



A Rechargeable Battery Recycling Corporation program

**ONTARIO  
INDUSTRY STEWARDSHIP PLAN FOR BATTERIES**

**PREPARED AND SUBMITTED BY:  
RECHARGEABLE BATTERY RECYCLING CORPORATION OF CANADA  
(RBRCC)**

**FEBRUARY 16<sup>TH</sup>, 2011**

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## **1.0 Introduction**

On December 11, 2006, acting under the *Waste Diversion Act* (“WDA”), the Minister of the Environment filed Ontario Regulation 542/06 designating Municipal Hazardous or Special Waste (“MHSW”). The diversion initiative was to be implemented in a series of phases, with Phase I incorporating single use dry cell batteries and Phase II including rechargeable batteries.

In accordance with the Waste Diversion Act and Waste Diversion Ontario’s (“WDO”) *Procedures for Industry Stewardship Plans* (“WDO Procedures”), the Rechargeable Battery Recycling Corporation of Canada (“RBRCC”) is submitting this Ontario Industry Stewardship Plan (“ISP”) on behalf of its existing Stewards and those stewards of primary batteries who have elected to participate in the RBRCC program in Ontario. This submission reflects the input and support from an extensive number of battery industry associations, including National Electrical Manufacturers Association (“NEMA”), Electro-Federation Canada, and the Portable Rechargeable Battery Association (“PRBA”). To expedite review, the submission below follows the outline of Section 5.3 of the WDO Procedures’ “Submission Information Required,” with cross references to other sections where appropriate.

The batteries that will be covered by this RBRCC Ontario ISP are often referred to as “consumer” batteries, although they may have been used by consumers, households, businesses, institutions, industrial facilities or others. They include all types of secondary (rechargeable) batteries used to power such devices as cellular telephones, laptop computers and cordless power tools, up to 5 kg in weight. (Technically, these “batteries” may be made up of a single electrical cell or multiple cells wired together and contained in a single package, which is sometimes referred to as a “battery pack.”) They also include primary (non-rechargeable) batteries. The RBRCC Ontario Stewardship Plan participants who market secondary and primary batteries bear all the costs of collecting and recycling batteries handled under the program, including collecting batteries of brand owners who do not participate in the program.

RBRCC initially submitted an ISP on July 2009 and provided multiple revisions. Because of the complexities in the approval process, RBRCC withdrew the ISP on March 2010 and has served as the battery service provider to Stewardship Ontario (SO) since July 1, 2010. This agreement with SO is scheduled to terminate on March 31, 2011, which is necessitated the resubmission and consideration of this ISP.

Further, with the various announcement by the Minister of the Environment (“MOE”) regarding phase I and phase II materials, there is the very real prospect that there will be a skeletal battery collection program as of April 1, 2011 that will find it difficult to clearly communicate with the public what batteries are available for collection. Data from several locations definitively show that battery collection schemes sub optimize performance and confuse consumers unless both single-use and rechargeable batteries are included.

As a consequence, this plan will cover the period of 9 months in 2011 plus the five years (2012 – 2016) thereafter, with the understanding that there will likely be a revised consolidated municipal hazardous and special waste (MHSW) plan approved the MOE which may require a revision of this plan.

Finally, this ISP draws heavily upon the original ISP as submitted and later revised in response to WDO’s comments. It has also been updated with new information and developments since the submission to WDO. The ISP is submitted with the intent to launch on April 1, 2011.

## **2.0 Description of the RBRCC Ontario ISP Procedures [WDO Procedures Section 5.3(A)].**

a. The proponent of the RBRCC Ontario ISP is RBRCC, on behalf of itself and the battery and product manufacturers it represents. RBRCC is a non-profit, public service organization dedicated to rechargeable battery recycling in Canada. It is a subsidiary of the United States' Rechargeable Battery Recycling Corporation ("RBRC"). RBRCC currently operates a nationwide harmonized and provincially-focused collection and recycling program – Call2Recycle® -- for used rechargeable batteries (nickel cadmium ("Ni-Cd"), nickel metal hydride ("Ni-MH"), lithium ion ("Li-ion"), nickel zinc ("Ni-Zn") and small sealed lead acid ("Pb")) and cellular telephones. These batteries power a variety of portable electronic products such as cellular and cordless phones, power tools, laptop computers, camcorders, two-way radios and digital cameras. In addition, since July 1, 2010, the Call2Recycle® program as operated in British Columbia and Ontario has accepted non-rechargeable as well as rechargeable batteries, and a comparable "expanded chemistry" program is expected to be implemented in Manitoba by the spring of 2011. In British Columbia, the Call2Recycle® program has been approved as meeting all requirements of affected stewards under that Province's extended producer responsibility statute, and similar approval is expected shortly in Manitoba.

RBRCC is governed by a Board of Directors that includes representatives of Sony, Panasonic, Energizer, Rayovac and Duracell which collectively, represents over 80% of the battery manufactured that are then sold in the Ontario market. In this regard, RBRCC is a true product stewardship organization, seeking to influence the design, manufacture and marketing of the material identified under the Waste Diversion Act.

The existing Call2Recycle® recycling program operates under the name Call2Recycle®/appelarecyclier® ("Call2Recycle®") and is free to the public, with the RBRCC covering the cost of collection containers, shipping, recycling, and related promotion and education support. Call2Recycle® operates in both official languages, and provides all-inclusive support, ranging from customer service to distribution of a full array of communication and support materials. Call2Recycle® collection sites are located at retail outlets, municipal and public agencies and businesses, and collect used batteries generated from both households and industrial, commercial and institutional sources. This program will form the backbone of the RBRCC Ontario ISP and will continue to be offered free to the public. Call2Recycle® does not assess "eco-fees" on retailers or consumers; this remains a business decision between brand owners and retailers.

b. Call2Recycle® has an existing service provider chain that allows it to sign-up, ship, collect, process and recycle all materials (batteries and cell phones) in the Call2Recycle® program. Importantly, this service provider chain has been developed over 13 years of day-to-day, year-over-year experience that allows us to confidently manage our accounts, opportunities and issues, and to meet marketplace demands.

Since Call2Recycle®'s program inception in 1994, \$100 million has been devoted to public education, marketing, outreach, and program administration in North America. Based on Ontario population and the existing infrastructure of Call2Recycle®, this means that \$4 million has already been invested in Ontario for the development and success of our collection and recycling efforts. RBRCC's Ontario ISP will build on this investment.

c. Because the Call2Recycle® program is already well-established, the infrastructure and processes are in place to allow the RBRCC Ontario ISP to commence by April 1, 2011. Operation will precede

uninterrupted, building upon already trained collection sites, service chain providers, and existing communication relationships in the marketplace. To ensure that we tap into every Ontario resource to maximize collections and the success of the Call2Recycle® program, we have established a newly reconstituted RBRCC Board of Directors, all but one of whom are Ontario citizens, which will track our success and encourage innovation. The members of this Board include representatives of rechargeable battery manufacturers, rechargeable product manufacturers and primary battery manufacturers, in addition to representatives from our collection chain and other appropriate outside directors.

d. As the approved ISP in Ontario, included amongst our Call2Recycle® program objectives are:

1. **Collection Objectives:** significantly increase collections of used batteries in Ontario over the next six years from 1155 tonnes (2011) to 4401 tonnes (2016).
2. **Program Awareness:** every Ontarian (resident, municipality, retailer, public agency, and business) is made aware that batteries can be recycled and knows how he or she can participate and where he or she can recycle their used batteries in Ontario.
3. **Collection Site Network:** increase from the existing 2187 collection sites (which cover retail, municipalities, public agencies and business) to 3,400 collection sites, largely reflecting additional public agency and business participation.
4. **Research & Development:** enhance the efficiencies and environmental effectiveness of our collection infrastructure and recycling processes by implementing automation, transportation and marketing enhancements.

These objectives go well beyond those advanced by Stewardship Ontario for its Phase I and Phase II battery collection programs, and reflect our already well-established collection base and well-tuned infrastructure.

### **3.0 Consultations Undertaken (WDO Procedures Section 5.3(B))**

- a. RBRCC on March 5, 2009 formally notified concerned parties at WDO, Stewardship Ontario and the Ministry of Environment of its intention to file an ISP application. Representatives of RBRCC previously had met with staff of those entities repeatedly to discuss the RBRCC program during the Stewardship Ontario consultation on the Phase 1 battery program and, subsequently, through a variety of correspondence with Stewardship Ontario and WDO staff.
- b. The RBRCC proposal was further discussed at a meeting of the Stewardship Ontario MHSW Steering Committee on March 13, 2009 and at several meetings of the SO Battery Working Group, as well as individual meetings with WDO, SO, and MOE representatives.
- c. RBRCC on April 3, 2009 advised key Ontario targets (Waste Management, Environmental, Municipal and Provincial elected officials) of our intent to become the ISP for batteries in Ontario. Additional correspondence to WDO regarding plan development considerations was submitted on July 20, 2009.

To solicit additional input to the RBRCC ISP proposal, public consultations were held as follows:

- A meeting was held with Provincial waste management experts on June 23, to review the draft ISP and solicit input.

- The draft ISP was posted on [www.call2recycle.ca](http://www.call2recycle.ca) June 29, 2009 and we notified the public about this through Ontario media and targeted associations involved in Environment, Waste Management, Municipal Affairs, and Industries.
- A public consultation meeting was held on July 9, 2009 in Toronto, enabling attendants to participate either through on-site presence or via webcast. Input was solicited both at the meeting and through follow-up correspondence to assist in the finalization of the ISP for July 31, 2009 submission to the WDO.
- This ISP will be posted at [www.call2recycle.ca](http://www.call2recycle.ca) as of Monday, January 31, 2011 where it will be available for public comment. The posted will be accompanied by a media release soliciting comments from stakeholders and the public.

