

RETAILER E-BIKE + E-SCOOTER BATTERY RECYCLING GUIDE

This guide will provide Bicycle Retailers an overview of the Canadian eBike + eScooter battery recycling program with a January 1, 2021 effective date, with a few Appendix at the back for reference beginning with ***APPENDIX A containing the recycling industry terminology.***

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To the Bicycle Retailer community in Canada,

Call2Recycle® is introducing the eBike and eScooter battery collection and recycling program effective January 1, 2021. Your store will be able to register beginning in January as an ebike battery collection site and, in conjunction with the bicycle OEMs/brand owners, help direct these end-of-life and damaged batteries to the right processors for recycling.

We are sending this letter to update on registering your store as a voluntary eBike battery collection partner with Call2Recycle; and for those retailers who may be obligated under provincial regulations, to provide information about obligations and the call2Recycle program.

Registering As A Collection Site

You can choose to register your store as an ebike battery collection site beginning in January. Call2Recycle's used battery collection program is a quick set up, pretty simple to operate and requires minimal staff resources to manage. For a complete overview of Call2Recycle's in-store eBike and eScooter battery collection program, including all promotional and support materials provided to you as a collection site, [please click here](#). Signing on as a collection site will begin January [via this link](#).

Collection sites receive and/or have access to:

- eBike battery recycling kits that are UN rated and contain a fire-retardant liner
- Damaged Defective eBike battery recycling kits that are UN rated and contain special CellBlock fire-retardant powder
- eBike handlebar hang tags*
- eBike battery stickers*
- Safe handling and packing instruction poster for service department

Environmental Handling Fee

Starting January 1, 2021, to cover the costs of battery collection, transportation and recycling, **bicycle OEMs/brand owners/importers of record who are participating in Call2Recycle's program will be charging \$10.00 CDN per battery as it goes into distribution within Canada.** You are permitted to pass the fee onto customers as long as it appears before tax.

Brands including Norco, Specialized, Trek, Electra, Pedego, Kona, Scott, Raleigh, Diamond Back, and Kracked to name a few, plus transmission and component suppliers Shimano and Bosch (via LTP) are participating. You will be hearing from them and other brands in the coming weeks.

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Legislative Requirements for Battery Recycling

Bicycle OEMs/brand owners/importers of record are obligated by provincial waste regulations in P.E.I., Que., Ont., Man., Sask., and B.C. to arrange for the recycling of the batteries used to power their products once they reach their end of life. In most instances the Bicycle OEM/brand owner is assuming this responsibility and have chosen to work with Call2Recycle in all provinces including those that are not regulated.

There is a small number of bicycle brands imported into Canada by Bicycle Retailers themselves. In this situation it is possible that you as the importer would become responsible for complying with the regulation. Call2Recycle would be happy to work with you to fulfill your regulatory obligations for product recycling. [Click here to read more](#) on how the program works if your company is the importer of record.

Call2Recycle's Role

Call2Recycle works on behalf of close to 400 obligated manufacturers, retailers and distributors to facilitate the safe collection, handling, transportation, and recycling of their batteries.

If you have questions about the program or would like assistance with registering as a battery collection site, please contact Erich Repper at erepper@appelarecycler.ca or at 1-888-665-0908.

Thank you.

Regards,

Jeff Haltrecht
Executive, Call2Recycle
jhaltrecht@call2recycle.ca

**Not for use in British Columbia or Ontario due to nature of regulations.*

DEFINITION OF PRODUCTS INCLUDED IN THE RECYCLING PROGRAM

The applicable products accepted for recycling will be:

- Batteries used to propel eBikes and eScooters sold as part of an OEM bike or scooter
- Batteries used to propel eBikes and eScooters sold as aftermarket replacement batteries
- Batteries used to propel eBikes sold as part of aftermarket conversion kits for bicycles
- Batteries used to propel eBikes and eScooters as part of ride sharing or rental business

Electric Bicycle (eBike): A bicycle style transportation device with an integrated rechargeable battery, typically lithium ion. Drive system can either be activated by pedaling or by a throttle such as a grip-twist, trigger or button, and available in Class 1, 2, or 3, with no motor-input at speeds in excess of 32km/hr.

Included: OEM and aftermarket batteries used to propel eBikes, including those available in conversion kits

Excluded: OEM and aftermarket batteries used to propel transportation devices travelling in excess of 32km/hr or specialty style vehicles including mopeds, motorcycles, ATVs, dirt bikes, motorized mobility chairs having 3 or 4 wheels, go carts, and golf carts.*

Electric Scooter (eScooter): A rechargeable battery-powered transportation device with a stem, handlebars and designed to be stood on (or standing with a bum rest option) by the operator during travel. Batteries are typically lithium ion. In most cases the batteries will propel the device with or without human assistance to a top speed of 32km/hr.

