



### **The Electronic Recycling Association**

1301 34 Ave SE  
Calgary, AB T2G 1V8

Oct 10th 2018

### **Basel Action Network**

206 First Ave S. #410  
Seattle, WA 98104

FAO Jim Puckett,

This is an open letter, drafted to express the Electronic Recycling Association's (ERA) vehement objection to and disagreement with the recent document released by BAN, entitled "**Export of e-Waste from Canada**", dated Oct 10<sup>th</sup> 2018.

While this letter will go on to comment on numerous specific aspects of the BAN document below, the short form of the ERA position is that the document – while masked as some sort of independent report – is a poorly veiled attempt to bring the 14 year+ history and reputation of the ERA into ill repute. Any truly objective reader of BAN's document will clearly note:

- Numbers and percentages erroneous in nature, from both methodology and conclusion standpoints, cited in an attempt to draw the reader into conclusions forgone by BAN and which are based on the personal views of Mr. Puckett.
- Attempts to inflate the numbers/percentages referenced above through questionable classifications and/or interpretations of some of the key matters involved.
- The ERA was clearly the specific target of this BAN undertaking. That very element of prejudicial bias – when combined with the document's repeated inclusion of personal viewpoints, selective data attributes, a "methodology" largely absent of appropriate diligence etc. etc. – clearly renders the real message of this document to be unsubstantiated.
- Timeframes and other offered information far removed from the expressed intent of the document and well outside of the parameters the document itself states – rendering the relevancy of their inclusion questionable at best, and probably intentionally misleading.

The ERA (holding ISO 9001:2008 Certification) has, does and always will represent themselves as a prominent and growing Non-Profit Organization whose core focus is to reduce unnecessary adverse environmental impact associated with the premature retirement of electronic and IT equipment. The ERA is keen to see equipment used through to true end of life wherever possible, and donations to other Non-Profits, Community Groups, Educational Organizations and innumerable others represents a significant portion of this "reuse" activity.



Simply perusing the ERA's many digital entities (website, social media etc.) at any given moment will demonstrate many of these activities. The ERA is the recipient of many "Thank You" messages from various Community Leaders nationwide, have had many of their initiatives publicized on various major news media outlets. The ERA are repeatedly invited to speak to schools, companies and other organizations on the topic of E-Waste and related considerations.

In regard to Data Security, the ERA holds regular and publicized events with various Law Enforcement agencies and handles data destruction requirements for some of the most sensitive organizations in the country.

The ERA is proud of the positive impact they have and continue to compel, and take offence to the attempt of BAN to turn wider opinion against them. Today's world is highly globalized with increasingly complex supply chains. While the ERA makes every effort to improve procedures in all areas, it is with regret to note any instance which may have escaped their immediate control. This is an area which will be a never-ending element of focus, the same with their industry peers – or even the multinational OEMs themselves.

The ERA objects to the BAN document and will take whatever measures available to them to respond in kind. What follows the conclusion of this letter is a non-exhaustive closer look at some of BAN's claims – and corresponding ERA counters.

Sincerely,

The Electronic Recycling Association



## ERA Commentary on Inaccurate Elements of BAN Document: “Export of e-Waste from Canada”, Oct 10<sup>th</sup> 2018

### A. (from page 1 of report; “Executive Summary”)

*“Of the 43 trackers deployed at Canadian electronics recyclers and collection sites, seven (7) of the 43 (16%) were exported out of Canada. Of the exported tracked scrap equipment four of seven (57%) went to developing countries -- three to Hong Kong and one to Pakistan. The other exports went to developed countries, one to Germany and two to the United States.”*

1. Based on the figures above, 9% of the tracked items ended up in “developing countries” (as per BAN’s classification which the ERA disputes, see point 2 below); the use of the “57%” statistic seems (intentionally?) sensational and misleading.
2. How is Hong Kong a “developing country”?:

#### **Hong Kong, China (SAR)’s HDI value and rank**

Hong Kong, China (SAR)’s HDI value for 2017 is 0.933 — which put the country in the very high human development category — **positioning it at 7 out of 189 countries and territories. The rank is shared with Sweden.** Between 1990 and 2017, Hong Kong, China (SAR)’s HDI value increased from 0.781 to 0.933, an increase of 19.4 percent.

#### **Human Development Index (HDI)**

The HDI is a summary measure for assessing long-term progress in three basic dimensions of human development: a long and healthy life, access to knowledge and a decent standard of living.

