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# Call2Recycle

## Draft BC Extended Producer Responsibility Plan

Submitted to: Director, Extended Producer Responsibility Programs  
Environmental Standards Branch  
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## Glossary

<b>Alkaline /Carbon Zinc</b>	A type of primary battery (e.g. AA or AAA, C, D, 9V, and button batteries).
<b>Collection Target</b>	Projected quantity of batteries to be collected on an annual basis.
<b>Consumer Batteries</b>	Rechargeable and primary batteries weighing less than 5 kilograms each.
<b>Damaged or Defective Batteries</b>	Lithium batteries that are not intact or are physically damage.
<b>Extended Producer Responsibility (EPR)</b>	An environmental policy wherein the producer is responsible for the reduction of environmental impacts across the life cycle of the product.
<b>Lithium Ion (Li-Ion)</b>	A type of rechargeable battery.
<b>Lithium Primary</b>	A type of primary battery.
<b>Nickel Cadmium (Ni-Cd)</b>	A type of rechargeable battery.
<b>Nickel Metal Hydride (Ni-MH)</b>	A type of rechargeable battery.
<b>Portable Power</b>	A lithium-based, stand-alone rechargeable battery.
<b>Primary Battery</b>	A battery that cannot be recharged by the consumer commonly known as AA, AAA, 9V, D-cell, and button cell batteries.
<b>Private Collection Facilities</b>	A location that actively collect batteries, but where public access is restricted.
<b>Processing</b>	Manual, mechanical, thermal, or chemical alteration of batteries for the purpose of recycling.
<b>Processor</b>	An entity that engages in processing batteries for the purpose of recycling.
<b>Public Collection Facilities</b>	Drop-off locations open to the public, even for a minimum amount of time, for collection of batteries.
<b>Rechargeable Battery</b>	A type of battery that is capable of being recharged.
<b>Recycling Efficiency Rate</b>	Defined by CSA as the amount of material recycled as a percentage of the amount of targeted material collected (inbound) minus reuse and shrinkage. The measurement of Recycling Efficiency will differ by program according to the nature of materials, markets and processing methods.
<b>Recovery Rate</b>	Part 1(1) of the British Columbia Recycling Regulation defines this as “the amount of product collected divided by the product generated, expressed as a percentage”.
<b>Responsible Recycling Standard or R2</b>	The R2:2013 standard outlines responsible recycling (“R2”) practices for the recycling of electronics globally. The requirements contained are comprehensive, covering environmental, health and safety, and data security practices. This standard is provided through an accredited third-party, to the program practices are conducted in an environmentally responsible manner, protective of the health and safety of workers and the public, and that data on media devices is secure until destroyed.
<b>SABC</b>	Stewardship Agencies of BC which is a group of stewardship agencies who work together on common issues.
<b>Zinc-air</b>	A type of primary battery. These batteries can typically be found in small devices such as hearing aids.

## 1. Introduction

Call2Recycle Canada, Inc., which administers the Call2Recycle® program, is a Canadian-owned not-for-profit product stewardship organization. Since 2010, Call2Recycle has been administering a consumer battery collection and recycling program in British Columbia (BC) under an approved Extended Producer Responsibility (EPR) plan. In the province of BC, the Recycling Regulation sets out the requirements for EPR, including the requirement for producers to participate under an EPR plan.

This EPR plan for consumer batteries under 5 kilograms is being submitted by Call2Recycle Canada, Inc. and replaces the previous approved stewardship plan submitted to the BC Ministry of Environment in 2010. For more information on Call2Recycle, please visit [www.call2recycle.ca](http://www.call2recycle.ca).

## 2. Duty of Producer

Call2Recycle's purpose is to assist producers in meeting their regulatory obligation with respect to collecting and recycling batteries in accordance with provincial regulations. This EPR plan is submitted by Call2Recycle on behalf of the producers in accordance with Section 2 (1) of the British Columbia Recycling Regulation (the Regulation) wherein a producer must:

- (a) have an approved plan under Part 2 [Extended Producer Responsibility Plans] and comply with the approved plan, or*
- (b) comply with Part 3 [Extended Producer Responsibility Program Requirements if No Extended Producer Responsibility Plan]*

*with respect to a product in order to use in a commercial enterprise, sell, offer for sale or distribute the product in British Columbia.*

## 3. Appointment of a Stewardship Agency

Representing producers of consumer batteries, Call2Recycle's members include manufacturers, brand-owners, first-importers, and retailers of consumer batteries sold in BC. Call2Recycle also manages the regulatory requirements of obligated producers in Manitoba and Quebec.

Call2Recycle's EPR plan is specific to consumer batteries that are sold as stand-alone items or sold for replacement purposes – this also includes portable power banks, a lithium-based, stand-alone rechargeable battery. Currently approximately 100 obligated producers are registered with Call2Recycle for the BC program for primary batteries. For a list of all producers who are members of Call2Recycle, please see Appendix A. Members represent the majority of obligated primary battery producers in the province.

Producers that have been identified by Call2Recycle are sent written notification of their obligation. Once the producers confirm that they are obligated and appoint Call2Recycle as its designated EPR program, the producer must enter into a formal membership agreement with Call2Recycle, acknowledging that Call2Recycle will manage their obligations under the Regulation. Call2Recycle will make membership agreements available to the Director upon request.

Rechargeable battery producers, referred to as ‘stewards’, currently participate under the Call2Recycle plan under the North American Licensee Agreement. Licensees enter into a formal agreement which acknowledges the regulatory obligations of producers in some jurisdictions. However, once EHF’s are introduced on rechargeable batteries, Call2Recycle will apply a similar process used with primary batteries for notifying and registering obligated producers, requiring them to sign a membership agreement. The North American agreement will no longer apply to obligated producers in BC upon implementation of EHF’s on rechargeable stand-alone batteries. The anticipated timeline for introduction of EHF’s on rechargeable batteries is January 1, 2019. For a list of current stewards represented under the North American Licensee Agreement, see Appendix B.