The results of previous input was incorporated in this version of the RBRCC Ontario ISP.

Additionally, Call2Recycle® is planning to conduct a consultation webinar in March 2011. Invitees include all municipalities, retailers and other stakeholders throughout the province. This plan will be posted to [www.call2recycle.ca](http://www.call2recycle.ca) no later than January 30<sup>th</sup>, 2011 for all stakeholders to read and comment on the plan. If substantive feedback – in addition to what already has been received – is communicated as part of this extended consultation process, the plan will be revised to reflect it.

The developments of the last half of 2010 – after the initial consultations were conducted -- do not, in our opinion, affect the benefit of the earlier consultations. If anything, the Minister's suspension of the Stewardship Ontario MHSW program in July and abandonment of the Phase 2 elements of that program in October, has further underlined the value of an ISP that efficiently will cover both primary and rechargeable batteries.

#### **4.0 Quantities Generated and To Be Recovered (WDO Procedures Section 5.3(C))**

The complex channels of distribution employed in making batteries available to consumers, businesses and institutions in Ontario, the uncertainties of product life, and the “hoarding” behavior of consumers – who tend not to dispose of used batteries, especially used rechargeable batteries, but rather to keep them for some imagined future use – make calculation of the quantity of used batteries available for collection and recycling in any year highly speculative.

#### **5.0 How the RBRCC Ontario ISP Will Divert and Handle Used Batteries, and How It Will be Financed. (WDO Procedures Section 5.3(D)).**

##### **a. Accessibility**

The RBRCC Ontario ISP will build seamlessly upon the existing *Call2Recycle*® program, which was created with RBRC's establishment as a non-profit public service organization in 1994 and brought to Canada in 1997. (The program was originally known as “*Charge Up to Recycle/Charger et Recycler*” and was renamed *Call2Recycle*® upon the program's expansion to include cell phones in 2004.)

*Call2Recycle*® originally focused on the collection of Nickel-Cadmium (“Ni-Cd”) rechargeable batteries at retail outlets. Through a series of continuous improvement initiatives, RBRCC expanded the collection and recycling program to include additional rechargeable battery chemistries (Nickel Metal Hydride

("NiMH"); Lithium Ion ("Li-ion") and Small Sealed Lead Acid ("Pb")) and additional collection site locations (municipal, public agency and business). In 2004, the program was expanded to also include the collection, recycling or refurbishment and resale when possible of cellular phones, with a portion of the proceeds benefiting *Kids Help Phone (Jeunesse J'écoute)*. In 2008, RBRCC expanded its rechargeable battery collection program to encompass a new chemistry, Nickel Zinc ("Ni-Zn").

The expansion of the Call2Recylce® program in Ontario to cover non-rechargeable batteries in July, 2010, has further expanded accessibility by adding these sites as locations for used primary battery collection as well as used rechargeable battery and cell phone collection.

As of December 1, 2010, Call2Recycle® had 2187 collection sites signed up in Ontario to participate in its now-expanded program; however, this total is not an accurate representation of what sites are generally available to the public and actively participating to the program. Based on feedback from the Waste Diversion Ontario (WDO) Board of Directors, we have revised our parameters for sites that are viewable via our site locator on our website. The following was implemented in March 2010: a "preferred collection site" is designated on the web locator and appears first and it will indicate that the site has returned batteries under the Call2Recycle® program within the last six months. New sites will also be characterized as "**preferred**" for the first six months of their operation and will continue thereafter as long as they have returned batteries. Viewable on a second tier, other still participating sites may also be found but under no circumstances will there be any sites portrayed as collection locations, either on the web or in reports to the WDO, if they have not returned batteries within the previous 18 month period.

As a reminder, the website will never identify non-public sites – the Royal Canadian Mounted Police is an example – so the total collection locations in the province will always exceed the sites viewable through the site locator.

The chart below indicates collection sites using these new parameters along with projected collection sites for the five year period of the plan.

**Call2Recycle® Collection Sites by Type and Projected by Year  
(As of December 1, 2010)**

	Current	Year One	Year Two	Year Three	Year Four	Year Five
<b>Publicly Viewable Preferred Sites</b>	775	1235	1385	1535	1660	1800
<b>Publicly Viewable Active Sites</b>	306	390	450	560	640	700
<b>Non-Public Active Sites</b>	1106	685	765	805	850	900
<b>TOTAL ACTIVE SITES</b>	<b>2187</b>	<b>2300</b>	<b>2600</b>	<b>2900</b>	<b>3150</b>	<b>3400</b>

The user interface that will be seen by the consumer will change to direct attention to those that have actively participated. A sample of the user interface (screen shot) is shown below, showing that "starred" sites as "preferred". Preferred sites will always be listed first and appear based on proximity to the postal code. "**Publicly Viewable Active Sites**" (sites that have participated but have not sent batteries in within the last 18 months) will appear immediately after.

The screenshot shows the Call2Recycle website interface. At the top, there's a navigation bar with links like Home, Program Info, Responsible Recycling, Province Specific, Learning Resources, Media Centre, and Battery & Product Manufacturers. Below the navigation is a search bar labeled "Dropoff Locator". The main content area features a heading "Call2Recycle Battery and Cell Phone Recycling Locations" and a sub-section for "Postal Code Search" with a field containing "M4V 1K6" and a "Search" button. A message below says "Total 456 stores matched." followed by a page navigation "1 | 2 | 3 | 4 | 5 | 6 | 7 .. 10" and a "Sort By" dropdown set to "Distance". A note indicates "Denotes an actively participating preferred site." Below this, a table lists seven collection sites with their names, addresses, distances, and "Map This!" buttons:

Location	Distance
Deer Park Home Hardware	0.14 Miles
Staples Canada/Business Depot	0.62 Miles
The Source	1.27 Miles
The Source	1.28 Miles
Stanley Knowles Housing Co-op	1.43 Miles
The Source	1.95 Miles
Locksmiths and Safemen Security Hardware Ltd	2.18 Miles

To the right of the main content, there's a sidebar with a large green banner stating "So far this year you have recycled 310,767 kilos of batteries!". It also includes a "Find a Drop-off Location" search bar, a "Facebook" link, and a "Create an account or log in to see what your friends like." section.

Call2Recycle® expects to have 3400 actively participating sites by the end of year five, convinced that the attractiveness of having an all battery collection effort (primary + rechargeable) along with the continued commitment to recycle many more products that contain batteries will significantly stimulate the addition of new sites.

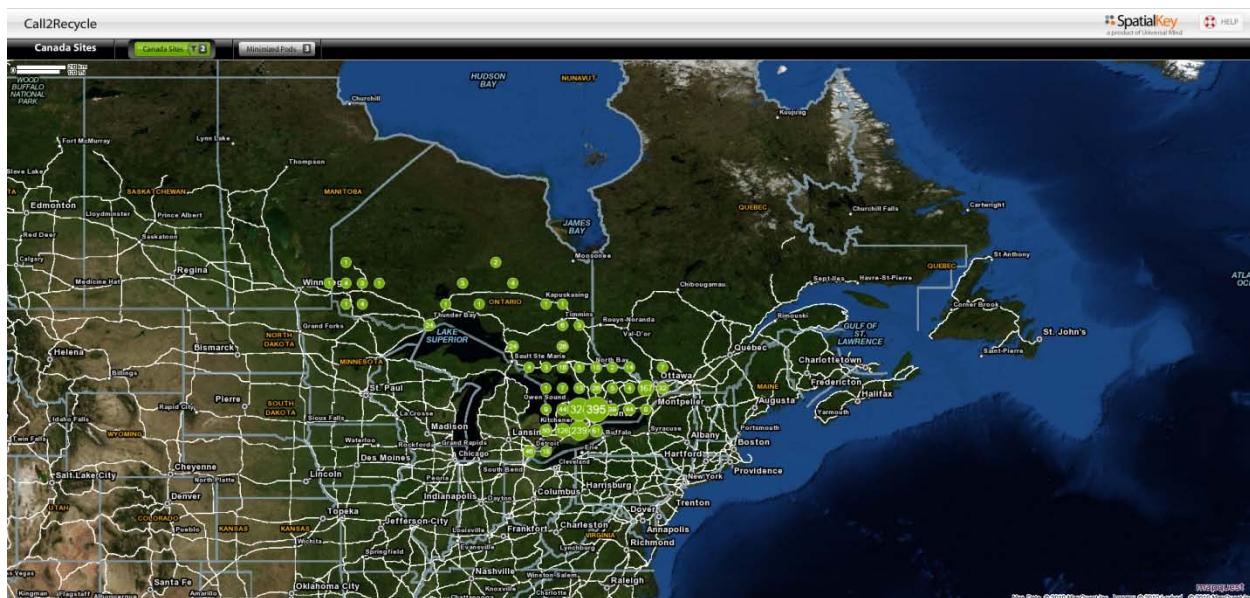
Retail locations, while very convenient, are often a difficult channel to support. Staff turnover and age, along with the desire to control the location of a collection area within the retail site, often make it difficult to reliably portray the collection activity of the site.

Knowing this, Call2Recycle® created a routine Missing in Action (MIA) report for major retailers where the headquarters office can quarterly view which sites have actively participated in the program or have significantly reduced their participation.

