

**Waste Electronics Incentive
Program Summary of
Compliance Assurance
Activities April 2013 to March
2014**



Prepared for:
Alberta Recycling Management
Authority

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Sign-off Sheet

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WASTE ELECTRONICS INCENTIVE PROGRAM SUMMARY OF COMPLIANCE ASSURANCE ACTIVITIES APRIL 2013 TO MARCH 2014

Introduction
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1.0 Introduction

The Alberta Recycling Management Authority (Alberta Recycling) has been mandated through regulation to administer electronics recycling programs in Alberta. On September 15, 2004, Alberta Recycling adopted the "Waste Electronics Incentive Program"¹ (the Program). The administration of the Program is carried out by Alberta Recycling.

Municipalities collect waste electronics for recycling at municipal collection sites registered with Alberta Recycling. In addition, Registered Processors may collect waste electronics from commercial clients, schools, government clients, etc. Collected materials are transported to a Registered Processor's site for processing and/or recycling. To become a Registered Processor (in order to be eligible for incentives paid under the Program), processors must meet the Registered Processor Compliance Requirements², as well as other terms and conditions specified under the Program, and be registered with Alberta Recycling.

At the time of the implementation of the Program in Alberta, there were three electronics processors who had applied to Alberta Recycling and had become Registered Processors under the Program. Additional processors have become registered since that time while some former Registered Processors have ceased operations or discontinued their participation under the Program. As of March 2014, there were six Registered Processors and one Interim Processor under the Program.

1.1 ALBERTA'S ELECTRONICS RECYCLING COMPLIANCE ASSURANCE MODEL

In order to monitor conformance to Program requirements (which includes compliance with applicable environmental, and occupational health and safety regulations, as well as industry standards related to health and safety), Alberta Recycling has developed "Alberta's Electronics Recycling Compliance Assurance Model". This Model framework describes the various audits, reviews and assessment processes that are undertaken to evaluate and help ensure processors' conformance to Program requirements. Intended to be flexible, compliance assurance activities are assessed and the Model is adjusted as appropriate, based on findings and the evolution of the Program.

As part of the Compliance Assurance process, Alberta Recycling commissions audits of Registered and Interim Processors, as well as the evaluation of new applicants. Four different

¹ The Program was originally referred to as the "Waste Electronics Incentive Program for Collectors and Processors".

² These were originally referred to as "Processor Qualification Requirements" and subsequently as "Processor Registration Requirements" and are found in Schedule E to the Waste Electronics Incentive Program Requirements.



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types of reviews of selected downstream processors to which material is sent under the Program have also been part of this process.

Compliance Assurance activities that have been conducted by Stantec on behalf of Alberta Recycling include the following evaluations, audits and reviews, which are further described below:

- Applicant Evaluations (and Initial Assessments);
- Processor Program Audits (of Interim or Registered Processors); and
- Downstream Processor Reviews (preliminary assessments, desktop studies, site visits and/or on-site audits).

1.1.1 Applicant Evaluations (and Initial Assessments)

The processor registration process is carried out when a new processor application is submitted to Alberta Recycling. Following submission, the application is evaluated against the Registered Processor Compliance Requirements² in order to make recommendations to Alberta Recycling regarding the qualifications and capability of processor applicant, and their suitability for registration under the Program. In order to complete this evaluation, the information contained in the processor application submitted to Alberta Recycling is reviewed. The evaluation involves an assessment of the content and completeness of the required information, including the application forms submitted by the applicant, a company overview, and details regarding environmental management and health and safety systems, insurance, and workers compensation board coverage.

Any information obtained through internet research regarding the applicant company is also considered. As well, an historical environmental enforcement search in respect of the applicant company is conducted through the Environmental Law Centre.

In addition to this documentation review and research, an initial assessment is completed in order to determine the scope and magnitude of the applicant's operations, to clarify information provided in the application, and to identify those elements that may require further clarification or investigation. The initial assessment, which may include a site visit, also facilitates the completion of other audit and review activities required by Alberta Recycling with respect to the Program.

At the applicant evaluation stage, information with respect to transportation companies (carriers) that will be retained by the processor, as well as downstream processors to which Program materials will be directed (as indicated on the application form), is also reviewed.

