Battery Stewardship Renewal Plan for Manitoba

2018 – 2023

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Submitted to:
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Leading the charge for recycling.™

Table of Contents

Executive Summary 2
1. Plan Submission 3
2. Call2Recycle Overview 3
3. Collection System and Consumer Access 4
4. Transportation and Sorting 9
5. Processing of Products 9
6. Consumer Awareness - Education and Outreach 10
7. Funding Structure 12
8. Management of Environmental Impacts 13
9. Dispute Resolution 15
10. Performance Measurement and Targets 15
11. Stakeholder Consultation 17
12. Appendices 19
Appendix A: Glossary 19
Appendix B: Physical Flow Chart 20
Appendix C: Highlights from Ipsos Reid Research - Oct 2015 21
Appendix E: Summary of Performance Measures 26
Appendix F: Stewardship Plan Reference 27
Appendix G: Stakeholder Consultation FAQs 33

Executive Summary

Call2Recycle Canada, Inc. (Call2Recycle®) is a non-profit organization created by battery and product manufacturers committed to responsible recycling. The stewardship program has been operating in Canada since 1997 collecting and recycling primary and rechargeable batteries nationally. In 2011, Call2Recycle's program was approved by the Manitoba Government as the agent for battery stewardship in the province.

Since the program was officially launched, Call2Recycle has collected more than 540,000 kg of batteries in the province and diverted them from the waste stream. The program has experienced steady growth year over year for the last five years as a result of many awareness raising events, media and advertising efforts, and participation by our dedicated network of collection site operators encouraging their employees, customers, and communities to recycle their batteries.

Pursuant to the requirements of the Manitoba Household Hazardous Material and Prescribed Material Stewardship Regulation, this Product Stewardship Plan is being submitted for review and approval for Call2Recycle to continue as the battery stewardship program for the Province.

This plan covers the five-year period from 2018 through 2023. It provides an outline of current program operations and our plans to further grow the program in Manitoba.

During the course of this plan, Call2Recycle proposes to:

- Increase consumer awareness of battery recycling from 77% to 85%
- Increase incidence/frequency of battery recycling from 44% to 60%
- Increase accessibility to recycling from the current 91% to 95%
- Reach a recovery rate of 30% by 2023

Continuous improvement is fundamental to the future success of the Call2Recycle program. As such, ongoing investment in research and development to enhance our collection and recycling infrastructure is essential. Performance measures and targets herein will be achieved through enhancing public awareness initiatives, increasing accessibility, leveraging partnerships with producers and collection organizations, transparent operational management, and continuing collaboration with the Province toward our shared goals. Every year a report will be provided to Manitoba Sustainable Development to review activities and performance.

Call2Recycle has proven its ability to meet the requirements of a stewardship program for Manitoba Sustainable Development over the past years. Further, we are an ideal candidate to continue as the stewardship program because we are focused on overcoming any challenges present in the marketplace, and we continue to investigate and utilize new technologies and go-to-market strategies. We look forward to continued collaboration with Manitoba Sustainable Development and also the residents of the province to increase battery collections and recycling.

1. Plan Submission

In keeping with the requirements of the Household Hazardous Material and Prescribed Material Stewardship Regulation (the "Regulation") issued under The Waste Reduction and Prevention Act and the Guideline for stewardship programs issued in Manitoba, Call2Recycle Canada, Inc. has developed this five-year battery recycling plan renewal and is submitting it for approval to Manitoba Sustainable Development.

2. Call2Recycle Overview

Call2Recycle Canada, Inc., which administers the Call2Recycle® program, is a Canadian-owned not-for-profit product stewardship organization. The program was established to fulfill the product stewardship obligations for retailers and distributors of products, battery manufacturers, and manufacturers whose products contain batteries. From inception, the program has diverted more than 100 million kilograms of batteries and cellphones from the solid waste stream and established 30,000 collection sites across North America.

Since 1997, Call2Recycle has operated a robust battery collection and recycling program across North America, and today works on behalf of more than 300 battery and product manufacturers and retailers. The program collects and recycles dry-cell batteries weighing less than five (5) kilograms from local governments, businesses, and consumers at no cost to them. Call2Recycle Canada is governed by a Canadian Board of Directors.

Our network of public and private collection facilities, sorters, and processors ensures optimal efficiency, cost-effectiveness, and continued growth along with promoting ease and practicality of the program. Call2Recycle's national reach minimizes confusion among consumers and reduces administrative red tape and redundancies for larger collection site operators.

In order to be effective contributors to the cause of conservation and recovery, Call2Recycle routinely adopts best practices gleaned from its own research and from associate organizations both in Canada and internationally to increase collections. Promoting environmental sustainability across the country, the program meets Basel Action Network (BAN) e-Steward qualification standards, and is the first program of its kind to receive the Responsible Recycling Practices Standard (R2) certification. As a result, Call2Recycle is the preferred choice for product stewards and stakeholders including retailers, governments, stewardship organizations, associations, and NGOs.

In 2011, the Manitoba Government approved Call2Recycle as the agency to meet producer obligations for household batteries. As required by the government we are submitting this five-year renewal plan for review and approval. This Product Stewardship Plan proposes to continue to build on the past success of the Call2Recycle program in Manitoba.

Pursuant to the requirements of the Manitoba Household Hazardous Material and Prescribed Material Stewardship Regulation, Call2Recycle submitted a product stewardship plan to Manitoba Sustainable Development in June 2017. Subsequently, the Minister of Sustainable Development approved the plan in July 2018 subject to a number of conditions of approval. This

version of Call2Recyle's Product Stewardship Plan reflects those conditions of approval and covers the new approval period, which is July 2018 to June 2023.

3. Collection System and Consumer Access

Call2Recycle operates a simple and highly efficient program. Our primary focus is to recycle consumer batteries wherein 100% of batteries collected through our program are diverted from landfill. The program is offered at no cost to consumers dropping off their batteries at our collection sites and for those signing up as collection site partners.

The program collects batteries weighing up to five (5) kilograms from collection facilities located across the province for consumer convenience. Batteries are shipped and sorted by chemistry, then sent to processing partners where their component parts are extracted for reuse in such products as new batteries, stainless steel alloy, and roadbed aggregate additives.

Applicable Products

Call2Recycle manages a recycling program for batteries which includes:

- Rechargeable and primary (single-use) battery chemistries
- Batteries, regardless of whether the battery is supplied as a stand-alone product or embedded in a product
- Batteries generated by both consumers and those generated by private businesses and other organizations

The Call2Recycle program accepts dry-cell batteries weighing less than five (5) kilograms each. Below is a list of the battery chemistries we accept:

- Nickel Cadmium (Ni-Cd)
- Nickel Metal Hydride (Ni-MH)
- Lithium Ion (Li-Ion)
- Nickel Zinc (Ni-Zn)
- Small Sealed Lead Acid
- Portable Power Banks
- Lithium Primary
- Alkaline/Carbon Zinc (AA, AAA, 9V etc.)
- Zinc Air
- Silver Oxide

Batteries sold in or with a product[1] including:

- Garden tools
- Construction/renovation tools
- Smoke and CO alarms
- Portable flashlights and spotlights
- E-toys

(See Appendix A: Glossary for detailed definitions.)

[1] Products not covered under an existing stewardship plan.

