locations	Community	Number of Locations
Burin	1	Marystown	1
Conne River	1	Milltown	1
Fortune	1	Port aux Basques	1
Harbour Breton	1	Ramea	1
Hermitage-Sandyville	1	Rose Blanche-Harbour le Cou	1

January 2019

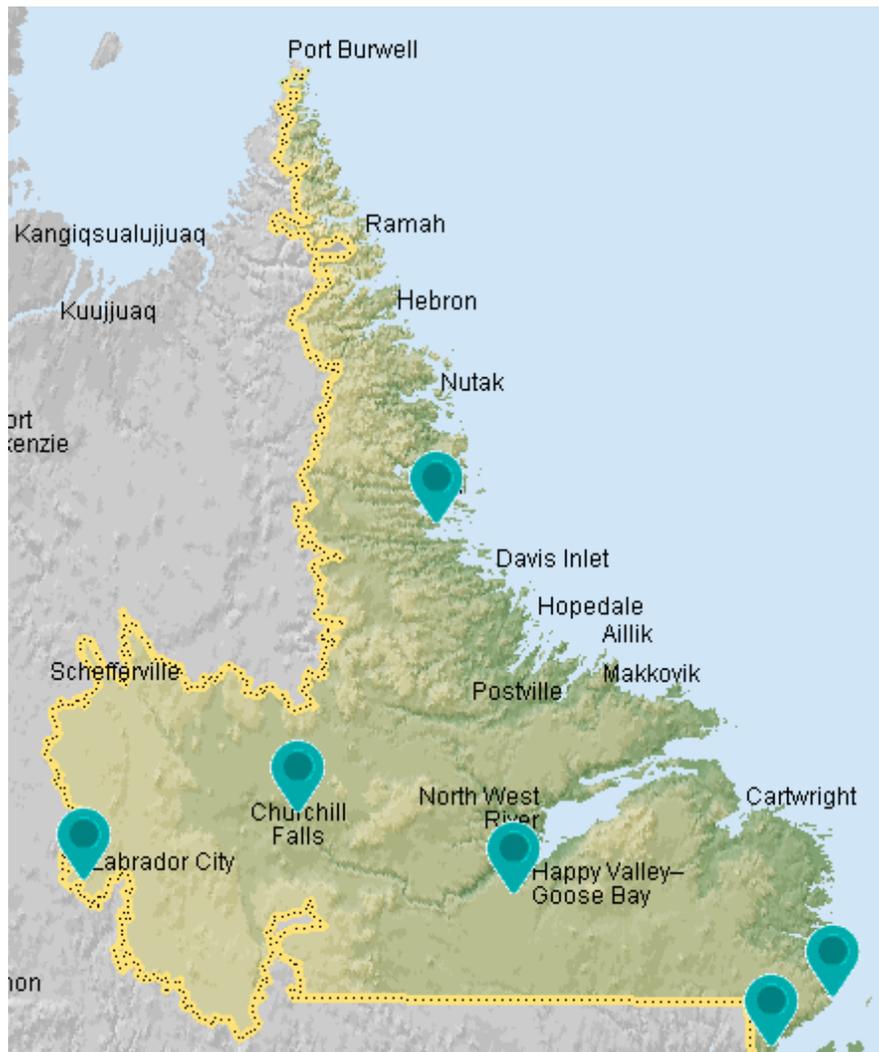
West Coast-Northern Peninsula



Community	Number of Locations	Community	Number of Locations
Birchy Head	1	Port Saunders	1
Cormack	1	Rocky Harbour	1
Corner Brook	6	Roddickton-Bide Arm	1
Daniel's Harbour	1	Stephenville	1
Massey Drive	1	Woody Point	1
Port au Port East	1		

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Labrador Region



Community	Number of Locations
Churchill Falls	1
Happy Valley-Goose Bay	3
Labrador City	2
Mary's Harbour	1
Nain	1
Pinware	1

Appendix C
Collection activities

Planned Collection Activities		
Stakeholder		<i>Estimated Implementation</i>
Stakeholder relations	CWTA will work with member producers to ensure that programs being implemented are structured such that the data can be included in RMC.	On-going.
	CWTA will work cooperatively with other stakeholders, as appropriate, to report data within its Annual Reports.	
Targeted stakeholder outreach promoting RMC	CWTA will leverage the other initiatives noted for Awareness and Accessibility in order to on-board interested drop-off locations quickly.	On-going.
Grass roots		<i>Estimated Implementation</i>
Sponsorship of events	CWTA will revamp its annual RMC Student Challenge.	Completed in 2016. Annual review.
Consumer		<i>Estimated Implementation</i>
RMC Web site	RecycleMyCell.ca and recyclemoncell.ca will continue to serve as the central hub for the program. CWTA will highlight all options available to consumers and the benefits to using a regulated program.	On-going.

Appendix D
Awareness activities

Planned Awareness Activities		
Stakeholder		<i>Estimated Implementation</i>
<i>Targeted stakeholder outreach promoting Recycle My Cell</i>	CWTA will continue to contact key stakeholders (including municipal and local governments as identified by MMSB) by sending targeted information (via email, or via mail as appropriate). The outreach will provide information concerning Recycle My Cell and encourage their participation in the program.	Annually - 2x a year – once in spring, once in fall.
	CWTA will continue to inform provincial government departments of Recycle My Cell and solicit their involvement in the program.	As staff changes are announced.
<i>Use of Recycle My Cell branded program</i>	CWTA will continue to promote the Recycle My Cell branded program to third-party locations, such as not-for-profit organizations and other parties not affiliated with current RMC members. The promotion is intended to encourage their participation as drop-off locations, and to communicate information about the program.	On-going.
	CWTA will contact recycling depots to encourage their participation.	Annually.
	CWTA will continue to make its promotional material available to interested third-parties.	On-going.
<i>Stakeholder relations</i>	CWTA will work cooperatively with other stewards, as appropriate, to ensure that consumer confusion is minimized.	On-going
Grass roots		<i>Estimated Implementation</i>
<i>Events</i>	CWTA will continue its RMC Earth Month Challenge.	Annual review.
	CWTA will sponsor or purchase trade-show space at relevant conferences/events within the province.	Annual review.
Consumer		<i>Estimated Implementation</i>
<i>RMC Web site</i>	RecycleMyCell.ca and recyclemoncell.ca will continue to serve as the central hub for the program. Updates to content will be made to ensure information is accurate.	On-going.
<i>E-mail and phone support</i>	Consumers, local governments and interested third-parties with additional questions about the program will continue to have access to RMC representatives via an email address that has been established for this purpose (info@recyclemycell.ca / info@recyclemoncell.ca), and via a toll-free number (1-888-797-1740).	On-going.

RMC material on stakeholder Web sites	CWTA will continue to work with other Stewardship Agencies, recycling councils, and third-parties to ensure relevant information is provided to consumers.	Annual review.
Social Media	CWTA will continue its strategy to engage its current Facebook followers more fully by providing useful information about recycling in general, and highlighting the ease and benefit of recycling devices.	On-going.
	Twitter (@RecycleMyCell) will be used to further promote messages about RMC to followers and further build engagement.	On-going.
Ads	CWTA's advertising efforts will continue to focus on alternate advertising methods, such as Google and Facebook ads, which offer a more targeted approach to providing information to those searching for it on-line.	On-going.
Media		Estimated Implementation
Editorial	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. These stories are often used by smaller, community-based publications and Web sites.	Annual review.
Press releases	CWTA will develop and distribute both targeted and national press releases to coincide with activities in which RMC participates in.	On-going.
Paid advertising to support specific events	Ads may be purchased to support specific initiatives. Large, province-wide media buys are not being contemplated.	Annual review.
Earned Media	CWTA will continue to honour media requests for information and opportunities to discuss the program via interviews.	On-going.
Other		Estimated Implementation
Ad hoc opportunities	CWTA will continue to explore all identified opportunities to work with relevant stakeholders in the province, whether other stewardship programs or local governments.	Annual review.