Based on the findings of the applicant evaluation and initial assessment, one of the following recommendations is made to Alberta Recycling in respect of the application:



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- to request that the applicant provide additional information and to reassess the documentation once the additional information is received, or
- to grant the applicant interim status as a processor under the Program pending the completion of the initial processor program audit, within three months, in order to evaluate compliance with Program requirements

Subsequent to the initial processor program audit, the auditors further recommend to Alberta Recycling:

- to grant the applicant full status as a Registered Processor under the Program, based on the findings of the initial processor program audit and the corrective actions taken by the processor, within the prescribed timelines, to address any deficiencies identified during the audit, or
- to suspend interim processor status due to the processor's failure to resolve, within the prescribed timelines, the deficiencies identified during the initial processor program audit, or
- to not register the applicant

If warranted, the applicant evaluation and initial assessment process may also involve periodic on-site inspections (monitoring) during commissioning in order to assess site activities and performance, and to assist the interim processor in addressing any issues related to conformance to Program requirements.

1.1.2 Processor Program Audits

On-site processor program audits of each Registered Processor (or Interim Processor) are undertaken to evaluate conformance to Program requirements. Appropriate protocols were developed and are used as a framework for collection of information during the processor program audit; these protocols are reviewed and updated as required to ensure that the audit criteria remain current. The audits include a review, at the Registered Processor's facility, of health and safety; environmental management; environmental regulatory requirements; and operations, sub-contractors and maintenance.

The initial processor program audit of an Interim Processor is scheduled approximately six months after a processor is granted interim status by Alberta Recycling, and subsequent audits of Registered Processors are typically carried out once per year thereafter (subject to the facility being eligible for a reduced audit frequency/interim site visit, as discussed below).

Depending on the findings of the processor program audit, one or more follow-up visits to the Registered or Interim Processor's facility may be conducted or, where appropriate, follow-up may be conducted via correspondence only, to ensure that any deficiencies identified during the audit are properly addressed in a timely manner.

In 2008, Alberta Recycling advised Registered Processors that, where the findings of any two consecutive processor program audits in respect of a given Registered Processor's facility



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showed no significant deficiencies (and if there is timely resolution by the Registered Processor of the deficiencies that were identified), the frequency of processor program audits in respect of that facility may be reduced from annually to biennial (once every two years), subject to information obtained during an interim site visit that would take place in the intervening year.

1.1.3 Downstream Processor Reviews

Apart from the audit of Program requirements pertaining to sub-contractors and transportation conducted as part of the processor program audits (described above), additional reviews are carried out as required in respect of downstream processors. When a Registered Processor or a new applicant/Interim Processor seeks to direct Program material to a new downstream processor, a preliminary assessment of the proposed downstream processor is generally conducted. Based only on the information provided by the Processor or applicant and any additional information that may be publicly available regarding the downstream processor facility, this preliminary assessment does not specifically draw conclusions regarding conformance to Program requirements pertaining to downstream processors, though Program requirements are considered in the collection and review of the information. A recommendation is made with respect to the appropriateness of approving the proposed facility as a downstream processor under the Program.

If/once the downstream processor receives electronics materials (eWaste) from the Registered Processor(s) under the Program for further processing/recycling, Alberta Recycling will sometimes request further review of the downstream processor facility (desktop studies) which would typically include telephone interviews with personnel from the downstream processing facility, and a review of any documentation provided by the Registered Processor and/or the downstream processor pertaining to materials ultimately receiving funding under the Program. Internet research is conducted, including a review of company websites, and available environmental regulatory approval and compliance history.

The need to conduct a site visit to, and/or an on-site audit of, the downstream processor's facility, based on the findings of the preliminary assessment and/or desktop studies (i.e. telephone interviews, document review and research), is determined on a case-by-case basis, based on an assessment of risk and materiality, in consultation with Alberta Recycling.

These reviews are aimed at evaluating whether the facilities downstream (and transporters) conform to Program requirements pertaining to downstream processors, e.g. that they possess all appropriate permits or certifications, that they process materials in an environmentally sound manner, that they safeguard the health and safety of employees, etc. Information obtained from the downstream processor is also reconciled with that provided by the Registered Processor (for example, with respect to quantities of eligible material shipped by the Registered Processor and received by the downstream processor).

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1.1.4 Schedule and Flexibility

The schedule and nature of the audits and reviews conducted as part of the Compliance Assurance Model are established with a view to ensuring conformance to Program requirements, which continues to be the key objective of the Model. As the Program evolves, Compliance Assurance activities are reassessed and the Model is adjusted as appropriate.