The EPR Plan will be posted to Call2Recycle’s British Columbia page under local resources which can be found at <https://www.call2recycle.ca/british-columbia/>

## Agency Governance

Call2Recycle is incorporated under the *Canada Not-for-Profit Corporation Act and BC Societies Act* and is governed by a Board of Directors comprised of producers and independent directors. As of May 2018, the Board of Directors is comprised of representatives from Call2Recycle, Inc, Costco Wholesale Canada Ltd., Familiprix, Gordon Gow Associates, London Drugs Ltd., Lowe’s Canada, Spectrum Brands, Velazquez Consulting Inc., and two (2) independent directors.

**Board members as of May 2018**

Board Member	Organization
<b>Norman Clubb</b>	Independent and Board Chair
<b>Bernard Gervais</b>	Familiprix
<b>Jeff Haltrecht</b>	Spectrum Brands
<b>Gordon Gow</b>	Gordon Gow Associates
<b>Jules Foisy Lapointe</b>	Lowe's Canada
<b>Katherine Larocque</b>	Costco Wholesale Canada
<b>Maury McCausland</b>	London Drugs
<b>Carl Smith</b>	Call2Recycle, Inc.
<b>Saquib Vali</b>	Independent
<b>Harriet Velazquez</b>	Velazquez Consulting Inc.

All relevant reports, policies, and guidelines are available to Call2Recycle’s members at [call2recycle.ca](http://call2recycle.ca) under the stewards section. All policies and bylaws can be found: [www.call2recycle.ca/resources-support-centre/](http://www.call2recycle.ca/resources-support-centre/). In addition to the website, Call2Recycle distributes two (2) newsletters per year to members to provide relevant program updates and notifications about the annual general meeting held in June of each year. The newsletters provide information on financials, collections results, marketing activities and more. Financial reports are available to members in the corporate annual report [www.call2recycle.ca/2017-annual-report/](http://www.call2recycle.ca/2017-annual-report/) and in the BC annual report to the Director.

Given the significant role retailers have in the fiduciary, collection and board composition of Call2Recycle, Call2Recycle routinely engages other stakeholder groups including Retail Council of Canada to consult and update their members on pertinent program information and changes.

### **Performance Monitoring and Reporting Commitments**

Any changes in Call2Recycle's structure and governance from one year to the next will be disclosed in the annual report.

## **4. Products Covered under the EPR Plan**

The Regulation's Schedule 3 for Electronic and Electrical Product Category includes 2 .1.(m) "batteries that could be used in an electronic or electrical product listed in this section, including primary batteries and rechargeable batteries". In accordance with this section of the Regulation, Call2Recycle collects and recycles primary and rechargeable consumer batteries that are sold as a stand-alone product or for replacement purposes. This includes batteries generated by consumers and industrial, commercial, and/or institutional (IC&I) sectors. Call2Recycle accepts dry-cell batteries weighing less than five (5) kilograms each.

### **Accepted Products:**

- Alkaline
- Carbon Zinc
- Lithium Ion (Li-Ion)
- Lithium Primary
- Portable Power Banks<sup>1</sup>
- Nickel Cadmium (Ni-Cd)
- Nickel Metal Hydride (Ni-MH)
- Nickel Zinc (Ni-Zn)
- Silver Oxide
- Small Sealed Lead Acid (SSLA)
- Zinc Air
- Damaged and defective batteries<sup>2</sup>

### **Excluded Products**

- Batteries weighing more than 5 kg
- Cellphones<sup>3</sup>
- Damaged or defective batteries sold in or with a device covered under another EPR plan
- Motive batteries
- Wet cell batteries

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<sup>1</sup> This battery type was not specifically named in the previous plan. Call2Recycle has consulted with producers, the Retail Council of Canada, and Electronics Product Stewardship Canada and all stakeholders have confirmed that these batteries should fall within the scope of Call2Recycle's EPR plan.

<sup>2</sup> If the battery was originally sold as a stand-alone product or for replacement purposes (recalled batteries are included provided that the battery was sold into the province and a fee has been paid).

<sup>3</sup> Call2Recycle will no longer cover cellphones under its EPR plan.

Several programs in BC manage consumer batteries. If a battery is sold in or with a device covered under a stewardship/EPR program, the responsibility of the end of life management of the battery or batteries resides with the program that manages the device.

These programs include:

- BC AlarmRecycle
- BC LightRecycle
- Electronic Products Recycling Association (EPRA)
- ElectroRecycle
- Heating, Refrigeration and Air Condition Institute of Canada (HRAI)
- Outdoor Power Equipment Institute of Canada (OPEIC)
- Recycle My Cell
- Shaw
- Telus

### **Orphaned/Free Rider Batteries**

“Orphaned batteries” refers to batteries produced by a manufacturer that either no longer exists or no longer produces batteries. “Free rider” refers to a battery produced by a manufacturer that is not a registered member of Call2Recycle. Call2Recycle makes concerted efforts to register all obligated entities under the regulation to eliminate free rider activity. However, it should be noted that both orphaned and free rider batteries are accepted by the Call2Recycle program.

## **5. Stakeholder Consultation**

To be completed post consultation.

## **6. Collection System and Consumer Accessibility**

In accordance with section (5)(c)(i), producers collect and pay for the costs associated with managing consumer batteries that are covered under Call2Recycle’s EPR plan. This includes consumer batteries that were previously or are currently sold, distributed, or offered for sale in BC.

Call2Recycle offers reimbursement to public facing collection facilities, such as municipalities or depots, that collect in bulk quantities. A bulk quantity is defined as a shipment of more than 250 kilograms of batteries contained in drums or Call2Recycle boxes consolidated on a pallet. Qualifying collection facilities must enter into an agreement with Call2Recycle to receive reimbursements to cover costs associated with labour and, in the case of drums, the purchase of the drum. Call2Recycle also covers the cost of transportation.