Participation of existing signed up locations is not the only concern regarding accessibility. It is important to ensure that there are sufficient overall collection locations within proximate distance of the population.

Below is a map of the province, highlighted by the density of the population, onto which we have identified existing collection sites. Analyses like these help the Call2Recycle® program determine what areas of the province require further concentration of sites.

### Ontario: Population Density and Call2Recycle Collection Locations (December 1, 2010)



As earlier mentioned, Call2Recycle® relies on four channels for collections: Retail, Community, Public Agency and Business. Because of the program's longstanding relationship with major retailers within the province, its retail footprint is the most developed of these four channels. Going forward, Call2Recycle® intends to primarily focus on the Community channel, which includes all municipalities within the province, to bolster its existing accessibility. The battery collections for most municipalities in the province are still managed by Stewardship Ontario and have never been transferred to Call2Recycle's management. Therefore, we believe that there is considerable opportunity to grow our collections through this channel.

Progress in ensuring accessibility will be a permanent topic for stakeholder and RBRCC Board review, in addition to reporting quarterly with annual consolidated results to the Waste Diversion Ontario (WDO) Board of directors and staff. Results will use the new standardized reporting format developed by WDO staff. Non-financial results specific to Ontario will be subjected to a third-party audit managed by WDO staff.

Call2Recycle® collects used batteries from consumer/residential as well as industrial, commercial and institutional sources. Currently, there are 2187 Call2Recycle® collection locations in Ontario. This number will increase after initiation of the RBRCC Ontario ISP, largely reflecting additional community and business participation. The breakdown of current sites by collection classification is as follows:

TYPE OF SITE*	Community	Public Agency	Business	Retail	TOTAL
NUMBER OF SITES	136	319	504	1228	<b>2187</b>

\* Some "retail" sites are not open to the public while some "business" sites are, explaining what might appear to be a discrepancy between this table and the table documenting "publicly viewable sites" on page 7.

The RBRCC Ontario ISP will retain and expand this existing collection base using both Call2Recycle®'s existing resources and the additional contacts that have arisen by virtue of its support, since mid-2010, from non-rechargeable battery stewards.

The expansion of Ontario's e-waste collection program, independent of the MHSW program, also will contribute to increased battery collection by the RBRCC Ontario ISP. RBRCC has well-established working partnerships with e-waste processors across the province, from which it already accepts rechargeable batteries through the Call2Recycle® program. This relationship will be further intensified as we move forward with the RBRCC Ontario ISP and focus energies to ensure that **all** batteries collected through e-waste initiatives are channeled into the Call2Recycle® program for recycling. Any e-waste depots or other battery collection and recycling processors who are not Call2Recycle® participants/partners will be asked to provide their collection data for inclusion in Call2Recycle®'s annual report of overall battery collection results in Ontario.

Larger quantity generators also have and will continue to have the option to utilize their own shipping containers, utilizing pre-approved labeling and adhering to certain preparation requirements (e.g., using containers that comply with Transport Canadian requirements) as with the Call2Recycle® collection containers. For those Call2Recycle® municipal collection locations that generate at least 150 kilograms of batteries per shipment, Call2Recycle® will pay to support municipalities' costs for sorting, packaging and handling material (in addition to shipment, processing and sorting).

Adherence to transportation and safety law and guidelines for battery collection is an ongoing priority of the Call2Recycle® program. Federal transport laws across Canada require that certain types of primary and rechargeable batteries must be insulated from possible electrical short circuit during transport (excerpts from regulations of relevance include: *the cells are separated to prevent short circuits; these dangerous goods may be handled, offered for transport or transported under this shipping name if the dangerous goods are (a) protected from short circuits.* While Canadian law allows certain non-Lithium primary batteries to be shipped without taping or bagging, it also requires the use of suitably rugged containers designed to handle the relatively heavy battery content. The containers used by Call2Recycle® and the manner of transport have been approved by both Environment Canada and the Ontario Ministry of the Environment.

All personnel handling Call2Recycle® collection containers are instructed to read the preparation and shipping instructions for proper battery collection, as well as view Call2Recycle®'s other educational materials.

When a used rechargeable battery is placed in our retail collection box for recycling, each battery is to be placed and sealed in an individual plastic bag provided by Call2Recycle®. If bags are not available, Call2Recycle® also allows the use of non-conductive electrical tape to cover the battery terminals. In many retail locations, staff has been instructed to ensure this by "cleaning up" the contents of the box prior to shipping so that any extraneous material or exposed batteries are addressed.

The current Call2Recycle® program operates, and RBRCC Ontario ISP will operate, in accordance with intra- and inter-provincial shipping and transportation approvals provided by Environment Canada, the Ontario Ministry of Environment and all other provincial environment and transportation ministry approvals. All shipments that are transported internationally are handled in compliance with both current Environment Canada requirements and the Basel Convention on Transboundary Movements of Hazardous Waste and all applicable international laws.

#### **b. The RBRCC Ontario ISP Processing System Will Build on Existing Infrastructure**

The constituents of all of the used batteries collected through the Call2Recycle® program and RBRCC Ontario ISP are and will be reclaimed, thereby enabling us to divert them fully from landfill. However, different battery chemistries require different reclamation methods. Therefore, Call2Recycle® utilizes and will continue to utilize several service providers.

The used batteries (and used cell phones) collected under the RBRCC Ontario ISP will be sent to Newalta Services in Fort Erie, Ontario for sorting. Newalta has been providing sorting services for Call2Recycle® since 1997 and has an exemplary record. From Newalta, sorted materials will be sent to licensed and well-operated commercial reclamation facilities in Ontario and elsewhere. At least initially, nickel-containing batteries will be processed at Inmetco's facility, Ellwood City, Pennsylvania facility; lead-containing batteries will be sent to Newalta Nova Pb in Ste-Catherine, Quebec; Lithium-ion batteries will be sent to Xstrata in Sudbury, Ontario or Toxco in Trail, British Columbia; and non-rechargeable batteries will be sent to Inmetco's facility in Ellwood City, Pennsylvania, where they are currently handled.

All of these facilities use thermal recovery processes to reclaim materials. Recovered metal materials include nickel, iron, lead, cadmium and cobalt. These metals are either returned to rechargeable battery manufacturers or used to make other products such as stainless steel. Some processes also recover plastic and other constituents.

To expand its existing extensive recycling network, RBRC issued a Request for Proposal (RFP) to potential primary battery processors and sorters to bid on fulfilling these services. Of the six bids received and deemed complete, Call2Recycle® qualified INMETCO, Valdi and Citron (the latter two located in France) to process single use batteries. Call2Recycle® aspires to qualify additional processors, particularly within the province of Ontario, in order to reduce costs and create local jobs. Call2Recycle® will continue to examine additional information from the remaining processors, and any new processors that emerge in the market, with the aim of qualifying them for this service. Call2Recycle will consider such processors based on several diverse criteria and will not simply select based on lowest cost.

#### **c. Financing**

As of the submission of this plan, more than 175 rechargeable battery manufacturers and marketers finance the Call2Recycle® program and would also be considered stewards under the WDA if the Phase 2 MHSW program had been continued. These companies support Call2Recycle® by licensing from RBRC the right to place a trademarked *Battery Recycling Seal* ("Seal") on their Ni-Cd, Ni-MH, Li-ion, Ni-Zn and Pb batteries and/or battery-powered products sold in the United States and Canada. Fees are based on the total number of licensed battery cells sold into North America, without distinction on the nation, state or province in which the sales occur, and cover the total cost of the Call2Recycle® program. No unique fees will be assessed against those Stewards to support the RBRCC Ontario ISP described here.

Funding for costs of the RBRCC Ontario ISP attributable to non-rechargeable batteries will be provided to the Call2Recycle® on a quarterly basis by stewards of those products who have chosen to support the RBRCC's Ontario ISP, as they have since July 1, 2010.

As of the date of submission of this plan, Energizer Inc., Panasonic North America, Inc., Duracell, Inc. (Procter & Gamble), Rayovac (Spectrum Brands), Kodak Canada, the Source and Sony of Canada Ltd. have agreed to support RBRCC's program. The Call2Recycle® single use battery recycling program will be financed by the primary battery manufacturers on a market-share based cost-plus reimbursement arrangement. The potential for a license fee per single use battery will be reviewed as actual collection/operating data is obtained.

Upon plan approval, additional stewards will be welcomed and encouraged to become involved in our stewardship program, and would assume similar financing arrangements as existing Call2Recycle® stewards. Call2Recycle® will provide the WDO and MOE with the full list of participating stewards for our expanded program, advising as well about stewards who have declined participation which will then require further follow-up.

Since an ISP under provincial law has no power to force compliance with the WDA, Call2Recycle is instead offering the following approach:

- “Obligated stewards” will be “brand owners” regardless of where the organization is domiciled. This will be voluntarily agreed to by Call2Recycle’s program participants.
- The Call2Recycle® program will absorb all costs associated with battery collections in the province, even from brand owners who have not chosen to participate in the program.
- Call2Recycle® believes that over 80% of the current brand owners participate in its program.