The Compliance Assurance process is intended to be flexible such that the scope and/or frequency of a given type of audit or review of a Registered Processor or downstream processor may be adjusted, if it is considered necessary to do so, based on findings. For example, the frequency of an audit or review may need to be increased, or other types of Compliance Assurance measures may be implemented, if any issues are observed that require follow-up on a more urgent basis; alternatively, audit findings may indicate that it is appropriate to reduce the audit frequency. (Refer to section 1.1.2, above, regarding a potential change to the frequency of processor program audits in specified circumstances.)

1.2 COMPLIANCE ASSURANCE ACTIVITIES – APRIL 2013 TO MARCH 2014

A number of Compliance Assurance activities have taken place since those canvassed in the last summary report issued in June 2013. These activities (from April 2013 to March 2014) are shown in the tables in Appendix A and are briefly described below.

Compliance assurance activities related to Registered Processors from April 2013 to March 2014 included processor program audits with respect to all of the six Registered Processors currently participating in the Program. All but one of these Registered Processors have been operating under the Program since 2007 or earlier and have been the subject of regular compliance assurance activities since that time. Registered Processor status was granted following the initial processor program audit of the sixth processor that took place in July 2013.

An applicant evaluation and initial assessment was completed in September 2013 in respect of an application to become a registered processor (see section 1.1.1, above), and status as an Interim Processor was granted to this applicant in October 2013. The process to approve this facility as a full Registered Processor was underway at the time of this report.³

Compliance assurance activities related to downstream processors from April 2013 to March 2014 included three downstream processor audits and one preliminary assessment of a proposed new downstream processor. Follow-up site visits in respect of an on-site audit of another downstream processor conducted in January 2013 took place in April and June 2013, and further follow-up communications occurred until February 2014.

³ Findings of the initial processor program audit of this Interim Processor conducted in April 2014 are not included in this report.

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1.2.1 Other Related Activities

In addition to these specific audit and review activities, Stantec has undertaken, at the request of Alberta Recycling, the following tasks also related to Compliance Assurance with respect to the Program:

- Preparation of summary and diversion reports, as requested
- Average weights study
- Mass balance inspections
- Inspections/monitoring/verification of eWaste activities
- Inventory tracking site inspections
- Attendance/presentations at Industry Council Meetings; assistance in responding to issues raised

1.3 SUMMARY OF FINDINGS

The summaries contained in the subsections below are based on the findings of processor program audits of Registered Processors conducted between April 2013 and March 2014, as well as the findings of any downstream processor review activities and any applicant evaluations conducted during the same timeframe.

1.3.1 eWaste Activities

Incoming eWaste arrives from various collection sites and other customers. In some cases, Registered Processors pick up electronics waste from customers.

Eligible eWaste⁴ is sorted from ineligible waste. Quantities of eligible (and ineligible) eWaste are tracked by the Registered Processor. Activities at the Registered Processors' facilities consist of receiving, sorting, processing and packaging electronics materials for shipping to a downstream processor. Processing generally involves the dismantling of the eWaste into its component parts (i.e. circuit boards, metal, plastic, wire and glass). Both automated equipment and manual labour is used to carry out the sorting, dismantling and processing operations.

In general, improvements to operations through the purchase of new equipment and/or changes to procedures are considered/implemented by Registered Processors on an ongoing basis, in some cases made necessary by changes to the design and construction of the electronics products that are being recycled. As new technologies emerge in respect of eligible eWaste, Registered Processors investigate options for processing or managing new materials that may be present. Alberta Recycling monitors new processing methods and/or hazardous waste management in respect of these new materials. Alberta Recycling introduced Schedule F

⁴ "Eligible eWaste" means waste in respect of which a Registered Processor is eligible for incentive payments under the Program.

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to the Program requirements, effective May 15, 2013, stipulating Eligible Processing Guidelines that Registered Processors must comply with.

From the Registered Processors in Alberta, eWaste (eligible and ineligible) is directed to a number of downstream processors.

Based on observations made during processor program audits, Registered Processors have continued to make efforts to improve their operations. Some have purchased new equipment, modified their site layout or even relocated their facility on one or more occasions in order to improve processing efficiencies and/or to comply with Schedule F requirements.

Weigh scales used at Registered Processor facilities are calibrated regularly and scale tickets are automatically generated⁵, enhancing the integrity of the information reported to Alberta Recycling regarding quantities of eWaste materials received and processed.