Prior to 2014, the reimbursement program was limited to one (1) collection facility per municipality. During the 2014 consultation of Call2Recycle’s draft plan, stakeholders expressed that this reimbursement policy should be revised. Following consultation, Call2Recycle expanded the qualification to any public collection facility that could collect a prerequisite volume. At that time, the

reimbursement amount was also adjusted. Call2Recycle continuously reviews its policies and the reimbursement rate will be reviewed in the future.

The box program is designed for small volume generators or for those that do not have space to collect large volumes of batteries. There is no reimbursement for this program offering as it is designed to limit the amount of labour required to manage it. The entire cost of the box from distribution to collection is covered by the program.

Call2Recycle offers an extensive network where consumers can drop off batteries for recycling at no additional cost as per section (5)(c)(iii) of the Regulation. Call2Recycle collects from four (4) sectors, public agencies, retailers, municipalities, and businesses including the IC&I sector.

Any entity which meets our collection facility requirements can participate as a drop-off location that is open to consumers (public collection facility) or collect batteries internally (private collection facility). Public collection facilities are strategically located where they are most likely to be used by consumers. Below are other considerations when adding public collection facilities.

- **Accessibility** – To ensure an optimal number of collection facilities available based on geography, population density, and ease of access.
- **Convenience** – Facilitate ease of drop-off for consumers not only in urban areas, but rural and remote communities by providing collection services at non-traditional drop-off locations, or recycling/round-up events
- **Cost-effectiveness** – It is necessary to manage the program's cost-to-serve for continued growth and success.
- **Environmental health and safety** – Call2Recycle will work with companies that want to enroll to promote environmental health and safety through battery recycling.
- **Association to batteries** – The likelihood that consumers will correlate batteries with the location (e.g. at retail or recycling depots).

## Collection System

Call2Recycle Canada has a vast network of drop-off facilities across the province, which enables consumers to deposit their used batteries at locations convenient to them. The program uses a qualification process for collection facilities to maximize battery returns. Call2Recycle commits to offering a minimum accessibility rate of 95 percent (%) of British Columbians access to a Call2Recycle public collection facility within 15 km of their home. Call2Recycle will report on the accessibility as a target as expressed above in the annual report to the Director.

Call2Recycle also collects from Business and the IC&I sectors. While these collection facilities may or may not be open to the public, they are a significant purchaser of consumer batteries in British Columbia and collector of used consumer batteries.



In 2017, there were over 1500 Call2Recycle collection facilities in BC. While some of the collection facilities are not open to the public, as of December 31, 2017, over 650 collection facilities were available for public drop-off, including:

- Retail
- Depots
- Landfill or transfer stations
- Libraries
- Municipal offices and city halls
- Collection events

Call2Recycle tracks battery collections from each individual collection facility by chemistry. Once shipments are received at the sorting facility, the batteries are sorted, weighed, and recorded. Using this information, Call2Recycle regularly reviews collection results of all regional districts to identify underperforming collections or under serviced areas of the province. In the case of underperforming collection facilities, Call2Recycle staff outreaches to these facilities to encourage increased participation. In underserved areas of the province, Call2Recycle staff seeks opportunities to collect.

### **Product Pathways Not Directly Managed by the EPR Program**

There may be some instances when consumer batteries may not flow through Call2Recycle's program. For example, when market-based commodity values for metals are high, batteries may be sold by collectors. There have also been reported incidences of batteries being transported to other provinces where bounty systems are in place.

With respect to batteries ending up in the waste stream, Call2Recycle participates in a waste composition audit facilitated through SABC. Batteries found in the waste stream cannot be solely attributed to Call2Recycle's program given the number of stewardship agencies who manage consumer batteries. The program uses information gleaned from the audit to identify areas of improvement. Call2Recycle will report on the result of the SABC facilitated waste audit in the annual report to the Director.

### **Collection Targets and Recovery Rates**

The 75 percent (%) recovery rate as set out in the Regulation is challenging when applied to consumer batteries for many reasons:

- 1) Multiple programs: batteries (with or without its host product) are managed by multiple programs.
- 2) Weight of battery: certain battery chemistries sold into the market declines year over year - Heavier battery chemistries, such as nickel cadmium, are being replaced by lighter lithium ion batteries. This will have implications on the overall battery weight sold into the market.
- 3) Life of a battery: Battery life is increasing which reduces the need to replace batteries as frequently.
- 4) Type of battery: Products that currently require primary batteries will likely be replaced by those that run on rechargeable batteries.

- 5) Purchase habits: Batteries are generally purchased in large or multiple quantities and have a multi-year shelf life. There is generally not an immediate 1:1 relationship between battery purchase and usage.
- 6) Hoarding issues: Consumers may keep spent batteries for a long time before they recycle them. Since consumer-type batteries are typically small, they can easily be stored at home, thus consumers have no immediate urge to recycle them.

That said, Call2Recycle will report on recovery rate as a performance target in annual reports. The chart on the next page is the proposed recovery rate through to 2022.

#### **Recovery Rate to 2022**

Year	2018	2019	2020	2021	2022
Recovery Rate expressed as a %	40%	42%	45%	47%	50%

Recovery rate can be difficult to project. The denominator used in determining total weight sold in BC is based on reported fee per unit sales from Call2Recycle members. Call2Recycle introduced Environmental Handling Fees (EHFs) on primary batteries on Feb 1, 2017. While members now represent the majority of the market, the ramp up time to bring producers on board impacted the reported sales in 2017. As of May 2018, EHFs have not been placed on stand-alone rechargeable batteries in British Columbia. Sales relating to that category is based on Call2Recycle data gleaned from Quebec where EHFs have been in place since 2015. Should the data change significantly, thus impacting the recovery rate, Call2Recycle will notify the Ministry of Environment in writing.

#### **Collection Accessibility**

Since 2010, Call2Recycle has implemented a highly accessible battery collection and recycling program serving British Columbians. Call2Recycle will continue to engage with and encourage residents to drop-off their batteries at one of the many designated collection locations. Call2Recycle's goal is to ensure that at least 95% of British Columbians reside within 15 kilometers of a public collection facility. While coverage in urban areas undoubtedly exceeds the 15 kilometers accessibility standard, improvements will continue to be made to increase accessibility in non-urban communities.