Excluded Products

This stewardship plan does not include management of:

- Motive batteries [2]
- Wet cell batteries
- Batteries weighing more than 5 kg

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 manufacturer that is not a registered steward with the Call2Recycle program. It should be noted that both “orphaned” and “free rider” batteries are accepted by our program, and all batteries are diverted from landfill. Call2Recycle makes concerted efforts to register all battery manufacturers with the program to eliminate “free rider” activity to ensure fairness in the market and compliance with the Regulations. This ongoing process involves identifying potential “free riders” followed by a series of recruitment actions including contacting the organization through letters and follow-up phone calls. This formal undertaking is continued until the “free rider” signs on to the Call2Recycle program or provides information that it has its own battery recycling program in the Province. In the case that the organization either refuses to comply or is unresponsive to our efforts and we have exhausted all avenues, we will seek assistance from Manitoba Sustainable Development to bring these Stewards into compliance.

Collection System

Since 2011, Call2Recycle has laid the foundation for a robust battery collection and recycling program serving Manitoba residents and businesses. In total, more than 540,000 kilograms of batteries have been collected and diverted from the Manitoba waste stream. Call2Recycle will continue to engage with and encourage residents to drop-off their batteries at one of our many collection sites.

Call2Recycle collection facilities use one of two collection methods: the bulk program or the box program. Our bulk program caters to facilities that generate large quantities of batteries for recycling (250 kg minimum per shipment). The box program is designed for facilities that do not generate large quantities of batteries in a short period of time or do not have the space to collect bulk quantities. These facilities receive collection boxes free of charge. The box kits include promotional material, plastic bags for battery terminal protection, and pre-paid shipping labels. Each box holds up to 30 kilograms of batteries. Call2Recycle covers the cost of shipping for both the bulk and box programs.

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

[2] Managed under the Canadian Battery Association (CBA) program.

- **Accessibility** – To ensure an optimal number of collection sites 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, holding recycling/round-up events, or through curbside battery collection.
- **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. an electronics store or recycling depots).

Collection locations that are available to Manitoba residents are listed on Call2Recycle's website and mobile phone locator. Residents can search by postal code or city and province to find a battery collection location. In addition, they can select a geographical radius of up to 150 km or even utilize the 'Recycle on the Way' feature that allows them to provide a start and end address and then shows drop-off locations that are en route to their destination.

Research into domestic and international battery recycling programs shows no direct correlation between changes in the number of collection sites and collection quantities. While there is a need to increase the number of collection sites throughout the province, specifically in rural and remote areas, Call2Recycle maintains a strong collection network throughout Manitoba.

For the duration of this plan Call2Recycle will take proactive measures to increase the number of collection sites across the province specifically targeting municipalities, retailers, businesses, and government agencies. We will also work to ensure that residents in urban, rural, and remote areas (including First Nation communities) are served with a variety of battery recycling options that range from permanent drop-off facilities, seasonal and event recycling, and direct door-to-door (curbside). (For strategies see section 7. Consumer Awareness.)

Over the past years, Call2Recycle has been signing up various businesses as private collection sites. As part of this renewal plan, efforts will continue to sign up these large volume generators of spent batteries. They also have the option to use Municipal and Eco-Depots that are open to the public. Depots are accessible by anyone, including large volume generators unless the specific depot has chosen otherwise.

Northern and Remote Communities

Northern, remote and First Nations communities pose specific challenges to collecting not only batteries for recycling, but all stewarded materials. These communities include geographic areas not serviced by Canada Post, only accessible by plane or ice roads in winter, and low population density spread out over a large area. Some of the issues in servicing these communities include land transport accessibility, cost of service, infrastructure and willingness of the locals to participate.

Call2Recycle will continue its collaboration with a variety of remote communities including First Nations, municipal offices and provincial government. Joining forces with other Producer

Responsible Organizations (PROs) is another strategy to service remote communities by pooling resources, sharing costs, and promoting and educating on recycling.

In the coming years Call2Recycle will continue to work with organizations such as Indigenous and Northern Affairs Canada to participate in Environmental Awareness sessions with First Nations communities. Call2Recycle will deliver presentations and educational material to create awareness for our program among the First Nations chiefs and their communities. These types of sessions provided insights in the various communities' needs and preferences.

Beginning in 2017, Call2Recycle has expanded our efforts in northern Manitoba. We will pilot a knowledge gathering project specifically targeting First Nations communities to better understand their needs and challenges.

Consumer Accessibility

Call2Recycle has serviced the province of Manitoba for 20 years with its collection and recycling program. At the time of this plan development, 91% of the Manitoba population has a drop off location within 15 kilometers of their home. While coverage in many urban areas exceeds the 15 kilometers' accessibility standard, improvements will be made to increase the number of collection facilities and/or collection methods in non-urban communities as well as First Nations communities.

By the end of 2023, Call2Recycle intends that 95% of the population will be within 15 kilometers of a public collection site. (See section 10. Performance Measurement and Targets)

The following chart and map depict the current Call2Recycle collection network.

Manitoba Network Summary

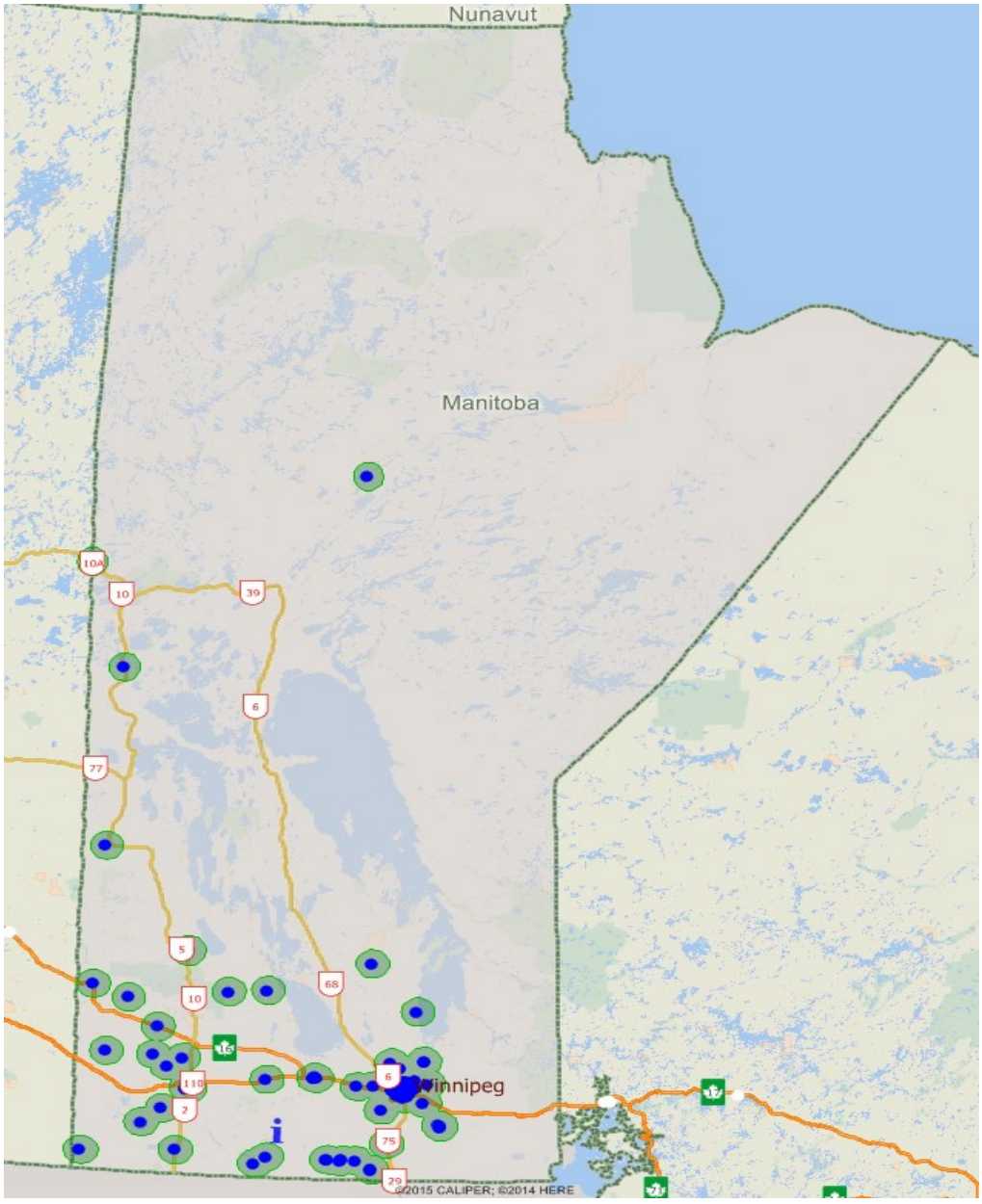
Total Active Sites	Active Public Sites	Active Private Sites	Accessibility
682	296	386	91%

In an effort to continually improve the convenience of its collection network within Manitoba, Call2Recycle will evaluate the Manitoba network on a semi-annual basis and actively solicit participation when and where needed.