1.3.2 Conformance to Program Requirements

Under the Program, Registered Processors must identify and comply with all applicable legislated environmental, and occupational health and safety requirements, as well as industry standards related to H&S⁶. All Registered Processors continue to have a health and safety program in place, and at least some elements of a typical environmental management system (EMS). The completeness of those programs, and the extent to which they have been implemented, varied among the Registered Processors.

In most cases, the health and safety and environmental programs and practices are in place and were generally being maintained, in spite of some deficiencies that were identified. Some deterioration in the maintenance of the program(s) was observed as a result of significant changes to supervisory staff and/or ownership but steps were subsequently taken to address these deficiencies.

Most facilities hold or are in the process of obtaining a Certificate of Recognition (COR) in respect of their health and safety program. This reflects a high level of management support for health and safety. One Registered Processor has ten or fewer employees at their facility and therefore qualifies as a "small employer" under the COR program. Another Registered Processor facility qualifies as a "small employer" 90% of the time, and held SECOR certification at the time of the most recent processor program audit but was working with a certifying partner to obtain COR (rather than SECOR) status. Some Registered Processors have obtained ISO 14001 (and/or ISO 9001) certification.

⁵ It was identified during the processor program audit of one Registered Processor that scale tickets were not being printed automatically; this deficiency was subsequently addressed/corrected.

⁶ Since the Certificate of Recognition (COR) program is widely accepted as an industry standard, COR requirements (or SECOR requirements, in the case of a small employer) have been adopted as the applicable industry standard in this regard.



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The Registered Processors' efforts to monitor and assess worker exposure to two of the more significant hazards -- lead and noise (and mercury, to a lesser extent) -- continue to be evaluated through the Compliance Assurance process, and the effectiveness of hazard controls are critically reviewed during every processor program audit to encourage management to have appropriate programs in place to address these hazards.

The findings continue to indicate that there is more emphasis on health and safety programs than environmental management at most of the Registered Processors' facilities (although, as noted above, some Registered Processors have obtained ISO 14001 certification). This is not unexpected given that the environmental risks associated with their operations are relatively small and that, overall, the facilities have a net positive environmental impact. No environmental monitoring is required. Most facilities take steps to reduce energy/resource consumption and minimize the quantities of waste directed to landfill.

Although eWaste materials continue to be stored outdoors at many facilities, most Registered Processors continue to take steps to reduce the amount of outdoor storage, which decreases the potential for impacts to soil and groundwater. In addition, Registered Processors endeavour to minimize the length of time that the incoming eWaste materials remain on site; efforts are made to process and ship the material out as soon as possible.

Certificates of Recycling or Destruction are issued either automatically or upon request.

Some housekeeping deficiencies have been noted at the Registered Processor facilities. Although all facilities have some security measures in place, deficiencies related to public access and secure storage of data-containing devices were identified.

Other deficiencies have been noted in respect of compliance with occupational health and safety regulatory requirements and industry standards. There were also a smaller number of deficiencies related to environmental management, and to operations, sub-contractors and maintenance (in addition to those discussed above). There have been no findings of non-compliance with environmental regulatory requirements though one Registered Processor received multiple notices in respect of a Land Use Bylaw requiring clean-up of the facility yard, which was subsequently addressed to the satisfaction of the municipality. Registered Processors do not require an approval under the *Environmental Protection and Enhancement Act* (EPEA). Hazardous waste generator numbers have been obtained from Alberta Environment as required.

The Registered Processor facilities have a business license or occupancy permit issued by the municipality in connection with which periodic inspections may be conducted by the local fire departments. All Registered Processors have a WCB account in good standing.

With respect to compliance with Program requirements related to protection of personal information and data (i.e. data destruction), in some cases, data-containing devices were not



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being physically destroyed on site, due to a lack of awareness of specific Program requirements in this regard.

A summary of the deficiencies identified in the most recent processor program audits of Registered Processor facilities is attached as a Schedule to this report (see section 2.0). Deficiencies identified during the processor program audits are brought to the attention of Alberta Recycling and the respective Registered Processors. A deficiency list in respect of an audit of a Registered Processor is provided to the Registered Processor following the processor program audit of their facility. Each Registered Processor is required to respond to the deficiency list on an item-by-item basis, typically within 14 days of receipt, and to address the deficiencies in a timely manner. Following the issuance of the audit report, the issues related to the deficiencies are followed up by the auditors, when necessary by means of additional site visits but often through email and telephone communications, to ensure that the appropriate corrective actions are implemented. Alberta Recycling also sent correspondence to the Registered Processors prescribing the timeline during which deficiencies were to be corrected. Registered Processors have typically been diligent in implementing corrective actions to address the deficiencies that are identified. Where the response in addressing an outstanding deficiency has been slow, Alberta Recycling has advised the Registered Processor that incentive payments will be withheld/postponed in the absence of prompt attention to the matter.