**6.0 Transition Plan (WDO Procedures Section 5.3(E))** “A transition plan for the period from the commencement of the ISP program until the ISP program achieves objectives that are similar to or better than the objective of the IFO’s approved program, including:

*“a. the process and schedule by which the designated material will be removed from the program operated by the Industry Funding Organization for designated material;”*

Upon approval upon the ISP by the Waste Diversion Ontario Board of Directors, the ISP (Call2Recycle®) in conjunction with the Industry Funding Organization (Stewardship Ontario) will develop and send communication to all designated Stewardship Ontario (SO) collection locations, including municipalities and private service organizations, indicating 1) the date and manner of transfer of responsibility for any programs for used batteries that currently are handled by SO; 2) the ISP interests in designating SO collection sites to become collection sites of the ISP, assuming that they are not already serving in this capacity; 3) providing detailed information for signing up to be a collection site for the ISP and procedures for sending designated materials to the ISP’s recycling stream; and 4) contact information at the ISP for formalizing this transfer. SO sites that seek to become Call2Recycle® sites will be uniquely designated in the Call2Recycle® systems to indicate which sites have shifted collection of the designated material to the ISP so that this transfer can be closely monitored and managed.

While the timing for this communication somewhat depends on the timing of SO’s transmission of the collection site information to Call2Recycle®, the expectation is that the initial communication would occur by February 28, 2011. The goal is to transfer all current collection of batteries from SO to

Call2Recycle by December 31, 2011. Call2Recycle® will report to Waste Diversion Ontario by July 15<sup>th</sup>, 2012 on the successful completion of transferring this obligation. Call2Recycle® will make its best efforts to ensure seamless transfer of these responsibilities as soon as practically feasible. Call2Recycle® will work with SO to reimburse it for potential incidental expenses associated with this transition.

*"d. a description of the method by which the ISP will determine the quantity of ISP materials remaining in the approved IFO's diversion program during the period of transition plan; and"*

Call2Recycle® will encourage Stewardship Ontario to designate each of its sorting locations as Call2Recycle® collection sites which will receive an earmarked designation within the Call2Recycle® systems. This will allow Call2Recycle® to: 1) ensure a cost effective management of the designated material from central SO facilities through the recycling process; 2) track the quantities of designated materials that remain in the IFO's waste stream (despite encouragement to leverage the ISP program); 3) periodically sample the material from these SO designated sorting locations to establish the mix of materials amongst ISP participant obligated stewards and IFO obligated stewards; and 4) compensate, if appropriate and consistent with the ISP policies, the designated sorting facility for certain handling costs. The ISP will only recognize materials transferred from SO to Call2Recycle® as "materials remaining in the approved IFO's diversion program" for the purposes of any potential compensation and in reporting data to Waste Diversion Ontario.

*"e. the method by which the ISP will exercise its responsibility for the ISP materials that remain in the approved IFO's diversion program during the period of the transition plan."*

Materials received from pre-existing SO collection locations between April 1, 2011 and December 31, 2011, will be closely tracked and audited. We will seek to ensure that all SO collection locations for batteries are fully transitioned during this timeframe. The results of any such activity will be made available to SO and Waste Diversion Ontario (WDO).

## **7.0 Projected Collection Quantities, Measurements and Improvements (WDO Procedures Section 5.03(F))**

Over the first six years (2011 – 2016), Call2Recycle® projects total cumulative collections of 17,669 tonnes, including rechargeable and non-rechargeable batteries.

Actual collections are often translated, as has been the case in various other program plan submissions, into collection "rate" calculations and targets. This runs the risk in Ontario of being misleading because of uncertainties associated with the limited data currently available for the "denominator" in the percentage calculation -- *i.e.*, the number of batteries available for collection, which must reflect both market sales at some earlier date and consumer "hoarding" behavior.

Call2Recycle® is thus very cautious in characterizing its collection projections and has included, as part of its first year R&D plan, a program to evaluate the most meaningful metrics that could be employed for this purpose. This effort would then be followed up in Year 2 with the collection of the necessary data to allow the appropriate metrics to be applied. Also, the below targets assume that collections from the existing Stewardship Ontario (SO) primary battery collection site – mostly municipalities – are transitioned to the Call2Recycle program as expeditiously as possible. All this combined will provide reliable metrics which will then be incorporated into this ISP as revisions as they become available in the future.

This analysis results in establishment, with all the foregoing caveats, of the following initial targets:

### Call2Recycle® - Ontario ISP Collection Targets (metric tonnes)

	<b>For Years Ending</b>					
<b>Primary Battery Tonnages</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
Supplied into Marketplace	5,254	7,088	7,185	7,295	7,417	7,540
Available for Collection	4,971	6,774	6,948	7,070	7,157	7,245
Collected	830	1,403	1,746	2,099	2,472	2,898
Reused	N/A	N/A	N/A	N/A	N/A	N/A
Input to Recycling	830	1,403	1,746	2,099	2,472	2,898
Recycled	632	1,068	1,330	1,598	1,882	2,206
Material Losses and Disposal	198	335	417	501	591	692
Diverted	632	1,068	1,330	1,598	1,882	2,206
<b>Primary Battery Percentage Rates</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
Reduction Rate	N/A	N/A	N/A	N/A	N/A	N/A
Collection Rate	17%	21%	25%	30%	35%	40%
Reuse Rate	N/A	N/A	N/A	N/A	N/A	N/A
Recycling Rate	13%	16%	19%	23%	26%	30%
Recycling Efficiency	76%	76%	76%	76%	76%	76%
Diversion Rate	13%	16%	19%	23%	26%	30%
<b>Secondary Battery Tonnages</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
Supplied into Marketplace	1,456	1,617	1,419	1,284	1,157	1,029
Available for Collection	1,064	1,598	1,801	2,039	2,231	2,423
Collected	425	749	963	1,197	1,384	1,503
Reused	N/A	N/A	N/A	N/A	N/A	N/A
Input to Recycling	425	749	963	1,197	1,384	1,503
Recycled	257	452	581	723	835	907
Material Losses and Disposal	168	297	382	474	549	596
Diverted	257	452	581	723	835	907
<b>Secondary Battery Percentage Rates</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
Reduction Rate	N/A	N/A	N/A	N/A	N/A	N/A
Collection Rate	40%	47%	53%	59%	62%	62%
Reuse Rate	N/A	N/A	N/A	N/A	N/A	N/A
Recycling Rate	24%	28%	32%	35%	37%	37%
Recycling Efficiency	60%	60%	60%	60%	60%	60%
Diversion Rate	24%	28%	32%	35%	37%	37%

Environment Canada Study - Kelleher Environmental in association with Robins Environmental.

"Battery Recycling in Canada – 2008 Update".

Assumes 5 Year Hoarding Rate

Because of the momentum in the marketplace, the existing collection infrastructure and the synergies in collecting all consumer batteries, we are committed to meeting our targets. In calculating a “collection rate, throughout the five years, we have used the prescribed “discard model”. The denominator of this calculation – batteries available for collection – comes from the Environment Canada methodology. Working with the WDO and other interested stakeholders, we seek to improve on that methodology and provide revised targets, based upon research that will generate supportable inputs.

Also, please note that the recycling efficiency indicated on this table does not reflect the same methodology used by the EU. We'd strongly urge that Ontario migrate towards this methodology moving forward.

## **8.0 Audit, Continuous Improvement and Related Quality Control Procedures (WDO Procedures Sections 5.03(G) and (H)).**

### **8.1 Performance Monitoring and Remedial Action**

The Waste Diversion Act (WDA) and its overall guidance governing the operation of industry stewardship plans (ISPs) place certain requirements for performance monitoring on the ISP. This section addresses performance monitoring of the program and results beyond explicit requirements of the WDA.

Call2Recycle® has routinely monitored the following performance measures: collections, participation rates (amongst multiple site collectors), collection sites, collections by channel (e.g., retail, community, business and public agency), and safety and compliance issues such as overloading boxes or transporting lithium-based batteries with unprotected terminals. While Call2Recycle® tracks and reports on collections by chemistry, it has relied on total collections as its main performance measure. Chemistries change frequently and the applications they are used in are very dynamic, minimizing the reliability and importance of using individual exact chemistry collections as critical performance measures.

TYPE	TOOL	AUDIENCE	POSSIBLE REMEDIATION
COLLECTION	Daily Receipts	Operations	Follow-up with Processor
	Monthly Report	Management & Board	Follow-up with Account Mgt
	Quarterly Report	Management & Board	Redesign / Review Funding
	Quarterly MIA Report	Customer Service & Account Management	Phone call; visit; report to parent
	Annual Report	Public, Government	Major Program Overhaul
AWARENESS	Monthly Web Hits	Management & Board	Content Changes; Search Engine Optimization
	Monthly Media Monitoring	Management	
	Annual Brand Awareness Survey	Management & Board	
ACCESSIBILITY	Monthly Site Review	Management	
	Monthly Call / Email Report	Management	Staffing changes; revised performance measures
SAFETY	Weekly BAR Report	Management; Collector	

An example of one of our monthly collection tracking reports appears below:

#### Call2Recycle® Program: Ontario and Canada Collections

Ontario	2010	2009		
	kgs. Collected	kgs. Collected	Increase	% incre
NiCd	67,357	74,261	(6,904)	-9.30%
Liion	30,433	19,828	10,605	53.49%
Ni-MH	15,619	11,417	4,203	36.81%
SSLA	25,882	24,805	1,077	4.34%
Total Rechargeable	139,291	130,311	8,980	6.89%
Primary	75,093	4,513	70,580	1563.85%
All Batteries	214,384	134,824	79,560	59.01%