Included: OEM and aftermarket batteries used to propel two in-line wheeled eScooters, two parallel wheeled eScooters, skateboard, hoverboard, youth mini scooter, monowheel

Excluded: OEM and aftermarket batteries used to propel transportation devices travelling in excess of 32km/hr or specialty style vehicles including mopeds, motorcycles, ATVs, dirt bikes, motorized mobility chairs having 3 or 4 wheels, go carts, and golf carts.*

**The recycling of batteries from ATVs, dirt bikes, motorized mobility chairs having 3 or 4 wheels, go carts, and golf carts are regulated in Quebec and are under review by Call2Recycle for inclusion at a future date.*

Aftermarket eBike Batteries: Stand-alone or replacement batteries, typically Lithium Ion, used to propel eBikes, including those available for conversion kits and replacement on/in a bicycle, ranging between but not limited to 100 and 1,600 watt hours.

Aftermarket eScooter Batteries: Stand-alone or replacement batteries, typically Lithium Ion, used to propel eScooters, whether this battery fits in the floorboard, in the down tube, or as 'click-in' style attached in a compartment.

REGULATIONS AND GEOGRAPHIES OF OPERATION

This program will operate nationally in the country of Canada. ***APPENDIX B contains links to the provincial regulations***

This program is structured with a combination of 'member services agreements' for regulated products in regulated provinces, and 'private business contracts' in non-regulated jurisdictions, to achieve national scope for industry.

	Regulated Provinces	Regulated Provinces	Non-Regulated Provinces
Member agreement with Call2Recycle	SK, MB, PQ, PEI	BC & ON - aftermarket batteries	
Private business contract with Call2Recycle		BC & ON - OEM batteries sold with bikes/scooters	AB, NB, NS, NFLD

Manitoba, Quebec, and Prince Edward Island where regulations are in place:

- Batteries used to propel eBikes and eScooters sold as part of an OEM bike or scooter
- Batteries used to propel eBikes and eScooters sold as aftermarket replacement batteries
- Batteries used to propel eBikes sold as part of aftermarket conversion kits for bicycles
- Batteries used to propel eBikes and eScooters used within a ride sharing or rental business

Saskatchewan, where regulations are recently in effect and Call2Recycle's program plan is under review:

- We anticipate batteries used to propel eBikes and eScooters, their aftermarket replacements, conversion kits and those used in ride sharing or rental businesses will be included for the January 1, 2021 start date.

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British Columbia where regulations require the OEM bike/scooter + battery are to be recycled together, while the aftermarket battery is recycled on its own. These regulations are in place today and companies are required to be compliant.

- **Aftermarket batteries:** We will operate under member services agreement per the regulations.
- **OEM batteries sold with bike/scooter:** We will operate under 'private business contract' between individual companies and Call2Recycle as an interim solution while we work with the MOE on a permanent solution for the entire bike/scooter/battery. During this interim period we will collect and recycle just the batteries used to propel eBikes and eScooters, conversion kits and those used in ride sharing or rental businesses.

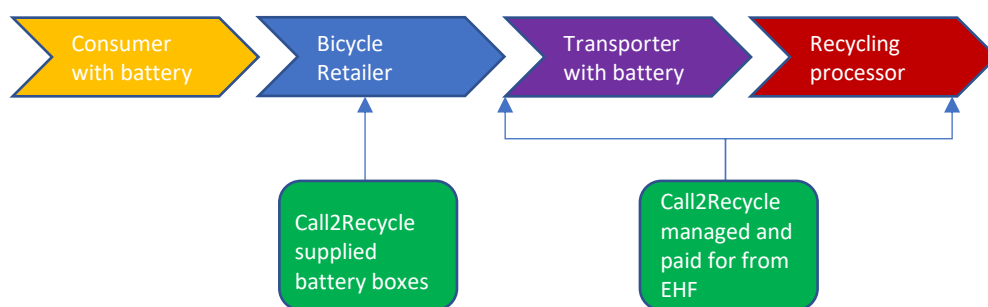
Ontario, where pending regulations state the aftermarket battery is recycled on its own

- **Aftermarket batteries:** We will operate under member services agreement per the regulations.
- **OEM batteries sold with bike/scooter:** We will operate under private business contract between individual companies and Call2Recycle, where we will collect and recycle the batteries used to propel eBikes and eScooters, conversion kits and those used in ride sharing or rental businesses.

