

Call2Recycle Canada, Inc.

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Call2Recycle

Draft BC Extended Producer Responsibility Plan

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

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

1. Introduction

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

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

2. Duty of Producer

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

(a) have an approved plan under Part 2 [Extended Producer Responsibility Plans] and comply with the approved plan, or

(b) comply with Part 3 [Extended Producer Responsibility Program Requirements if No Extended Producer Responsibility Plan]

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

3. Appointment of a Stewardship Agency

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

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

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

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

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

Agency Governance

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

Board members as of May 2018

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

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

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

Performance Monitoring and Reporting Commitments

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

4. Products Covered under the EPR Plan

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

Accepted Products:

- Alkaline
- Carbon Zinc
- Lithium Ion (Li-Ion)
- Lithium Primary
- Portable Power Banks¹
- Nickel Cadmium (Ni-Cd)
- Nickel Metal Hydride (Ni-MH)
- Nickel Zinc (Ni-Zn)
- Silver Oxide
- Small Sealed Lead Acid (SSLA)
- Zinc Air
- Damaged and defective batteries²

Excluded Products

- Batteries weighing more than 5 kg
- Cellphones³
- Damaged or defective batteries sold in or with a device covered under another EPR plan
- Motive batteries
- Wet cell batteries

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

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

³ Call2Recycle will no longer cover cellphones under its EPR plan.

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

These programs include:

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

Orphaned/Free Rider Batteries

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

5. Stakeholder Consultation

To be completed post consultation.

6. Collection System and Consumer Accessibility

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

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

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

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

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

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

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

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

Collection System

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

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

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

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

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

Product Pathways Not Directly Managed by the EPR Program

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

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

Collection Targets and Recovery Rates

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

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

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

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

Recovery Rate to 2022

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

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

Collection Accessibility

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

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

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

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

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

Performance Monitoring and Reporting Commitments

Performance Targets:

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

Reporting Commitments:

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

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

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

7. Consumer Awareness

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

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

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

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

Recycling Incidences in British Columbia

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

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

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

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

Target Audiences will include:

A. British Columbia Residents:

- Consumers
- Businesses

B. Collection Network:

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

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

Initiatives include:

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

Performance Monitoring and Reporting Commitments

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

Performance Targets:

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

Reporting commitments:

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

8. Management of Program Costs

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

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

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

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

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

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

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

Performance Monitoring and Reporting Commitments

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

9. Management of Environmental Impacts

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

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

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

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

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

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

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

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

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

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

Performance Monitoring and Reporting Commitments

Performance Targets:

Recycling Efficiency Rate

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

Reporting Commitments:

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

10. Dispute Resolution

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

⁴ Representing total material recovery percentage

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

11. Performance Monitoring and Reporting Commitments

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

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

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

Appendix A: List of Call2Recycle Primary Battery Members

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

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

Appendix B: List of Rechargeable Licensees

3M Automotive Aftermarket Division
3M Commercial Solutions Division (CSD)
3M Constrctn & Home Imprv
3M Materials Resources
3M Personal Safety Division
A2Z Development Center
Accell North America
Acer America Corporation
Advanced Battery Systems
Advanced Respiratory, Inc.
Aero Design, Inc
Aerosense Inc.
Agilent Technologies
Alcatel and Alcatel Onetouch
Allied Intl/Allied Tools
Alltrade Tools LLC
Alpha Source, Inc.
Amazon.com, Inc.
American Honda Motor Co., Inc.
American Lawn Mower Co
American Toppower
Anton/Bauer
APC - Schneider Electric
Apple, Inc
Arris Group, Inc
Asus Computer International
Audio Enhancement, Inc.
Axiom Mobile Group
Baccus Global
barnesandnoble.com, LLC
Battery Specialties
Bayco Products
Bayer Healthcare
Belkin International, Inc.
Best Buy Co., Inc.
BionX International
Bissell Homecare, Inc
BlackBerry
BlackBerry Limited

