

**Canadian Brandowner Residual
Stewardship Corporation
Stewardship Plan**

**Appendix 1
Electronic Toy Stewardship
In British Columbia**

**Prepared for the
Canadian Toy Association**

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Executive Summary

The Stewardship Plan for Electronic Toys will be launched on July 1, 2012. On behalf of the Canadian Toy Association, the CBRSC has partnered with Waste Management (WM) Canada Inc's Upstream Division to implement the Stewardship Program for Electronic Toys. WM Upstream has extensive expertise, infrastructure and systems that can be used for the collection, transportation and processing of Electronic Toys. In addition, WM Upstream brings extensive experience in consumer awareness and has innovative programs and systems such as the Greenopolis website, interactive recycling kiosks and innovative Business Intelligence Tools.

Electronic Toys pose a unique challenge for the Stewardship Agency as there is no way to estimate the volumes of product returned by consumers using different collection methods. As such, the first phase of the Stewardship Program for Electronic Toys will generate credible information on efficient collection methods, recoverable volumes and recovery rates. The initial information will be used to further design and modify the implementation of the Stewardship Program.

Because there was virtually no information on the volumes and nature of Electronic Toys, the CBRSC in partnership with the Canadian Toys Association and WM Upstream undertook a pilot project on October 2, 2010. The results of the Pilot are summarized in this Appendix and the results used to guide the intended collection, transportation and processing of residuals.

The Stewardship Program for Electronic Toys intends to emphasize events and permanent collection centers at retail stores, schools and malls because of their proximity to population plus ease of access, space and transportation. In addition, the Stewardship Program will work with Producers and large retailers to integrate the Stewardship Program elements in their marketing programs.

A draft stewardship plan was used in consulting with Producers and stakeholders. At the consultations, stakeholder concerns and suggestions will be heard and the plan will be revised to address the feedback received. Consultation themes will be summarized and the plan will be updated as necessary.

Following approval of the program plan by the BC Ministry of the Environment, the focus will be on program plan implementation, including:

- identification and qualification of collection sites, transporters and processors;
- implementation of the communication and public awareness strategies
- establishing monitoring and reporting systems

Section 1: Introduction to Electronic Toys Stewardship

1.1 *Background*

The stewardship plan for **Electronic Toys** was developed by the Canadian Brandowner Residual Stewardship Corporation (CBRSC) on behalf of the Canadian Toy Association.

The stewardship plan was written to meet the requirements of Part 2 of the BC Recycling Regulation for the Electronic Toys product category. The CBRSC will perform all the duties of the Producers listed in Section 6 under Part 2 of the Recycling Regulation and will be effective July 1, 2012.

Producers of Electronic Toys within Section 6 of this Stewardship Plan have notified the CBRSC in writing that they wish to be covered by this Stewardship Plan in order to meet the requirements of Part 2 of the Recycling Regulation.

The CBRSC has been working with the Canadian Toy Association for the past 12 months developing a comprehensive and effective stewardship plan. A pilot project that tested assumptions was completed on October 2, 2010 in Vancouver. The results of the pilot along with industry data were useful in determining the appropriate stewardship model for unwanted Electronic Toys.

1.2 *Definition of Electronic Toys*

The Recycling Regulation clearly defines Electronic Toys in Section 3.2 of Schedule 3. The definition includes:

electronic or electrical toys, including, without limitation, trains, car racing sets, cars and trucks, including remote control and ride on toys, video games and video gaming equipment and consoles.

The Electronic Toys that meet this definition range in complexity from simple battery operated toys that display lights and make simple sounds to sophisticated computer gaming systems that are complex computers and video display units.

Most Electronic Toy products are manufactured from raw materials such as plastic, paper and cardboard and a range of electronic components. The manufacturing processes include injection molding, blow molding, spray painting, printing, box making and assembly.