Call2Recycle will also continue testing new methods for collecting batteries from Manitoba residents to enhance access. For example, the ultimate in offering consumers accessibility is curbside collection.

While curbside collection for recycling a variety of products has been around for decades, the ability to collect batteries via curbside is new and in a testing phase. One challenge to implementing curbside is that waste pick-up is becoming more automated and uses larger equipment providing personnel a hands-free work environment with no necessity to get out of their vehicle. Due to the nature of the size of batteries our program collects, and the fact that some types may fall under hazardous waste, collections in the traditional manner (for example - with other blue box materials) is not possible. However, Call2Recycle will endeavour to pilot a curbside collection program to enhance consumer access.

Manitoba Collection Network Map



4. Transportation and Sorting

Call2Recycle will continue to utilize a variety of service providers including those for transportation and sorting. (See Appendix B: Call2Recycle Physical Flow Chart) In order to optimize participation, improve efficiency, and meet or exceed collection targets Call2Recycle is committed to an open, transparent, and fair process in selecting service providers.

Call2Recycle operates in accordance with intra- and inter-provincial shipping and transportation standards established by Transport Canada, Environment Canada, and any other applicable provincial environment and transportation ministry approvals. Shipments transported internationally are manifested/shipped according to Environment Canada, Transport Canada, US Environmental Protection Agency, and the US Department of Transportation.

Currently there are no sorters operating in Manitoba. Therefore, batteries collected through Call2Recycle in the province are sorted and consolidated in Ontario. While sorting batteries is currently done manually, new technologies are emerging and Call2Recycle remains at the forefront of investigating and utilizing these resources. Recently Call2Recycle contracted with a new sortation provider. This is the only operation in North America using automated sorting technology to separate batteries by chemistry. An artificially intelligent optical sortation device, the system sorts cylindrical batteries using a visible-light camera to determine brand and chemistry. Due to this automation, these types of batteries can now be sorted and separated at a rate of up to 1000 kg of batteries per hour. This is not only a more cost-effective method for sortation; it also increases Call2Recycle's ability to handle greater volumes of collections and lessens the likelihood of human error.

Once batteries are sorted according to chemistry, their weights are recorded, and they are readied for shipping to the appropriate recycling processor based on their chemical composition.

5. Processing of Products

Call2Recycle is committed to meeting the highest global standards for safe and effective battery processing. We seek to maximize the amount of material that is captured from processing to direct it to secondary uses. Through the Call2Recycle program, all of the battery's constituent parts are reclaimed and diverted from the waste stream.

Different battery chemistries require different reclamation methods; therefore, Call2Recycle seeks partnerships with various processors to ensure optimal performance. We seek local processing partners wherever possible to reduce our transportation footprint. All of our processing facilities use the latest and proven-effective thermal, mechanical, or chemical processes to recover materials such as nickel, iron, lead, cadmium, and cobalt.

Service partners are and will continue to be qualified by Call2Recycle under its rigorous 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:

- Review of the facility audit performed by CHWMEG (in past 2 years) or outside auditor chosen by Call2Recycle to ensure the facility is in compliance with all regulatory and performance requirements. CHWMEG, Inc. is a non-profit trade association comprised of manufacturing and other "industrial" companies interested in efficiently managing the waste management aspects of their environmental stewardship programs. Their programs are based upon their potential environmental liability related to the wastes that are inherently generated by their companies' manufacturing processes.
- 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:

- Responsible Recycling (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.
- Basel Action Network (BAN): Call2Recycle is the first battery recycling program to be recognized as an e-Steward, by the Basel Action Network (BAN), for ensuring that the battery and electronic waste (e-waste) that the program collects and recycles is not dumped in developing countries, local landfills, or incinerators. Thus, certifying that the Call2Recycle program adheres to the strictest social and environmental standards.

Call2Recycle regularly monitors the landscape to keep abreast of the activities, regulations, and new capabilities within processing facilities both locally (unfortunately at this time there are no processors in Manitoba) and nationally. We also commit 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.

6. Consumer Awareness - Education and Outreach

Strategic Approach

Call2Recycle will employ an aggressive education and program awareness building campaign over the course of this plan. Primarily focusing on Manitoba residents, we will enlist our

collection network participants - retailers, businesses, and municipalities - to raise awareness, drive participation, and maximize collections. On a parallel track, Call2Recycle will implement a proactive program to reach key opinion leaders, stakeholders, and media outlets. This will be complemented by an integrated, multi-channel approach through traditional, non-traditional, and digital media, as well as sponsorships and partnerships to efficiently reach the defined target audiences and further battery diversion goals.

While Call2Recycle operates a national program across Canada, it also appreciates the unique characteristics of individual provinces, its residents, and available communication channels. Knowing who to reach and how to reach them is critical to the success of any outreach and education plan. To that end, Call2Recycle will continue to engage in specific research to understand the nuances of the Manitoba market. (See Appendix C for Highlights of 2015 Ipsos Reid Research Summary and Learnings.)

To ensure a successful education and awareness campaign, the marketing budget will support a range of new and recurring outreach and education efforts. We will monitor consumer behaviours, attitudes, and actions, and will evaluate programs against key metrics, including collection targets and collection network accessibility. Based on continued learnings and outcomes, strategies and plans will be adjusted accordingly.

Objectives

1) **Educate:** Inform Manitoba residents that a free collection and recycling solution exists for consumer batteries and what types of batteries can be recycled.
2) **Motivate:** Inspire the audience to recognize the role they play — raising awareness of the importance of battery recycling.
3) **Move to action:** Demonstrate the accessibility of battery drop-off sites, and provide a range of opportunities to find collection locations via online, partner, and telephone locators.

Target Audiences

A. Manitoba Residents:
- Consumers
- Businesses

B. Collection Network:
- Public Site (collects directly from residents): Municipalities, Retailers, Communities
- Private Site (internal collections): Solid Waste Facilities, Businesses

C. Stakeholders:
- Key Influencers (Local Government, Industry and Trade Associations, and Non-Governmental Organizations – NGOs-)
- Battery Stewards
- Media, Experts, Influencers

Call2Recycle's collection network - whether a public or private site - receive ongoing training and support. Education is provided on how to participate as a collection site. Other materials are

designed to educate staff, and show how to promote collections to the public. A variety of communication vehicles are used to increase consumer awareness on battery recycling at the point of sale including posters, rack cards, bookmarks, promotional items, brochures, signage, newsletters, email blasts, etc. For some examples of material visit http://www.call2recycle.ca/downloads/

To further promote recycling of batteries, Call2Recycle requests that collection boxes are placed in an area that is clear and visible. However, the decision on where to place collection receptacles lies with the individual sites.