[http://hdr.undp.org/sites/all/themes/hdr\\_theme/country-notes/HKG.pdf](http://hdr.undp.org/sites/all/themes/hdr_theme/country-notes/HKG.pdf)

#### **“Hong Kong crowned world’s most competitive economy, beating Singapore”**

Thursday, 01 June, 2017, 11:28am

In its latest annual report, the Swiss business school ranked Hong Kong first out of 63 economies based on four indicators: economic performance; government efficiency; business efficiency; and infrastructure. Switzerland placed second, followed by Singapore. **The Lion City overtook the United States**, which placed third last year.

<https://www.scmp.com/news/hong-kong/economy/article/2096456/hong-kong-crowned-worlds-most-competitive-economy>

If one were to (understandably) remove Hong Kong as a destination representing a “developing country” – then out of the 43 trackers, 1 ended up in a developing economy, or 2.3%.

**2.3% is a far less sensational number than the 57% provocatively used in BAN’s document.**



**B.** (from page 13 of report; “What we Found Out -- By the Numbers”)

*“Of these, deployments 7 (16%) were exported, 4 (9.3%) moved to a Canadian Recycler, 6 (14%) likely moved to a Canadian Recycler, 1 (4.3%) moved to a landfill, 15 (34.9%) moved to an unknown location, and 10 (23.25%) never moved from the place they were deployed. One device is still reporting.”*

1. Based on the numbers above – **58.25%** of the tracked items have not been moved, or their movement cannot be verified (ref: “unknown location”). In other words, **over HALF of the trackers have resulted in inconclusive findings**. Any reasonably objective reader would thus question the entire conclusions of the document.

**C.** (from pages 13 to 22 of report; “Methodology” & “Trackers Deployed”)

1. On page 13 of BAN’s document, it is stated: *“In this report, we have endeavored to cross reference our tracker enabled device deployments with the EPRA and ARMA programs... In 2017, between March and August, the Basel Action Network (BAN) deployed 43 trackers across Canada.”*

Clear and pronounced bias associated with the methodology employed in BAN’s undertaking. **The ERA was a target location for BAN trackers 5 times - or nearly 12% of total**. The next most frequent target of BANs efforts was Best Buy Canada – **and they were targeted only 2 times, or 4.5% of total**. In the interest of objectivity, the ERA reasonably asks why they were targeted far more than any other destination - and well over twice as often as the next in line, Best Buy? Best Buy operates 184 locations in Canada:

<https://stores.bestbuy.ca/en-ca/index.html>

2. On page 14 of BAN’s document, it is stated: *“The study was designed to be random and rely heavily on the government/EPRA/ARMA websites that a consumer would likely find and use.”*

As outlined in point C 1 above – the ERA was targeted 5 times. All other organizations were targeted by BAN trackers once each, aside from Best Buy and FCM who each were targeted twice. How is that “random”?



From Page 16 of BAN's document:

## Trackers Deployed

Below is a comprehensive list of all the trackers deployed in Canada between March and August 2015. Approved Depot column cross-references the following programs:  
British Columbia: <https://www.recyclemyelectronics.ca/bc/where-can-i-recycle/>  
Alberta: [https://www.albertarecycling.ca/recycling-depots/?city=Edmonton&postal\\_code=&type=el](https://www.albertarecycling.ca/recycling-depots/?city=Edmonton&postal_code=&type=el)  
Saskatchewan: <https://www.recyclemyelectronics.ca/sk/about-us/>,  
Nova Scotia: <https://www.recyclemyelectronics.ca/ns/about-us/>,  
Manitoba: <https://www.recyclemyelectronics.ca/mb/about-us/>,  
Ontario: <https://www.recyclemyelectronics.ca/on/>,  
Quebec: <https://www.recyclemyelectronics.ca/qc/where-can-i-recycle/>

Of ALL the BAN-provided web links in their document (as per screenshot above) – **the ERA appears on NONE of these directories. Zero.**

Staples seems to – by far – have the most number of collection points cited across all the web links...though they were not targeted by BAN...not even once. Again, **the ERA is targeted FIVE times.**

How is this “random”? How is this even remotely reflective of what “a consumer would likely find and use”?

3. On pages 16 to 22 of BAN's document, the apparent tracking activity is tabulated in a table view with various columns. As per the example screenshot below (the manner of data classification referenced continues through to the end of page 22)...BAN appears to be attempting to influence reader opinion against the ERA, unreasonably so.