1.3 The Producers

The Recycling Regulation¹ provides a clear definition of “Producer” of Electronic Toys as:

- (i) a person who manufactures the product and sells, offers for sale or distributes the product in British Columbia under the manufacturer's own brand,
- (ii) if subparagraph (i) does not apply, a person who is not the manufacturer of the product but is the owner or licensee of a trademark under which a product is sold or distributed in British Columbia, whether or not the trademark is registered, or
- (iii) if subparagraphs (i) and (ii) do not apply, a person who imports the product into British Columbia for sale, distribution or use in a commercial enterprise;

The members of the Canadian Toys Association that meet one of more of these definitions are listed in Section 6 as a “Producer” and have appointed the CBRSC as their stewardship agency and its authorized agent as described in Section 2(2) of the Regulation.

Section 2: Current State Assessment

2.1 Electronic Toys Market

The Canadian Toys Association estimates that the Canadian market for toys is approximately \$1.4 billion dollars. Very rough estimates suggest that the national electronic toy component of this total is 15% or 210 million. Based on population demographics from Statistics Canada, BC represents 13% of the national electronic toy market.

The toy business is highly seasonal with consumers making a large percentage of all toy purchases during the traditional holiday season. A significant portion of toy industry customers’ purchasing occurs in the third and fourth quarters of each fiscal year in anticipation of such holiday buying. In addition, a small number of retailers account for a large portion of all toy sales.

Competition among the toy manufacturers is intensified due to recent trends towards shorter life cycles for individual toy products, the phenomenon of children outgrowing toys at younger ages, and an increasing use of high technology in toys.

¹ British Columbia Ministry of Environment (2006) *Recycling Regulation*
http://www.bclaws.ca/EPLibraries/bclaws_new/document/ID/freeside/449_2004

Toy manufacturers deal with a “children getting older younger” phenomenon resulting in children moving away from traditional toys and games at a younger age and the array of products and entertainment offerings competing for the attention of children has expanded. This has resulted in the expansion and creation of more electronic toys as market demands require more sophistication in products.

2.2 *Electronic Toy Categories*

There are seven electronic toy categories developed following results of a consultation with the industry and the pilot project (Table 1). The categorization also attempts to anticipate the need to communicate these product types throughout the distribution chain especially considering program members, retailers, consumers and government.

Table1: Electronic Toy Categories:

Electronic Toy Categories
Plush Textile
Metal or Hard Plastics with Electronics
Remote Control Vehicles
Ride On Vehicles Small
Ride On Vehicles Large
Hand Held Game Devices
Gaming Devices with PC /TV

2.3 *Collection Estimates*

The sales of electronic toys in BC are estimates based upon the Canadian national market and the percent of population in British Columbia (13.2%).

Unfortunately there is very little industry information on the life span of Electronic Toys or of Toys in general. Some toys have a very short life span such as electronic toys given out at restaurants and fast food chains compared to very long lived products that are passed from one generation to another.

In addition, BC’s stewardship program for Electronic Toys will be the first stewardship program for that product category in North America. Consequently there is not data from which to compare. The only information that may be relevant is with the sophisticated gaming systems. The expected life span of a computer may be extrapolated for these product types.

Because of the lack of industry data and absence of a similar type stewardship program, the CBRSC undertook a pilot project in Vancouver on October 2, 2010. While the pilot project was successful, the pilot did not provide great insight into the life-cycle of electronic toys. The array of products returned could not be consistently defined by age of product, manufacturer, or country of origin.

The toy industry has a vast array of manufacturers from all over the world who are not always easily identifiable. Many manufacturers are no longer in business and consolidation of the industry through acquisition has further complicated the availability of information. The industry at large lacks quantifiable studies on the subject. Engineers asked to define the life-expectancy of their products are challenged by the request. The material content of electronic toys are mostly plastic and will not break down due to environmental factors, therefore an electronic toy will typically last beyond the interest a child has to use it. Finally, toys handed from generation to generation are not as common as in the past.