Below is an overview of the marketing plan in chart form.

Audience	Strategies	Campaigns/Tactics
A. Manitoba Residents & Businesses		
Consumers	Seasonal Campaigns: National & Local	National: National Battery Day, Spring Cleaning, Back to School, Daylight Saving, Holiday Local: Waste Reduction Week Library Campaign, Winter Arena Campaign
Businesses	Key Industry-focused Campaigns	Campaigns targeted at Healthcare, Hospitality, Education, Travel, Solid Waste Facilities
B. Collection Network		
Municipalities/ Communities	Campaigns for organizations who collect directly from residents at public and private places	Depots: National Municipal Depot Campaign Collection site Newsletter
Retailers		Retail Campaigns Retailers Newsletter
C. Stakeholders		
Key Influencers	Partnerships with Local Government, Industry and Trade Associations, Non-Governmental Organizations	Association Partnerships: AMM, MARR NGO Partnerships: Manitoba Eco-Network Environmental Partnerships: Pride Manitoba
Stewards	Activities focused on supporters and contributors to our program	Stewards Newsletter
Thought Leaders	Programs targeting media, journalists, subject matter experts, key decision makers	National and Local Media campaign Focused events and conferences

7. Funding Structure

On February 1, 2017, Call2Recycle implemented a new funding model. Advance notice of this program modification was provided to Manitoba Sustainable Development along with a stakeholder communication plan. The funding mechanism is 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 Board of Directors.

Based on the number of units of batteries sold into Manitoba, Stewards report quantities sold into the Province at pre-set periods using an online system. Call2Recycle will continue to keep Manitoba Sustainable Development apprised of any upcoming changes pertaining to the Schedule of EHFs.

EHFs are used as a means to fund the program including but not limited to communications, collections, processing, and administration. Call2Recycle's program budgeting follows the same structure as most other steward programs.

Call2Recycle will ensure accurate Steward remittances through a system that could include periodic audits to verify compliance and completeness of reporting of EHFs.
It is solely the decision of the individual Stewards whether or not to recover the EHFs 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.

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.

Call2Recycle complies with all annual reporting requirements as stipulated by Manitoba Sustainable Development as per the Regulation. Our consolidated finances are audited annually by an independent third-party auditor, and the results are made public and provided to stakeholders.

A report specific to the province is provided to Manitoba Sustainable Development annually. As stipulated in the Regulation, the report provides an account of activities in the Province as relates to the waste management of batteries, including but not limited to consumer outreach and education, and collection performance. Once approved the report is posted on the Manitoba page at call2recycle.ca/manitoba.

In accordance with the requirements of the WRAP Act and the Regulation, Call2Recycle will remit annual payments to Manitoba Sustainable Development for the payment of salaries and other costs of government for the administration and enforcement of the WRAP Act and the Regulation for the duration of this plan.

8. 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 in a position to promote a reduction in the use of batteries, and reconditioning batteries for reuse can pose an unacceptable safety risk to consumers. Therefore, we do not support reconditioning batteries unless certain strict conditions pertaining to the reconditioning organization, the safety testing, and the proper labeling of reconditioned batteries are met.

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

Call2Recycle had been relying on a hazardous waste generator registration for the storage of waste rechargeable batteries and spent electronics that it handles, but there is no requirement to use a manifest or have individual collection sites licensed. The Province has replaced several of the relevant regulations under the Dangerous Goods Transportation Act with a new Hazardous Waste Regulation that came into force effective May 25, 2016 however it is not necessary to obtain any additional or amended permits for the Call2Recycle Canada program in its current form, as confirmed by the Environmental Approvals Branch of Manitoba Sustainable Department.

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. We continually monitor each processor to ensure competitive pricing and an ability to adapt to increases in volume. The following charts show the recycling efficiency rates (recovery rates) for the processors currently used by the Call2Recycle program and how the various materials are managed.

Recycling Efficiency Rates

	Rechargeable Battery Chemistry			Primary Chemistry	
Battery Type	NI-CD	LI-ION	NI-MH	ALKALINE	LITHIUM
Processor	Inmetco	Glencore	Inmetco	Inmetco	Inmetco
% Material Recovered*					
To Metals	50%	27%	57%	21%	0 to 50%
To co-product, aggregate	2%	0%	14%	1%	37%
To Cadmium	12%	0%	0%	0%	0%
To Secondary Recovery**	4%	0%	5%	57%	2%
Plastic Recovery or Reductant	12%	44%	10%	5%	2%
Total Recovery	**80%**	**71%**	**86%**	**84%**	**91%**

All collected batteries are sent to sorters and processors in Canada and the U.S. (See Appendix B: Physical Flow chart.) Each of these facilities uses thermal, mechanical, or chemical recovery processes to reclaim materials such as nickel, iron, lead, cadmium, and cobalt, and prepare them for use in new products such as new batteries, stainless steel alloy, and roadbed aggregate additives. Some processes also recover plastic and other constituents.

Environmental Transparency and Accountability

Call2Recycle maintains a commitment to third-party audit of non-financial, material end-fates, and downstream processes in accordance with Manitoba Sustainable Development's requirements, in order to ensure transparency and accountability to the government and to the public.

9. Dispute Resolution

Call2Recycle has established written agreements with our Stewards (Membership and Proxy Agreements – available at http://www.call2recycle.ca/resources-support-centre/) and service providers (sortation and processing partners). Disputes with either of these groups follow a similar process to ensure that there is a fair and equitable resolution. 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 another mutually agreed upon timeframe). If we cannot come to a resolution within the given timeframe, the two will select a mutually agreed upon third party to arbitrate and settle the dispute with his/her decision.

10. Performance Measurement and Targets

It is important to measure the success of a program and organization in order to improve its performance and ensure accountability. In its original plan submission in 2010, Call2Recycle provided Manitoba Sustainable Development with specific collection and recycling targets and thereafter with an annual report on performance. With this plan renewal, the program performance measures remain consistent. The projected new targets are based on the learnings and growth within the province over the past five years. In reviewing performance, both quantitative and qualitative measures are taken into consideration to allow for a full evaluation of the battery stewardship program in Manitoba.

Accessibility

In 2016, 91% of Manitobans resided within 15 kilometres of a Call2Recycle drop-off site. By 2021, Call2Recycle will ensure that accessibility will reach 95%. Accessibility and convenience is critical in driving recycling behaviour. By the end of 2021 the program will expand recycling convenience beyond the traditional "brick and mortar" concept and work with municipal and waste collectors to provide additional recycling services through events and/or curbside

collections.

As previously written, Call2Recycle will focus on alleviating the challenges of recycling in remote and First Nations communities with a goal of increasing their accessibility to battery recycling. While the methods may not be traditional drop-off locations, we will work with locals, government and other PROs to provide services that are specific to their unique needs and that are cost effective for the program.

A chart with the annual accessibility target is provided below.

2018	2019	2020	2021	2022	2023
90%	91%	92%	93%	94%	95%

Battery Sales and Recovery Rate

The recovery rate is calculated by total weight collected in each calendar year divided by the total weight sold in the calendar year and expressed as a percentage. Calculating the amount of batteries sold into Manitoba can be challenging for a variety of reasons including:

1) Weight of certain battery chemistries sold into the market declines year over year - Heavier battery chemistries, such as nickel cadmium, are being replace by lighter lithium-ion batteries. This will have implications on the overall battery weight sold into the market.
2) Life of a battery - Battery life is increasing which reduces the need to replace batteries as frequently.
3) Type of battery - Products that currently require primary batteries will likely be replaced by those that run on rechargeable batteries – both embedded and easily removable.
4) 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.
5) 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.