The ERA is not an “Approved Processor”, as they are not a “Processor” at all. This is consistent with all history, current and future external messaging. The ERA is similar to Best Buy and CRD in this regard.

BAN seems intent on distinguishing the ERA from their other Non-Processor peers however. Where Best Buy (and all other Non-Processors through to page 22) have a “N/A” classification – which seems to infer “Not Applicable” – the ERA simply has “No” documented in the same column, throughout pages 16 to 22.



**Why?** This appears to be clear intent on BAN's behalf to knowingly influence reader opinion against the ERA...on the topic of a moot point...which would not be clear to a reader unless they were reasonably immersed in this sector specifically. Surely this is clear to BAN however?

Tracker Number	Deploy Site	Province	Deploy Date dd-mm-yr	Approved Depot	Approved Processor	Certified	Dev Typ
BC 135389	Best Buy Victoria 3450 Uptown Blvd #200 Saanich, BC	British Columbia	29-03-2017	Yes	N/A	N/A	LCD
BC 135686	CRD Hartland 1 Hartland Ave, Victoria, BC	British Columbia	29-03-2017	Yes	N/A	N/A	Prin
BC 335335	ERA 11280 Twig Pl. Unit 125, Richmon d, BC	British Columbia	28-03-2017	No	No	None	CRT

**D.** (from pages 23 to 35 of report; "Exported Trackers in Detail")

1. BAN makes a point of declaring: "**Certification: None**" when citing the ERA. The ERA holds no certification such as R2 or otherwise – as they are not applicable to the nature of ERA's operations. The ERA does not directly process equipment gathered. The primary focus of the ERA to avoid unnecessary/premature adverse impact associated with electronic and IT equipment by exploring reuse or redeployment opportunities wherever possible first. For that equipment which is at "true end of life", it is moved on to accredited recycling facilities for subsequent processing in accordance with EPRA standards.



This has, is and always will be the focus of the ERA and is completely consistent with past, present and future external messaging.

**E. (from pages 36 to 42 of report; “ERA: Canada’s Prolific Exporter”)**

1. In the interest of determining objectivity associated with this BAN document, the ERA rightfully asks why such a significant portion of the report is dedicated to one particular organization, when 31 organizations in total were targeted by BAN’s tracking devices?
2. *“Our study has identified one organization responsible for 75% of the tracked devices that moved from Canada to developing countries.”*

Again, the ERA highlights the use of an (intentionally?) sensational and misleading statistic on BAN’s behalf. As previously cited, 1 item ended up in a developing country (Pakistan).

3. *“They had a relationship with a former Vancouver e-waste recycler known as PC Max -- a company from which we had also documented significant exportation... **We believed** PC Max was another channel through which ERA exported large volumes of e-scrap to Asia.”*

The ERA objects to BAN citing an unsubstantiated personal belief in a document which – despite clear bias – seeks to pass itself off as objective and data-driven.

4. *“ERA Vancouver Container Exports: Observed 2018-2013”*

The ERA points out that this is clearly a misleading, and frankly, irresponsible presentation of BAN’s “facts”. The headline of this table clearly states a timeline representation of “2018-2013”, yet the last date cited in the tables was “2013-02-24”. ***If February 24<sup>th</sup>, 2013 is the last date cited on this table – why the stretch to 2018 in the table title?***

Not only is this a clear indicator of bias, it is a clearly an intentional attempt to influence the reader’s opinion to conform to BAN’s apparent personal distaste with the ERA.

What is the relevance of citing data which has a date range covering “2008-05-18” to “2013-02-24” – in a report purporting to disclose the findings of activities undertaken “*In 2017 between the months of March and August*”, as stated in the Executive Summary?

5. *“...threatened BAN volunteers photographing his property and later sent people to confront and intimidate the volunteers with large dogs.”*

The ERA has not nor currently does not employ the use of guard dogs, nor are there any dogs around of any intimidation capability. Nor are any “large dogs” owned by any ERA staff that would have been or are present with them at work at any ERA property or



facilities. There was “Snoopy”, an aging (yet sweet faced) Labrador Retriever who would consistently nap at the Calgary facilities – until he had to be put down due to old age/chronic pain in 2015. There is also “Yogi” who can be found at some facilities from time to time, though the suggestion that he is intimidating is indeed quite a stretch:

