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Extended Producer Responsibility: Part A

*A Foresite White Paper Series on The Environmental Policy
Principle that is Re-Shaping Manufacturing*

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July 2010

Introduction

Environmental laws in the late 20th and early 21th century have been marked by the emergence of regulations designed to mitigate and control the environmental impacts of products and place the burden of responsibility on the producers of those products. The driving force behind this proliferation of Extended Producer Responsibility (EPR) legislation (also known as Product Stewardship) has come from growing public awareness and concern over the impacts companies and the products they produce have on human health and the environment. The concurrent globalization of the market has placed increased costs and responsibilities on producing/importing companies, as local legislatures have adopted diverse compliance standards that can vary between different countries, states, or even cities.

This survey provides an overview of the legislative frameworks for extended producer responsibility in diverse localities for which compliance is a requirement for sustained local market access. The survey then offers guidance on steps companies are taking to best position themselves to initiate sustainable business strategies that will have a positive impact on bottom line profitability. Due to the scope and size of the project, the jurisdictions covered by the global EPR survey will be evaluated and released in sections for ease of review and in an effort to increase readability.

Part A of this survey will be dedicated to electronic waste (e-waste) laws in the major North American markets. EPR regulations in the United States and Canadian Provinces are reviewed and corporate strategies to meet the highlighted requirements are examined in the following material. Mexico has not presently adopted EPR e-waste laws and several smaller North American markets are not within the scope of this review.

North American Electronic Waste Laws

A. The United States

As of June 2010, the United States of America has not adopted a uniform policy toward the disposal and recycling of electronic waste through a uniform EPR regulatory scheme. Accordingly, as is often the case, individual states have stepped in to fill the void by adopting state specific legislation designed to manage electronic waste. The following provides a brief summary of Foresite's latest survey of the legislation within the individual states. Notably, this list and all following lists are meant to serve exclusively as an initial reference tool and are not designed to serve as legal advice, nor is the accuracy of the content validated, as new regulations are proliferating rapidly.

Arkansas

Arkansas passed legislation in 2007 that imposes landfill disposal fees on solid waste to fund an e-waste recycling program. The law authorizes the Arkansas Pollution Control and Ecology Commission to establish controls on the disposal of electronic devices in landfills. However, administrative controls have yet to be put into force.

California

The California Advanced Recycling Fee (ARF) program was implemented in January 2005 and applies to the sale of TVs, monitors, laptops, and portable DVD players. The program is funded by consumers who pay a recycling fee at the purchase of products, which is turned over to the state to pay for recyclers. Consumers and businesses are entitled to make use of this recycling program without cost and recyclers submit receipts from the collection of items to the state and are then reimbursed. In addition, California has a landfill ban in effect which applies to Cathode Ray Tubes (CRTs), TVs, monitors, computers, printers, VCRs, cell phones, telephones, radios, and microwave ovens. California has implemented a cell phone recycling law, which took effect in July 2006.

Colorado

Colorado passed an e-waste bill in 2009 that authorized the Colorado Department of Public Health and Environment to create a task force on researching electronics recycling in order to make legislation recommendations related to e-waste extended producer responsibility legislation.

Connecticut

Connecticut passed an e-waste law in 2007 that covers desktop or personal computers, computer monitors, portable computers, printers, CRT-based televisions and non-CRT-based televisions. Regulations went into effect on June 1, 2010, which require municipalities to arrange for the collection of materials, which are transported to recyclers. Recyclers then bill manufacturers for collection, transportation, and recycling costs. In addition, a disposal ban is slated to take effect on January 1, 2011, whereby all covered devices cannot be disposed of in landfills.

Georgia

The Georgia Senate passed a resolution to create a senate study committee to make recommendations for an e-waste EPR law by Dec 15, 2009; however, the committee was not appointed as of our last legislative review.

Hawaii

Hawaii passed an e-waste law in January 2010 that covers TVs, computers, computer printers, computer monitors, and portable computers with a screen size greater than four inches measured diagonally. Under the legislation, television and computer manufacturers must pay an annual registration fee and submit plans to the Hawaii Department of Health for product take-back and recycling programs.

Illinois

Illinois passed an e-waste law in January 2010 that covers computers, computer monitors, TVs, and printers. Manufacturers must register with Illinois Environmental Protection Agency (IEPA) and meet an annual recycling/refurbishment goal set by the IEPA. In addition, the law implements a landfill ban on covered electronic devices that takes effect January 1, 2012.