Chart 1: Estimated Number of Units Sold in British Columbia by Product Category

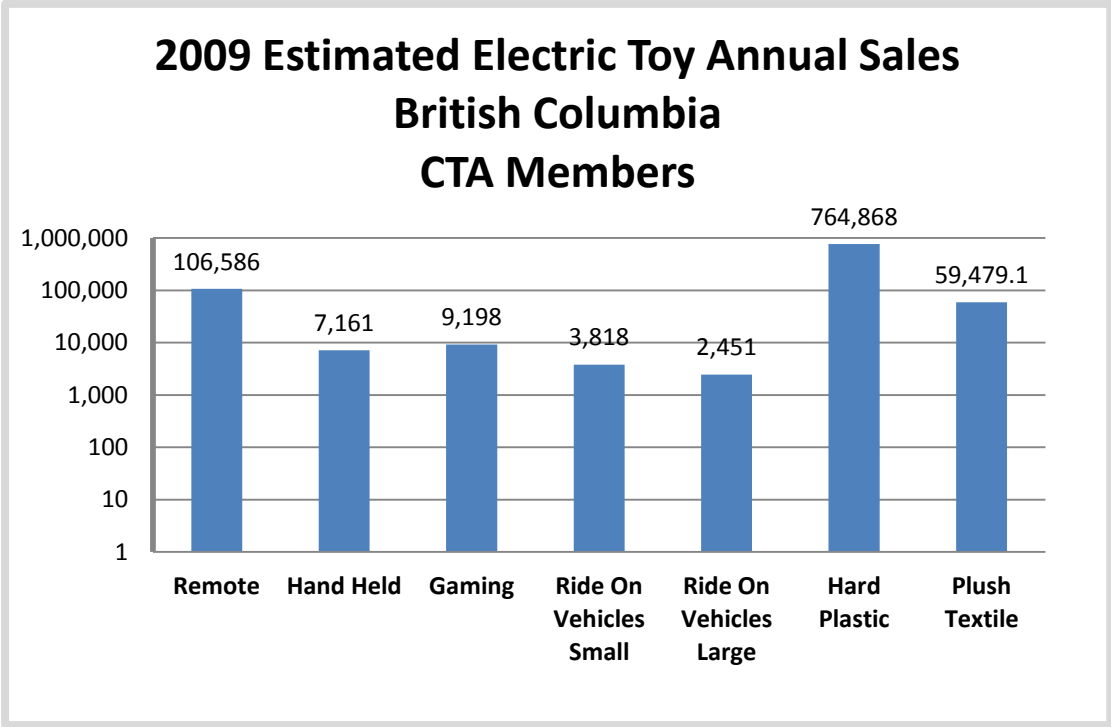


Chart 2: Estimated Kilograms of Units Sold in British Columbia by Product Category