Canada	2010	2009		
	kgs. Collected	kgs. Collected	Increase	% incre
NiCd	159,752	154,663	5,089	3.29%
Liion	71,046	41,748	29,297	70.18%
Ni-MH	41,107	26,910	14,196	52.76%
SSLA	60,268	48,133	12,135	25.21%
Total Rechargeable	332,172	271,455	60,718	22.37%
Primary	182,973	12,320	170,653	1385.17%
All Batteries	515,145	283,775	231,370	81.53%

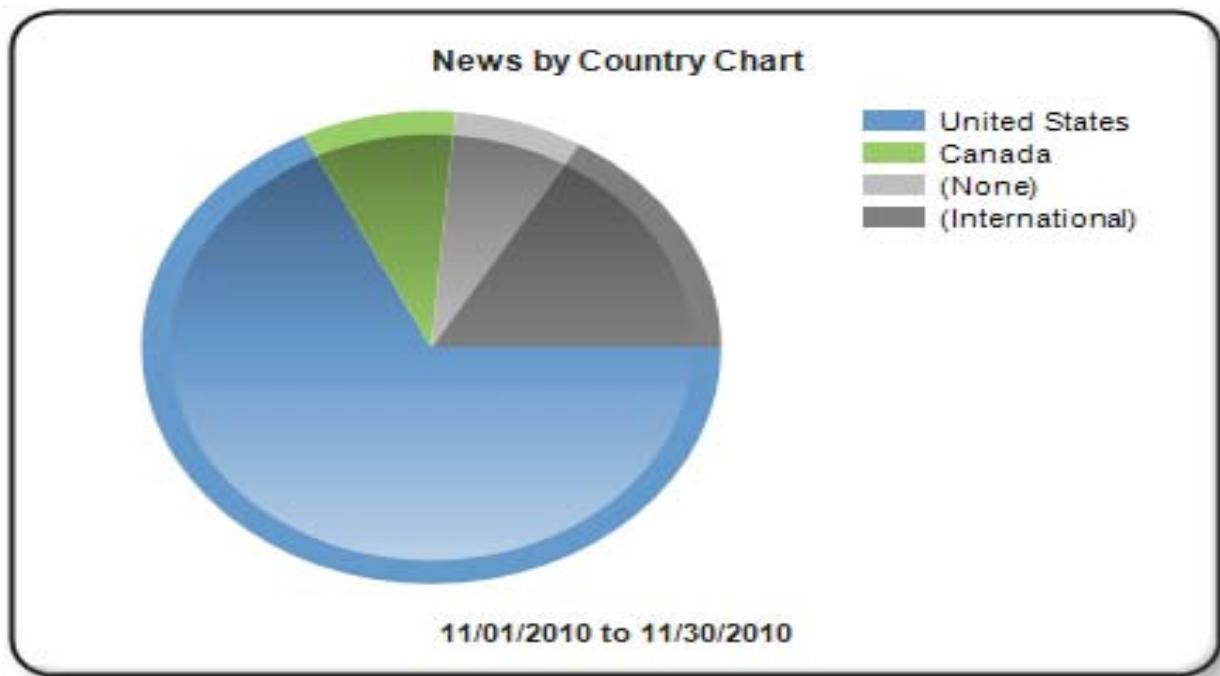
One tool, which is produced quarterly (referred to above as the “MIA” report), is a performance tracking report that indicates which formerly active sites have lessened or stopped returning batteries.

Appearing on such a report automatically triggers a call from customer service attempting to better understand what has happened, educate on what they should do, and ensuring that the site has the materials to resume collections.

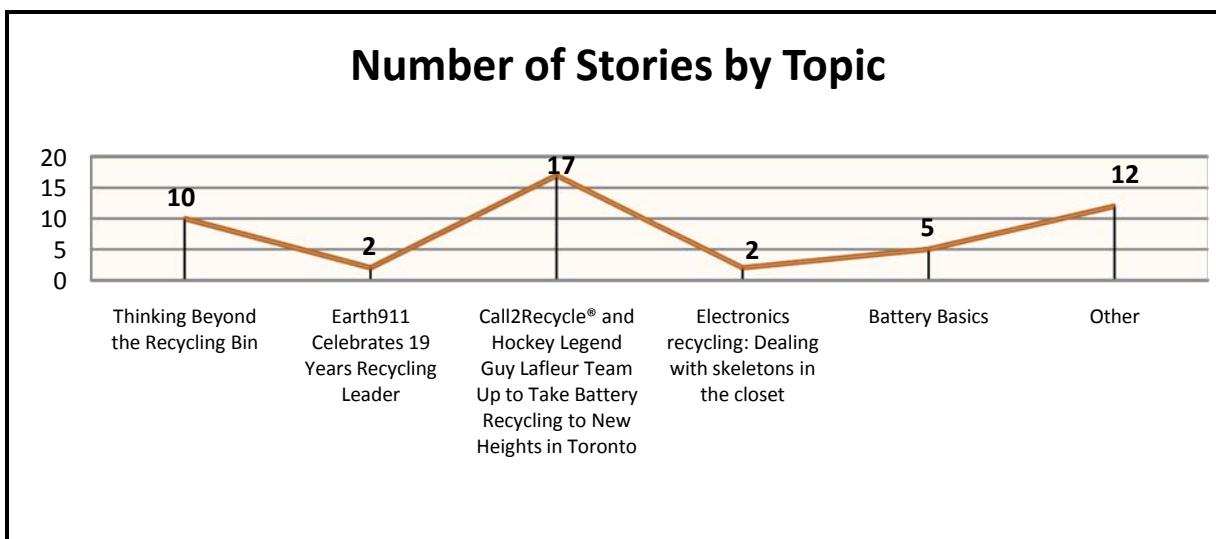
All of these reports and performance measures will be reported monthly to the Board of directors and annual stakeholder consultations, both to hold the program accountable for meeting goals but also to solicit ideas on how to better meet agreed upon targets. Similarly, Call2Recycle will quarterly report results to WDO; annual consolidated results will also be submitted to the WDO for reviewing and auditing, if appropriate.

If targets are not routinely being met, Call2Recycle® commits to reviewing its program design to ensure that it explores and implements measures necessary to meet its targets. Design changes might include shifting emphasis on particular channels, devoting monies to a specific awareness campaign, or partnering with a specific group to expand the program’s reach. Failure to meet targets is neither acceptable nor routine.

As program operators, Call2Recycle® utilizes “early warning” tools to help in anticipating such issues. For instance, the program closely monitors media impressions by market, country and issue (see below).



Also, the program closely tracks what stories gain traction in the media so that future campaigns to bolster recycling efforts are better understood and any resultant collections that come from the media campaigns can be measured. An example of this tracking for November 2010 appears on the graph below.



While monies have been allocated to major functional areas like public education, promotion, advertising and research & development, program management is empowered to reallocate dollars as the need arises and to go back to the RBRCC Board of Directors if it seeks incremental funding that promises a positive rate of return.

Call2Recycle® long has employed, and as part of the RBRCC Ontario ISP will continue to employ, several different processor specific procedures to assure compliance with required laws and regulations, safety best practices and general efficiency. These include:

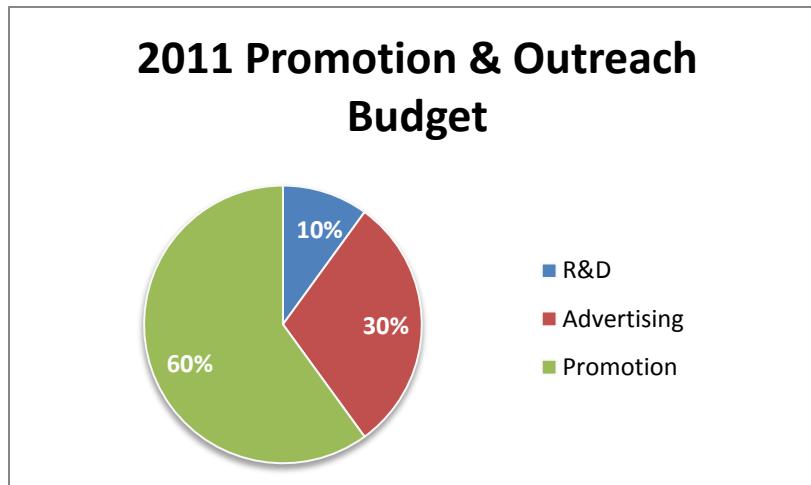
- Confirming contractor compliance with regulatory agencies
- Independent 3<sup>rd</sup> party verification of program accomplishments
- Requiring certificates of recycling from its service suppliers.
- Performing environmental audits of its recycling facilities
- Providing Certificates of Recycling to program participants requiring documentation
- RBRCC has obtained Basel Action Network (BAN) qualification

Call2Recycle® also incorporates its own Service Level Requirements ("SLR") into any agreement with its battery processors. These SLR's include, but are not limited to, the following:

- Timeframes for recording, reporting and processing material
- Limits on data processing error rate percentages
- Proper identification/recording non-conforming material
- Must meet provisions of the Basel Convention that prohibit the export of batteries for disposal to non-OECD countries.

## **9.0 Promotion, Education and Awareness Programs (WDO Procedures 5.3 (I)).**

In 2010, Call2Recycle® invested approximately \$315,000 for Ontario outreach and promotion activities. Based on anticipated Year 1 collections, Call2Recycle® anticipates the 2011 promotion, education, and R&D budget to be \$500,000: \$300,000 for promotion, \$150,000 for advertising, and \$50,000 for R&D.



At the core of the Call2Recycle®, public education program is the focus on information accessibility. This is accomplished through both electronic services and staff availability.