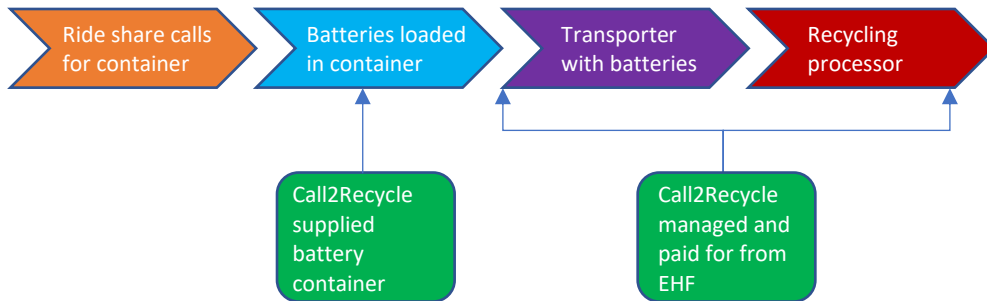
Alberta, Ontario, New Brunswick, Nova Scotia, and Newfoundland

- Where battery legislation does not yet exist, we will operate in these provinces based on 'private business contract' between individual companies and Call2Recycle, where we will collect and recycle batteries used to propel eBikes and eScooters, their aftermarket replacements, conversion kits and those used in ride sharing or rental businesses, and will do so for the same price as in regulated provinces.

HOW THE RECYCLING PROGRAM OPERATES



For personal use eBikes and eScooters, Call2Recycle will supply bicycle retailers registered as collection sites with UN approved pre-addressed fire-retardant battery shipping boxes. When the consumer returns an end-of-life or defective battery, it is inspected then placed in the fire-retardant shipping box and sent by approved carrier for recycling at a pre-approved processor. Additional boxes are ordered from Call2Recycle at any time by calling 1-888-665-0908.



For ride sharing eBikes and eScooters, at the time eBike and/or eScooters batteries are damaged in the field and/or reach end-of-life, the operator will call Call2Recycle at 1-888-665-0908 and discuss quantity, location, situation. The proper sized container will be sent to location for loading by operator's employees based upon clear standard operating procedures (SOPs) pre-approved by both organizations. Call2Recycle will arrange for pick-up and recycling.

THE ENVIRONMENTAL HANDLING FEE (EHF) AND CONFIDENTIALITY

An Environmental Handling Fee, or EHF, is a charge on a product to handle the responsible collection and end-of-life recycling management of that product.

The EHF for personal use and ride sharing eBike and eScooter batteries will be \$10.00 CDN and will come into effect January 1, 2021. The EHF's dollar value is a calculation factoring in the following notable costs, and as a non-profit, does not include incremental profit targets.

- | | | |
|-----------------|---------------------|-----------------|
| -Collection | -Processing | -Administration |
| -Transportation | -Consumer education | |

Importers of record/bicycle brand owners may be including the EHF in their invoices to Bicycle Retailers. The Retailer may also place the EHF into the price of the bicycle before to taxes when selling to their customers.

While most importers of record/bicycle brand owners will be working with Call2Recycle, a few may not thus requiring you as a retailer to work directly with Call2Recycle (particularly if you are the importer of record).

WHO IN INDUSTRY IS OBLIGATED TO PARTICIPATE?

Please see provincial regulations in **APPENDIX B** for information on your company's obligations.

The OEM bicycle/scooter manufacturer/brand owner/first importer/company operator who has a place of business in Canada can be the member on behalf of their retail network. **This is the scenario we will operate within for most major brands of bicycles and scooters.**

and...

If you import or acquire domestically finished eBike and eScooters for the use in a ride sharing or rental company, your business may be an obligated steward in province(s) it does business in. **This is the scenario we will operate within for ride sharing businesses.**

Inevitably there will be a few exceptions that may fall into the following type of scenarios. Ultimately your company is responsible for determining if it is the obligated party.

- If you are the provincial importer of OEM eBikes and/or eScooters and/or aftermarket batteries and operate as a franchise of the OEM or independent bicycle retailer, and your OEM is not becoming a member of Call2Recycle, your business may be an obligated steward in the province(s) you operate within for that OEM's brand.
- If you import batteries and/or parts for the assembly of battery modules and/or packs in Canada, your business may be an obligated steward in the province(s) you operate within.
- If you import batteries and/or eBikes and eScooters for the sale out of corporate owned stores and the internet (under your own company's name or third-party brand name), your business may be an obligated member in the province(s) it does business in or ships to.
- If you are importing, distributing and/or retailing a brand of bicycle whose company does not have business operations in Canada (ie this brand of bicycle/scooter is not owned by your company and there are no Canadian offices for this brand), your business may be an obligated member in the province(s) it does business in or ships to.