Indiana

Indiana implemented an e-waste law in April 2010 that covers computers, peripherals, fax machines, DVD players, video cassette recorders, and video display devices. Manufacturers are required to register with the Indiana Department of Environmental Management, and are responsible for the collection and recycling of covered electronic devices proportionate to at least 60 percent by weight of their sales. In addition, the law implements a disposal ban that takes effect January 1, 2011, which prohibits households, public schools, and small businesses (with 100 or fewer employees) to mix unwanted covered electronic devices and any other computer, computer monitor, printer, or television with municipal waste that is intended for disposal in landfills or incinerators.

Kentucky

Kentucky has a pending e-waste bill that applies to TVs, and would require manufacturers to implement a recycling program and pay a registration fee to the Department for Environmental Protection. The pending legislation would also require the Environmental and Public Protection Cabinet to establish a working group to study the effects of a ban on electronic waste in landfills.

Maine

Maine implemented an e-waste law in January 2006 that covers computer central processing units, CRT devices, and video display devices with a screen greater than four inches measured diagonally, including digital picture frames. The law was amended in 2009 to include desktop printers and video game consoles to the list of covered devices. Under the law, producers pay a fee for the transportation and recycling, producers and municipalities share e-waste collection costs, and consumer households can make use of a free recycling program. The 2009 changes establish manufacturers' responsibility for recycling on a market share basis, which went into effect on January 1, 2010, and require manufacturers to pay an annual registration fee beginning July 1, 2010. In addition, a landfill ban on CRTs has been in effect since July 2006. Subsequently, Maine implemented a cell phone recycling law, which took effect January 1, 2008.

Maryland

Maryland passed an e-waste law in January 2005 that created a 5-year pilot program that covers computers and video display devices with a screen greater than four inches measured diagonally. The legislation was amended in 2007 to increase the fees that producers pay to the state, which is used to reimburse counties via grants for e-waste recycling programs. Manufacturers can reduce the fee paid to the state by creating their own take-back program.

Massachusetts

Massachusetts presently has pending e-waste legislation covering CRT devices, computers, laptops, monitors, printers, fax machines, video game console, video cassette recorders/players, digital video disk players, zip drives, external hard drives, scanners, and TVs. In addition, the state has a landfill ban that has been in effect since April 2000, which bans CRTs from disposal.

Michigan

Michigan's e-waste law took effect in April 2010 and covers computers, laptops, monitors, and video display devices with a screen larger than four inches. Printers will fall under the scope of the legislation beginning in April 2011. The law requires manufacturers and e-waste recyclers to register with the Department of Natural Resources and Environment. Manufacturers must pay an annual registration fee and implement a free take-back program for households and small business (with 10 or fewer employees). Additionally, there is an advisory committee that is reviewing whether a landfill ban of e-waste should be introduced.

Minnesota

Minnesota's e-waste law was passed in May 2007 and covers computers, peripherals, fax machines, DVD players, video cassette recorders, and video display devices. Under the law, manufacturers must register with the state, pay an annual registration fee, and are responsible for the collection, transportation, and recycling of covered devices. In addition, a landfill ban on CRTs has been in effect since July 2006.

Missouri

Missouri passed an e-waste bill in June 2008 that requires manufacturers of computers and monitors to create recovery plans, submit those plans to the Department of Natural Resources, and implement those plans by July 2010.

Nebraska

Nebraska has a pending e-waste bill that covers household computers, monitors, TVs, and video display devices, and requires manufacturers to pay an ARF for covered devices sold to

households and businesses within the state. Under the pending bill, manufacturers would also be required to implement a take-back program for covered devices at no cost to the consumer.

Nevada

Nevada passed an e-waste bill in 2009 that requires the Nevada Division of Environmental Protection to conduct a study on electronic take-back programs and issue at least one recommendation to the Legislature, when it reconvenes in 2011.

New Hampshire

New Hampshire has a landfill ban prohibiting the disposal of video display devices that was revised in June 2009 to include video display media recorders, players, and computers.

New Jersey

New Jersey implemented an e-waste law in January 2010, which covers desktop or personal computers, computer monitors, portable computers, and TVs. Manufacturers are required to register with the Department of Environmental Protection and pay an annual registration fee. Beginning January 1, 2011, the law requires producers to pay a fee for the collection, transportation, and recycling of e-waste and funds a free recycling program for consumers. In addition, New Jersey has a landfill ban of covered devices that takes effect in January 2011. A bill is presently before the legislation that would expand the scope of the regulation further to include additional electronic devices.