Changing market conditions add to the difficulty of estimating actual sales into market, Call2Recycle will strive to achieve the targets as set out below. The targets also take into account Manitoba specificities such as population density, urban/rural and remote location challenges.

The plan goal is to attain a 30% recovery rate of batteries that are sold into the Manitoba market by the end of year five (2023). Call2Recycle will annually assess performance against targets

using pre-defined metrics and may adjust strategies if necessary. Any performance deficiencies will be outlined in a remediation plan, including corrective and strategic actions. The chart below indicates the stepped approached to reach 30% by 2023.

Recovery Targets

	2018	2019	2020	2021	2022	2023
Collection Targets (as a % of sales)	20%	22%	24%	26%	28%	30%

Implementation Timeline

As outlined in the Education and Outreach section, seasonal and other promotions and events will be ongoing through the renewal plan years. The number of initiatives will vary over the years all focusing on accessibility, awareness and action. We will regularly meet with other provincial PROs to identify opportunities for partnerships that promote stewardship programs.

Major initiatives to increase Accessibility, Awareness and Action 2017 - 2019
Consumer Education - through schools and libraries
Collection Methods - for example curbside pick up
Increasing Collections - from northern, remote and First Nations communities

For an overview of all targets included throughout this plan, see Appendix E for the Summary of Performance Measures chart.

For an overview of stewardship plan requirements and location in this plan, see Appendix F for the Stewardship Plan Reference chart.

11. Stakeholder Consultation

Prior to being submitted to Manitoba Sustainable Development, Call2Recycle presented its plan for consultations from stakeholders and the general public using the following methods:

1) The plan was posted on Call2Recycle's website on April 4, 2016
2) Information about the consultations was posted on call2recycle.ca/mbconsultations/
3) Consultation announcements and requests to participate were sent to more than 300 stakeholders

4) A webinar was held on April 21, 2016 at 2:00 pm EDT. The recording of the webinar was subsequently posted on call2recycle.ca/mbconsultations/
5) Communications and inquiries regarding the renewal plan were carried out through email at mbplan@call2recycle.ca and via phone by central Canada staff.
6) Frequently asked questions and answers relating to the renewal plan and consultations were posted on our website and can be found in Appendix G.

During the consultation phase some questions about the program where asked (see Appendix G) but no concerns about the program where raised.

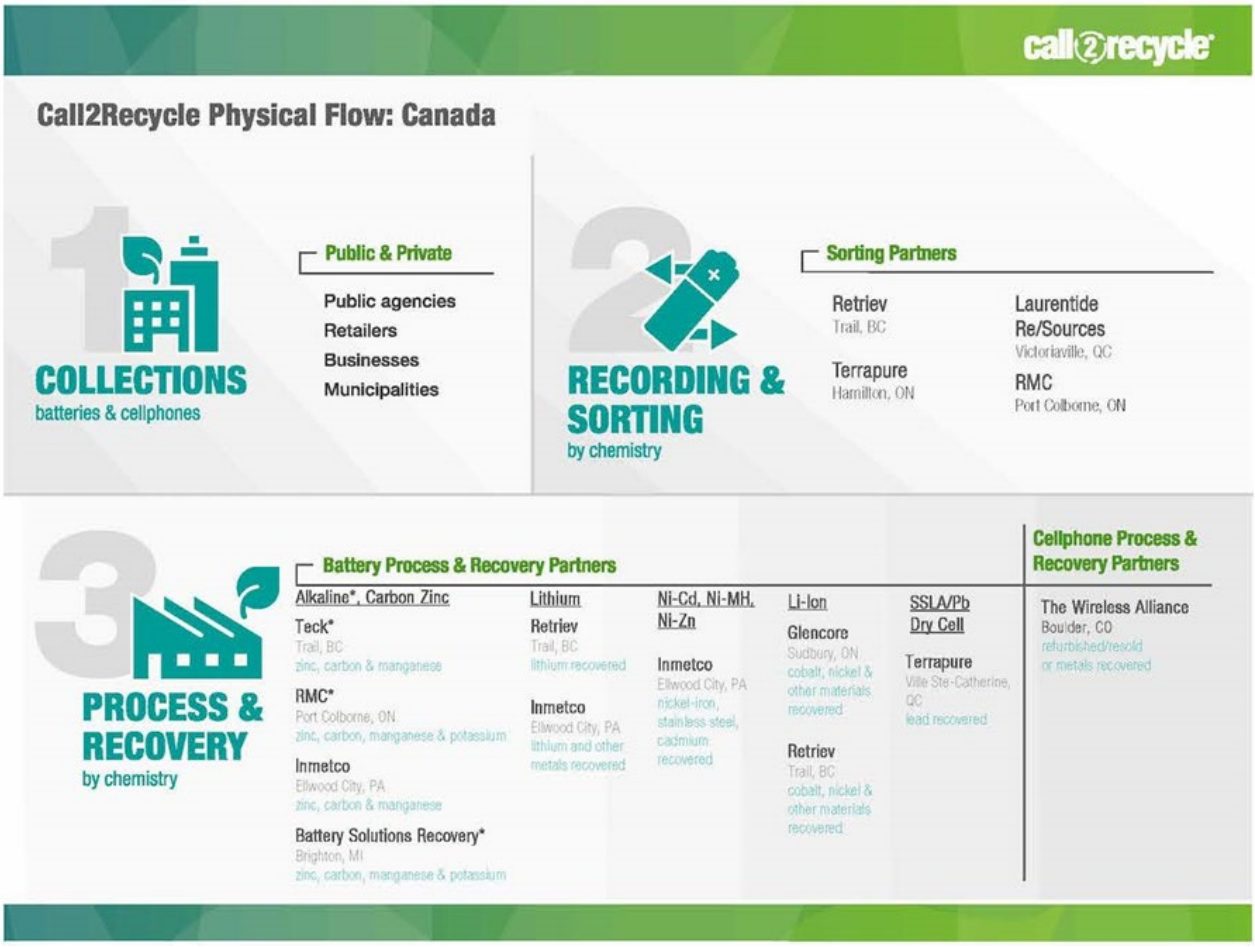
Further public consultations may be undertaken by Manitoba Sustainable Development.

12. Appendices
Appendix A: Glossary

The following is a glossary of key terms and definitions in this plan.

TERM	DEFINITION
Alkaline /Carbon Zinc	A type of single-use battery (e.g., AA or AAA batteries).
Lithium Ion (Li-Ion)	A type of rechargeable battery.
Batteries sod in or with a product	A device sold with an easily removable battery/batteries that is not covered under an existing stewardship program and includes, e-toys, smoke and co alarms, garden tool, construction/renovation tools, flashlights and spotlights.
Lithium Metal/Lithium	A type of single-use battery.
Nickel Cadmium (Ni-Cd)	A type of rechargeable battery
Nickel Metal Hydride (Ni-MH)	A type of rechargeable battery.
Primary Battery	A battery that cannot be recharged by the consumer (for example, but not limited to, alkaline, Carbon Zinc, lithium and zinc-air commonly known as AA, AAA, 9V, D-cell, and button cell batteries). Also referred to as single-use batteries.
Portable Power	A lithium-based, stand-alone rechargeable battery
Rechargeable Battery	A type of battery that is designed to be used for a longer period of time than a primary battery and is capable of being recharged.
Single-Use Battery	Also referred to as primary batteries. A battery that cannot be recharged by the consumer (for example, but not limited to, alkaline, lithium and zinc-air commonly known as AA, AAA, 9V, D-cell, and button cell).
Zinc-air	A type of single-use battery. These batteries can typically be found in small devices such as hearing aids.

Appendix B: Physical Flow Chart*



*Flow charts are updated from time to time and can be found at http://www.call2recycle.ca/flow-chart

Appendix C: Highlights from Ipsos Reid Research - Oct 2015

- Eight in ten (77%) residents of Manitoba say that at least some kinds of household batteries can be recycled while one in five (19%) say they don't know and 4% say no, they can't be recycled.
- Men (81%) are significantly more likely than women (74%) to believe that household batteries can be recycled. Women (22%) are much more likely than men (15%) to not know if household batteries can be recycled.
- There is not much variation in responses by age, however, 18-34 year olds are slightly more likely than 35-54 year olds and residents 55+ to believe batteries can be recycled.
- Looking at all batteries, nearly three in ten (28%) are recycled. A majority (56%) of Manitobans say they recycle none of their batteries, while 15% recycle all of them. Roughly one in three (35%) batteries are thrown out – in fact, two in ten (19%) residents throw all of their batteries in the garbage, no matter what kind of battery.
- Most frequently, Manitoba residents have recycled their household batteries at a recycling depot or centre (37%), at a retailer (27%), and at work (24%).
- No matter the gender, most Manitobans recycle at a recycling depot or centre, at a retailer, and at work. Men appear to be more likely to recycle at these locations.
- 53% of Manitobans are saving their single-use batteries for a future recycling trip while 41% say it's easier to throw away rechargeable batteries, and over 30% just do not know what to do with their used batteries.

Appendix D: Battery Stewards

As at December 31, 2015 (Updated list can be found at www.call2recycle.ca/list-of-stewards/)

3M Personal Safety Division
Accell North America
Acco Brands Corporation
Ace Hardware Corporation
Acer America Corporation
Advanced Battery Systems, Inc.
Agilent Technologies
Allied Intl/Allied Tools
Alltrade Tools LLC
Alpha Source, Inc.
Amax Products
Amazon
Amazon.com, Inc.
American Lawn Mower Co
American Toppower
Anton/Bauer
APC - Schneider Electric
Asus Computer International
Avex Electronics Corporation
Baccus Global
barnesandnoble.com, LLC
Batteries du Quebec Inc.
Battery Specialties
Bayco Products
BCBGMAXAZRIA
Belkin International, Inc.
Best Buy Canada
Best Buy Co., Inc.
BionX International
Bissell Homecare, Inc.
Black & Decker Corporation
BlackBerry
BMR Group Inc.
BMW Canada Inc.
Bose Corporation
Braun/P&G/Gillette
Brother International
Bushnell, Inc.
Canac-Marquis Grenier Ltee.
Canadian Tire
Canon USA Inc.
Casio America, Inc.
Cell-Con Inc.
Chenzhou Grand-Pro Tech Co.,Ltd.
Chervon Limited
Chrysler Canada Inc.
Cisco Systems Inc.
Clean Republic SODO, LLC
Cleva North America/LawnMaster
CO-OP Atlantic
Coleman Company
Corporate Express
Costco
Couche Tard
CTE Energy Co., Ltd.
Dantona Industries/ Ultralast
Deere & Company (John Deere)
Delhaize America (Hannaford Supermarkets)
Dell Canada Inc.
Dell Inc.
Deltran USA LLC
Digi-Key Corporation
DLG Power Battery (Shanghai) Co.,Ltd.
Do It Best
Dollar General
Dollarama
Dongguan Golden Cel Battery Co.
Dorcy International, Inc.
Duracell Canada (P&G)
Duracell/Div of P&G
Duracell/Gillette Company/Proctor & Gamble
Eaton Corporation
Eco-Stream Canada
Enerco Group Inc.
Energizer Battery Manufacturing,

Inc.
Energizer Canada
Energy Sales
EnerSys Delaware Inc.
Epson America, Inc.
Esselte Corporation
Eveready (Energizer)
Evergreen (C.P.) USA Inc.
Excell Battery Company (W)
EZsmart Gutter Cleaner, LLC
Familiprix
Family Dollar
FdK America
Fedco Electronics, Inc.
Ferno - Washington, Inc.
Finish Thompson, Inc.
Ford of Canada
FujiFilm Holdings America Corp
Garmin International, Inc.
GE Healthcare Canada, Inc.
General Motors
General Wireless Operations (Old R/S)
Getac Inc.
Giant Tiger Stores Limited
Gibson Innovations
GiiNii Tech Corporation
Global Technology Systems, Inc.
Gold Peak Industries (NA), Inc.
GP Batteries International Limited
GP Battery Marketing Inc.
GRACO, Inc.
Greatbatch Inc.
Green Smoke Inc.
Groupe BMR Inc.
GS Battery (USA) Inc.
Harris Corporation
Hasbro
Hewlett Packard
Hilti, Inc.
Hitachi Koki Canada Co.
Hitachi Koki USA Ltd.
HOBBICO, Inc.
The Home Depot
Home Hardware
HoMedics
Honeywell International Inc.
House of Batteries
HTC (High Tech Computer)
Husqvarna AB
Hyundai Auto Canada Corp.
IDX System Technology Inc.
Illinois Tool Works
Indigo Books Inc.
Industrial Battery Service Inc.
Ingersoll Rand
Inspired Energy LLC
Intec Industries Co. Ltd.
Intermetro Industries Corp.
Interstate Batteries Recycling, LLC
Invacare Corporation
Invox Hardware Limited
iRobot Corp.
iTech
ITO Co., Ltd.
Jean Coutu Group Inc.
Jiawei Technologies (USA) Ltd.
JLG Industries Inc.
Jvckenwood USA Corp.
KAN Battery Co., Ltd.
Karcher North America
Keysight Technologies
Kia Canada Inc.
Kodak Canada
Kwonnie Electrical Products, Ltd.
L'Image Home Products
Lasource Division Gestion Quemar Inc.
Le Groupe Jean Coutu
Lego Group
Lego Systems Inc.
Lenmar Enterprises, Inc.
Lenovo Canada Inc.
Lexel Battery Co Ltd.
LG Electronics MobileComm USA
Loblaw Inc.
Logitech Inc.
Mag Instrument, Inc.
Makita Canada, Inc.
Makita USA

Mattel, Inc.
Maxell Corporation of America
McKesson Canada Corporation
McMahon Distributeur Inc.
Meritool LLC
Metabo Corporation
Metro
Metro Richelieu Inc.
Michael Stores Inc.
Microsoft
Midland Radio Corporation
Miller Mfg. Co.
Milwaukee Electric Tool Corp.
Mitsubishi Motors of Canada
Motorola Mobility LLC
MTD Products Inc.
Musco
myCharge
National Battery
National Power Corp
Neptune Technology Group Inc.
Netgear, Inc.
Nikon Canada Inc.
Nippon Primex Inc.
Nissan Canada Inc.
Nobil Instrument Inc.
Normark Innovations Inc.
Novatel Wireless Inc.
NYCL Company, Inc.
Nylube Products Company LLC
O2COOL, LLC
Olympus America Inc.
OOMA Inc.
Oracle America, Inc.
Original Power Inc.
Palladium Energy
Panasonic Canada Inc.
Panasonic Corporation
Panasonic North America Inc.
Pantech Co. Ltd.
Pelican Products, Inc.
Philips Consumer Lifestyle
Plantronics, Inc.
PLR IP Holdings, LLC (Polaroid)
Polycom, Inc.
Positec Tool Corporation
PowerMax Battery USA
ProTeam, Inc.
Pure Energy
Quality One Wireless
Rapport, Inc. formerly Car-Go
Rayovac/Spectrum Brands
Richpower Industries, Inc.
Ridge Tool Company (RIDGID)
RiteAid
RKI Instrument, Inc.
Robert Bosch Tool Corporation
Rocket Batteries Canada
Rona Inc.
Ronda Group Co., Ltd.
Royal Consumer Information Products, Inc.
Rozon Batteries Inc.
RRC Power Solutions
Sail Plein Air Inc.
Samsung Electronics Co.
SANYO Energy USA Corp.
Scosche Industries
Scotts Canada Ltd.
Sears Canada
SEE CGREEN1 GREENSMOKE
Senco Products, Inc.
Sensidyne LP
Sharp Electronic of Canada Ltd.
Shenzhen Jingkehui Electronic Co, Ltd.
Shoppers Drugmart Inc.
Sigma Corporation
Snap-on Inc.
Sobey's Quebec Inc.
Sony Canada
Sony Electronics, Inc.
Southern Telecom, Inc.
Southwick Technologies Inc.
Southwire Company
Spectrum Brands
SRAM, LLC
Stanley Black & Decker Corporation
Staples Canada, Inc.
Star Micronics Co., Ltd.

STIHL Incorporated
Stihl Limited
StorTronics
Streamlight, Inc.
Summer Infant, Inc.
Surefire, LLC
Suzuki Canada
Tacony Corporation
Technical Power Systems Inc.
Techtronic Industries Co Ltd
Techtronic Industries GmbH
Test Rite Products Corp
Texas Instruments Inc.
The Source
TNR Technical
Toro Company
Toshiba America
Toyota Canada Inc.
Toys R Us Canada Ltd.
Tractor Supply
Transcosmos America Inc.
Traxxas L.P.
Trek Bicycle Corporation
True Value
TTEK Assemblies Inc.
UAP Inc.
Ultralife Corporation
Uniden America Corporation
Uniprix
Universal Power Group
Varta Microbattery Inc.
Venom Group International
Vernier Software & Technology
Vibratex, Inc.
Vizio Inc.
VTech Telecommunications Ltd.
Wacom Technology Corp.
Walmart Canada Corporation
Water Pik Inc.
Wohler USA Inc.
Zebra Technologies
Zippo Manufacturing Company

Appendix E: Summary of Performance Measures

	Annual Targets and Goals					
Measures	**2018**	**2019**	**2020**	**2021**	**2022**	**2023**
Accessibility - % of population within 15 km of collection site	90%	91%	92%	93%	94%	95%
Collections Targets - batteries to be collected expressed as a percentage of what is sold into the MB market	20%	22%	24%	26%	28%	30%
Consumer Awareness	Conduct two (2) Omnibus Surveys per year to inform on awareness and incidence					
Battery Recycling Awareness*	77%	79%	81%	82%	84%	85%
Battery Recycling Incidence**	44%	48%	52%	56%	58%	60%
Locator Searches***	31,640	33,000	40,000	45,000	48,000	50,000

*Battery Recycling Awareness: # or % of residents aware that household batteries can be recycled in Manitoba

**Battery Recycling Incidence: # or % of residents who have recycled their batteries in Manitoba

***Drop-off locator on call2recycle.ca: # of MB-based searches

Appendix F: Stewardship Plan Reference

	Required in Plan	Location
A.	**Stewardship Plan**	
1	The establishment and administration of a waste reduction and prevention program for household hazardous material and prescribed material	Throughout Plan
2	The appropriate management of household hazardous material and prescribed material according to guidelines established by the minister	Throughout Plan
3	A province-wide, convenient collection system for waste material without user fees at the point of collection	Section 3
4	A system for the payment of expenses incurred in the collection, transportation, storage, processing and disposal of waste material in connection with the waste reduction and prevention program	Section 7
5	The orderly collection of revenue from program subscribers in balance with expenses for the program	Section 7
6	The establishment and administration of education activities for the program	Section 6
7	The establishment and administration of point-of-sale information for the program	Section 3
8	The payment of salaries and other costs for the administration and enforcement of the regulation and the Act as it relates to household hazardous material and prescribed material	Section 7
9	On-going consultations with those who may be affected by the program, including members of the public, in accordance with any consultation guidelines the minister may establish	Section 11
10.	The Plan may also deal with research and development, training and education activities, as well as activities related to waste reduction or pollution prevention. The minister may provide additional program guidance to program operators.	Section 6
B.	**Program Plan Evaluation** Proposed Plan shall demonstrate how:	
1	The cost of managing designated waste materials is borne by the stewards and users of the designated material rather than by the taxpayer	Section 7
2	The management of these materials is economically and environmentally sustainable	Section 8

	Required in Plan	Location
3	Product stewards determined how these materials are managed and how the affected industry and potential program partners will bear these costs	Section 7 & 8
4	The methodology by which fees, if any, will be set and collected under an approved program plan	Section 7
5	A comprehensive public awareness and education program will be developed and implemented in consultation with the department	Section 6
6	The operator will provide a province-wide collection system that ensures convenient and consistent public access in all regions of Manitoba	Section 3
7	The stewardship program in Manitoba is harmonized, where practical and feasible, with those of other provinces	Section 2
8	Funds raised for the management of a material or product relate to the costs of managing that designated material or product	Section 7
9	The transparency of program operations will be provided through the development of industry proposals, program plans, and annual reports, to be made available to all stakeholders	Throughout Plan and call2recycle.ca/manitoba
10	The operator undertook appropriate consultations on program plan proposals prior to submission of those proposals to government	Section 11
11	The operator will resolve stakeholder disputes	Section 9
12	The operator will conform to regulatory requirements to ensure a level playing field among stewards responsible for a designated waste stream	Section 1, 7 & 8
13	The operator will measure, monitor and report on program performance, including meeting designated material recovery rate targets	Section 9
14	The operator will adhere to guideline provisions for pollution prevention and best management practices (Section I).	Section 8
C.	**Public Consultation Process for Household Hazardous Material and Prescribed material**	

	Required in Plan	Location
1	Stewards shall: a. Ensure that stewardship program decisions and activities include processes or measures for informing those affected by decisions and actions in a timely manner b. Provide meaningful opportunity for public consultation and due process, including the timely release of pertinent information c. Ensure that local governments and citizen groups are consulted d. Employ collaborative decision-making and consensus-building processes, where appropriate	Section 1, 8 & 11
2	Stewards shall seek input during the development and amendment of the program plan, annual reporting, and review of operations from: a. Government b. Service delivery agencies c. Relevant external agencies d. The public.	Section 11
3	Prior to submitting its program plan to the minister, the applicant is required to consult with affected stakeholders and the public. To do this, stewards shall: a. At the outset of any program plan consultation, identify: i. who they expect to consult with; ii. the purpose of the consultation; and iii. how they will conduct the consultation. b. Seek input from those who i. Have a mandate or responsibility in a related program area ii. Are expected to implement the proposal iii. Are expected to bear the cost of implementing the proposal iv. May be impacted by the proposed plan	Section 1, 8 & 11
4	In a program plan proposal, stewards shall identify to the minister: a. Who has been consulted in the process of developing and evaluating the plan and/or proposal options b. Any objections and concerns raised by those who were consulted c. Endorsement of proposed responsibilities by program partners.	Section 11
D.	**Design of an Adequate Collection System**	