An active collection facility is defined as one that has shipped at least one receipt (full box of batteries or bulk shipment) within a calendar year, or any facility that has enrolled in the program during the calendar year regardless of receipt. Call2Recycle does have registered facilities that may ship on an infrequent basis and may not be considered active given the definition of an active collection facility.

Call2Recycle's 2010 plan called for 2000 private and public collection facilities by 2014. The Recycling Regulation speaks to public accessibility and therefore it is a more meaningful metric to report on public collection facilities as a target. Call2Recycle commits to maintain a minimum of 600 collection facilities throughout the province which aligns to an accessibility target of 95% of British Columbians residing within 15 kilometers of a public collection facility. The program continually seeks new way to collect

batteries and if will work with Ministry of Environment to update this target in the event of changes to program delivery.

Call2Recycle will work to increase coverage in underserved or remote areas of the province by seeking opportunities to enroll permanent collection facilities to provide year-round recycling for consumer batteries. If this is not possible, Call2Recycle will work with local government or other stakeholders on a collections event. Transport Canada prohibits the transportation of used batteries by air, therefore Call2Recycle cannot service communities that do not have marine or land access.

## **Performance Monitoring and Reporting Commitments**

### **Performance Targets:**

- Accessibility rate using Call2Recycle's accessibility metric of percentage (%) of the population residing within 15 kilometers of a collection facility. Call2Recycle commits to maintain a minimum of 95 percent accessibility rate.
- A minimum of 600 public collection facilities.
- Recovery Rate -Total weight (kilograms) collected in BC during each calendar year divided by the total weight sold in the province and expressed as a percentage (see page 10 for target commitment)

### **Reporting Commitments:**

In the Annual Report to the Director, Call2Recycle will report on the following:

- Number of active collection facilities in the province by sector
- Number of public and private collection facilities
- Number active collection facilities in the province
- Number of collection facilities in each regional district
- Total kilograms collected in each regional district
- Total weight collected per capita by regional district
- Location of collection facilities
- Changes in number of collection facilities from previous report
- Total weight, in kilograms, collected during the calendar year in BC
- Result of SABC facilitated waste composition audit pertaining to consumer batteries
- Dates, locations, and results of collection events (if applicable)

All information in this section is consistent with the requirements for the assurance on non-financial information including program specific definition and applicable criteria.

## **7. Consumer Awareness**

Consumer awareness is critical to the success of any EPR program and as such, Call2Recycle deploys a multi-pronged promotions and education approach to increase the level of awareness and incidences of consumer battery recycling. Its efforts include both traditional and digital strategies, including:

- Call2Recycle website
- Social media including Facebook and Twitter
- Customer service call centre
- RCBC Recycling hotline and Recyclepedia
- Point-of-sale brochures available to all retailers (available on [call2recycle.ca](http://call2recycle.ca))
- Sponsorships and collaborations with like-minded associations
- Media (Print/Online/Radio/Television)

To gauge its effectiveness to positively move the ‘recycling’ needle, Call2Recycle conducts annual consumer awareness studies. The study helps Call2Recycle quantify levels and trends in consumer awareness and behaviors and the effectiveness of its outreach campaigns to increase battery recycling incidence among target audiences.

The most recent study done in 2017, revealed that 87 percent of British Columbians surveyed believe that both primary and rechargeable batteries are recyclable, a two (2) percent increase in awareness over 2016. The survey also revealed that 48 percent of British Columbians recycled batteries within the calendar year. Call2Recycle commits to reporting the results of its annual consumer awareness study in support of its goal to maintain an awareness level of 87 percent or higher. The percentage of British Columbians who recycled consumer batteries each year (incidences) will also be reported with a commitment to increase by one (1) percent each year until 2022.

**Recycling Incidences in British Columbia**

	2018	2019	2020	2021	2022
<b>% of British Columbians who recycled batteries in a calendar year</b>	49%	50%	51%	52%	53%

Call2Recycle also participates in the SABC consumer awareness survey; however, for the purpose of the annual report to the Director, the results from Call2Recycle’s initiated study will be used.

Call2Recycle is committed to continued education and awareness initiatives to ensure that British Columbians understand the value of recycling batteries and are inspired to do so. Call2Recycle will implement a suite of new and recurring promotion and education initiatives to achieve the following:

- 1) *Educate*: Inform BC residents that consumer batteries can and should be recycled, that a convenient collection and recycling solution exists and why recycling batteries is important.
- 2) *Motivate*: Inspire the audience to recognize the role they play. This will be accomplished by raising awareness about the importance and benefits of battery recycling.
- 3) *Move to action*: Demonstrate the ease and convenience of battery recycling by providing a range of opportunities for residents to find a collection location and persuading them to drop off batteries rather than throwing them out.

Target Audiences will include:

A. British Columbia Residents:

- Consumers
- Businesses

B. Collection Network:

- Public collection facilities (collects directly from residents): Municipalities, Retailers, Communities
- Private collection facilities (internal collections): Businesses, schools etc.

Call2Recycle works with other programs to increase awareness and encourage recycling behavior.

Initiatives include:

- Active member of SABC, a group of stewardship agencies who seek synergies and solutions in common whenever possible.
- BC Recycles:
  - bcrecycles.ca is an SABC-led initiative offering information on all SABC member programs.
  - Recycling Handbook/Brochure which describes all SABC member programs.

### **Performance Monitoring and Reporting Commitments**

Call2Recycle will report on the following metric in the annual report to the Director.

#### **Performance Targets:**

- Maintain an awareness level of 87 percent or higher.
- The percentage of British Columbians who recycled consumer batteries each year will also be reported with a commitment to increase by one (1) percent each year until 2022 with a starting point of 49 percent in 2018. (see page 12 for target commitments).

#### **Reporting commitments:**

- The number and type of marketing and awareness activities within the calendar year.
- Number of website hits to the BC page.
- Number of searches on the web-based Call2Recycle collection facility locator.

## **8. Management of Program Costs**

On February 1, 2017, Call2Recycle implemented a new funding model for primary batteries. Advance notice of this program modification was provided to the BC Ministry of Environment along with a stakeholder communication plan. The funding mechanism is now a “fee per unit sold” model referred to as Environmental Handling Fees (EHFs). The fees themselves are set through a budgeting process and then reviewed and approved by the Call2Recycle Canada, Inc. Board of Directors. Based on the number of units of batteries sold into BC, members report quantities at pre-set periods using an online system.

Call2Recycle will continue to keep the Ministry of Environment apprised of any upcoming changes pertaining to the Schedule of EHF.

EHFs are used to fund the program including but not limited to communications, collections, processing, and administration. Call2Recycle will ensure accurate member remittances through a system that could include periodic audits to verify compliance and completeness of reporting of EHF. It is solely the decision of the individual member whether or not to recover the EHF paid into the program from consumers either through a separate invoice item or product price. No fees are or will be charged to consumers at the point of collection of spent batteries.

At the time of this writing, there are no EHF on stand-alone or replacement rechargeable batteries in BC. The fiduciary and environmental responsibility associated with managing rechargeable batteries remains with over 300+ battery and/or battery-powered product manufacturers who pay into the program based on the number of units sold into the province. Call2Recycle anticipates shifting this funding model for rechargeable batteries to an EHF in 2019.

EHF may be adjusted over time to address issues or surpluses or deficits. Call2Recycle anticipates assessing a reduction on primary battery fees soon.

The organization maintains a reserve fund, whose amount is determined by Call2Recycle Canada's Board of Directors. This fund ensures the stability of the current program and any future financial obligations that may arise including wind-down costs if necessary.

Call2Recycle complies with all annual reporting requirements as stipulated by the Regulation. The organization's consolidated finances are audited annually by an independent third-party auditor, and the results are made public and provided to stakeholders in the provincial and corporate annual reports.

### **Performance Monitoring and Reporting Commitments**

Call2Recycle remains committed to operating a transparent program. Independently audited financial statements will be produced annually. These statements will detail revenues and expenditures for associated fees collected from the sales of batteries in the calendar year. The audited financial statement will also be available in the corporate annual report, which is shared out with stewards and publicly available on the Call2Recycle website.

## **9. Management of Environmental Impacts**

The Province abides by the pollution prevention hierarchy—reduce, reuse, and recycle—however this hierarchy can be more difficult to apply to batteries than to other materials and products. Call2Recycle is not able to promote a reduction in the use of batteries and reconditioning batteries for reuse can pose an unacceptable safety risk to consumers if not done properly. Therefore, Call2Recycle only supports the reconditioning and reuse of batteries if safety is not compromised, and the proper guidelines are

followed, including proper authorization to perform reconditioning, adhering to strict safety testing standards, and ensuring reconditioned batteries are labeled as such.

Recycling is the most viable way of keeping batteries from entering landfills. The Call2Recycle program efficiently and cost-effectively recycles consumer batteries of all types, and no battery collected through our program that can be recycled goes to landfill. The reclaimed materials from the batteries collected can be used in various products, such as new batteries, cookware, appliances, and hardware.

Call2Recycle's transportation and battery processing partners have passed a rigorous selection process to ensure that they comply with applicable environmental, health and safety, and transportation regulations. Each processor is continually monitored to ensure competitive pricing and the ability to adapt to volume increases.

Service partners are and will continue to be qualified by Call2Recycle under its selection practices. Processors are selected through a fair and transparent system that requires compliance with applicable environmental, health and safety, and transportation regulations. Processors will also be expected to have industry recognized certification(s) and audit processes in place. Some selection practice examples are noted below:

- Under the Responsible Recycling (R2) standard, processors are certified every three (3) years, but must go through annual surveillance audits to maintain the certification.
- In 2017, Call2Recycle implemented and performed annual inspections on facilities that are NOT R2 certified.
- In 2018, inspections of sorters and processors will be included as a requirement for Call2Recycle's R2 certification.
- Written policies outlining corporate commitment to environmental management and continuous improvement.
- Complete tracking and documentation of materials in and out of facilities.
- Final destination receipt and disposal documentation/certification, downstream processing material management, residual material management, and residual waste management.

In an added effort to ensure the highest standards, the Call2Recycle program itself also undergoes inspections to maintain industry recognized certifications, like those listed below:

- R2 2013: This certifies that Call2Recycle's management practices are comprehensive; covering environmental, health and safety, and data security practices.
- International Standardization Organization (ISO) 14001: This certifies Call2Recycle's Environmental Management Standards for the management of the collection, and the distribution to downstream processors, for the recycling of batteries.
- Occupational Health and Safety Advisory Services (OHSAS) 18001: This certifies Call2Recycle's Occupational Health and Safety Management System for the management of the collection, and the distribution to downstream processors, for the recycling of batteries.

Call2Recycle regularly monitors the landscape to keep abreast of the activities, regulations, and new capabilities within processing facilities both locally and nationally, if available. The program also commits to regularly reviewing processors to ensure that they can demonstrate an ability to adapt to Call2Recycle's program growth and volume increases in recyclable materials.

In accordance with the requirements of the third-party assurance of non-financial information, Call2Recycle will report annually on product end-fates and battery recycling efficiency rates (RER) by chemistry. Any changes to the recycling efficiency rates or product end fate will be disclosed in the annual report. Call2Recycle will commit to RER targets; however, it must be noted that these RERs are processor specific and may change from time to time if there is a change in processor or updates to the processor's technology.

## Performance Monitoring and Reporting Commitments

### Performance Targets:

#### Recycling Efficiency Rate

Battery Chemistry	RER Target <sup>4</sup>
Alkaline, Carbon Zinc, Zinc Air	75%
Lithium	50%
Ni-Cd	75%
Ni-MH	75%
Li-Ion	60%
Small Sealed Lead Acid	70%

### Reporting Commitments:

In the annual report to the Director, Call2Recycle will report on product end fate as per the requirements of the non-financial assurance.

## 10. Dispute Resolution

For collection facilities that enter into an agreement for cost reimbursement associated with collection of batteries in bulk quantities, a contract is in place which outlines the dispute resolution process. For collection facilities that do not have a formal agreement with Call2Recycle, the same approach will be followed. As a first step, once the issue has been raised in writing, representatives from Call2Recycle and the other party will attempt to resolve the issue within 30 days or a mutually agreed upon timeframe. If the parties cannot come to a resolution within the given timeframe, the two parties will jointly select a third party to arbitrate and settle the dispute with his/her decision. Any arbitration would be consistent with the *BC Arbitration Act* RSBC 1996. Call2Recycle will operate in good faith with its partners and will

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<sup>4</sup> Representing total material recovery percentage



try to resolve a dispute without arbitration. Arbitration will only be used if both parties cannot come to a reasonable solution.

## 11. Performance Monitoring and Reporting Commitments

Performance Measure	Annual Targets													
Recovery Rate	<ul style="list-style-type: none"><li>Calculated by total weight collected in each calendar year divided by the total weight sold in the calendar year and expressed as a percentage</li></ul>													
	<table><tr><th>Year</th><th>2018</th><th>2019</th><th>2020</th><th>2021</th><th>2022</th></tr><tr><td>Recovery Rate expressed as a %</td><td>40%</td><td>42%</td><td>45%</td><td>47%</td><td>50%</td></tr></table>	Year	2018	2019	2020	2021	2022	Recovery Rate expressed as a %	40%	42%	45%	47%	50%	
	Year	2018	2019	2020	2021	2022								
Recovery Rate expressed as a %	40%	42%	45%	47%	50%									
Accessibility	<ul style="list-style-type: none"><li>Accessibility rate using Call2Recycle’s accessibility metric of percentage (%) of the population residing within 15 kilometers of a public collection facility. Call2Recycle commits to maintain a minimum of a 95 percent accessibility rate.</li></ul>													
Consumer Awareness	<ul style="list-style-type: none"><li>Maintain an awareness level of 87 percent or higher.</li><li>The percentage of British Columbians who recycled consumer with a commitment to increase by one (1) percent each year until 2022.</li></ul>													
	<table><tr><th></th><th>2018</th><th>2019</th><th>2020</th><th>2021</th><th>2022</th></tr><tr><td>% of British Columbians who recycled batteries in a calendar year</td><td>49%</td><td>50%</td><td>51%</td><td>52%</td><td>53%</td></tr></table>		2018	2019	2020	2021	2022	% of British Columbians who recycled batteries in a calendar year	49%	50%	51%	52%	53%	
		2018	2019	2020	2021	2022								
% of British Columbians who recycled batteries in a calendar year	49%	50%	51%	52%	53%									
Management of Environmental Impacts:	<ul style="list-style-type: none"><li>Recycling Efficiency Rate by Chemistry and Processor</li></ul>													
	<table><tr><th>Battery Chemistry</th><th>RER Target</th></tr><tr><td>Alkaline, Carbon Zinc, Zinc Air</td><td>75%</td></tr><tr><td>Lithium</td><td>50%</td></tr><tr><td>Ni-Cd</td><td>75%</td></tr><tr><td>Ni-Mh</td><td>75%</td></tr><tr><td>Li-Ion</td><td>60%</td></tr><tr><td>Small Sealed Lead Acid</td><td>70%</td></tr></table>	Battery Chemistry	RER Target	Alkaline, Carbon Zinc, Zinc Air	75%	Lithium	50%	Ni-Cd	75%	Ni-Mh	75%	Li-Ion	60%	Small Sealed Lead Acid
Battery Chemistry	RER Target													
Alkaline, Carbon Zinc, Zinc Air	75%													
Lithium	50%													
Ni-Cd	75%													
Ni-Mh	75%													
Li-Ion	60%													
Small Sealed Lead Acid	70%													

Reporting Commitments	Description
<b>Agency Governance</b>	<ul style="list-style-type: none"> <li>Any changes in Call2Recycle's structure and governance from one year to the next will be disclosed in the annual report.</li> </ul>
<b>Collection System and Consumer Accessibility</b>	<ul style="list-style-type: none"> <li>Number of active collection facilities in the province by sector.</li> <li>Number of public and private collection facilities.</li> <li>Number active collection facilities in the province.</li> <li>Number of collection facilities in each regional district.</li> <li>Total kilograms collected in each regional district.</li> <li>Total weight collected per capita by regional district.</li> <li>Location of collection facilities.</li> <li>Changes in number of collection facilities from previous report.</li> <li>Total kilograms of consumer batteries sold into BC during a calendar year.</li> <li>Result of number of batteries reported in the SABC facilitated waste composition audit.</li> <li>Dates, location, and results of collection events (if applicable).</li> </ul>
<b>Consumer Awareness</b>	<ul style="list-style-type: none"> <li>The number and type of promotion and education activities within the calendar year.</li> <li>Number of website hits to the BC page.</li> <li>Number of BC searches on the Call2Recycle web-based collection facility locator.</li> </ul>
<b>Management of Program Costs</b>	<ul style="list-style-type: none"> <li>Independently audited financial statements will be produced annually. These statements will detail revenues and expenditures for fees collected from the sales of batteries in the calendar year.</li> <li>The audited financial statement will also be available in the corporate annual report.</li> </ul>
<b>Management of Environmental Impacts:</b>	<ul style="list-style-type: none"> <li>Product Ends Fate</li> </ul>

All performance measures and reporting commitments are subject to third party assurance for non-financial information as required by the BC Ministry of Environment.

## Appendix A: List of Call2Recycle Primary Battery Members

Ace Canada	FuturPlus - Div Cathelle Inc
Acklands Grainger Canada	Gescan (Sonepar Canada)
Amazon	Grand & Toy
Army & Navy Dept. Store Ltd.	Graybar Canada
Bartle & Gibson Co Ltd	Guillevin International Cie
Bass Pro Shops Canada ULC	HearingLife Canada Ltd
Battery Canada	Henry's
Battery World Corp	Home Hardware Stores Limited
BC Fasteners & Tools (2000) Ltd	Hudson's Bay Company
BDKS Ent. Inc	Ikea Canada
Bed Bath & Beyond	Indigo Books and Music Inc.
Best Buy Canada Ltd.	Inter Trade Canada Ltd
Buy-Low Foods LP	Interstate All Battery Center of Kelowna
Canadian Energy & Power Corp	Interstate Batteries Inc.
Canadian Tire Corporation, Ltd	Johnston Drug Wholesale Ltd
Canon Canada Inc.	Ledvance Ltd
Cardinal Health	Loblaws Inc.
CGT Brands Inc.	London Drugs Limited
Château Manis Electronics Inc.	Magnacharge Battery Corporation
Connect Hearing	Mastermind LP
Core-Mark International Inc.	McKesson Canada
Costco Wholesale Canada	Metalic Safety Supply Ltd
Dollar Tree Stores Canada	Michaels Stores Inc.
Dollarama L.P.	Mills Office Productivity
East Penn Canada (Power Battery Sales Ltd.)	Monk Office Supply Ltd
EB Horsman & Son	Mountain Equipment Co-op
Edma Marketing Ltd	Nedco West Division
Edmonds Batteries Ltd	NexGen Hearing Group
EECOL Electric ULC	NII Northern International Inc.
Elgered Tv Sales & Services Ltd	Novexco
Fastenal Canada	Onlybatteries.com
Federated Co-operatives Ltd	Overwaitea Food Group
Fourniture de Bureau Denis	Peavey Industries

Princess Auto Ltd  
Proflash Technologies Inc  
RONA Inc.  
S.P. Richards Canada  
SGB Enterprises Ltd dba Dollar Smart  
Shoppers Drug Mart Inc.  
Slegg Construction Materials  
Sobeys West Inc.  
Staples Advantage Inc. (Corporate Express)  
Staples Canada Inc.  
Supreme Basics  
Synnex Canada Ltd  
Tenaquip Limited  
The Home Depot of Canada Inc.  
The North West Company  
The Source (Bell) Electronics Inc.  
The Stevens Medical Company  
Toys R Us Canada, Ltd  
UAP Inc.  
UBC Bookstore  
Uline Canada Corporation  
uniPHARM Wholesale Drugs Ltd  
Vancouver Battery Corp  
Veritiv Canada Inc  
Wallace and Carey Inc.  
Walmart Canada  
Wesco Distribution Canada  
Westburne Electric (BC)  
Wisdom Electronics Inc  
Würth Canada Ltd  
West Vancouver Hearing Clinic Inc.  
Westshore Hearing Solutions Inc.  
Wild Ears Audiology Inc.

## Appendix B: List of Rechargeable Licensees

3M Automotive Aftermarket Division	Bose Corporation
3M Commercial Solutions Division (CSD)	Brother International
3M <u>Constrctn &amp; Home Imprv</u>	Bushnell, Inc.
3M Materials Resources	BYD Company Limited
3M Personal Safety Division	Canadian Tire Corporation, Ltd
A2Z Development Center	Canon Canada Inc
<u>Accell</u> North America	Canon USA Inc
Acer America Corporation	Casio America, Inc.
Advanced Battery Systems	Cell-Con Inc
Advanced Respiratory, Inc.	Century Optronic Inc.
Aero Design, Inc	Changzhou Globe Tools Co. Ltd.
<u>Aerosense</u> Inc.	<u>Chervon</u> HK Limited
Agilent Technologies	<u>Chervon</u> HK Limited/The Home Depot
Alcatel and Alcatel <u>Onetouch</u>	<u>Chervon</u> HK Lmtd/The Home Depot Canada
Allied Intl/Allied Tools	Cisco Systems Inc.
<u>Alltrade</u> Tools LLC	<u>Cleva</u> North America/ <u>LawnMaster</u>
Alpha Source, Inc.	Cognex Inc.
Amazon.com, Inc.	Computer Technology Link Corp (DBA CTL)
American Honda Motor Co., Inc.	Conair Corporation
American Lawn Mower Co	CTE Energy Co., Ltd.
American <u>Toppower</u>	<u>Cybertron</u> International
Anton/Bauer	DANTONA INDUSTRIES/ULTRALAST
APC - Schneider Electric	Deere & Company (John Deere)
Apple, Inc	Dell Canada Inc.
<u>Arris</u> Group, Inc	Dell Inc
Asus Computer International	<u>Deltran</u> USA LLC
Audio Enhancement, Inc.	Digi-Key Corporation
Axiom Mobile Group	DLG (Shanghai) Electronic
<u>Baccus</u> Global	Dongguan <u>Sunly</u> Battery Tech Co., LTD
barnesandnoble.com, LLC	<u>Dorcy</u> International
Battery Specialties	Duracell Canada Inc
<u>Bayco</u> Products	Duracell US Operations
Bayer Healthcare	Eaton Corporation
Belkin International, Inc.	Echo Incorporated
Best Buy Co., Inc.	<u>Enerco</u> Group Inc.
<u>BionX</u> International	Energizer Holdings, Inc.
Bissell Homecare, Inc	Energizer Holdings, LLC.
BlackBerry	Energy Sales
BlackBerry Limited	EnerSys Delaware Inc.

Epson America, Inc.	Invacare Corporation
Esselte Corporation	<u>Invox</u> Hardware Limited
Evergreen (C.P.) USA Inc	iRobot Corp.
<u>EZsmart</u> Gutter Cleaner, LLC	<u>iTech</u>
FDK AMERICA	Jasco Products Company
<u>Fedco</u> Electronics, Inc.	Jiawei Technologies (USA) Ltd.
<u>Ferno</u> - Washington, Inc.	JIN CO Ltd
Finish Thompson, Inc.	JKH Health Co., Ltd.
Flying Dragon Development Ltd.	JLG Industries Inc
<u>FujiFilm</u> Holdings America Corp	JVCKENWOOD USA Corp
Fujitsu America	KAN Battery Co., Ltd
<u>GammaTech</u> Computer Corporation	<u>Karcher</u> North America
Garmin International, Inc	Keyence Corporation of America
GE Healthcare Canada, Inc.	Keysight Technologies
Getac Inc.	Konica Minolta
Gibson Innovations USA, Inc.	<u>Kwonnie</u> Electrical Products, LTD
<u>GiiNii</u> Tech Corporation	<u>L'Image</u> Home Products Inc. (IHP)
Global Technology Systems, Inc	LEDVANCE, LLC.
Gold Peak Industries (NA), Inc	Lego Group
GRACO, Inc.	Leica Camera Inc
Gradus Group	Lenmar Enterprises, Inc.
Greatbatch Inc	Lenovo (United States) In
<u>GreenSmoke</u> , Inc.	LEXEL BATTERY CO LTD
GS Battery (USA) Inc.	LG Electronics Canada, Inc.
Guangzhou Great Power Energy Tech Co LTD	LG Electronics <u>MobileComm</u> USA
Harris Corporation	Logic Technology Development
Hewlett Packard <u>Enterpris</u>	LOGITECH INC.
Hilti, Inc.	Mag Instrument, Inc
Hitachi Koki Canada Co.	<u>Maha</u> Energy
Hitachi Koki USA Ltd	Makita Canada, Inc.
<u>Hobbico</u> , Inc	Makita USA
<u>HoMedics</u>	Mattel, Inc.
Honeywell International Inc.	<u>Meritool</u> LLC
HP Inc.	<u>Metabo</u> Corporation
HTC Corporation	Microsoft
Huawei Device USA. Inc	Midland Radio Corporation
Husqvarna AB	Miller <u>Mfg</u> Co
IDX System Technology Inc	Milwaukee Electric Tool Corporation
Illinois Tool Works	Moshi
IMA Test Steward	Motorola Mobility, LLC
Industrial Battery Service Inc	Motorola Solutions, Inc
Ingersoll Rand	MTD Products Inc
Inspired Energy, LLC	<u>myCharge</u>
Intec Industries Co. Ltd.	National Battery
<u>Intermetro</u> Industries Corp	National Power Corp

NEC Corporation of America  
 Neptune Technology Group Inc.  
 Nest Labs, Inc.  
Netgear, Inc.  
 Nikon Canada Inc  
Nippon Primex Inc.  
Normark Innovations Inc.  
 Novatel Wireless Inc  
 NU MARK LLC  
Nylube Products Company LLC  
 O2COOL, LLC  
 Olympus Corp of the Americas  
 OOMA INC  
 Oracle America, Inc.  
 Palladium Energy  
 Panasonic Canada Inc  
 Panasonic Corporation  
Pantech Co Ltd  
 Pelican Products, Inc.  
 Philips Consumer Electron  
 Philips Lighting  
 Pioneer Home Entertainment  
 Pitney Bowes, Inc.  
 Plantronics, Inc.  
 Polycom, Inc.  
Positec Tool Corporation  
 POWER PRODUCTS  
Privoro, LLC  
 ProTeam, Inc.  
 PSA PARTS, INC.  
 Quality One Wireless  
 Rapport, Inc.  
Resistacap  
Richpower Industries, Inc.  
 Ricoh Imaging Americas Corporation  
 Ridge Tool Company (RIDGID)  
 RKI Instrument, Inc  
 Robert Bosch Tool Corporation  
 Royal Consumer Information Products, Inc.  
 RRC POWER SOLUTIONS  
 Samsung Electronics America Inc.  
 SANYO Energy (USA) Corp.  
Scosche Industries  
 SDI Technologies Inc  
Senco Products, Inc

Sensidyne LP  
SharkNinja  
 Sharp Electronics Corporation  
 SHIMANO  
 Sigma Corporation  
Sinopower Technology (HK) Ltd  
 Snap-on Inc  
 Sony Electronics, Inc  
 Southern Telecom, Inc.  
 SOUTHWICK TECHNOLOGIES INC  
 Southwire Company  
 Spectrum Brands  
 SRAM, LLC  
 Stanley Black & Decker, Inc.  
 Stihl Incorporated  
 Stihl Limited  
StorTronics  
Streamlight, Inc.  
 Summer Infant, Inc.  
 SUNBEAM PRODUCTS  
Surefire, LLC  
Tacony Corporation  
 TCL Mobile  
 TCT MOBILE INC-ALCATEL BlackBerry  
 Technical Power Systems Inc.  
 Techtronic Industries GmbH  
 Techtronic Trading Ltd  
 Test Rite Products Corp  
 Texas Instruments Inc  
 The Coleman Company  
 The Gillette Co/Braun Div  
 The Gillette Co/Oral-B Div  
 The Source  
 The Toro Company  
 TNR Technical  
 Tokyo Seimitsu Co., LTD  
 TomTom Inc.  
 TOSHIBA AMERICA  
 Toshiba of Canada Limited  
 Trans Cosmos America/GVIDO  
Transcosmos America Inc.  
Traxxas L.P.  
 Trek Bicycle Corporation  
 TTEK ASSEMBLIES INC  
 TTI (Macao Comm OfSh) Ltd

ULTRALIFE CORPORATION  
Uniden America Corporation  
VARTA Microbattery Inc.  
Venom Power  
Vera Bradley  
Vernier Software and Technology  
Vibratex, Inc.  
Vizio Inc.

VTech Telecommunications Ltd  
WACOM TECHNOLOGY CORP  
WATER PIK, INC.  
Whill, Inc  
WOHLER USA  
Xplore Technologies Corp.  
Zebra Technologies Corp  
Zippo Manufacturing Company