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To: **Honourable Barry Penner**

Ministry of Environment of British Columbia

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Re: Electronics Stewardship Program of BC

Dear Honorable Minister Penner:

I am writing this letter to express my deep concerns regard to Electronics Recycling Stewardship Program of BC.

1. BC has an electronics waste problem, but recycling of electronics has never been any problem. BC had a good, adequate and workable electronics recycling solution. The existing companies with market mechanism work well without public pay any recycling fee. On one hand, the existing recycling companies are not able to get enough used electronics for reuse and recycling and on the other hand ERSPBC tries to set up a monopoly program to solve a no problem's problem and create new problem.
2. ERSPBC takes the advantage of public concern and consciousness to the environment and purposely creates an e-waste recycling problem but never have a good plan of how to solve it. There is no scientific study and verified independently on electronics recycling industrial in BC to justify that BC need to force people to pay for recycling and even worse let one company to control the market through a so called and misleading governmental program. This program is greatly plotted for money making but poorly designed for environmental protection and recycling.
3. The excuse of ERSPBC using is that they want to stop the export of the e-waste because it goes to China to pollute their environment. To create the needed scenario, they keep using the

same video shooting made up almost 10 years ago, a small town of China called Guiyu are polluted by dismantling electronics scraps from Canada. In China, no small town like Guiyu gets so much attention from a couple of foreign groups of so called environmentalist , who travel back and forth, make up all sorts of stories, selectively use bias data from nowhere without any scientific verification, false reporting to authority to investigate, set up plot , sabotage their competitor , exaggerate the facts, making up scene of dirty and polluting activity, stretch and misinterpret the true definition and purpose of the law, constantly complain to all type news media and make all sorts of troubles for other companies in the electronics recycling business in Canada , All of these are for one object that is try to make somewhat a connection between what happened in their made up story about Guiyu and electronics recycling business in Canada , Why they are so much interested in what happened in other country but ignore the much more serious pollution problem created by them in Canada? Are they really caring about the people there ten thousand miles away? Is the e-waste problem their real interest or a just a pretext for other purpose? Obviously there is other purpose behind, it would be anything but definitely not for the environment either in Guiyu or Canada and not for the Chinese people in Guiyu who they care least or even at all.

4. All of these are because there is big money to be made back in Canada! Just in BC alone, there could be over 2000 million dollars opportunity to be made and enjoyed by those special interest group who have been trying to destroy other electronics recycling companies, become a monopoly in the market and collect recycling fees from the public. Who will be suffering? Publics who will pay for the recycling fees; Second hand market, who prolong the use of electronics product; less fortunate people, who not afford new and will not get used one any more either; environment which get more toxics from Dioxin and greenhouse gas in the air to solid waste and polluted water in the ground from the incinerator burning the electronics collected in BC and landfill as well as the developing countries who have to import more toxic more environment hostile ore concentrate material to generate more pollution and more greenhouse gas to obtain the necessary

resources which are vital for their manufacture industries and improving their living standard.

5. Even in that town, Chinese central government sent a task group to investigate the pollution issue of electronic recycling when reported first time by a foreign special interest group ten years ago, there finding is much difference. Comparing the total industrial output; the pollution caused mainly by recovering gold from the circuit board which is only taking about 2% of the total weight of electronics scrap is very small. It is almost 100 times less environmental cost compare to get same amount of the metals from ores concentrate imported from the mining companies of Canada.
6. The electronics used by Canadian people is considered high quality because our living standard is much higher than most other area of the world. Up to 60% can be sold as second hand electronics in the second hand market. Used TV and Monitors will take at least 40% in weight. There is only around 20% will be dismantled for raw material purpose; circuit board is only less than 2% in total weight of electronics scrap. Moreover there is little electronics scrap shipped from Canada to China in recent years, even that something getting into China from Canada would be very little compare the total amount recycled there. Canada probably is the least among all the industrial counties to export scrap material, let alone BC. Trying to put two things together is to deceive BC public to create a so called electronics recycling problem and then to collect environmental fee. This is not an environmental issue; this is pure business issue and competition done under the green face of environment.
7. News Media is just one of the tools for them to use to complete the plot. Recently CBC made another episode about electronics recycling in Canada and still using the same video shouting took almost 10 years ago as what happen today to cheat Canadian public to prove that BC still need to have a program to collect money from them. They are making news! They try to make what happen in China 10 years ago to relate to what happen in Canada today. They have the money; of course they afford to pay the media to make up anything to serve their purpose.