	Required in Plan	Location
1	The program plan shall adequately provide for collecting and managing waste household hazardous material and prescribed material	Section 3, 4 & 5
2	The collection system shall be designed to provide for reasonable and free consumer access to collection facilities and recycling services. The following service expectations are intended as a guide for program operators: a. Rural density: In rural areas, a radius of approximately 50 km is appropriate spacing for facilities. b. Urban density: In urban areas, facilities should be approximately 15 minutes travelling distance from any point. c. Remote and northern areas: In remote and northern areas, other standards may be proposed. Initiatives such as special collection events may be appropriate	Section 3 & 6
3	The collection system design should consider and prioritize the degree of risk presented by the product	Section 3, 4, 5 & 8
4	Consultation with local governments, municipal corporations, community councils, and First Nations should occur to determine the most effective collection systems for the communities	Section 3, 6 & 11
5	Stewards may partner with existing collection systems established by other stewards or another program plan for other designated materials	Section 3, 4, 6 & 8
6	Consumers shall not be charged a user fee at the point of collection	Section 2, 3, 6 & 7
E.	**Achieving Designated Material Performance Targets**	
1	In consultation with the program operator and other stakeholders, the minister will confirm minimum performance targets for designated material	Section 10
2	Stewards are expected to commit to continuous improvement in program performance.	Throughout Plan
3	The minister may establish other performance requirements in consultation with the program operator and other stakeholders	Section 10 and TBD
F.	**Establishing Appropriate Performance Measures**	
1	A steward may recommend program performance measures in the program plan submitted for approval. The measures must be able to show both what is recovered, and what is not	Section 10
2	The minister may specify one or more performance measures or targets as part of the program plan approval process	Section 10 and TBD

	Required in Plan	Location
3	The following are examples of acceptable performance measures: a. Sales and recovery data b. Municipal waste composition study results c. Periodic surveys of public awareness of the program and use of the collection system d. The amount of waste material collected by service providers; e. Number of collection points f. Proportion of product to be managed, according to the principles of pollution prevention and 4Rs hierarchy	Section 10
G.	**Dispute Resolution Procedure**	
1	A program plan shall adequately provide for a dispute resolution process, which allows for fair, transparent, and unbiased independent processes where all views are known when stakeholder or public interests may be affected.	Section 9
H.	**Annual Report**	
	Section 16 (1) of the Household Hazardous Material and Prescribed Material Stewardship Regulation requires the operator of an approved program plan to submit an annual report within 90 days after the end of each calendar year. In addition to Section 16 (2) of the regulation, which provides the minimum requirements for an annual report, operators shall: 1. Post a copy of the report on the program website 2. Document the performance in adherence to the program plan; and 3. Specify what the stewards will do to reduce or eliminate any gap between actual and projected performance	Section 6, 7, 10 & call2recycle.ca/manitoba
I	**Pollution Prevention and Best management Practices for Household Hazardous Material and Prescribed Material**	
1	For household hazardous material and prescribed material, Manitoba promotes the principles of pollution prevention and the 4Rs of reduce, reuse, recycle, and recover. This means: a. Safely using the product for its originally intended purpose b. Reuse of the products where it is safe to do so c. Recycling waste household hazardous material and prescribed material d. Disposing waste household hazardous material and prescribed material safely	Section 5 & 8
2	Manitoba prohibits the improper storage, illegal dumping, or landfilling, of waste household hazardous material and prescribed material.	Throughout Plan

	Required in Plan	Location
3	Stewardship program operators shall: a. Where environmentally and economically sustainable, promote local processing, manufacture and use of products from waste material as an alternative to exporting recovered material to another jurisdiction b. Operate in a manner supportive of national and international agreements	Throughout Plan

Appendix G: Stakeholder Consultation FAQs

Frequently Asked Questions

1) Why is Call2Recycle submitting a renewal plan for Manitoba?

Every stewardship program must submit a renewal plan every five (5) years as a requirement of the Household Hazardous Material and Prescribed Material Stewardship Regulation issued under The Waste Reduction and Prevention Act and the draft Guideline for stewardship programs issued in Manitoba.

2) Who is the renewal plan being submitted to?

The renewal plan is being submitted to the Ministry of Sustainable Development.

3) What type of batteries are accepted by the Call2Recycle program?

The Call2Recycle program accepts dry-cell batteries weighing less than five (5) kilograms each. (Automotive and wet cell batteries are not accepted.) Below is a list of the battery chemistries we accept:

- Nickel Cadmium (Ni-Cd): Commonly found in cordless power tolls, phones and digital cameras.
- Nickel Metal Hydride (Ni-MH): Commonly found in cellphones, cordless power tools, digital cameras and two-way radios.
- Lithium Ion (Li-Ion): Commonly found in cellphones, cordless power tools, laptops, tablets and e-readers.
- Nickel Zinc (Ni-Zn): Commonly found in wireless keyboards and small electronics.
- Lithium Primary: a type of single-use battery, cannot be recharged. Commonly found in smoke alarms, remote controls, computer peripherals, etc...
- Alkaline/Carbon Zinc (AA, AAA, 9V etc.): a type of single-use battery, cannot be recharged. Commonly found in smoke alarms, remote controls, computer peripherals, etc...

4) Where can I view the renewal plan?

The draft renewal plan is posted on the Manitoba section of the Call2Recycle website. To review the plan click here

5) When and where are the consultations being held?

A webinar consultation will be held on Thursday, April 21, 2016 at 2:00 p.m. EDT. This will be an opportunity to learn more about the Call2Recycle plan, and to make comments or ask questions.

6) What are the major differences between the last plan and the current renewal plan?

This renewal plan does not have many major differences from the original launch plan. Rather, it was designed to build on our learnings and successes in Manitoba over the past 5 years and ultimately increase our collections within the province.

Call2Recycle has refined the focus of the program for the coming years and is more specific in its strategies, and tactics to achieve our goals. The priority of the renewal plan is to increase accessibility and move consumers to action. For example, we will:

- Work more closely with municipalities
- Increase the focus on rural and remote communities, and
- Expand on our methods of collection (drives/round-up events/test curbside/etc)

7) **Will Call2Recycle increase consumer accessibility?**

Yes. Currently 81% of the Manitoba population has a drop off location within 15 kilometres of their home. We intend to move that number to 90% by the end of 2021. Call2Recycle will also continue testing new methods for collecting batteries from Manitoba residents to enhance access.

8) **Are there any changes in the renewal plan that will affect collection sites, service providers and/or Stewards of the Call2Recycle program?**

No. Nothing changes in terms of the nature of the program. However, Call2Recycle will seek to have even more collaboration with our various stakeholders. We will provide additional support to our collection network and municipalities, and leverage partnerships both locally and nationally.

9) **Will businesses collect batteries at their site and then bring them to a Call2Recycle collection location if collecting less than a certain threshold per month?**

No. Call2Recycle covers the shipping for all its collection sites. For facilities that do not generate large quantities of batteries we offer a box program that includes a pre-paid shipping label.

10) **What are the biggest challenges for Call2Recycle in running its program in Manitoba?**

The main challenge in running a recycling program in Manitoba is a low population density. There are a few “urban” areas with the rest of the population spread out in rural or very remote locations (i.e. no road access).

11) **How do you plan on working with rural and remote communities to increase recycling?**

The following are some of the tactics we will employ:

- Educate the public that there are battery recycling options for their communities
- Providing collection services in non-traditional ways - collections at atypical sites, special events or round-ups
- Work with First Nations - deliver presentations, attend workshops and provide educational materials
- Partner with other stewardship programs

12) **Does Call2Recycle work in other provinces?**

Yes. In addition to Manitoba, Call2Recycle is the official consumer battery collection program for the provinces of British Columbia and Quebec. Call2Recycle also runs a voluntary national battery recycling program with collection sites throughout Canada.

13) **Will the funding mechanism change?**

Not at the present time. The Call2Recycle program is financed by single-use and rechargeable battery manufacturers, and manufacturers whose products are powered by rechargeable batteries. It may however be necessary in the future to modify or change the current funding mechanism.

14) **How do I submit my comments or questions on the renewal plan? Is there a deadline?**

Comments may be submitted to mbplan@call2recycle.ca. The deadline for submissions is 17:00 EDT on April 28, 2016.