New Mexico

New Mexico passed an e-waste bill in February 2008 directing the state and an independent panel to make recommendations for state electronic purchasing and recycling by December 1, 2009. The bill applies to state owned electronics only. The report and recommendations were released in September 2008, which recommended that the Department of Information Technology (DoIT) and the Purchasing Division of General Services Department (GSD) adopt written electronics recycling policies for all state agencies, and that an evaluation for compliance of such policies be implemented after 2 years.

New York

New York has in force a Wireless Recycling Act, which requires cell phone providers to accept up to 10 cell phones from any consumer for reuse or recycling at no charge to the consumer. New York has also passed an e-waste law that covers computers, laptops, monitors, TVs, small electronics (portable music player, VCR, DVD, DVR, digital converter box, cable or satellite receiver, video game console), computer peripherals (printer, keyboard, mouse, fax, scanner) and attached cables, cords, and wiring. Consumers can recycle their electronic waste for free with the fees generated by the law once the law takes

effect on April 1, 2011. The law also makes it illegal for individuals to dispose of electronic waste at landfills, effective January 1, 2015.

North Carolina

North Carolina has an e-waste law that went into effect on January 1, 2010, which covers TVs and computer equipment, including desktops, laptops, monitors, and peripherals. In 2011, the state is anticipating to add printers. TV and computer manufacturers pay a fee for the transportation and recycling of the waste that compensates municipalities for setting up and operating e-waste collection sites. In addition to the e-waste law, a disposal ban will take effect on January 1, 2011, which prohibits the disposal of discarded TVs and computer equipment in landfills or incinerators.

Ohio

Ohio has a pending bill that covers computers, laptops, monitors, printers, and video display devices. The pending bill would require manufacturers to establish a take-back program for covered devices beginning April 1, 2011. Manufacturers would also be required to pay an annual registration fee to the Director of Environmental Protection.

Oklahoma

Oklahoma's e-waste law took effect in January 2009, which covers desktops, laptops, and monitors. Under the regulation, computer manufacturers pay a fee for the collection, transportation, and recycling of e-waste that funds a free recycling program for consumers.

Oregon

Oregon's e-waste law went into effect in January 2009, which covers TVs, monitors, desktop computers, and portable computers. Under the regulation, manufacturers pay a fee for the collection, transportation, and recycling of e-waste, which funds a free recycling program for households, small businesses (with 10 or fewer employees), small non-profit organizations (with 10 or fewer employees), and anyone dropping off 7 items or less. The legislation was amended in March 2010 to include an annual manufacturers' recycling obligation based on their market share percentage. In addition to the e-waste law, a disposal ban went into effect on January 1, 2010, which prohibits the disposal of covered electronic devices at landfill sites, transfer stations, and incinerators.

Pennsylvania

Pennsylvania put before the state senate an e-waste law that imposes an ARF on TVs, computers, and monitors. The pending bill would require the Department of Environmental Protection to develop and implement policies to encourage and expand the use of current electronics recycling programs and ban the dumping of electronic waste in landfills. Pennsylvania also has a pending bill that would require computer manufacturers to implement a recovery plan for the collection, recycling and reuse of computers and monitors.

Rhode Island

Rhode Island implemented an e-waste law in January 2009 that covers computers, computer monitors, combination units, and TVs or any other video display device with a screen larger than nine inches. Under the regulation, producers pay a fee for the collection, transportation, and recycling of e-waste that funds a free recycling program for consumer households as well as public and private elementary and secondary schools. In addition, a landfill ban has been in effect since July 2008 that applies to desktop computers, computer monitors, portable computers, combination units, and TVs or any other video display device with a screen greater than four inches.

South Carolina

South Carolina passed an e-waste law in May 2010 that covers desktop or notebook computers, computer monitors, printers, and TVs. The law applies an ARF on CRT devices and display devices with a screen greater than four inches which are sold to consumers only. In addition, the regulation imposes a landfill ban on e-waste that will take effect on July 1, 2011.

Tennessee

Tennessee has pending e-waste legislation that would apply to desktops, notebooks, monitors, and printers.

Texas

Texas implemented e-waste legislation in September 2008 that covers computer equipment, including desktop or notebook computers and computer monitors or any other display device without a tuner. Under the legislation producers pay for the collection, transportation, and recycling of computer equipment, which funds a free recycling program for consumers.

