



**Recycle My Cell  
Stewardship Plan for the Recycling of  
Cellular Phones in Manitoba  
2017 to 2022**

# Table of Contents

- 1. Recycle My Cell Stewardship Plan 2017 to 2022 ..... 3
- 2. Executive Summary ..... 3
- 3. Historical Overview ..... 4
- 4. Consultation ..... 7
- 5. Program Overview..... 7
- 6. Program Scope ..... 9
- 7. Product Collection ..... 10
- 8. Managing Environmental Impacts ..... 12
- 9. Consumer Education and Awareness..... 13
- 10. Performance Indicators and Reporting Commitments ..... 14
- 11. Planned Activities ..... 15
- 12. Conclusion ..... 15
- Appendix A ..... 17
- Appendix B ..... 18
- Appendix C ..... 19
- Appendix D..... 20
- Appendix E ..... 23
- Appendix F ..... 24

## **Glossary of Technical Terms**

### **Accessibility**

A consumer's ability to access the Recycle My Cell collection network either via (1) a physical drop-off location or (2) mail-back.

### **Collection**

Material collected via all Recycle My Cell mechanisms.

### **Consumer Diversion from Landfill (CDL)**

CWTA developed term that explains consumer behaviours related to end-of-life management of cell phones. CDL encompasses many different self-reported consumer behaviours, including "recycling" as consumers traditionally define it.

### **End-of-life**

The point in time where a device is no longer actively being used for its defined purpose by the consumer.

### **Post-collection Management of Material**

How collected materials are managed once they reach a processor. This is based on each processor's best practices.

### **Proponent**

As defined by regulation.

### **Steward**

As defined by regulation. In general terms, the party designated by regulation to take responsibility for a defined material.

### **Recycle (as determined by processor)**

Wireless devices that cannot be used for their intended purpose and are broken down into component parts and sold as commodities.

### **Reuse (as determined by processor)**

Wireless devices that can be used for their intended purpose and are resold.

## 1. Introduction - Recycle My Cell Stewardship Plan 2017 to 2022

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

RMC has been operating within Manitoba since 2009. In 2013 it became a regulated Stewardship Program within the province and has been operating 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 Manitoba – 2017 to 2022** outlines a new approach to performance measurement that is aligned with reporting across Canada.

The Stewardship Plan describes the program and duties that CWTA will perform on behalf of its member stewards via Recycle My Cell.

The RMC program meets all regulatory guidelines.<sup>1</sup> It will also:

- 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 stewards;
- Assist in the processing of mobile devices which do not fall under the responsibility of any obligated steward (orphan, historic and imported); and
- Encourage fair competition between this and non-affiliated collection programs, allowing them to operate without hindrance.

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.

The following stewards are covered by Recycle My Cell:

- Bell (including Aliant, The Source, Solo, and Virgin Mobile);
- Bell MTS (formerly MTS); and
- Rogers Communications (including Rogers Wireless and FIDO).

In addition, manufacturers such as BlackBerry and Samsung Electronics Canada participate in the program.

---

<sup>1</sup> Refer to Appendix A

The program accepts mobile devices that were primarily designed to connect to cellular or paging networks, regardless of brand, model, origin or age. Examples of acceptable devices include: cellular phones, smartphones, superphones, phablets, wireless PDAs, removable external aircards, and pagers.

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.

There are currently 111 participating RMC drop-off locations in 27 communities across the province of Manitoba. Most Manitoba 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](http://www.recyclemycell.ca) and [www.recyclemoncell.ca](http://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 Manitoba takes place with the assistance of processing partners. All processors 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 number of devices collected through drop-off sites and via mail-back originating from Manitoba. Along with this quantitative data, qualitative data will be gathered and reported through the use of yearly surveys conducted to gauge the awareness and knowledge of the Manitoba population concerning cellular phone recycling. Numerous performance indicators will also be studied and reported.

While there are many contributing factors that determine the success of the RMC program, there are also three factors that pose challenges. These include competition with other programs collecting cell phones (both regulated and non-regulated), alternative disposal mechanisms used by consumers, and consumer awareness vs. behavior patterns. Data on the last two items will be collected and reported annually.