There was an increase in the number of deficiencies identified in some Registered Processors audited in 2013 as compared to the previous four years. In one or two cases, the significant increase in the number of deficiencies from one year to the next and/or a recurrence of similar deficiencies coincided with significant staff changes at the facility, particularly among environment and health and safety management; in another instance, there was a change in facility ownership.

An application to become a Registered Processor was received by Alberta Recycling in June 2013 and, based on an applicant evaluation completed in September 2013, the applicant was granted interim processor status. (An initial processor program audit was conducted in April 2014.)

Registered Processors are required to provide advance notice to Alberta Recycling prior to sending materials to any new downstream processors. A preliminary assessment (described in section 1.1.3, above) is conducted in respect of any new downstream processors and, once eligible shipments of eWaste are made to these downstream processors, their operations may be further evaluated as part of the downstream processor review process. Alberta Recycling has denied approval in respect of certain downstream processors whose operations were not consistent with Program policies and objectives; incentive payments are not paid in respect of shipments of eWaste (whether eligible or ineligible) to such facilities. Based on the findings of the preliminary assessment of a proposed downstream processor conducted in March 2014, recommendations were made to obtain additional information and/or conduct a more



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complete assessment of the facility prior to making any recommendations to Alberta Recycling regarding its suitability as a downstream processor under the Program.

Apart from identifying the downstream processors, Program requirements also stipulate that the Registered Processor must have a process in place to ensure that the downstream processors meet certain specified criteria. All but one of the Registered Processors were found to have a process in place to periodically evaluate/assess both downstream processors and transporters, though the process was sometimes informal in nature, and supporting documentation was lacking or not current in some cases but was subsequently updated during follow-up communications with the Registered Processors.

Other types of downstream processor reviews (described in section 1.1.3, above) went beyond evaluating whether the Registered Processor has the required process in place and to assess the downstream processors themselves, to determine whether the Program criteria are being met. As noted in section 1.2, above, three downstream processor audits were conducted in early 2014. Also considered in the summary provided below are the findings of three downstream processor audits conducted in early 2013 not discussed in the 2013 summary report. Based on these six downstream processor audits, there was generally no evidence to suggest that the downstream processors failed to meet the specified criteria.

In spite of some non-compliances related to regulatory requirements pertaining to health and safety, the findings of the downstream processor audits indicated that, overall, the downstream processors safeguard the health and safety of employees working at the facility, in conformance to Program requirements. In one case, a significant number of non-compliances with health and safety regulatory requirements were identified and follow-up communications took place for an extended period (see the second table in the Appendix) to ensure that these deficiencies were addressed. However, observations made during the audit (and during follow-up communications) indicated that management was committed to ensuring that sound H&S practices are followed/maintained in the workplace, and did not suggest that the company does not safeguard the health and safety of its employees.

Five of the six downstream processors audited had a formal environmental management system (EMS) in place and the audit findings indicated, overall, that eWastes are processed and recycled in an environmentally sound manner. One downstream processor was in the process of developing an EMS in respect of activities conducted at the facility. This facility was found to handle and process Program material (received from Registered Processors) in an environmentally sound manner. However, observations made during the audit suggest that there was a potential for contaminants associated with non-Program material to leach into the soil and groundwater.

Based on information provided by site personnel, any material that is not in a final recycled state leaving the downstream processor facility is not being sent to non-OECD countries for disposal.



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The deficiencies identified during the audits were brought to the attention of the downstream processor facilities; it is the opinion of the auditors that the corrective actions (completed and proposed), will adequately address the deficiencies.

Based on the findings of the processor program audits and the downstream processor audits, and having regard to the deficiencies identified and related corrective actions, all Registered Processors were in substantial conformance to the Program requirements that were in effect at the time that the 2013/2014 compliance assurance activities were conducted. In most cases, any deficiencies identified during the processor program audits were addressed in a timely manner. Follow-up activities, including site visits when necessary, will continue to be undertaken to address any deficiencies that were found.

1.4 NEXT STEPS

To ensure that the audit criteria continue to be consistent with current Program requirements, prior to conducting future processor program audits, the audit protocols will need to be formally updated to reflect the revisions to Program requirements that took effect April 1, 2014.