Call2Recycle® maintains (and will continue to maintain) two websites ([www.call2recycle.ca](http://www.call2recycle.ca); [www.appelarecycler.ca](http://www.appelarecycler.ca)) and two toll-free information lines: 877-2-RECYCLE (recorded) and 888-224-9764 (staff monitored). The websites provide comprehensive program information of relevance to all interests/support groups: retail, municipality, public agency, business, consumer, and media. Program participants (both existing and potential) as well as consumers can access information about the location of nearby retail collection sites, extensive details on the operational dynamics of the

Call2Recycle® program and sign-up guides for retailers/municipalities/public agencies and businesses. These guides provide a registration application as well as detail recycling guidelines including storage, safety, packing and shipping including necessary documentation for non- Call2Recycle® container. Program participants also can download support materials such as web banners, signage, and other communication support materials from Call2Recycle® website. Upon approval of the RBRCC Ontario ISP, Ontario-specific information will be added to these information sources.

In addition to the information provided on Call2Recycle®'s website, awareness support for the RBRCC Ontario ISP will be promoted in many ways and through a variety of mediums.

For years, Call2Recycle® has maintained and increased involvement by program participants, and this effort will continue. Support initiatives will continue to involve direct phone calls, postcard mailings and updates on collection results as well as site visits across Ontario (coordinated during the summer months through personnel dedicated to this outreach, all designed to inform and remind existing collection sites of their vital roles. In-store/organization signage is provided in collection box shipments. Upon approval of the RBRCC Ontario ISP, this signage will be updated to promote all battery collection and acknowledge Ontario's leadership role in this initiative.

Call2Recycle® also purchases advertising space in select consumer and trade publications (such as *Harrowsmith*, *Municipal World*, *Solid Waste & Recycling*, *Hazardous Materials Management*, *PhotoLife* and *Canadian Home Workshop/Mon Chalet*). The use of paid advertising will continue as an important communication component of our program support upon approval of the RBRCC Ontario ISP. The directness of our communication message will be even more pronounced once *Call2Recycle®* expands to an "all battery" recycling program.

Supplementing purchased advertising will be the distribution and airing of a series of radio and television Public Service Announcements (PSAs) encouraging battery recycling. Call2Recycle® will cooperate with the Ministry of Environment in preparing new PSAs upon approval of the RBRC Ontario ISP.

Presence at targeted consumer and trade shows is an additional component of Call2Recycle®'s outreach campaign. In 2009/2010, Call2Recycle® exhibited at *Canada Blooms*, *Federation of Canadian Municipalities*, *Ontario Small Urban Municipalities Conference* and the *Association of Municipalities of Ontario*. At these shows, Call2Recycle® representatives answer inquiries and provide handout materials to support awareness and drive program participation. This form of outreach support will continue after approval of the RBRCC Ontario ISP.

During 2010, Call2Recycle® conducted several high visibility collection events including one in the GTA in recognition of Call2Recycle® Week in September and with the City of Hamilton as part of its efforts for its citizens to check the batteries in their smoke detectors as they converted to daylight savings time. These events both raise the visibility and awareness of battery recycling and result in tangible collections. For instance, the Hamilton "challenge" resulted in 7,000 kg of batteries collected in a relatively short period. Call2Recycle® will continue to conduct collection events around the Province with this dual purpose as the goals.

In addition, to outreach to communities across Ontario and Canada, Call2Recycle® expects to continue for the near future as a prime sponsor of the *Old Timers' Hockey Tour*. During winter 2010, Call2Recycle®'s tour sponsorship involved specific events in 11 Ontario cities: Barrie, Hamilton, Kingston,

London, Newmarket, Oshawa, Ottawa, St. Catherines, Toronto, Waterloo, and Windsor. Call2Recycle®'s in-game presence is significant as evidenced through postcard handouts, PSA airings, arena announcements and interviews, rink board advertising, program advertising and the sponsorship of the *Hockey Tykes*.

The inclusion of primary batteries in our already well-established battery recycling program will provide an opportunity to simplify our recycling message and program, streamlining the communication from a "recycle rechargeable batteries" focus to simply "recycle batteries." Our already extensive roster of communication vehicles and forums will be able to incorporate this heightened message right from the program's outset, enabling us to invigorate our collection partners to deliver exponential program growth and collection results.

## **10.0 End-use Markets and Promotion of Products Employing Reused Materials (WDO Procedures Sections 5.3(J and K)**

### **10.1 Recycling Efficiency**

The **recycling efficiency** targets provided are based upon an emerging methodology in the EU used to measure recycling performance. The program will use the EU methodology until such time as a common methodology has been developed and implemented by Waste Diversion Ontario (WDO). The recycling efficiency targets provided below mirror those specified by the European Union Battery Directive. To verify data and calculate the recycling efficiencies of each candidate facility, Call2Recycle® hired an independent third-party auditor who personally inspected each facility, extensively reviewed supporting documentation and filed confidential and exhaustive reports on the processors with Call2Recycle® program management. Due to the fact that some issues such as the calculation of water, whether used or new batteries are used in the calculation, and a variety of other issues, the recycling efficiency targets indicated may not be comparable with other processors' representations in the market.

### **10.2 After Markets**

In contrast to some other materials covered by the Waste Diversion Act, markets are well developed for the metals and other materials reclaimed from used batteries. Ready insight into these markets can be obtained at the website [www.metalprices.com/FreeSite](http://www.metalprices.com/FreeSite).

The diligence of RBRCC and its recycling suppliers to ensure that the maximum utilization potential of recovered metal is a cornerstone of the longevity and credibility of the RBRCC program.

## **11.0 Research and Development (WDO Procedures Section 5.03(L))**

Continuous improvement is fundamental to the current and future success of Call2Recycle®. As such, ongoing investment in research and development to enhance our collection and recycling infrastructure has been essential and will be continued into the future.

To ensure continued leadership in learning and program effectiveness, RBRCC and its parent RBRC participate in a large number of initiatives to coordinate and develop best practices with analogous battery organizations operating around the world, such as RECHARGE in Europe and PRBA in the U.S. In addition, RBRCC and RBRC support and cooperate in research and development programs seeking better mechanisms to recycle rechargeable and primary batteries. Most recently, through the American

Recovery and Reinvestment Act of 2009 (the “*Stimulus Act*”), Call2Recycle® has been included in two applications that have been filed with the U.S. Department of Energy to improve the recycling of lithium ion and primary batteries.

Industry-wide investments are further supplemented by individual R&D initiatives spearheaded by our battery stewards, all of whom also support the RBRCC Ontario Program and collection/recycling network.

In addition to processing and efficiency improvements, Call2Recycle® annually invests to improve marketing outreach and communication programs to maximize collections.

As such, we implement and will continue to implement a number of initiatives to sharpen our program’s effectiveness. Specifically,

#### *1. Success Metrics*

As explained in Section 7 above, the current state of development of metrics for measuring success of product stewardship initiative is woefully inadequate. One of RBRCC’s primary immediate R&D efforts will be to address this important issue.

Call2Recycle® intends to commission further analyses of the impact of including in calculations: batteries sold as part of or in the packaging of electronics products; “hoarding” habits pertaining to used batteries specific to the Ontario population; the advantages and disadvantages of implementing high-visibility recycling and diversion programs across numerous materials at the same time; and the adequacy of data to allow alternative diversion rate calculations based on, for example, volumes of batteries in municipal waste streams.

Call2Recycle® anticipates this analysis to be complete within the first year of implementation of the expanded RBRC Ontario ISP. Once the preferred metric has been chosen, data collection mechanisms will be adjusted accordingly, with the expectation that the chosen metric will be fully useable by the third year of program implementation.

#### *2. Collection Infrastructure*

Call2Recycle®’s overriding mission is to provide for the safe collection, transportation, and recycling used batteries, while continually increasing public awareness of Call2Recycle®. To achieve this goal, Call2Recycle® frequently assesses its current program offerings, including collection boxes, plastic bags, shipping guidelines, and informational materials. Safety and compliance remains at the core of the assessment.

Ensuring safety and shipping compliance is a complex and ongoing challenge, and as a result, the reason Call2Recycle® requires “bagging/taping” of every battery. To identify new ways to serve and support our participants and consumers, Call2Recycle® contracted with IDEO, an innovation and product design firm, which completed a comprehensive project to address this challenge and help improve the function and efficacy of our collection boxes within multi-stream retail settings.

When the RBRCC Ontario ISP is implemented, research and development will remain an important element with the key project priority being the examination of a collection box and possible

redesign to enhance safety and transportation requirements while encouraging the consumer to recycle.

### *3. Brand Awareness*

To better understand driving forces behind consumers' "green" practices and attitudes, and to determine consumer recycling habits in general, Call2Recycle® has been tracking consumers' attitudes and practices for many years through various research projects.

Additionally, program awareness will be tracked among key audiences, including Retail Partners, Collection Site Managers, Key Opinion Leaders, and Green Business Executives. Through a brand awareness study performed among US and Canadian audiences, a variety of insights will be explored including current awareness and perception of the Call2Recycle® program, the importance of recycling, environmentalism and sustainability and how it impacts their organization, the relative importance of battery recycling within their activities, and attitudes and motivation for environmental activities (including revenue opportunities). The brand awareness study will provide a reliable and actionable baseline measure and tracking measurement for Call2Recycle® branding efforts to better reach participants and consumers. This study was conducted in 2010 and again in 2011.