### **3. Historical Overview**

#### **a) Program Performance 2013 - 2016**

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

Historical Summary: Awareness					
Measure		2013	2014	2015	2016
Awareness	General*	N/A	N/A	N/A	77%
	Specific Program	44%	44%	37%	43%
	RMC program	16%	17%	20%	23%

Notes:  
 \*New measure of awareness introduced in 2016. Respondents were asked if they were aware that cell phones could be recycled.

CWTA conducts an annual recycling survey *Understanding Cell Phone Recycling Behaviours*, 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 initiatives with the goal of increasing the level of awareness concerning cell phone recycling.

Historical Summary: Accessibility (Number of Collection Sites)				
Measure	2013	2014	2015	2016
Collection Sites	134	140	136	115

Historical Summary: Absolute Collections									
Measure		2013		2014		2015		2016	
Total Product Collected (units)*	RMC	11,170	20,482	13,879	22,987	11,558	16,637	17,120	28,095
	Other	9,326		9,111		5,079		10,975	
Product collected per capita (units) <sup>2</sup>		.0162		.0179		.01284		.0213	
Total Product Collected (in kg)**		4,096 kg		4,597 kg		3,327 kg		5,618 kg	

Notes:  
 \*Devices are collected via two mechanisms: 1) the RMC Program, 2) through "Other Member Initiatives" (devices that are returned to participating RMC members for a variety of reasons including buyer's remorse or damage).  
 \*\*kg weight is an estimate based on 0.2kg per device. Estimates include devices collected via RMC as well as "Other Member Initiatives".

Historical Summary: Management of Material					
Measure		2013	2014	2015	2016
Management of Product Collected	% Reuse	26%	34%	42%	51%
	% Recycle	74%	66%	58%	49%

Going forward, as identified in this Stewardship Plan, CWTA has proposed a harmonized set of performance indicators. Harmonization ensures that a consistent program is delivered to all Canadians as member stewards are able to find operational efficiencies that allow them to provide RMC free of charge.

<sup>2</sup> Source: Statistics Canada. Annual Demographic Estimates: Canada, Provinces and Territories. <http://www.statcan.gc.ca/pub/91-215-x/2016000/t463-eng.htm>

## **b) Program Challenges**

With 8 years of experience in the operation of RMC, CWTA has identified several challenges which both impede the program's operation, but also provide support to the notion that cell phones are not being routinely discarded in the garbage.

**Competition with Other Program** - Recycle My Cell is not the only regulated program with a defined collection network in Manitoba. Within Manitoba, there is one other Stewardship Programs that intends to collect cell phones: EPRA.

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

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.

**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.

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. 2016 study results note that when asked if they had any cell phones in storage, 59% of Manitoba respondents reported that they did. This type of behaviour is not specific to the Manitoba market; in fact, the storage rates in both the US<sup>3</sup> (estimated between 50% and 62%) and Australia<sup>4</sup> (42%) are in-line with those reported via the annual consumer survey that CWTA undertakes.
- Alternative "Reuse" activities were reported by nearly 45% 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

---

<sup>3</sup> <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>

<sup>4</sup> [http://www.mobilemuster.com.au/media/134587/annual\\_report.pdf](http://www.mobilemuster.com.au/media/134587/annual_report.pdf)

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 results<sup>5</sup>, support for cell phone recycling is high (98%), as is awareness that cell phones can be recycled (78%).

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.

## 4. Consultation

This Stewardship Plan was reviewed by participating stewards, other Manitoba PROs, and a list of defined stakeholders including local governments that had, at minimum, one physical drop-off location within their community.<sup>6</sup>

Feedback provided by participating stewards was operational in nature and has been incorporated. No additional feedback was received from PROs, or other identified stakeholders.

CWTA is open to ongoing feedback concerning the RMC program and its operation:

- Participating stewards have direct access to CWTA via staff, or the monthly committee meetings;
- Stakeholders have direct access to CWTA via designated emails and a toll-free number.

## 5. Program Overview

### a) Participating Stewards

RMC is supported by the following stewards:

- Bell (including Aliant, The Source, Solo, and Virgin Mobile);
- Bell MTS;
- Rogers Communications (including Rogers Wireless and FIDO);

Members of the RMC program are primarily wireless service providers that distribute and sell mobile devices via retail locations within the province; these stewards serve approximately 93% of all wireless subscribers in Manitoba.<sup>7</sup>

In addition, manufacturers such as BlackBerry and Samsung Electronics Canada participate in the program.