Alberta Recycling will continue to commission independent, third-party audits of the Registered Processors on an annual basis. It is anticipated that processor program audits of the six existing Registered Processors will be conducted in 2014, and that Alberta Recycling will make a determination regarding the status of the Interim Processor based on the findings of the initial audit of that processor conducted in April 2014.

It is further anticipated that Alberta Recycling will commission additional downstream processor reviews (desktop studies, site visits and/or on-site audits) in respect of some downstream processors, and that further preliminary assessments will be conducted of any proposed new downstream processors.

Applicant evaluations and initial assessments will be carried out as required when new processor applications are received by Alberta Recycling.

1.5 CLOSING

Having regard to the purposes of the Program, and the overall Program requirements, all current Registered Processors have been found to be substantially in conformance to the terms and conditions of the Program.

Alberta Recycling will continue to require that the Registered Processors address any deficiencies in a timely manner in order to ensure conformance to Program requirements and to further the overall Program objectives.



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2.0 Schedule

2.1 SUMMARY OF DEFICIENCIES IDENTIFIED DURING PROCESSOR PROGRAM AUDITS

The following is a summary of the deficiencies identified at one or more facilities during processor program audits of Registered Processors conducted between April 2013 and March 2014. The deficiencies are categorized under the various areas within the scope of the audits. The relevant legislative or Program reference is also provided.

HEALTH AND SAFETY		
	ITEM	REFERENCE (see note below table)
1.	There was no complete job/task inventory or organizational chart available for review. Job descriptions were not available for all positions. Positions in respect of which job descriptions were provided did not match those present on the organization chart.	<i>Industry standards (COR requirements)</i>
2.	Not all existing and/or potential hazards (and applicable controls) were identified.	<i>Alberta Occupational Health and Safety Code (2009)</i>
3.	Hazard assessments had not been revised/repeated when changes to operations were implemented or when a new work process was introduced or changed (i.e. to include the hazards associated with certain new material). The increased level of risk associated with handling these materials had not been communicated to the employees prior to handling the material.	<i>Industry standards (COR requirements) Alberta Occupational Health and Safety Code (2009)</i>
4.	No assessment of lead (airborne particulate and/or surface testing), air quality testing for other parameters, and/or noise exposure had been conducted at the current facility and/or was not being conducted regularly to confirm the controls in place are effective.	<i>Alberta Occupational Health and Safety Code (2009)</i>
5.	Records/results related to noise exposure measurements did not include all of the required components. There was no evidence that audiometric testing had been recently conducted. The noise exposure program did not include all of the required elements for audiometric testing.	<i>Alberta Occupational Health and Safety Code (2009)</i>



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6.	Workers had the potential to be exposed to silica but no health assessment related to this potential exposure had been conducted.	<i>Alberta Occupational Health and Safety Code (2009)</i>
7.	One or more employees were observed to not be wearing the required PPE. Use of PPE was not being enforced. A hazard control was not being enforced.	<i>Industry standards (COR requirements) Alberta Occupational Health and Safety Code (2009) Alberta Recycling's Registered Processor Compliance Requirements</i>
8.	Appropriate safeguards were not in place to control material free-falling from the top of a conveyor into cages below and the procedure for operating the conveyor was not being followed.	<i>Industry standards (COR requirements) Alberta Occupational Health and Safety Code (2009) Alberta Recycling's Registered Processor Compliance Requirements</i>
9.	A drum containing batteries, stored outdoors, was not properly labeled (i.e. not all harmful substances/containers were identified).	<i>Industry standards (COR requirements) Alberta Occupational Health and Safety Code (2009)</i>
10.	There was no formal preventative maintenance program/process for all equipment within the facility.	<i>Industry standards (COR requirements)</i>
11.	Employees were observed working alone at a facility where hazards exist that create an increased potential to leave that employee in a situation where they are unable to communicate in the event of an emergency.	<i>Alberta Occupational Health and Safety Code (2009)</i>
12.	Poor housekeeping was observed at some facilities (creating potential hazards).	<i>Industry standards (COR requirements) Alberta Occupational Health and Safety Code (2009)</i>
13.	Certain areas of the facility were not part of the monthly inspections. Fire extinguishers were not consistently inspected on a regular basis. There was no inspection checklist for vehicles used to transport materials. Inspections were not being carried out consistent with the policy requirement.	<i>Industry standards (COR requirements)</i>
14.	In respect of those inspections forms where an item was identified as unsatisfactory, no comments were provided. Not all deficiencies identified in inspection reports were corrected in a timely manner.	<i>Industry standards (COR requirements)</i>
15.	The maintenance policy did not identify all tools, equipment and vehicles requiring inspections and did not accurately reference applicable inspections forms. Recent maintenance records were incomplete.	<i>Industry standards (COR requirements)</i>