Bose Corporation
Brother International
Bushnell, Inc.
BYD Company Limited
Canadian Tire Corporation, Ltd
Canon Canada Inc
Canon USA Inc
Casio America, Inc.
Cell-Con Inc
Century Optronic Inc.
Changzhou Globe Tools Co. Ltd.
Chervon HK Limited
Chervon HK Limited/The Home Depot
Chervon HK Lmtd/The Home Depot Canada
Cisco Systems Inc.
Cleva North America/LawnMaster
Cognex Inc.
Computer Technology Link Corp (DBA CTL)
Conair Corporation
CTE Energy Co., Ltd.
Cybertron International
DANTONA INDUSTRIES/ULTRALAST
Deere & Company (John Deere)
Dell Canada Inc.
Dell Inc
Deltran USA LLC
Digi-Key Corporation
DLG (Shanghai) Electronic
Dongguan Sunly Battery Tech Co., LTD
Dorcy International
Duracell Canada Inc
Duracell US Operations
Eaton Corporation
Echo Incorporated
Enerco Group Inc.
Energizer Holdings, Inc.
Energizer Holdings, LLC.
Energy Sales
EnerSys Delaware Inc.

Epson America, Inc.
 Esselte Corporation
 Evergreen (C.P.) USA Inc
EZsmart Gutter Cleaner, LLC
 FDK AMERICA
Fedco Electronics, Inc.
Ferno - Washington, Inc.
 Finish Thompson, Inc.
 Flying Dragon Development Ltd.
FujiFilm Holdings America Corp
 Fujitsu America
GammaTech Computer Corporation
 Garmin International, Inc
 GE Healthcare Canada, Inc.
 Getac Inc.
 Gibson Innovations USA, Inc.
GiiNii Tech Corporation
 Global Technology Systems, Inc
 Gold Peak Industries (NA), Inc
 GRACO, Inc.
 Gradus Group
 Greatbatch Inc
GreenSmoke, Inc.
 GS Battery (USA) Inc.
 Guangzhou Great Power Energy Tech Co LTD
 Harris Corporation
 Hewlett Packard Enterpris
 Hilti, Inc.
 Hitachi Koki Canada Co.
 Hitachi Koki USA Ltd
Hobbico, Inc
HoMedics
 Honeywell International Inc.
 HP Inc.
 HTC Corporation
 Huawei Device USA. Inc
 Husqvarna AB
 IDX System Technology Inc
 Illinois Tool Works
 IMA Test Steward
 Industrial Battery Service Inc
 Ingersoll Rand
 Inspired Energy, LLC
 Intec Industries Co. Ltd.
Intermetro Industries Corp

Invacare Corporation
Invox Hardware Limited
 iRobot Corp.
iTech
 Jasco Products Company
 Jiawei Technologies (USA) Ltd.
 JIN CO Ltd
 JKH Health Co., Ltd.
 JLG Industries Inc
 JVCKENWOOD USA Corp
 KAN Battery Co., Ltd
Karcher North America
 Keyence Corporation of America
 Keysight Technologies
 Konica Minolta
Kwonnie Electrical Products, LTD
L'Image Home Products Inc. (IHP)
 LEDVANCE, LLC.
 Lego Group
 Leica Camera Inc
 Lenmar Enterprises, Inc.
 Lenovo (United States) In
 LEXEL BATTERY CO LTD
 LG Electronics Canada, Inc.
 LG Electronics MobileComm USA
 Logic Technology Development
 LOGITECH INC.
 Mag Instrument, Inc
Maha Energy
 Makita Canada, Inc.
 Makita USA
 Mattel, Inc.
Meritool LLC
Metabo Corporation
 Microsoft
 Midland Radio Corporation
 Miller Mfg Co
 Milwaukee Electric Tool Corporation
 Moshi
 Motorola Mobility, LLC
 Motorola Solutions, Inc
 MTD Products Inc
myCharge
 National Battery
 National Power Corp

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

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

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

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