Utah

Utah has a pending e-waste bill that covers TVs, computers, laptops, monitors, peripherals, and desktop printers, scanners, or copiers. Under the pending bill, counties would designate e-waste drop-off sites, and manufacturers would be required to reimburse recyclers.

Vermont

Vermont passed an e-waste law that takes effect on July 1, 2011, and covers desktops, laptops, monitors, and TVs. Under the law, free e-waste collection centers are provided for consumers, charities, school districts, and small businesses. In addition, the regulation imposes a landfill ban on e-waste that will take effect on January 1, 2011.

Virginia

Virginia implemented an e-waste law in July 2009, which covers desktops, laptops, and monitors. Under the legislation, producers pay a fee for the collection, transportation, and recycling of e-waste, which funds a free recycling program for consumers. In addition to the e-waste law, a landfill ban has been in effect since February 2008, which allows localities to ban CRTs from landfills, if the jurisdiction has an appropriate CRT recycling program.

Washington

Washington implemented an e-waste law in January 2009, which covers TVs, monitors, laptops, and desktops. Under the legislation, producers pay a fee for the collection, transportation, and recycling of e-waste, which funds a free recycling program for consumers, charities, small businesses (fewer than 50 employees), schools, and small governments (with population under 50,000 or counties under 125,000 and special purpose districts). Presently, there are several counties that have passed e-waste landfill bans; however, there is not a landfill ban at the state level.

West Virginia

West Virginia implemented an e-waste law in April 2008 that covers desktop computers, laptops, monitors, and TVs. The regulation required manufacturers to develop recycling programs and implement take-back programs by July 1, 2009. Producers must pay registration fees to a state fund, which is used to reimburse counties and municipalities for recycling programs and administrative costs. In addition, the state has a landfill ban that takes effect on January 1, 2011, which prohibits the disposal of discarded TVs, computers, and monitors in landfills.

Wisconsin

Wisconsin implemented an e-waste law in January 2010 that covers TVs, monitors, laptops, desktops, printers, keyboards, fax machines, DVD players, and VCRs. Under the legislation, manufacturers pay for the collection, transportation, and recycling of e-waste. In addition, the regulation imposes a disposal ban that takes effect on September 1, 2010, which prohibits the disposal of covered electronic devices at landfills or incinerators.

B. Canada

The Canadian provinces have been implementing a staggered series of e-waste recycling programs with relatively expensive fees and significant variations. The following provides a provincial review of the Canadian schemes and a brief description of each scheme's dominant characteristics.

Alberta

Alberta passed Canada's first e-waste law in October 2004, which requires producers to register with Electronics Recycling Alberta. Suppliers of all designated electronic products, laptops, printers, computer processors, computer monitors, and TVs, must register with ARMA and suppliers of a subset of designated electronics must report to and pay an Advance Disposal Surcharge (ADS) to Alberta Recycling Management Authority (ARMA) on a monthly basis. E-waste recycling fees are collected from retailers, wholesalers, distributors, and manufacturers to pay for recycling, which funds the end-user recycling program for e-waste collection and disposal at designated collection points.

British Columbia

British Columbia passed an e-waste law in August 2007 that applies to televisions, computers, computer monitors, computer peripherals, and printers. The second phase of product stewardship was implemented on July 1, 2010, which applies to information technology and telecommunications equipment, small appliances, audio/visual playback and recording systems, lighting equipment, toys, leisure and sports equipment, and monitoring and control instruments. The final phase is expected to be implemented in 2012 and includes large appliances, electronic tools, electronic cash dispensing appliances, and electronic medical devices. Producers of e-waste must submit a stewardship plan covering e-waste management, and the program is funded by fees at the retail level.

Manitoba

Manitoba has passed e-waste legislation that applies to all designated electric and electronic devices. Under the regulation, which comes into force on April 1, 2011, producers are required to operate or subscribe to an e-waste stewardship program. Presently, there are numerous e-waste drop-off locations around the province.

New Brunswick

New Brunswick passed the Clean Environment Act and Designated Materials Regulation in May 2008, which established a Multi-Material Stewardship Board to oversee industry-led stewardship programs in the province which, in the future, may include electronics. New Brunswick has not, however, designated any electronic products as being subject to a product stewardship program.