### b) Program Funding

Recycle My Cell is not funded by eco-fees.

---

<sup>5</sup> 2016 "Understanding Cell Phone Recycling Behaviours" survey results: <http://www.recyclemycell.ca/wp-content/uploads/2016-Recycling-Survey.pdf>

<sup>6</sup> Refer to Appendix B.

<sup>7</sup> Based on an estimate of Bell, Bell MTS and Rogers' 2015 subscriber share in Manitoba using publicly-available data: <http://www.crtc.gc.ca/eng/publications/reports/policymonitoring/2016/cmr5.htm>



The cost to operate the RMC program is borne directly by member stewards 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 steward 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 stewards 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.

### **c) Proponent Structure**

#### **Proponent**

CWTA is a not-for-profit corporation under the Canada Not-for-Profit Corporations Act.

CWTA is the authority on wireless issues, developments and trends in Canada. It represents wireless service providers as well as companies that develop and produce products and services for the industry, including handset and equipment manufacturers, content and application creators and business-to-business service providers.

CWTA is a member-based 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, including the Recycling Committee.

CWTA staff is responsible for the day to day operations of the association, based on direction provided via approved Strategic Plans and budgets. CWTA staff is responsible for the management of all CWTA programs, including RMC, on behalf of members with oversight provided by the Recycling Committee.

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.

Any dispute between a steward and the processor they employ will be resolved by the dispute process they have put in place as a result of their contractual relationship.

#### **Stewards**

In their role, member stewards 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 steward wishing to participate.

In addition, member stewards 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 concerning the RMC program; and
- Maintaining internal contracts and relations with all levels of the program, including collection sites and sites of incidental waste as required.

#### **d) Program Roles & Responsibilities**

##### **Proponent**

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 stewards who are not already participating in the program; and
- Maintaining contracts and relationships as required.

CWTA collaborates with other stakeholders in the province, including: Manitoba Sustainable Development, municipalities, and other approved Stewards on issues of joint importance or interest.

##### **Stewards**

Under Recycle My Cell, member stewards continue to operate their own corporate programs to collect, reuse and recycle mobile devices. Consumer education and public awareness leverages the extensive retail and brand penetration of participating wireless service providers and device manufacturers operating in Manitoba. Consumers will readily be able to return mobile devices at any of the participating retail stores operated by stewards 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.

Members in the RMC program are primarily wireless service providers that distribute and sell mobile devices via retail locations within the province.

In addition, manufacturers may opt to participate in the program on a voluntary basis.

##### **Non-member Stewards**

Non-member stewards 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.

## **6. Program Scope**

### **Material Covered by RMC**

RMC is a cell phone recovery program that manages mobile devices that were primarily manufactured to connect to a cellular or paging network. Such devices include:

- Cellular phones;
- 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 when they are returned to a location by a consumer.

RMC accepts all orphaned, historic and imported mobile devices, as well as mobile devices from stewards that are not part of RMC 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 stewards 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 steward does not operate, or is not part of, an approved electronic Stewardship Plan.

## 7. Product Collection

### a) Consumer Access

Residents of Manitoba who visit the bilingual website – [www.RecycleMyCell.ca](http://www.RecycleMyCell.ca) and [www.Recyclemoncell.ca](http://www.Recyclemoncell.ca) – can enter their postal code to locate drop-off locations closest to them where their unwanted mobile devices and accessories will be accepted, regardless of brand or condition. If a consumer is unable to get to a drop-off location, the website provides printable postage-paid labels to use for mailing their wireless devices.

The website also provides information about the program, facts and figures on e-waste, FAQs and links to other provincial e-waste stewardship programs. There is also a downloadable brochure and information about how consumers can clear their device of all personal data before dropping it off for recycling.

### b) Collection Network

Recycle My Cell leverages existing programs being operated by wireless service providers and handset manufacturers within the province.<sup>8</sup>

Since the launch of the RMC program, all Manitoba residents have had access to the RMC program whether via a physical drop-off location, or mail-back.

RMC uses three mechanisms for device recovery:

1. Return-to-retail steward locations: Consumers can readily return mobile devices at all participating retail stores operated by member stewards within the province during normal business hours.
2. Third-party locations: Consumers are able to return devices to third-party locations where these locations have agreed to participate as drop-off locations using the RMC-branded program.

Recycle My Cell 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.

---

<sup>8</sup> Refer to Appendix C for a list of programs.

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.

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

While the current network<sup>9</sup> has shown resilience and robustness over the first five years, it is difficult to anticipate how this may change over the next five years. Decisions concerning retail locations are based on numerous factors that fall outside of cell phone recovery initiatives.

It is expected that the current retail network will continue to expand. Some of this expansion will be the result of member stewards 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 stewards, or retailers not affiliated with current member stewards. Regardless, this expansion will not be sustainable year-over-year as markets reach their saturation.

#### **c) Collection Network Expansion**

Many communities have multiple drop-off locations that belong to either RMC or other regulated programs; in some instances, these locations service multiple programs.

Where additional drop-off locations are considered for areas that currently do not have any physical drop-off, the process for identifying locations occurs in two ways:

1. Member stewards are asked to identify any potential locations within their respective networks. In many instances, dealer stores exist in desired locations but are not included in the program officially until they are able to meet specific criteria, like participation in member corporate programs. It is important to understand that the control that member stewards can exercise over dealer locations is not the same as that which they are able to exercise over a corporate location; therefore, inclusion of dealer locations must be thoughtfully considered.
2. CWTA identifies potential locations within a community and solicits their participation in the program. These collection sites will focus on alternatives like depots or other third-party locations.

While CWTA will make every effort to identify and on-board potential RMC-branded locations, it will also be cautious to avoid “poaching” locations affiliated with other programs.

#### **d) Access for First Nations and Remote Communities**

The collection network outlined above provides access to consumers in the vast majority of communities within Manitoba. In general terms, if a location exists for the purchase of a phone within a community, that location will also be able to recycle a phone at its end of life.

In instances where First Nations and Remote Communities do not have readily available access, CWTA has developed a three-tier strategy to extend recycling to these communities. The strategy is aligned with CWTA’s overall approach to ensuring access:

---

<sup>9</sup> Refer to Appendix D.

1. CWTA will work collaboratively with its member stewards to determine whether non-participating retail or affiliate locations exist in the community. In these instances it will solicit the participation of these locations.
2. CWTA will continue to support the provision of a postage paid mailbox option.
3. CWTA will work collaboratively with the other PROS to discuss cooperative opportunities within the province.

## 8. Managing Environmental Impacts

### a) Life-cycle Considerations

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 that 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.

### b) Material Management Post-collection

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 (reusable) 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.

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.

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.

#### **c) Processor Certification**

All processors<sup>10</sup> that are involved with the RMC program hold valid ISO certifications, R2 certifications and/or are verified to the Recycler Qualification Office's Electronic Recycling Standards (ERS).

## **9. Consumer Education and Awareness**

Based on data collected via the Recycling Study in 2016, CWTA has been able to determine that 78% of Manitoba respondents are aware that cell phones can be recycled. When looking at specific programs, 43% report being aware of a cell phone recycling program, and 23% report being aware of RMC specifically.

#### **a) CWTA Activities**

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 conducts an annual recycling survey *Understanding Cell Phone Recycling Behaviours*, 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 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.

#### **b) Steward Activities**

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.

---

<sup>10</sup> Refer to Appendix E.

Each steward 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.

Stewards 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.

## 10. Performance Indicators and Reporting Commitments

The following performance indicators and reporting commitments are proposed going forward.

### Accessibility and Public Participation (Collection Network) Indicator

**Program Accessibility Objective:** Maintain the current number of Recycle My Cell drop-off locations on a three year rolling average, and work toward a 1% increase per year from 2017 to 2022.