Call2Recycle® continues to undergo a brand enhancement project to establish Call2Recycle® as its primary brand identifier by associating itself with environmental stewardship and "doing the right thing" in the broader sustainability sense. To do this, a branding effort is being developed to identify batteries and their environmental practices within the larger context of sustainability. Call2Recycle® will reposition itself to be synonymous with environmental stewardship by serving as the best mechanism for battery manufacturers (as well as consumers) to fulfill their product stewardship responsibilities. Through this branding project, the Call2Recycle® brand will serve as the means of unifying its purpose, mindset and mission.

Call2Recycle® monitors the impact of advertising through both Public Service Announcement placements and paid vehicles. Consumer responses through website tracking and collection are tracked against our generated advertising actions with programs modified/enhanced based on results. This diligence to striving to achieve the optimum efficiencies and effectiveness in our communication investments will continue with the expanded and approved Ontario "all battery" Call2Recycle® program.

### *4. Program Efficiencies*

Additionally, Call2Recycle® routinely commissions a research study to gain information on the market shares of key companies in the portable battery market in the U.S. and Canada. Included in this study is also an estimate on the number of batteries sold separately compared to those in products. The results from this study will assist Call2Recycle® in understanding the landscape of the primary players and the collection potential in both the U.S. and Canada.

### *5. Processing*

The opportunity exists to improve sorting efficiencies through automation. Given our expanded collection focus, Call2Recycle® intends to concentrate on the means to move from "individual"

sorting of batteries into automation of this important task. Investigation of existing methods underway internationally will help expedite Call2Recycle®'s learning and implementation plans to improve the current manual nature of the sorting process, thereby realizing considerable cost and management efficiencies.

Additionally, our constant review of each individual box receipt enables us to review compliance with our program (e.g., adequate bagging of batteries, absence of non-accepted program materials, appropriate weight limits of box). Non-conformance with our shipping requirements results in follow-up feedback with the sender to ensure improved compliance. Investment in further computerization of this tracking and feedback process will enable us to track ongoing compliance and shipping improvements by previous and continuing non-conforming entries.

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These combined initiatives have been developed to further enhance and measure Call2Recycle®'s performance and success as well as educate and encourage consumers to recycle their used batteries in Ontario.

**12.0 Rechargeable Battery Stewards (Licensees) of the RBRCC Program**  
*As of February 15, 2011*

3M COMPANY - OH&ES DIVISION	EPSON AMERICA INC.
A&M ELECTRICAL	EUREKA CO.
ACCESS BATTERY & POWER SYSTEMS	EVEREADY BATTERY CO.
ACER SERVICES CORP	EVERGREEN (C.P.) USA, INC.
ADVANCE BATTERY SYSTEMS, INC.	EXCEL BATTERY
AIPHONE CORPORATION	FCI USA, INC./FRAMATONE
ALEXANDER TECHNOLOGIES EUROPE, LTD	FEDCO ELECTRONICS INC.
ALLIED INTL TOOL	FREIGHT SECURITY NET
ALLSTAR MARKETING	FRESHBATTERY.COM
ALLTRADE TOOLS	FUJI PHOTO FILM USA INC.
AMERICAN LAWN MOWER COMPANY	FUJIMIC INC
AMPTECH	FUJITSU COMPUTER SYSTEMS
ANDIS COMPANY	GARRITY INDUSTRIES INC
ANTON/BAUER INC.	GATEWAY INC
AONENG ELECTRICAL APPLIANCES	GEMINI INDUSTRIES, INC.
APPLE	GENERAL DYNAMICS ITRONIX
APPLICA	GLI LLC / 02 COOL
APPLIED POWER INC.	GP BATTERIES (HONG KONG)
ARROW FASTENER	GP BATTERIES (USA)
ATICO INTERNATIONAL USA INC	GREAT BATCH LTD
AVEX ELECTRONICS CORPORATION (DUPLICATE)	GREAT POWER
AVT INC.	HEWLETT-PACKARD COMPANY
BATTERIES PLUS LIMITED	HIGH TECH COMPUTER
BATTERY SPECIALTIES	HITACHI-KOKI USA LTD.
BISSELL	HOBBICO
BLACK & DECKER CORPORATION	HOT-SHOT PRODUCTS CO., INC.
BRAUN INC.	HOUSE OF BATTERIES
BYD BATTERY (USA) CO.	HUNAN CORUN HI-TECH CO LTD (RADIO SHACK/VTECH)
CANADIAN TIRE CORP	ICOM AMERICA INC.
CANON U.S.A. INC.	IDX TECHNOLOGY
CAR-GO-BATTERY CO.	INTEC INDUSTRIES CO, LTD
CASIO HITACHI MOBILE COMM	INTERACTIVE SAFETY PRODUCTS
CASIO INC.	IOTA ENGINEERING COMPANY
CENTURION INTERNATIONAL INC	ITECH
CHERVON N.A.	ITW PASLODE
CONAIR CORP.	IWATSU AMERICA INC.
DC BATTERY PRODUCTS	JB ENERGY (HK) LTD.
DELL	JIANGSU HIGHSTAR CHEMICAL
DIGI-KEY CORPORATION	JVC CORPORATION (U.S.)
DORCY INTL INC	KENDALL COMPANY LP
DOUGLAS QUICK CUT	KENSINGTON COMPUTER PRODUCTS
DU-BRO PRODUCTS INC.	KENWOOD AMERICAS CORPORATION
DURACELL (P & G)	LEICA CAMERA
ENERGY SALES	LENMAR
ENGINEERED ASSEMBLIES	

LENOVA/IBM	S-B POWER TOOL COMPANY
LG ELECTRONICS	SEARS
LUMEDYNE INC.	SHENZHEN ELITE ELECTRONIC CO., LTD
MAG INSTRUMENT INC.	SIGMA
MAKITA U.S.A. INC.	SNAP-ON INCORPORATED
MATSUSHITA ELECT. CORP.	SOLARIS SCIENTIFIC, LLC
MAX COMPANY LTD	SONY ELECTRONICS INC
MEGATECH INTERNATIONAL	SOUTHWEST ELECTRONICS ENERGY
MERITOOL	SPM/MICRO POWER ELECTRONICS
MICROSUN TECHNOLOGIES	STANLEY TOOL (BYD)
MILWAUKEE ELECTRIC TOOL CORP.	STARLIGHT VIDEO
mitsubishi digital electronics	STREAMLIGHT INC.
MOTOROLA INC.	STRYKER
MOXIA ENERGY	TANDY CORPORATION
MPC COMPANY	TECHTRONIC APPLIANCES HK LTD
MULTIPLIER INDUSTRIES CORP. - (PURCHASED BY UNIROSS)	TECHTRONIC INDUSTRIES CO LTD
NABC	TELEDYNE WATER PIK
NATIONAL POWER	TERRALUX INC
NIKKO AMERICA INC.	TERRATEK INC
NORELCO CONSUMER PRODUCTS CO.	THE HOOVER COMPANY (PURCHASED BY TTI NA)
NORMARK INNOVATIONS	THE STANLEY WORKS
NOVATEL WIRELESS, INC	THOMSON CONSUMER ELECTRONICS
OLYMPUS AMERICA INC.	TNR TECHNICAL INC.
OOMA, INC	TOCAD AMERICA INC.
P&G (TAC FACILITATED)	TOSHIBA AMERICA INC
PENTAX TECHNOLOGIES CORP	TRINITY PRODUCTS INC.
PHYSIO-CONTROL CORPORATION	TRUMPF POWER TOOLS
PORTER-CABLE CORP.	UNIDEN AMERICA CORPORATION
POWER PRODUCTS	UNIROSS
POWERGENIX SYSTEMS, INC	UNIVERSAL POWER GROUP
PRO TEAM, INC	UT STARCOM
PROFESSIONAL DENTAL TECHNOLOGY	VARTA BATTERIES INC
PROFESSIONAL TOOL PRODUCTS	VENONOM RACING
PROGRESSIVE TECHNOLOGIES INC.	VERNIER SOFTWARE
PROMARK ELECTRONICS DIVISION	VICTORY CINEVIDEO
QUALITECH	VTECH COMMUNICATIONS LTD
QUANTUM INSTRUMENTS INC	W & W ASSOCIATES
RAYOVAC/REMINGTON - SPECTRUM BRANDS	WAHL CLIPPER CORP.
RESEARCH IN MOTION	XUZHOU ENERGY ELECTRONICS CO
RESISTACAP INC.	
RIDGE TOOL COMPANY	
RONWAY BATTERY CO LTD (MCNAIR) - VTECH	
ROYAL APPLIANCE MFG. CO.	
RYOBI NORTH AMERICA INC	
SAFT AMERICA INC	
SAMSUNG	
SANYO ENERGY (U.S.A.) CORP	

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**Primary Battery Stewards of the RBRCC Program**  
*As of February 15, 2011*

DURACELL CANADA (PROCTER & GAMBLE)\*  
ENERGIZER CANADA\*  
KODAK CANADA  
PANASONIC NORTH AMERICA, INC.  
RAYOVAC CANADA (SPECTRUM BRANDS)\*  
SONY CANADA  
THE SOURCE

\* *Letters of support attached or pending.*



Ed J. MacLellan  
President

March 5, 2010

The Honourable John Gerretsen  
Minister of the Environment  
77 Wellesley Street West  
11th Floor, Ferguson Block  
Toronto ON  
M7A 2T5

Subject: ISP for Batteries

Dear Minister Gerretsen,

Energizer Canada Inc. has partnered with Call2Recycle®, the battery collection and recycling program run by the Rechargeable Battery Recycling Corporation of Canada (RBRCC) for several years. We have relied on their considerable experience to provide an efficient, voluntary product stewardship program. Their customer service and commitment to improve our environment have met our expectations.