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16.	There was no formal training program to identify what training is required prior to an employee being assigned to a particular task, to ensure that employees have the qualifications and training to perform their jobs in a healthy and safe manner on an ongoing basis.	<i>Industry standards (COR requirements) Alberta Recycling's Registered Processor Compliance Requirements</i>
17.	New hires were not receiving WHMIS training and/or evidence of current WHMIS training was not available.	
18.	It was unclear who was responsible for receiving eWaste and whether those individuals had received TDG training. Shipper/receiver personnel did not have the necessary current TDG training.	<i>Industry standards (COR requirements)</i>
19.	Insufficient numbers of employees were trained in first aid on one or more shifts.	<i>Industry standards (COR requirements) Alberta Occupational Health and Safety Code (2009)</i>
20.	The contents listed on the first aid kit did not meet the minimum OH&S Code requirements.	<i>Industry standards (COR requirements) Alberta Occupational Health and Safety Code (2009)</i>
21.	There were no emergency showers or regular showers, an emergency exit was blocked and eye wash supplies were not immediately accessible (i.e. workers did not have immediate access at the work site to emergency showers and not all first aid equipment was accessible).	<i>Alberta Occupational Health and Safety Code (2009)</i>
22.	The emergency response plan was not reviewed with employees during orientation and employees did not understand their responsibilities in the case of an emergency.	<i>Industry standards (COR requirements)</i>
23.	There was no inventory of fire extinguishers (fire protection equipment), and there were no spill kits in some areas where controlled products were stored.	<i>Industry standards (COR requirements)</i>
24.	Accident/incident report forms were not properly completed and there were no near miss reports to review.	<i>Industry standards (COR requirements)</i>
25.	There was no tracking system to determine who was responsible for addressing the action items from a previous COR audit or the current status of each action item.	<i>Industry standards (COR requirements)</i>

**WASTE ELECTRONICS INCENTIVE PROGRAM SUMMARY OF COMPLIANCE ASSURANCE ACTIVITIES
APRIL 2013 TO MARCH 2014**

Schedule
June 2014

ENVIRONMENTAL MANAGEMENT AND REGULATORY REQUIREMENTS		
1.	One or more key elements of the environmental management system (EMS) were not properly documented and/or implemented, and/or were not being properly maintained.	<i>Alberta Recycling's Registered Processor Compliance Requirements</i>
2.	Secondary containment was not provided for oil containers (i.e. improper storage of hazardous materials).	<i>Alberta Recycling's Registered Processor Compliance Requirements</i>
3.	The municipality had issued two notices in respect of a land use bylaw and the requirement for the front yard at a site to be cleaned up. A number of action items had been identified but the notices had not yet been complied with.	<i>Alberta Recycling's Registered Processor Compliance Requirements</i>
OPERATIONS, SUB-CONTRACTORS, AND MAINTENANCE		
1.	Evidence of having posted/updated financial security was not provided during the audit.	<i>Alberta Recycling's Waste Electronics Incentive Program Requirements, Fiscal 2013-2014</i>
2.	Storage media was not being physically destroyed on site prior to being shipped to an approved downstream processor.	<i>Alberta Recycling's Registered Processor Compliance Requirements</i>
3.	Batteries and other hazardous materials were not being properly stored; access was poor due to no/minimal aisle spacing, etc.	<i>Alberta Recycling's Registered Processor Compliance Requirements</i>
4.	Public access was not restricted and data-containing devices were not stored in a secure manner.	<i>Alberta Recycling's Registered Processor Compliance Requirements</i>
5.	Scale tickets were not being printed automatically.	<i>Alberta Recycling's Registered Processor Compliance Requirements</i>
6.	Inventory management was poor overall in respect of the length of time eWaste was on site and the quantity of eWaste. Labels were missing from some gaylords/totes. It was not clear that accurate inventories of eligible (vs. ineligible) eWaste quantities were being kept and/or that claims for incentives were based on accurate inventories.	<i>Alberta Recycling's Waste Electronics Incentive Program Requirements, Fiscal 2013-2014</i>
7.	The document and record control procedure indicated that some records relating to the Program are kept for less than five years.	<i>Alberta Recycling's Waste Electronics Incentive Program Requirements, Fiscal 2013-2014</i> <i>Alberta Recycling's Registered Processor Compliance Requirements</i>
8.	Evidence of current liability insurance of \$5 million was not provided.	<i>Alberta Recycling's Registered Processor Compliance Requirements</i>
9.	Whole units were being sent to a downstream processor for dismantling (i.e. waste electronics were not sufficiently dismantled into component parts/ materials prior to shipping to downstream processor facilities).	<i>Alberta Recycling's Waste Electronics Incentive Program Requirements, Fiscal 2013-2014</i>