**Indicator:** Absolute number of physical drop-off locations.

**Method to evaluate:** Map or list to highlight the number of drop-off locations.

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

### Collection Indicator

**Collection Objectives:** Continue to report the number of devices that are recovered by the program.

**Indicator 1:** Absolute collection

**Method to evaluate:** Devices collected on an aggregate provincial basis.

**Indicator 2:** Absolute collection per capita.

**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 Manitoba 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).<sup>11</sup>

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

---

<sup>11</sup> Consumer Diversion from Landfill (CDL) has been included as one of RMC's program evaluation measures since 2015, and is based on data collected via the Recycling Study. The 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.

When it comes to deciding what to do with their last device, very few Manitobans report throwing it in the garbage. Top CDL methods include: storing (e.g. junk drawer), returning to a cell phone carrier or retail store, giving it away, recycling it (as a deliberate choice), selling it, and repurposing it (e.g., as an alarm clock).

## Post-collection Management 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).

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

## Public Education and Awareness

**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 Manitoba respondents aware that cell phones can be recycled.

**Method to evaluate:** Annual survey to gauge consumer awareness.

**Indicator 2:** Percentage of Manitoba respondents aware that programs exist (measured by general awareness, RMC awareness and carrier program awareness).

**Method to evaluate:** Annual survey to gauge consumer awareness.

**Indicator 3:** Number of database searches for recycling locations in Manitoba.

**Method to evaluate:** Tracking of visitors who search for a Manitoba location via postal code on the [recyclemycell.ca](http://recyclemycell.ca) website.

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

## 11. Planned Activities

The identified planned activities<sup>12</sup> are subject to change as new data, and new opportunities, are identified.

## 12. Conclusion

Recycle My Cell will help 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.

---

<sup>12</sup> Refer to Appendix F.



CWTA and its members have enjoyed a positive and productive relationship within Manitoba 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

### Confirmation of Meeting Regulatory Guidelines

<b>A. STEWARDSHIP PLAN</b>	
<b>A plan for electrical and electronic equipment stewardship program shall include provision for:</b>	
1. the establishment and administration of a waste reduction and prevention program for electrical and electronic equipment;	Y
2. the appropriate management of waste electrical and electronic equipment according to this guideline established by the minister;	Y
3. a province-wide, convenient collection system for waste electrical and electronic equipment without user fees at the point of collection;	Y
4. a system for the payment of expenses incurred in the collection, transportation, storage, processing and disposal of electrical and electronic equipment in connection with the waste reduction and prevention program;	N/A
5. the orderly collection of revenue from program subscribers in balance with expenses for the program;	N/A
6. the establishment and administration of education activities for the program;	Y
7. the establishment and administration of point-of-sale information for the program;	Y
8. the payment of salaries and other costs for the administration and enforcement of the regulation and the Act as it relates to electrical and electronic equipment; and	N/A
9. ongoing consultations with those who may be affected by the program, including members of the public, in accordance with any consultation guidelines the minister may establish.	Y
<b>B. PUBLIC CONSULTATION PROCESS FOR ELECTRICAL AND ELECTRONIC EQUIPMENT</b>	
1. CWTA consultation with stewards, local governments, and PROs	Y
2. Sustainable Development consultation	

## Appendix B

### Consultations in Manitoba

The following organizations were approached for feedback on the revised Stewardship Plan via email.