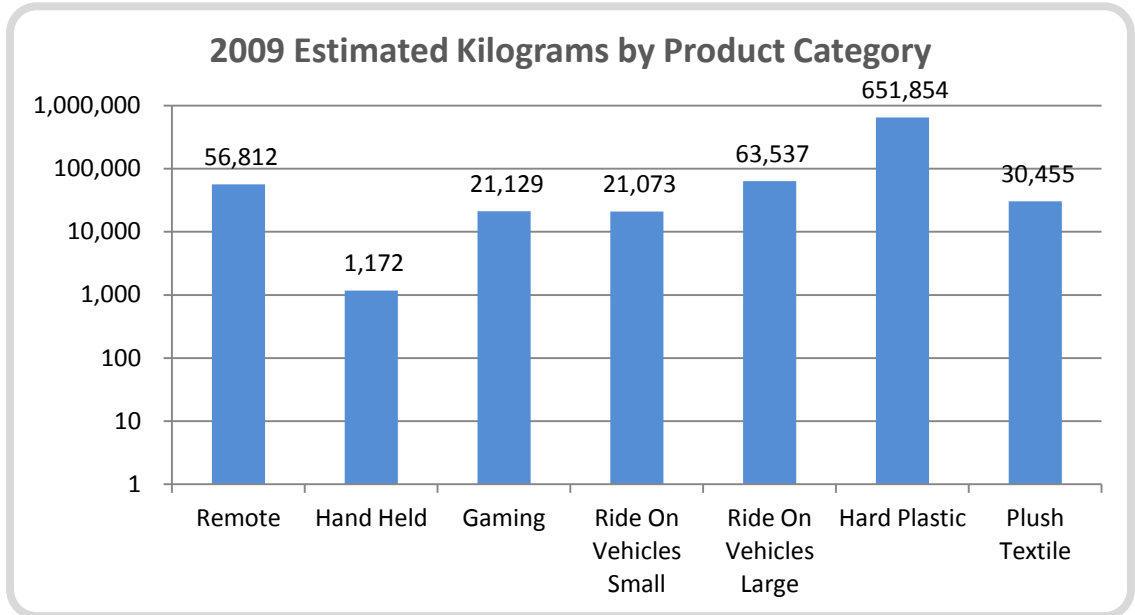
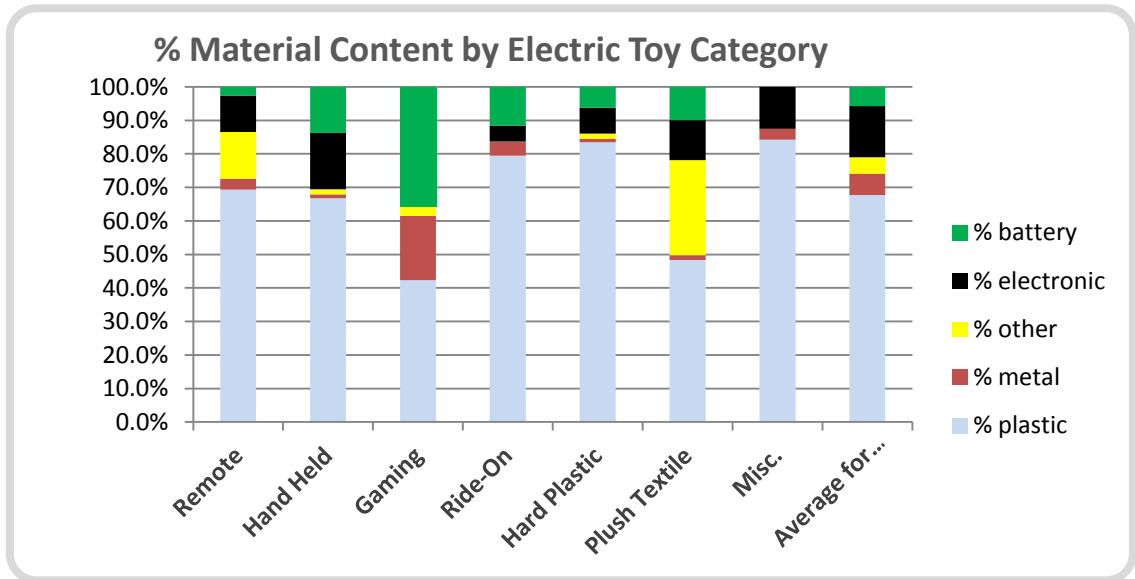


Chart 3: Material Content of Electronic Toys (results from Pilot Project)



The lack of industry life cycle information and the absence of other stewardship programs, the CBRSC concludes that there is no credible data or information on expected recovery rates for Electronic Toys.

The pilot project was successful in determining the types of Electronic Toys that will be recovered and the necessary collection, transportation and processing logistics needed for Electronic Toys.

Table 2 summarizes the expected recovery of electronic toys based on the results of the pilot project.

Table 2: Electronic Toy Material Content (results from Pilot Project Extrapolated to Annual Sales by Product Category)

Electric Toy Category	Plastic	Metal	Other	Electronic	Battery	Total
Remote	39,382	1,861	7,906	6,203	1,460	56,812
Hand Held	783	13	18	197	161	1,172
Gaming	496	224	33	413	5	1,172
Ride On Vehicles Small	16,748	858	19	1,001	2,446	21,073
Ride On Vehicles Large	50,498	2,588	58	3,019	7,375	63,537
Hard Plastic	543,902	7,054	10,172	50,347	40,380	651,854
Plush Textile	14,714	447	8,618	3,639	3,037	30,455
Total	666,523	13,045	26,823	64,820	54,864	826,075

Section 3: Proposed Operations

The CBRSC and the Canadian Toys Association have done considerable research into the stewardship of electronic toys. Because electronic toys have never been included in a stewardship program in North America, the data and information is limited. As such, the Canadian Toys Association in partnership with the CBRSC and Waste Management sponsored a pilot project day on October 2, 2010 in Vancouver British Columbia. The results of that pilot combined with industry data will form the basis of this section.

3.1 Collection, Transportation and Processing

The CBRSC's Stewardship Program will design an efficient reverse-distribution program building on the existing infrastructure of Waste Management, local contractors and processors and expertise within WM's sustainability initiatives for businesses.

The following sections outline the intended Collection, Transportation and Processing systems for Electronic Toys.

3.1.1 Collection

The Electronic Toys program will use a combination of the following methods to recover electronic toys:

- permanent return collection facilities at depots and retail locations;
- events at retail locations, schools and malls as appropriate;
- temporary collection facilities (e.g., “Depot in a Box”) for remote locations;

The stewardship program believes that events and collection centres at retail stores, schools and malls will produce the best recovery rates because of their proximity to population plus ease of access, space and transportation. In addition, remote communities are best served by “Depot in a Box” options.

However, the stewardship program will establish more traditional return collection facilities initially to ensure that consumers have a viable option to return their unwanted electronic toys. Then the CBRSC will expand retail and other consumer-focused options as these options are developed over time.

The electronic toys collected at the permanent return collection locations, events and “Depot in a Box” will feed into strategically located depots in the major centres on Vancouver Island, Lower Mainland, Okanagan, Prince George and the Peace River. In addition, WM has a variety of contractors, transporters and processors that will be used within the network as necessary.

The targets for Return Collection Facilities and Events for the first 5 years are summarized in Table 3.

Table 3: Return Collection Facilities and Events

	Permanent Locations	Events	Depot in a Box
Year 1	42	4	10
Year 2	44	6	20
Year 3	46	8	30
Year 4	48	10	40
Year 5	50	12	50

* represents the number of communities

3.1.2 Transportation

The Electronic Toys Program intends to utilize internal and contracted transport resources of WM Upstream to operate the program. Contracted

transporters will meet all regulatory requirements and will maintain qualifications under WM Upstream’s rigorous vendor management system.

Because the components of Electronic Toys do not trigger the transportation of hazardous waste as defined by the Environmental Management Act, no hazardous transportation provisions will be required for Electronic Toys.

3.1.3 Processing

The pilot project identified the following material types that will need to be managed for Electronic Toys that cannot be reused.

The processing options and fate of recovered commodities for electronic toys is summarized in Table 4. Note that landfilling and incineration are not desirable options for recovered commodities. The commodity recovery target for Electronic Toys is 95%.

Table 4: Processing Options and Fate of Recovered Commodities

Toy Component	Processing Options	Fate of Recovered Commodities
Electronic Games	Manual disassembly followed by mechanical processing and material separation of commodities	Recovered metals smelted and used into new products
Internal Circuit Boards	Manual disassembly followed by mechanical separation of commodities	Recovered metals smelted and used into new products
Fabric from Plush Toys	Manual separation from other materials	Fabric sent for Energy Recovery
Batteries (Alkaline and Lithium)	Manual removal followed by mechanical processing	Recovered metals (Fe, Zn and Li) smelted and used into new products. Recovered carbon sent for Energy Recovery

Cables & Wires from Electronic Games	Mechanical processing	Recovered metals smelted and used into new products Plastic covering sent for Energy Recovery
Plastic	Manual disassembly followed by bailing	Generation of Processed Engineered Fuel through hydrous pyrolysis (R&D stage) or Energy Recovery
Other Ferrous and Non-ferrous Metals	Manual or mechanical processing	Recovered metals smelted and used into new products

The Electronic Toys program intends to utilize BC and Canadian businesses for the primary dismantling and processing of electronic toys. All primary and secondary processors will be required to meet the CBRSC's Operational Controls. Commodities will be sold for the highest and best use depending on local and global markets.