We look forward to expanding our partnership with Call2Recycle® to meet all of our consumer battery collection and recycling needs in Ontario. However, we cannot begin this initiative without the WDO approval of the ISP submitted by Call2Recycle®. We have confidence that this plan will meet our extended producer responsibilities by satisfying the upcoming regulatory obligations in the most cost effective manner. We strongly encourage your office to provide any support necessary to generate approval of the Call2Recycle® ISP.

Again, we are confident that that Call2Recycle® will meet and exceed expectations set by the government and by the citizens of this province. We therefore urge you to approve the Call2Recycle plan to handle this important issue. Thank you for your attention.

Sincerely

Ed J. MacLellan  
President, Energizer Canada Inc.

**ENERGIZER, FIRST! PEOPLE · PRODUCTS · SERVICES**

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6733 Mississauga Road, Suite 700, Mississauga, Ontario L5N 6J5  
PHONE 905 286-6100 · FAX 905 286-6190 · E-mail: [edj.maclellan@energizer.com](mailto:edj.maclellan@energizer.com)



Procter & Gamble Inc.  
Post Office Box 355  
Station "A"  
Toronto, Ontario  
M5W 1C5

March 10, 2010

The Honourable John Gerretsen  
Minister of the Environment  
77 Wellesley Street West  
11th Floor, Ferguson Block  
Toronto ON  
M7A 2T5

jgerretsen.mpp.co@liberal.ola.org

Subject: **Call2Recycle®, the battery collection and recycling program run by the Rechargeable Battery Recycling Corporation of Canada (RBRCC)**

Dear Minister Gerretsen,

P&G is a leading consumer products company in Canada with a strong portfolio of trusted, quality, leadership brands including Duracell, Tide, Pampers, Always, Pantene, Head & Shoulders, Olay, Cover Girl, Clairol, Crest, Oral-B, Downy, Bounce, Swiffer, Mr. Clean, Bounty, Iams, Pringles, and more. We have been in Canada since 1915 and employ almost 3,000 people in several sites across Ontario.

P&G has been actively supportive and productively involved in all waste diversion initiatives in Ontario over the years. Our people were instrumental in developing the MHSW Phase 1 Program Plan for Batteries with Stewardship Ontario (SO). We were also productively engaged in the development of the Consolidated MHSW Program Plan which captures many of P&G's products.

I am writing to you today about Call2Recycle®, the battery collection and recycling program run by the Rechargeable Battery Recycling Corporation of Canada (RBRCC).

P&G/Duracell has partnered with RBRCC and their Call2Recycle® battery stewardship program since it's inception over a decade ago. We have relied on their considerable experience to provide an efficient and voluntary product stewardship program.

We are seeking to expand our partnership with RBRCC/Call2Recycle® to meet all of our consumer battery collection and recycling needs in Ontario, including both primary and rechargeable batteries. We are unable to begin this initiative without Waste Diversion Ontario's approval of the Industry Stewardship Plan (ISP) submitted by RBRCC. We have

confidence that this plan will meet our extended producer responsibilities by satisfying our regulatory obligations in the most cost effective and sustainable manner.

RBRCC's substantial experience in organising and managing the diversion of consumer rechargeable batteries inside Ontario can be seamlessly expanded to cover single use batteries bringing operating efficiencies to the batteries diversion network throughout the Province. As well, the familiarity with a known system and organisation will better serve the battery retailer and consumer communities and provide the launch pad for growth of infrastructure and user acceptance. The close working relationship between battery stewards and RBRCC will also facilitate the adoption of improvements in recycling technology pioneered by international companies as well as the adoption of other efficiency measures proven by diversion programs in other parts of the world.

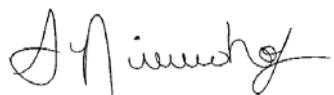
"From Waste to Worth" communications emphasize and seek to encourage private initiatives of extended producer responsibility. It is our judgement that the RBRCC's plan would make a positive difference in the sustainable management of battery wastes within Ontario. Rejecting the Call2Recycle® plan seems counter to the government's commitment to this policy direction.

We are confident that Call2Recycle® will meet expectations set by the government and by the citizens of this province. We hope that the WDO will agree with the views and experience of the Stewards. We therefore urge you to support the Call2Recycle plan to handle this important issue.

P&G remains committed to continuing to engage productively in waste diversion efforts with all stakeholders. We share in the common interest of helping make Ontario a more environmentally-responsible society, as well as a Province known as a great place to do business.

Thank you for your consideration and support in this matter.

Sincerely,



Susan Nieuwhof, P.Eng.  
Director, Corporate & Government Relations  
Procter & Gamble Inc.



Electronics Product  
Stewardship Canada  
[www.epsc.ca](http://www.epsc.ca)

Recyclage des produits  
électroniques Canada  
[www.rpec.ca](http://www.rpec.ca)

The Honourable John Gerretsen  
Minister of the Environment  
135 St. Clair Avenue West  
Toronto, ON M4V 1P5

March 5, 2010

Dear Minister Gerretsen,

**Re: Battery Recycling Industry Stewardship Plan**

Dear Minister Gerretsen,

Electronics Product Stewardship Canada (EPSC), is a not for profit corporation dedicated to e-waste management. Our members include the following brand manufacturers, Apple, Brother, Canon, Dell, Epson, Hewlett-Packard, IBM, Lenovo, Lexmark, LG Electronics, Microsoft, Northern Micro, Samsung, Sony, Sun Microsystems, and Toshiba.

Our members are Obligated Stewards for the rechargeable batteries sold with their products. Many of our members sell rechargeable batteries and are also members of the Rechargeable Battery Recycling Corporation of Canada (RBRC). RBRC manages Call2Recycle®, the battery collection and recycling program.

We hope that the RBRC request to form an Industry Funded Plan to recycle batteries will be considered positively by WDO. RBRC has been running a successful program in Ontario for the past 13 years. This is just the sort of program you endorsed in the “From Waste to Worth” paper which seeks to encourage private initiatives of extended producer responsibility.

Additionally, the Call2Recycle® program, in which our members participate, is harmonized across Canada and North America, is self financed and has a good track record.

We are confident that the RBRC Plan will more than meet expectations set by the government. This is why we are supporting their proposal and we hope that you do as well.

Thank you for considering our comments

Sincerely,

Shelagh Kerr  
President & CEO  
Electronics Product Stewardship Canada

Cc: John Vidan, MoE;  
Cliodhna McMullin, WDO



**Oldtimers' Hockey Challenge Classic**  
8000 Jane St Tower A,  
Suite 401  
Concord, ON L4K 5B8

March 11, 2010

The Honourable John Gerretsen  
Minister of the Environment  
77 Wellesley Street West  
11<sup>th</sup> Floor, Ferguson Block  
Toronto, ON M7A 2T5

Dear Mr. Gerretsen,

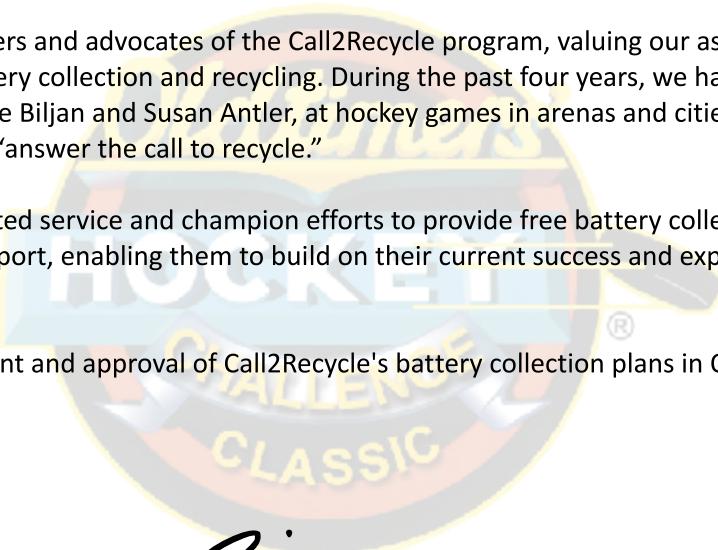
**Teaming up with Call2Recycle for Ontario's Environmental Care**

We have been proud supporters and advocates of the Call2Recycle program, valuing our association with their proactive efforts and dedication to battery collection and recycling. During the past four years, we have worked with Call2Recycle and their team, notably Tyrone Biljan and Susan Antler, at hockey games in arenas and cities across Ontario as well as Canada, encouraging folks to "answer the call to recycle."

Call2Recycle's years of dedicated service and champion efforts to provide free battery collection and recycling are worthy of your continued support, enabling them to build on their current success and expand their program excellence for the citizens of Ontario.

We trust in your good judgment and approval of Call2Recycle's battery collection plans in Ontario.

Sincerely,

A large, semi-transparent watermark of the Oldtimers' Hockey Challenge Classic logo is centered on the page, appearing behind the signatures.

*Bryan Trottier* '99      *Billy Smith* 31      *Steve Shutt* '92

Bryan Trottier  
HHOF 1997

Billy Smith  
HHOF 1993

Steve Shutt  
HHOF 1993

*Dale Hawerchuk* '00

Dale Hawerchuk  
HHOF 2001

*Glenn Anderson* '08

Glenn Anderson  
HHOF 2008