Nova Scotia

Nova Scotia's e-waste legislation requires every "brand owner" of designated electronic products to participate in an approved product stewardship program. The regulation designated products in two phases with implementation dates of February 1, 2008 for Phase 1 products and February 2, 2009 for Phase 2 products. Phase 1 was implemented on February 1, 2008 and includes: desktop computers, portable computers, computer peripherals (mouse, keyboard, hard drive, and optical drive), televisions and printers. Phase 2 was implemented February 1, 2009 and includes: computer scanners, audio/visual playback and recording systems, home theatre systems, vehicle audio/visual systems, telephones and fax machines, cell phones and other wireless devices. Additionally, there is a landfill ban on e-waste.

Ontario

Ontario passed e-waste legislation, which took effect on April 1, 2009, and imposed a monthly fee for e-waste disposal on suppliers. The initial phase covered desktop and notebook computers, peripherals, monitors, printers, fax machines, and televisions. Phase 2 of the legislation took effect in April 1, 2010, and expanded the legislation to include phones, cameras and audiovisual equipment. The Act also permits the establishment of separate industry stewardship plans, with approval from the Ministry of the Environment. However, until approval is obtained, a steward must comply with the existing legislation program.

Quebec

In March 2008, the Ministry of Sustainable Development, Environment and Parks published a policy paper which set out a proposal for extended producer responsibility for "producers" of electronics in Quebec. The definition of "producer" would include owners, holders or users of intellectual property or first suppliers. Under the legislation, electronics companies must implement schemes to collect unwanted products, outsource them to be recycled and pay the bill for the service. The law would also require that companies advertise the recycling option to their customers. Quebec presently has pending e-waste legislation to enact this policy.

Prince Edward Island

Prince Edward Island passed e-waste legislation in December 2009 that covers TVs, computers, monitors, peripherals, audio and video players, telephones, wireless phones, fax machines, and desktop printers or scanners. In addition, the legislation implements a

landfill ban on e-waste and a manufacturer's obligation to operate or subscribe to an e-waste stewardship program, which come into force on July 1, 2010.

Saskatchewan

Saskatchewan implemented e-waste legislation in February 1, 2007 that requires manufacturers to register with the Saskatchewan Waste Electrical Equipment Program (SWEEP), track the Environmental Handling Fee (EHF) for each product, and provide a monthly report and fee payment to SWEEP, which funds the recycling program. The fees apply to CRTs, CPUs, laptops, input devices, printers, and TVs.

Corporate Strategies

A. Regulatory Compliance Assessment

Companies operating within North America or seeking to import into North America are facing new regulatory compliance challenges from the states and Canadian provinces. Within North America's high profile and image sensitive markets, a failure to meet the compliance requirements within a state can prove damaging to a business reputation and cause a loss of revenue. To avoid being blind-sided by environmental regulations that often have minimal compliance costs but large business costs for non-compliance, many organizations are engaging experts to conduct regulatory compliance assessments and/or regulatory briefings.

The purpose of a regulatory compliance assessment is to engage in a review of legislation that may adversely affect a company's business operations and to offer recommendations to maintain compliance. The initial review consists of an assessment of a specific region's environmental standards within a defined scope (i.e. consumer electronics); followed by a recommendation of the necessary steps that should be taken to remain compliant. The performance of this evaluation is highly scalable depending on the level of detail requested and the number of jurisdictions where review is requested.

To facilitate this process, an assessment should review global or regional legislation and make recommendations concerning where the client should focus their attention. This high level or preliminary evaluation provides the focus for an in-depth evaluation and brings management's attention to areas where compliance gaps may exist and offers recommendations for addressing those compliance gaps.

Once these preliminary assessments are completed and tailored to a client's needs, a compliance plan is developed that outlines the necessary steps to achieve compliance within the regulatory framework of the reviewed jurisdiction(s). Typically, this plan is transformed into a dynamic environmental compliance program that can be systematically reviewed and updated, as a means to demonstrate due diligence, and account for compliance processes in the event of regulatory audit.

B. Logistics and Supply Chain Analysis

Modern supply chains can be complex, often involving systematic outsourcing and staged product manufacturing. In this context, environmental compliance can prove challenging, as strong, open supply chain communication channels must be leveraged and remain open to ensure compliance programs can be effectively implemented. Additionally, extended producer responsibility legislation may have jurisdictional variations that place the burden of compliance on different parties within the supply chain process, for example, either the importer or the retailer may be the subject of e-waste recycling fees.

The purpose of a logistics compliance profile is to review a client's route-to-market and map it against a defined environmental compliance objective. A review of a logistics process requires a high level of internal coordination between the key personnel responsible for implementing and developing the process. Accordingly, the initial assessment may require an on-site inspection of a company's record keeping area and/or an audit of an individual warehouse that manages import/export operations.