BECOMING AN EBIKE BATTERY COLLECTION SITE

Call2Recycle will supply most registered Bicycle Retailers and other locations collecting batteries with pre-paid fire-retardant battery shipping boxes for reverse logistics to a processor for recycling, with costs covered by Call2Recycle. Please call Erich Repper at member services 1-888-665-0908 to register as a battery collection site.

Drop-off locations accepting batteries must inspect for damages, place the battery in appropriate box, and call transport company for pre-paid pick-up.

Collection sites receive and/or have access to:

- eBike battery recycling kits that are UN rated and contain a fire-retardant liner
- Damaged Defective eBike battery recycling kits that are UN rated and contain special CellBlock fire-retardant powder
- eBike handlebar hang tags*
- eBike battery stickers*
- Safe handling and packing instruction poster for service department

**Not for use in British Columbia or Ontario due to nature of regulations.*

NEXT STEPS

Feel free to read the frequently asked questions in **APPENDIX C**. Please contact our member services team at the numbers found at end of this program document for further discussions.

1. Speak with your eBike suppliers about this eBike battery recycling program. We will be publishing a list of participating brands in the coming month.
2. If your company is importer of record for a brand of eBikes and this brand has not signed-on with Call2Recycle, your company may be obligated for that brand only.
3. You may sign-on as a collection site for eBike batteries.

ABOUT CALL2RECYCLE

We are a non-profit stewardship organization committed to the safe handling, transportation, storage and responsible recycling of batteries at end-of-life.

We supply R2 certified reverse logistics and recycling services that bring batteries back from within the market and direct them to the proper processors for recycling. We bring together the battery and



Leading the charge for recycling.™

November 23, 2020

product manufacturers, dealers & retailers, industrial operators, and the processor industries in responsible new, defective and end-of-life recycling programs.

With a collection network of 9,000+ battery drop-off locations across Canada, we have safely and responsibly recycled more than 22 million kilograms of consumer batteries since the Canadian company's inception in 1997.

Today we are announcing the eBike + eScooter battery recycling program, and as we look to the future of electric mobility, our intention is to help establish the reverse logistics, diagnostic, refurbishing and recycling options for the broader electric mobility industry.

CONTACT INFORMATION

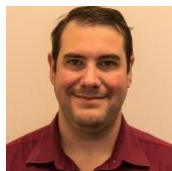
Member Services Team: Toll free 1-888-665-0908

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Executive

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APPENDIX A

RECYCLING INDUSTRY TERMINOLOGY

An introduction to the industries terminology to help in communicating with each other...

Member – The company obligated by provincial regulations to join a recycling program associated with their product category.

Program Operator – Call2Recycle Canada, Inc.

Collection Site or Drop-off Location – The location a user can drop off a battery. This place may be the original point-of-purchase or a participating location that handles recyclable materials.

Regulated Provinces – British Columbia, Manitoba, Quebec, and Prince Edward Island have regulations in place. Saskatchewan regulations were recently released and Call2Recycle's program plan is being reviewed by the Saskatchewan Ministry of Environment. Ontario's existing regulations are being updated by the Ministry of Environment and we anticipate they will come into effect by January 2021.

Non-regulated Provinces – At time of writing they will include AB, NS, NFL, NB.

Environmental Handling Fee (EHF) – An Environmental Handling Fee is a charge on a product to handle the responsible collection and end-of-life recycling management of that product.

End-of-life (EOL) – When the battery is no longer useful for its intended purpose and has not been damaged.

Damaged, Defective, Recalled (DDR) – When the battery is no longer useful for its intended purpose because it was or may have been damaged, or is determined defective. Recalled refers to batteries the OEM is doing a voluntary or government directed removal from market. These batteries require special handling to be recycled.

Transporter – Program approved company used to transport collected batteries between locations.

Sorter – Program approved company in reverse logistics supply chain responsible for separating/sorting batteries into like chemistries.

Processor – Program approved company in logistics supply chain responsible for recycling the batteries.

APPENDIX B

SUMMARY OF PROVINCIAL END-OF-LIFE PRODUCT REGULATIONS FOR LI-ION BATTERIES

To learn more about provincial battery stewardship regulations for e-bikes and scooter batteries, we encourage you to check the provincial regulations as follow:

[Quebec Environmental Quality Act](#)

Article 29 establishes the products covered by Section 2 of Chapter VI, namely most rechargeable batteries and single-use batteries. Batteries placed on the market as a component of another product, such as batteries placed on the market in a watch, a toy, a tool, a bicycle, a scooter, etc. are also covered (see Article 3).