8. The fact is what they mentioned most as the one of the major possible pollutants “waste glass from CRT” is lesser the problem for pollution in that part of the world. Up to 90% of the used TV and monitor is tested, repaired and refurbished as whole for resell or the CRT tubes are refurbished to be used in manufacturing brand new TV. Even the broken glass of CRT is worth about 200 USD per Mt in the market of making new glass for electronics bulb manufacture. Nothing left as waste for landfill. Where is the pollution? What a joke? They are so dare to tell lies and the funny thing is our governmental even support this open liar.
9. For BC government so quickly rushing into a letter to endorse a program as such without enough public and professional consultation is improper. This is not a serious and responsible attitude to work with BC public interest and their money. Especially the program has no way to handle e-waste but sending the material to incinerator which is the worst way to processing e-waste of which will generate great amount of Dioxin, heavy metals and greenhouse gas to the surrounding environment of BC. The result is that we as Canadian will pay to pollute ourselves.
10. The nature of electronics recycling is just a series of steps of disassembling and selection. There is not much sophisticated technology involved and processing is not much more hazardous at all then any other assembling process in the new manufacture, except it looks disorder. The ESRPBC make the impression that the electronics recycling need very high requirement to work with so nobody can meet except their own people, even the most simple thing dismantling that they choose not doing because compare to incineration others are all more expensive. The electronics recycling fee is already in their pocket and not related to the outcome of the recycling, they spend less money on the recycling end will leave more money in their own pocket, no wonder incineration is their choice, simple and less money spend.
11. What ESRPBC wants is getting 100% of the market and collects 100% of the fee but only does a fraction of the showcase work, to the best 20% of the e-waste. And worst is even this number will getting to smaller and smaller, they discourage any body to participate the program because they do not want to increase the e-

waste collection, they collect less e-waste, and they will pay out less money to the collector. All their interest is to increase the collection of the fee. What will happen to the rest of e-waste still going to the landfill, they does not care about anymore, because they already got the recycling fee, there is no incentive for Encorp to either collect e-waste or recycling them. Environment looks like the last thing they are caring about.

12. The program implies that it is a governmental program and the fee is a type of environment tax collected by a private company and is mandatory when purchasing new items. Anybody buying new electronics has to pay, what is their calculation and mechanism to relate the cost of recycling used electronics to the charge of fee on the new item purchase? What is the control mechanism? How much collected? how to spend, where to spend, who to spend, all of these are decided by themselves, nobody know and nobody can ask, basically they do whatever they want ; you do not have a choice. The method used by ERSPBC and Encorp is unfair, misleading, and non-transparent, monopoly and unethical in manipulating the government, public and the electronics recycling industry. Many of our customers called us to complain the so called recycling fee when they purchase new electronics items which is almost as high as they pay for GST, when told the fee is not a tax collected by government and is on voluntary base, they are all taken by surprise and shocked especially after they paid all the fees, they still cannot find a place to recycle their used ones, some people has to drive around five to six locations to try to get rid of their old electronics and at the end they were told nobody recycle for them except come to us (electronics-recycling.com) location to do for them but we are not one of ERSPBC.
13. ERSPBC indicates in their program the cost to recycle is close to 1000 dollar per Mt, under their assumption that they will easily collect over 5000 million dollars under the program each year . The worst thing is that they charge the new items you are purchasing which have nothing to do with recycling cost; it is just name for them to use to cheat., the more money they collected the worse to the recycling, , if they collect less electronics waste and send less to the incinerator, they will have more to keep in their

own pocket. Can you see any incentive for them to do more recycling? How clever is the game designed!

14. The composition of the ESRPBC is mainly from large electronics manufactures and retailers such as Panasonic, SONY, Future Shop and Best Buy etc. their interest is to promote sales of new product by destroy the used one at the same time let consumer to take the burden of recycling. The so called “who manufacture and who will responsible for recycling” become “who purchase who responsible” in the program and even worse that all the recycling fee gone to one company who doing little of recycling.
15. David Betts, The president of ESRP of Canada, who pushed setting up the e-waste stewardship program, after the program in Albert started, got out of ESRP and find himself in “e-cycle solutions”, the Albert e-waste recycling company who is the biggest beneficial from the program. All he did for ESRP is finally paid off.
16. Joyce Thayer, the person working in ESRPBC, has no education in environment, no knowledge in electronics recycling business, no background whatsoever related to electronics recycling, now sit in the ESRPBC office, when called, asked question, all her answer is “NO. I don’t know”. She is just a puppet working in the front, the real people behind is the same people benefit from this program, who is Encorp. They just try to get a program going to benefit themselves.
17. It is a well know principle in the world of recycling electronics that is to promote the reuse as the first option. However in this program they not only not promote the reuse but even leave no possibility for reuse. It is designed to destroy the second hand market. It puts the responsibility to the people having the used electronics to find the reuse market themselves. Their logical is “a person who had a computer and does not need it, he has to find a reuse himself, if he cannot find someone himself for the reuse that means the computer is waste”. Make everybody a second hand electronics dealer!
18. This program destroys second hand market and damage the interest of less fortunate people or the interest of the people need second hand product. It is against the principle of reuse as the first choice

of recycling electronics. Destroying a second hand market is very irresponsible to the society, environment and nature resource. It will only waste more energy, resource and create more pollution and greenhouse gas in the process of manufacturing new product. It seriously affects the right of the less fortunate people accessing technology, information as well as education. First they increase the sale of new product by destroying second hand market, so the large electronics companies love it. Second, they stick their hand in our pocket to dig money for recycling fee themselves; third, they got all the recycling material free which can be resold for high profit, fourth they eliminate all other companies in the business of used electronics and recycling. This program is a crime against poor people, a crime against environment and a crime of playing money game of cheating publics.