This initial review is used to assess where the compliance and monitoring processes are weak so as to recommend steps that will bring the logistics processes into compliance and to assist the client in defining where the regulatory compliance burden exists within a given jurisdiction. A in-depth assessment might also arise, whereby a company would create a detailed plan or seek assistance in registering with the necessary compliance organizations and/or the development of business processes to manage compliance initiatives.

C. The Importance of a Flexible Information Management System

The international nature and high degree of local variation in EPR legislation is influenced by the globalization of environmental regulatory controls. In this complex regulatory environment, automated, enterprise-based environmental management systems, represent an effective information technology tool to address the documentation and record-keeping challenges. Certain key functions are vital for organizations seeking to develop a flexible EPR management program that can serve as a compliance engine for future and present legislative compliance initiatives. Important key functionalities include:

- Broad exposure to nuanced country and state/province specific EPR compliance schemes;
- A data storage element that will allow the successful recall of information from past data inputs in a readily accessible and auditable format;
- Algorithms that can calculate the fees for compliance and identify when imports/products placed on the market have exceeded the regulatory reporting thresholds;
- The ability to aid in the production of detailed compliance reports; and
- The flexibility to be expanded to include new unique EPR regulations that emerge, which will impact your business directly.

The centralization of auditable EPR compliance data in a flexible information management system provides the greatest opportunity to construct an easily accessible compliance and



quality platform that can provide your organization with a cost-savings tool and a competitive advantage related to the patchwork quilt of North American EPR legislation.

About Foresite

Foresite Systems, Ltd. has been designing systems to support global environmental management for nearly two decades. The resulting wealth of experience, innovative spirit, and international presence has provided Foresite with the ability to remain a best-in-class provider of environmental compliance engines for over 100 of the best and most recognizable blue chip companies in the world. The flexibility of the Global Environmental Management Systems (GEMS) and Foresite's pragmatic approach to compliance has made the Waste Electrical and Electronic Equipment (WEEE) Compliance Modules premiere tools for our client implementation of effective and sustainable e-waste compliance strategies. For more information, please contact Foresite's Manager of Environmental Compliance at travis.miller@foresitesystems.com.

Summary of E-Waste Regulatory Requirements

Jurisdiction	E-Waste Fee	Recycling Law	Landfill Ban/Fee	Pending Legislation
Arkansas			X	
California	X	X	X	
Colorado				X
Connecticut	X	X	X	
Georgia				X
Hawaii	X	X		
Illinois		X	X	
Indiana		X	X	
Kentucky	X	X		X
Maine	X	X	X	
Maryland	X	X		
Massachusetts			X	X
Michigan	X	X		X
Minnesota	X	X	X	
Missouri		X		
Nebraska				X
Nevada				X
New Hampshire			X	
New Jersey	X	X	X	X
New Mexico		X		
New York	X	X	X	
North Carolina	X	X	X	
Ohio				X
Oklahoma	X	X		
Oregon	X	X	X	
Pennsylvania				X
Rhode Island	X	X	X	
South Carolina	X		X	
Tennessee				X
Texas	X	X		
Utah				X
Vermont		X	X	
Virginia	X	X	X	
Washington	X		X	
West Virginia	X	X	X	
Wisconsin	X	X	X	
Alberta	X	X		
British Columbia	X	X		
Manitoba	X	X		
New Brunswick				X
Nova Scotia	X	X	X	
Ontario	X	X		
Quebec				X
Prince Edward Is.	X	X	X	
Saskatchewan	X	X		

ⁱ Travis Miller is an attorney and environmental scientist with experience in industrial/manufacturing process auditing for environmental risks, financial consulting, and environmental law interpretation. Travis serves as the Managing Consultant for Foresite Systems, Ltd., where he leads Foresite's team of consultants that advise clients on international environmental legislation compliance issues, which impact trade and product marketability, and supports Foresite's Global Environmental Management System (GEMS) integration. His particular areas of expertise are legislative risk/liability management, business strategy implementation, and regulatory compliance planning for legislation such as RoHS and REACH.

ⁱⁱ Anne Barr is a sustainability manager with experience in the design and implementation of global environmental management systems. Anne works as a Consultant for Foresite Systems, Ltd., specializing in European legislation and compliance liaison. Anne leads on Foresite's environmental research. Anne's particular areas of expertise are regulatory analysis, design of environmental accounting methodologies and sustainability.

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