Local Government				
Mayor	Altona	Manitoba	R0G 0B0	reception@altona.ca
Mayor	Arborg	Manitoba	R0C 0A0	townofarborg@mymts.net
MLA	Ashern	Manitoba	R0C 0E0	info@ashern.ca
Mayor	Brandon	Manitoba	R7A 6A2	cityclerk@brandon.ca
Mayor	Carman	Manitoba	R0G 0J0	info@townofcarman.com
Mayor	Dauphin	Manitoba	R7N 1K3	info@Dauphin.ca
Reeve	Elie	Manitoba	R0H 0H0	reeve@rm-cartier.mb.ca
Mayor	Flin Flon	Manitoba	R8A 0T7	mkolt@flinflon.ca
Mayor	Gillam	Manitoba	R0B 0L0	dforman@townofgillam.com
Mayor	Lac du Bonnet	Manitoba	R0E 1A0	townldb@mymts.net
Mayor	Minnedosa	Manitoba	R0J 1E0	minnedosa@minnedosa.com
Mayor	Morden	Manitoba	R6M 1V3	info@mordenmb.com
Mayor	Morris	Manitoba	R0G 1K0	info@townofmorris.ca
Mayor	Portage la Prairie	Manitoba	R1N 0L8	info@city-plap.com
Mayor	Roblin	Manitoba	R0L 1P0	toroblin@mts.net
Mayor	Russell-Binscarth	Manitoba	R0J 1W0	info@mrbgov.com
Mayor	Selkirk	Manitoba	R1A 0W6	ea@cityofselkirk.com
Mayor	Ste. Anne	Manitoba	R5H 1B5	town@steannemb.ca
Mayor	Steinbach	Manitoba	R5G 2J1	info@steinbach.ca
Mayor	Stonewall	Manitoba	R0C 2Z0	info@stonewall.ca
Mayor	Swan River	Manitoba	R0L 1Z0	main@townsr.ca
Mayor	The Pas	Manitoba	R9A 1K8	info@townofthepas.ca
Mayor	Thompson	Manitoba	R8N 1S6	reception@thompson.ca
Mayor	Virден	Manitoba	R0M 2C0	virден_sec@mymts.net
Mayor	Winkler	Manitoba	R6W 1B4	admin@cityofwinkler.ca
Mayor	Winnipeg	Manitoba	R3B 1B9	311@winnipeg.ca
Other				
Executive Director	Green Action Centre			tracy@greenactioncentre.ca
Executive Director	Manitoba Eco Network			executivedirector@mbeconetwork.org
<b>Plus, all PROs operating a program in Manitoba.</b>				

## Appendix C

### Program specifics for member initiatives

Program	Locations	Devices Accepted	Consumer Incentive
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.
Bell MTS: Wireless Devices Recycling Program	Accepted at all participating locations.	All mobile devices as defined by this program from any manufacturer or carrier.  Generally \$0-value devices.	Proceeds from the program will be used to support various charitable and community initiatives.
Bell MTS: My 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.
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.
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.

## Appendix D

### Drop-off Locations in Manitoba

Program/Location Name		Community
Bell	The Source	Altona
Bell MTS	Bell MTS	Altona
Bell MTS	Bell MTS	Arborg
Bell MTS	Bell MTS	Ashern
Bell	Bell	Brandon
Bell	The Source	Brandon
Bell	Virgin Mobile	Brandon
Bell MTS	Bell MTS	Brandon
Bell MTS	Bell MTS	Brandon
Rogers	Moga Mobile	Brandon
Rogers	Rogers	Brandon
Rogers	Telco Supply	Brandon
Bell MTS	Bell MTS	Carman
Bell	The Source	Dauphin
Bell MTS	Bell MTS	Dauphin
Rogers	North of 51 Designs & Computers	Dauphin
Recycle My Cell	Rural Municipality of Cartier	Elie
Bell MTS	Bell MTS	Flin Flon
Recycle My Cell	Town of Gillam	Gillam
Recycle My Cell	Town of Gillam	Gillam
Recycle My Cell	Town of Gillam	Gillam
Bell MTS	Bell MTS	Lac Du Bonnet
Bell MTS	Bell MTS	Minnedosa
Recycle My Cell	Evergreen Environmental Technologies	Minnedosa
Bell MTS	Bell MTS	Morden
Bell MTS	Bell MTS	Morris
Bell MTS	Bell MTS	Neepawa
Recycle My Cell	Town of Neepawa	Neepawa
Bell	The Source	Portage la Prairie
Bell MTS	Bell MTS	Portage la Prairie
Rogers	Reimer Antenna Service	Portage La Prairie
Recycle My Cell	Town of Roblin	Roblin
Bell	The Source	Russell
Bell MTS	Bell MTS	Selkirk
Rogers	Nickel Communications	Selkirk
Recycle My Cell	Sustainable Development / Développement Durable	Ste. Anne
Bell	The Source	Steinbach
Bell MTS	Bell MTS	Steinbach

Rogers	Nickel Communications	Steinbach
Bell MTS	Bell MTS	Stonewall
Bell MTS	Bell MTS	Swan River
Rogers	Sears Swan River	Swan River
Bell MTS	Bell MTS	The Pas
Rogers	Sound Innovation	The Pas
Bell	The Source	Thompson
Bell MTS	Bell MTS	Thompson
Rogers	Connect 24/7	Thompson
Bell	The Source	Virden
Bell	The Source	Winkler
Bell MTS	Bell MTS	Winkler
Recycle My Cell	Prairie Printing	Winkler
Recycle My Cell	Winkler MCC	Winkler
Rogers	Nickel Communications	Winkler
Bell	Bell	Winnipeg
Bell	Bell	Winnipeg
Bell	Bell	Winnipeg
Bell	Bell	Winnipeg
Bell	Bell	Winnipeg
Bell	Bell	Winnipeg
Bell	Bell	Winnipeg
Bell	The Source	Winnipeg
Bell	The Source	Winnipeg
Bell	The Source	Winnipeg
Bell	The Source	Winnipeg
Bell	The Source	Winnipeg
Bell	The Source	Winnipeg
Bell	Virgin Mobile	Winnipeg
Bell	Virgin Mobile	Winnipeg
Bell	Virgin Mobile	Winnipeg
Bell	Virgin Mobile	Winnipeg
Bell MTS	Bell MTS	Winnipeg
Bell MTS	Bell MTS	Winnipeg
Bell MTS	Bell MTS	Winnipeg
Bell MTS	Bell MTS	Winnipeg
Bell MTS	Bell MTS	Winnipeg
Bell MTS	Bell MTS	Winnipeg
Bell MTS	Bell MTS	Winnipeg
Bell MTS	Bell MTS	Winnipeg
Bell MTS	Bell MTS	Winnipeg
Bell MTS	Bell MTS	Winnipeg
Bell MTS	Bell MTS	Winnipeg
Bell MTS	Bell MTS	Winnipeg
Bell MTS	Bell MTS	Winnipeg
Bell MTS	Bell MTS	Winnipeg

Bell MTS	Bell MTS	Winnipeg
Recycle My Cell	Assiniboine Park Zoo	Winnipeg
Recycle My Cell	Kleysen Group LP	Winnipeg
Recycle My Cell	Precision Camera Repair Ltd.	Winnipeg
Recycle My Cell	Together In Elmwood Parent Child Coalition	Winnipeg
Recycle My Cell	Westwood Collegiate	Winnipeg
Rogers	Airsource	Winnipeg
Rogers	Airsource	Winnipeg
Rogers	Airsource	Winnipeg
Rogers	Airsource	Winnipeg
Rogers	Airsource	Winnipeg
Rogers	Airsource	Winnipeg
Rogers	Airsource	Winnipeg
Rogers	Airsource	Winnipeg
Rogers	Airsource	Winnipeg
Rogers	Fido	Winnipeg
Rogers	Fido	Winnipeg
Rogers	Fido	Winnipeg
Rogers	Moga Mobile	Winnipeg
Rogers	Moga Mobile	Winnipeg
Rogers	Red Wireless	Winnipeg
Rogers	Rogers	Winnipeg
Rogers	Rogers	Winnipeg
Rogers	Rogers	Winnipeg
Rogers	Rogers	Winnipeg
Rogers	Rogers	Winnipeg
Rogers	Telco Supply	Winnipeg

## Appendix E

### Processor Certifications

Processor	Certifications	Link
eCycle Solutions	ISO 14001:2004 OHSAS 18001:2007 ISO 9001:2008 R2:2013 RQP Verified	<a href="http://www.ecyclesolutions.com/about">http://www.ecyclesolutions.com/about</a>
Greentec	ISO 14001:2004 OHSAS 18001:2007 R2:2013 RQP Verified NAID Certified	<a href="http://www.greentec.com/environmental-credentials/">http://www.greentec.com/environmental-credentials/</a>
GEEP	ISO 14001:2004 OHSAS 18001:2007 ISO 9001:2008 R2:2013 RQP Verified Controlled Goods E-Stewards: Version 2.0	<a href="http://www.geepglobal.com/about-global-electric-electronic-processing/certifications-and-awards/">http://www.geepglobal.com/about-global-electric-electronic-processing/certifications-and-awards/</a>
IQA Metal Inc.	ISO 14001:2004 OHSAS 18001:2007 R2:2013	<a href="https://www.iqametal.com/about-1/">https://www.iqametal.com/about-1/</a>



## Appendix F

### Planned activities

<b>Accessibility and Public Participation</b>	
<b>Stakeholder</b>	
<b>Stakeholder relations</b>	CWTA will work with all member stewards to ensure that the list of physical drop-off locations is kept updated on the RMC website.
	CWTA will work with impacted stakeholders (communities, etc.) to identify possible new non-retail locations for inclusion in the program. Priority will be given to areas without a physical location (if possible).
	CWTA will work cooperatively with other PROs, as appropriate, to provide mechanisms for material collection.
<b>Targeted stakeholder outreach promoting Recycle My Cell</b>	CWTA will continue to reach out to a wide variety of local government officials by sending targeted mail-outs. The mail-outs will provide information concerning Recycle My Cell and program availability in their respective areas.
	CWTA will extend the outreach campaign to include specific recycling depots. Depots will be encouraged to participate in the program.
<b>Use of Recycle My Cell branded program</b>	CWTA will continue to promote the Recycle My Cell branded program to third-party locations, such as recycling depots, municipal waste depots, not-for-profit organizations and other parties not affiliated with current RMC members, to encourage their participation as drop-off locations.
<b>Consumer</b>	
<b>RMC website</b>	RecycleMyCell.ca and recyclemoncell.ca will continue to serve as the central hub for the program. The most current list of locations will be provided to consumers.

<b>Product Collection</b>	
<b>Stakeholder</b>	
<b>Stakeholder relations</b>	CWTA will work with member stewards to ensure that programs being implemented are structured such that the data can be included in RMC.
	CWTA will work cooperatively with other stakeholders, as appropriate, to report data within its Annual Reports.
<b>Targeted stakeholder outreach promoting Recycle My Cell</b>	CWTA will leverage the other initiatives noted for Awareness and Accessibility in order to on-board interested drop-off locations quickly.

Grass roots	
<b>Sponsorship of events</b>	CWTA will continue to promote its RMC Earth Month Challenge.
Consumer	
<b>RMC website</b>	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.

Post-collection Management of Materials	
Stakeholder	
<b>Stakeholder relations</b>	CWTA will work with member stewards to ensure that programs being implemented are structured such that the data can be included in RMC. This will include developing/updating processes and flows as appropriate.
	CWTA will work cooperatively with other stakeholders, as appropriate, to gather and report data within its Annual Reports, based on established protocols.

Public Education & Awareness	
Stakeholder	
<b>Stakeholder relations</b>	CWTA will work with other PROs on joint initiatives, as appropriate, that raise program awareness within the province and amongst relevant stakeholders.
<b>Targeted stakeholder outreach promoting Recycle My Cell</b>	CWTA will continue to reach out to a wide variety of municipalities by sending targeted mail-outs. The mail-outs will provide information concerning Recycle My Cell and encourage their participation in the program.
<b>Use of Recycle My Cell branded program</b>	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.
	CWTA will continue to make its promotional material available to interested third-parties.
Grass roots	
<b>Sponsorship of events</b>	CWTA will support relevant provincial events, and initiatives like the RMC Earth Month Challenge.  In addition, CWTA will consider sponsorship of community events.

<b>Consumer</b>	
<b>RMC website</b>	RecycleMyCell.ca and recyclemoncell.ca will continue to serve as the central hub for the program. Regular updates to content will be made to ensure information is accurate.
<b>E-mail support</b>	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).
<b>RMC material on stakeholder websites</b>	CWTA will continue to work with other stakeholders, recycling councils, and third-parties to ensure relevant information is provided to consumers.
<b>Ads</b>	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 online.
<b>Social Media</b>	CWTA will roll out a 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.
	Twitter (@RecycleMyCell) will be used to further promote messages about RMC to followers and further build engagement.
<b>News Canada</b>	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 websites. These stories are often used by smaller, community-based publications and websites.
<b>Media</b>	
<b>Press releases</b>	CWTA will develop and distribute both targeted and national press releases to coincide with activities in which RMC participates in as appropriate.
<b>Paid advertising to support specific events</b>	Ads may be purchased to support specific initiatives. Large, province-wide media buys are not being contemplated.
<b>Earned Media</b>	CWTA will continue to honour media requests for information and opportunities to discuss the program via interviews.