19. The so called local processor such as “Free Geek” actually is just a primary disassembling process. For example, to a computer, what they do is to separate it into several parts: steel case, flop disc driver, hard disc drives, power supply box, CD ram driver, circuit board, plastic and wire etc., and then gather same kind of items in a super bag or gay load box, then sell to a others and eventually all the stuff ended to overseas destination. What is the difference between a whole computers and disassembled computer? All the parts are there the same. However they call this recycling and ask public to pay for it. However after dismantling, nobody question anymore, they already have the excuses to collect the recycling fee in the name of environment protection, they used name once and served their purpose; afterwards whether the recycling is real or false, they do not care anymore.

20. Even if BC need a collecting system, the system shall based on the current electronics recycling company’s facility and the companies who are in the second hand or new product retail store, BC has over a hundred of electronics second hand stores and over thousand of retail stores, all has knowledge and facility and related in the electronics business. A system base on these will have more coverage, they all related to electronics product sale or handling, more experienced, has the knowledge and know-how, has adequate facility and trained people, used to handle electronics item, has the technology and equipment to identify and sorting the products.

Like battery recycling program shall be a collecting system with the auto repair shop system and auto industrial. Tyre recycling shall be collected with a tyre change and repair system. This program expelled the right of all of those existing electronics businesses to participate and even deprive of their rights to stay in the business. Why we do not let the free market economy working for electronics recycling program. Why we have to only point one company to control the market?

21. The nature of electronics product and bottle is totally two different things; bottles are small in size and uniform in material, after used, there is little second hand value, has to be disposed of or recycled, but used electronics is durable goods, using it once will not make them doomed go to recycle path. Electronics scrap is more complicated than any existing recycling items, just take used TV as an example, there are many types from CRT to projection, from plasma to liquid crystal, there are so many sizes, from over 100 feet large to 9 inch small. Over few hundred type of material made of from wood to glass, from metal to plastic.
22. BC needs a system specially constructed for electronics recycling just like for battery, tyre and oil. However ERSPBC give the right to Encorp the only company can collect the used electronics who has nothing to do with the industry of electronics retail, repair, and manufacture, resale and reuse and recycling, and has no training, no previous experience and no business relation in the field of electronics, all they have is a used bottles recycling which is total different with the used electronics. We know our former financial minister now is working in Encorp, Is this just because of political connection or actually secret deal in the back?
23. It is not proper to charge on the new electronics product recycling fee for recycling the used electronics. There is no relation between the new purchaser and old disposer. There is no relation between the new product and old product. How does a fee specialize in purpose actually not quantified to its application? It is not fare for someone buy new electronics product be hold responsible for old product other person enjoyed and used and maybe can give to another person as second hand to continue using for many year. Even there is a fee need to be charged shall be on the item to be

recycled unless this is tax revenue that government needs to have for totally public spending in a general revenue reservoir. Make the service fee charge on new for old is also a mechanism to blur and confuse the public thinking and fund management.

24. By now after one year the programs started, the program in every way has been failure except that their system of collecting money is excellent. Even in bottle collection depots only a few sites are willing to participate, they have to use Salvation Army to collect for them; If Encorp at first place is incapable to work with this program, why BC governmental approve a program as such and allow the entire program to work as a monopoly.
25. BC publics should not pay 1000 and 1000 millions of dollars each year for something based on media report artificially made up by special interest group. This program only makes BC e-waste problem worse, they destroy the current market system but they do not know how to do themselves. They collect the entire recycling fee but put 80% of e-waste to landfill which before are handled by other companies who are now destroyed by this program. They only made the problem worse and make the market chaos and confused.
26. ERSPBC program is not a good and professional plan and is fundamentally wrong in its purpose and planning. Any people with a logical thinking will be able to see it is completely a money game and a program with purpose of serving special interest and market strategy. There is nothing to do with environmental protection. Let such a program approved and started by Encorp is even more a mistake. There is no justification either economically, politically or /and environmentally for BC to have a program as such. Electronics recycling stewardship program could be one of the well plotted money game in BC history.
27. ERSPBC benefits few companies, rip of f public, create monopoly, destroy free market and protect no environment. BC public as the passive participator has a right to know the truth and the complete story about the whole game. Thing is not always looks like what shows on the surface, even though “green face” is a nice cover to camouflage the real purpose. It is time to reveal it. Do not let it

become a hypocrite's money game under the green face.
Environment and resource should be a win-win game that is we all
should fight for, for us and for our next generation.

Yours Truly,

Edward Wu