[Manitoba Waste Reduction and Prevention \(WRAP\) Act](#)

In Manitoba, batteries are included in the Household Hazardous Material and Prescribed Material Stewardship Regulation. This includes devices that convert chemical energy to electrical energy and that can be restored to full charge by the application of electrical energy.

[British Columbia Environmental Management Act Recycling Regulation](#)

The electronic and electrical product category includes batteries that could be used in electronic or electrical products, including primary batteries and rechargeable batteries. This applies to batteries used in electronic sporting equipment.

[Prince Edward Island Environmental Protection Act: Materials Stewardship and Recycling Regulations](#)

The Act and regulations list rechargeable and single-use batteries as designated materials. In the case of a rechargeable or single-use battery contained in a device or product that is a designated material under these regulations, (a) subsections (1) and (2) do not apply; and (b) the rechargeable or single-use battery shall be dealt with in accordance with the stewardship program for the device or product in which it is contained.

[Saskatchewan Household Hazardous Waste Products Stewardship Regulations](#)

The final regulation for producer responsible end-of-life product management for single use and rechargeable batteries will come into effect January 2021.

[Ontario Ministry of the Environment Conservation and Parks](#)

The final regulation for producer responsible end-of-life product management for rechargeable batteries will come into effect January 2021.

APPENDIX C

FREQUENTLY ASKED QUESTIONS

Why does the importer of record/brand owner have to work with Call2Recycle?

You actually don't, however your company will need to establish battery recycling programs in the regulated provinces and work individually with each Ministry of Environment in order to be in compliance with regulations.

Call2Recycle offers a service to industry whereupon we operate government approved environmental services for recycling batteries in the provinces of BC, MB, PQ, and PEI. SK's regulations are recently in effect and Call2Recycle's program plan is currently under review by the Ministry. Ontario's existing regulations are being updated by the Ministry of Environment and we await its publishing any day now. The company operates voluntary recycling programs in AB, NB, NFLD, and NS.

Call2Recycle is recognized by the current 400+ members and government for its reverse logistics battery recycling network and ease of implementation of its programs.

How much profit does Call2Recycle make on this program?

With its not-for-profit status, Call2Recycle designs the recycling programs to be self-funding and no incremental profit.

How is the environmental handling fee calculated?

We include the following costs:

- | | | |
|-----------------|---------------------|-----------------|
| -Collection | -Processing | -Administration |
| -Transportation | -Consumer education | |

Fees are determined using a calculation that factors in the cost to manage the collection and responsible recycling of each battery, by specific type.

Do we have to operate in the non-regulated provinces?

Our experience over 22 years would suggest it beneficial to run a national program. The industry hears one message and the volume helps with fixed overhead keeping the cost of program lower.

Bicycle Retailers in non-regulated areas whose OEM is working with Call2Recycle will have to help manage the program at retail. However if a given OEM is not participating in a non-regulated area, the Bicycle Retailer has two options: a) they too do not have to participate or b) they may choose to work with Call2Recycle to offer eBike battery recycling for their clients.

Is my business obligated if we sell only on the internet?

Your business may be obligated to participate in certain regulated provinces as you will be considered the provincial importer of record. Please see regulations in Appendix B.

Why are BC's regulations different than the other provinces?

Recycling legislation is provincial jurisdiction (vs. federal), and as such we have varying regulations per province. BC requires the OEM bike/scooter + battery to be recycled together, while the aftermarket battery is recycled on its own.

Aftermarket batteries: Call2Recycle will operate under 'member services agreement' per the regulations.

OEM batteries sold with bike/scooter: Call2Recycle will operate under 'private business contract' between individual companies and Call2Recycle as an interim solution while we work with the MOE on a permanent solution for the entire bike/scooter/battery. During this interim period we will collect and recycle just the batteries used to propel eBikes and eScooters, conversion kits and those used in ride sharing or rental businesses.

Can we just drop the batteries off at other battery recycling locations?

Not all collection locations in the Call2Recycle program will accept eBike or eScooter batteries. It's very important to consider the safe handling requirements of eBike and eScooter batteries. They should be transported in UN approved fire-retardant battery containers and under Transport Canada guidelines by people trained in handling and transporting dangerous goods.

Where do the batteries go after they are collected?

A network of dangerous goods approved transporters and battery chemistry specific recycling processors primarily in Canada.

~~~~~ END ~~~~~