3.2 *Operational Controls*

The CBRSC will ensure that WM Upstream develops Operational Controls for the collection locations, events, transportation networks and processing facilities as part of its ISO 9000/14001 certification.

Electronic Toys do not meet the criteria of Hazardous Waste as defined by the Environmental Management Act/Hazardous Waste Regulation and as such there are no regulatory storage or transportation requirements.

There are a variety of Occupational Health and Safety requirements that will need to be integrated into the Operational Controls for processing facilities. These OHS requirements will be reviewed for each jurisdiction and incorporated in the Operational Controls.

3.3 *Environmental Footprint*

The CBRSC intends to track the environmental footprint of its stewardship program by estimating the carbon footprint of the collection, transportation and processing of Electronic Toys.

Once the baseline information has been collected in the first year of the program, the CBRSC will benchmark the programs Environmental Footprint and develop strategies to minimize the environmental footprint of the collection and transportation and processing programs.

3.4 Consumer Awareness

Because the stewardship of electronic toys is a new and unique program, the CBRSC intends to undertake a comprehensive consumer awareness program. The consumer awareness will include:

- Consumer surveys to quantify the awareness of the program and the products included in the program;
- Identification of target audiences and the most effective method of communicating the awareness of the program;
- Pioneer the use of social networking and schools to drive awareness and the recovery of electronic toys.

In addition, the CBRSC intends to work with the Producers, Retailers and Greenopolis (a subsidiary of WM - www.greenopolis.com) to develop an effective awareness program for children that not only promotes the recycling of electronic toys but teaches the benefits of recycling to children.

3.5 Monitoring and Auditing

During the CBRSC's consultation with Producers, one of the key needs was access to the recovery data and being able to perform timely analysis about environmental, social and economic performance. The CBRSC intends to employ the advanced data and analysis tools of Waste Management Upstream to provide insight to develop and execute sustainable strategies (see Section 3.2 of the Stewardship Plan for more details).

In addition, the CBRSC will develop customized internet based "dashboards" to help understand and continuously monitor and communicate the status of the program. The dashboards will provide recovery and recycling information about all aspects of the recovered Electronic Toys. The dashboards will be posted on the CBRSC web-site.

Finally, the monitoring program will include the inspection of the various collection facilities, transportation networks and processing facilities using a risk management hierarchy developed by WM Upstream. See Section 6.4.3 of the CBRSC Stewardship Plan for more details regarding audit and risk management procedures that will be used.

3.6 Funding

3.6.1 Administration Fees

The CBRSC will utilize a base fee costing for Producers within the Stewardship Program that covers program administrative costs.

3.6.2 Processing Fees

The operational costs of collection, transportation and processing of Electronic Toys will be fully funded by members of the Program through eco-fees levied either at the consumer level or the wholesale level.

The fees for Electronic Toys will vary depending on a fair cost structure system that includes the following criteria:

- 1) weight;
- 2) volume;
- 3) ease of dismantling;
- 4) hazard rating of materials;
- 5) value of recovered commodities.

Future enhancements of the program will include incentives for environmentally designed products.

Producers will be obligated to pay the fees starting July 1, 2012 and the fees will be negotiated between the Producers of Electronic Toys, WM Upstream as the Service Provider and the CBRSC as the Stewardship Agency.

Costs associated with managing obsolete or orphan products will be borne by the members in this Stewardship Program.

Activities in advance of fee collection (such as developing the plan, establishing the collection network, assessing qualified processors and developing the communication strategy) will be initially borne by the CBRSC and WM Upstream and then repaid from future program revenues from Electronic Toy Producers.

Non-CBRSC Member Electronic Toy Producers with product currently in the market place will be responsible for paying retroactive fees back to the start date of the Stewardship Plan plus any membership fees required by the Canadian Toys Association. New Electronic Toy Producers who have no history of selling toys in British Columbia will not be charged retroactive fees.

3.6.3 Reserve Fund

The Electronic Toys Program proposes to accrue a reserve fund. The amount of the reserve fund will be determined by the Board of Directors.

The reserve fund allows for stability of program funding in case of sale decreases, volume increases, fluctuations in operational costs or reduced revenue in the event that commodity prices decrease.