**WASTE ELECTRONICS INCENTIVE PROGRAM SUMMARY OF COMPLIANCE ASSURANCE ACTIVITIES
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Schedule
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10.	Current documentation was not available in respect of some downstream processors.	<i>Alberta Recycling's Registered Processor Compliance Requirements</i>
11.	A process for periodic evaluation/assessment of downstream processors was not available and had not been completed.	<i>Alberta Recycling's Registered Processor Compliance Requirements</i>
<p>Note: Item 2.1 of Alberta Recycling's Registered Processor Compliance Requirements (Schedule E) requires that all Registered Processors comply with all applicable health and safety regulations, including industry standards. Given that all health and safety deficiencies are with reference to industry standards and/or the OH&S Code, all health and safety items are also deficiencies relative to item 2.1 of Schedule E.</p>		

APPENDIX A
COMPLIANCE ASSURANCE ACTIVITIES



Compliance Assurance Activities with respect to Registered Processors - April 2013 to March 2014

Activity	Apr 2013	May 2013	Jun 2013	Jul 2013	Aug 2013	Sep 2013	Oct 2013	Nov 2013	Dec 2013	Jan 2014	Feb 2014	Mar 2014
Processor Program Audits (PPAs)												
ecycle				PPA								
Recycle Logic						PPA						
Technotrash					PPA							
GEEP Edmonton						PPA						
GEEP Calgary				PPA								
Shanked Computer Recycling Inc.								PPA				
PPA Follow-up												
ecycle ¹					conference call with ARMA			1st follow-up letter issued	2nd follow-up letter issued		3rd follow-up letter issued	
Recycle Logic ²							conference call with ARMA		conference call with ARMA			
Technotrash ³											follow-up letter issued	
GEEP Edmonton ⁴												
GEEP Calgary ⁵							follow-up letter issued					
Shanked Computer Recycling Inc. ⁶												site visit; follow-up letter issued

1. No follow-up site visit was conducted specifically in respect of the PPA though other types of inspections were conducted at the facility. Follow-up communications (including in-person and conference call meetings) took place between August 2013 and February 2014.
2. Follow-up communications took place between October 2013 and March 2014. A follow-up site visit may be coordinated by Alberta Recycling.
3. No follow-up site visit has been conducted. Follow-up communications took place between October 2013 and February 2014.
4. Follow-up communications (email correspondence) took place between September 2013 and December 2013; no site visit or follow-up letter required.
5. Follow-up communications took place between September 2013 and December 2013.
6. Alberta Recycling conducted a site visit in December 2013. Follow-up communications took place between January 2014 and March 2014. A follow-up site visit was conducted and a follow-up letter was issued in March 2014



Compliance Assurance Activities with respect to Downstream Processors - April 2013 to March 2014

Compliance Assurance Activity/ eWaste Material Handled by Downstream Processor¹	Apr 2013	May 2013	Jun 2013	Jul 2013	Aug 2013	Sep 2013	Oct 2013	Nov 2013	Dec 2013	Jan 2014	Feb 2014	Mar 2014
Downstream Processor Audits												
plastic/metal mix, sorted MEWA plastic, low grade VLG, low grade fines, wires, scrap electronics and low grade metal mix	See footnote 2					See footnote 2		See footnote 2		See footnote 2		
CRT glass												
leaded and non-leaded glass, mixed plastics												
ferrous and non-ferrous metals												
Desktop Studies												
No desktop studies were performed between March 2013 and April 2014												
Preliminary Assessments												
ferrous and non-ferrous metals												

1. The downstream processors in respect of which Compliance Assurance activities were conducted between April 2013 and March 2014 are listed based on the type of eWaste material that they handle.

2. Follow-up site visits in respect of an on-site audit conducted in January 2013 took place in April and June 2013. Follow-up communications continued to take place periodically until February 2014.