3.7 *Application of Pollution Prevention Hierarchy*

3.7.1 Reuse of Electronic Toys

The reuse of electronic toys for the CBRSC Stewardship Program provides several health, safety and regulatory challenges. First, there are a variety of health risks that stem primarily from the reuse of plush toys. These concerns include the spread of communicable diseases, bed bugs and head lice. Secondly, safety risks stem primarily through guaranteeing the used product still meets CSA or ULC or other safety standards.

Thirdly, and most importantly, toys are regulated in by the Canada Consumer Product Safety Act and the Toy Regulations (www.gazette.gc.ca/rp-pr/p2/2011/2011-02-16/html/sor-dors17-eng.html). Because toys are used by children that do not have the cognitive ability to assess the associated health and safety risks of toys, the Toy Regulations provide very stringent health and safety requirements that would apply to used toys collected by the CBRSC.

In conclusion, the CBRSC has a fiduciary responsibility to ensure that all Federal regulatory requirements are met if unwanted electronic toys collected by the program are reused by children.

3.7.2 Fate of Commodities

In all cases, electronic toys will be disassembled and the commodities recovered in their purest form in order to maximize commodity values

The CBRSC will use the Pollution Prevention Hierarchy and Zero Waste processing to ensure that the recovered commodities have the highest and best use. The commodity recovery rate for electronic toys is anticipated to be 95%

Recovered commodities will be moved up the Pollution Prevention Hierarchy depending on the recyclability of the material. A challenge identified in the Electronic Toy pilot project is that a high percentage of electronic toys are low quality, non-recyclable plastics and the only option on the P2 Hierarchy is energy recovery.

3.7.3 Collection, Transportation and Processing

The environmental footprint of the collection, transportation and processing components of the stewardship plan are also important in the design of an environmental program.

The CBRSC will use the Pollution Prevention Hierarchy to guide decisions relating to the environmental footprint of the collection, transportation and processing of electronic toys.

Initially, the CBRSC will focus on GHG emissions and the Pollution Prevention Hierarchy will be used to guide program decisions that will lower the GHG footprint of the collection, transportation and processing aspects of the program.

Section 4: Proposed Strategies & Actions

The strategies and actions for Electronic Toys are designed to implement the program and then continually improve and expand the program. Because electronic toys have never been stewarded in North American, this program will use the first two years to develop and refine a cost effective, efficient and Province wide recovery program. The remaining 3 years will focus on refinement of the program.

There are five strategies that the CBRSC will use in the first five years. The strategies and their actions are:

4.1 Administration and Management

The goal of this strategy is to develop a program that is efficient and cost effective that minimizes costs to the consumer.

Year 1 Actions:

- Establish data management systems, audit protocols and firewalls so that market share data and information is protected;
- Develop electronic reporting systems for retailers;
- Conduct collection material analysis to ensure all producers are participating in the program;

Years 2-5 Actions:

- Review costs of collection, transport and processing costs to generate efficiencies;
- Review options to up move recovered materials up the P2 Hierarchy;
- Review fee categories and definitions to ensure that they fairly represent the materials being collected and fees promote DFE;
- Promote “design for the environment” with CBRSC members.

4.2 Consumer Awareness

The goals of this strategy are to have consumers:

- aware of the electronic toy program,
- understand the options for re-use and recycling; and,
- where to find a return collection facility or event for their products.

Year 1 Actions:

- Conduct a consumer awareness survey in urban and rural areas of the province to establish baseline;
- Develop the communication strategy and materials for retail outlets, depots and events;
- Implement the communication materials that would include a website, RCBC hotline and Recyclepedia, materials for point of return, and materials at point of sale.

Year 2 Actions:

- Repeat consumer awareness survey to ensure Year 1 targets are met;
- Review and modify communication strategy based on experience and Year 2 consumer awareness survey results;
- Pilot community based social marketing projects;

Year 3 through 5 Actions

- Repeat consumer awareness survey to ensure annual consumer awareness targets are met;
- Prepare annual communication strategy based on previous years successes and most recent consumer awareness survey results;
- Integrate recycling information into Producer advertizing programs.

4.3 Comprehensive Collection Network

The goal of this strategy is to provide the public with a well-run network of collection options.

Year 1 Actions:

- Establish initial collection network using depots in the major cities;
- Develop operational controls and audit protocols for the collection network;
- Develop event programs for underserved communities.

Year 2 Actions:

- Increase size of collection network to ensure entire province has basic coverage;
- Audit existing return collection and processing facilities for compliance to operational controls;
- Expand event days to compliment depot network.

Year 3 through 5 Actions:

- Expand network of collection and event days to ensure rural areas have basic coverage;
- Evaluate and assess rate of collection, determine barriers that still exist and develop plan to capture remaining amount of backlog;
- Conduct collection site operator satisfaction survey and address any issues as well as waste audits using Greensquad methods to determine effectiveness.

4.4 Environmental Footprint

The goal of this strategy is to minimize the environmental impact of the products through product design, collection, transportation and processing.

Years 1 & 2 Actions:

- Develop metrics and baseline data for impacts of program;
- Analyse and track GHG impact.

Years 3 through 5 Actions:

- Publish program footprint and initiate sustainability initiatives to reduce GHG impact where possible;
- Evaluate effectiveness of program and develop reduction targets based on baseline after two years;

4.5 Program Performance Measures

The goal of this strategy is to develop, monitor and report the Performance Measures as outlined in the Stewardship Plan that provides meaningful and timely data and information to Producers and consumers.

Year 1 Actions:

- Establish data management systems, audit protocols and firewalls so that market share data and information is protected (same as Section 4.1)

Year 2 Actions:

- Start the development of performance criteria once baseline data has been collected;
- Start the development of dashboards for performance criteria as specified in Section 6 of the CBRSC Stewardship plan;
- Integrate dashboards into website for Electronic Toys.

Year 3-5 Actions:

- Evaluate effectiveness of dashboards and expand so that consumers can track their products through the collection, transportation and processing program.

Section 5: Stakeholder Consultation

This draft of the Electronic Toys Stewardship Plan (Appendix 1) will be used during the consultation with stakeholders. The results of consultation will be reviewed and the Stewardship Plan will be modified where appropriate. The final copy of the Stewardship Plan will be submitted to the Ministry of Environment for approval. The approved Stewardship Plan will be posted on www.cbrsc.ca website with progress updates.

Because the Stewardship Plan proposes visible eco-fees at the point of sale, the consultation will include direct consultation and outreach to the general public. In addition, the consultation will focus on local governments because they are responsible for residual management in the Province as well as retailers, brandowners and the environmental community.

There will be three main elements to the consultation. The first element is the posting of the draft stewardship plan on the CBRSC, the RCBC and the BC MoE websites combined with press releases and email notifications through various organizations (e.g., RCBC, Coast Waste Management, BC Product Stewardship Council etc). The draft stewardship plan will be posted for a minimum of 45 days and stakeholders are encouraged to review the document and submit written comments by email.

The second element includes the opportunity to attend a regional meeting with Stakeholders in Prince George, Kelowna, Surrey and Victoria. These regional meetings will be open to all stakeholders and the meeting will include a review of the elements of the Stewardship Plan and a discussion of stakeholder issues. Additional meetings will be scheduled if there is a strong demand for the consultation using a regional meeting format. The schedule and location of the meetings can be viewed at www.cbrsc.ca.

The third element will include a minimum of two webinars to allow stakeholders in the remote communities to attend a virtual meeting in the same manner as the regional meetings. Additional webinars will be scheduled if there is a strong demand for this format of consultation.

To ensure that stakeholders are aware of the opportunity to comment on the draft Stewardship Plan or attend a regional meeting or webinar, the CBRSC will undertake an awareness program that will include newspaper advertisements for the general public.

Finally, the following contact information will be used during the consultation:

www.cbrsc.ca; consultation@cbrsc.ca;
Malcolm Harvey, M E Harvey and Associates (604) 831-7203

Section 6: Producers within the Electronic Toys Stewardship Program