

Call2Recycle Canada, Inc.

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Saskatchewan Product Stewardship Program Plan for Consumer Batteries

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Submitted by: Call2Recycle Canada, Inc.

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Program Contact: Kristen Romilly
Director, Western Canada
Call2Recycle Canada, Inc.
201- 2590 Granville Street
Vancouver, BC, V6H 3H1
kromilly@call2recycle.ca

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1. Introduction

Call2Recycle Canada, Inc., which administers the Call2Recycle® program, is a Canadian not-for-profit battery stewardship organization. For more than 20 years, Call2Recycle has been managing a voluntary consumer battery collection and recycling program in Saskatchewan. In the province of Saskatchewan, *The Household Hazardous Waste Product Stewardship Regulations* (the Regulation) sets out requirements obligating first sellers to participate in a product stewardship program (PSP) approved by the minister. This PSP plan for consumer dry-cell batteries weighing less than five (5) kilograms is being submitted by Call2Recycle Canada, Inc. For more information on Call2Recycle, please visit www.call2recycle.ca.

2. Program Overview

Call2Recycle was established to help producers fulfill their regulatory product stewardship obligations for batteries. Since inception, the program has diverted more than 21 million kilograms of batteries from the solid waste stream and established more than 9,000 collection sites across Canada.

Since 1997, Call2Recycle has operated a robust consumer battery collection and recycling program across Canada, and today works on behalf of manufacturers, distributors and retailers. The program collects and recycles dry-cell primary (single-use) and rechargeable batteries weighing less than five (5) kilograms from retailers, local governments, businesses, and consumers.

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

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

Call2Recycle distributed a consultation document on November 15, 2019 to 120 Call2Recycle members that have been identified as potentially obligated under the Regulation. The document contained a summary of all key elements and commitments in this PSP plan. Members were provided two (2) weeks to provide comments on the program plan. Call2Recycle members were overwhelmingly in support of Call2Recycle's PSP plan.

3. Management Structure and Board of Directors

Call2Recycle is a federally incorporated non-profit and is governed by a board of directors that is committed to ensuring an efficient and effective program. The board is comprised of battery manufacturers, distributors and retailers and independent directors. The board composition aims to ensure that the interests, activities, and goals of each regulated province are represented. For example, currently, some retailers that operate in Saskatchewan hold positions on the board of directors, and Call2Recycle will continue to ensure that Saskatchewan’s interests are represented.

The President of Call2Recycle reports directly to the board of directors. Management of the provincial program will be overseen by the regional director with program services provided by several departments including account management, operations, customer service, member services, marketing and communications, finance and accounting, and information technology.

3.1 Saskatchewan Advisory

The Regulation requires that interests of Saskatchewan must be represented by way of an advisory committee. In order to provide a platform for all Saskatchewan interests to be addressed, Call2Recycle will establish and chair a local advisory committee with Saskatchewan representation. Advisory committee participants will be selected by the program and will ensure that the interest of program stakeholders are represented. The advisory committee will serve as a mechanism and a meaningful forum to foster dialogue for stakeholders to provide feedback regarding the program. The council may also advise on program goals, program development, and opportunities for continuous improvement. Recommendations emerging from the committee will be non-binding but will be used to inform program enhancements.

4. Program Details

The Call2Recycle program is designed to meet the regulatory requirements of obligated parties in Saskatchewan for rechargeable and other batteries under the Regulation. This PSP plan will address dry-cell rechargeable and primary (single-use) battery chemistries weighing less than five (5) kilograms each. This PSP plan includes removeable batteries, regardless of whether the battery is supplied stand alone product or embedded in a product¹ and batteries generated by both consumers and those generated by private businesses and other organizations.

4.1 Batteries Included and Excluded in this Plan

Batteries Included in the PSP Plan:

Rechargeable Batteries		Primary (Single-Use) Batteries	
Lithium Ion	Nickel Zinc	Alkaline	Zinc Carbon
Nickel Cadmium	Portable Power ²	Lithium Primary	Zinc Chloride
Nickel Metal Hydride		Silver Oxide	Zinc Air

¹ Except when batteries are sold in or with a device that is covered under a pre-existing approved stewardship plan.

² A small lithium-based, stand-alone rechargeable battery that is self-contained and typically transportable unit that stores and supplies electrical power to electronic devices external to the device. The portable power unit can be designed to be used by a specific device, such as a power pack integrated into a phone case, or by connecting via a cord to various devices.

Products Excluded from the PSP plan:

- Lead acid batteries including small sealed lead acid
- Wet cell batteries
- Batteries weighing more than 5 kg
- Damaged, defective, or recalled batteries that have been removed from a device that is covered under a pre-existing approved stewardship plan.

Orphaned and Free Rider Batteries

“Orphaned batteries” refers to batteries produced by a manufacturer that either no longer exists or no longer produces batteries. “Free rider” also refers to an obligated entity that is not a registered member of the Call2Recycle program. Call2Recycle’s program is operated on behalf of Call2Recycle members who are obligated first-sellers of batteries, including those who offer batteries for sale online, in the province of Saskatchewan. Call2Recycle makes concerted efforts to register all obligated entities with the program to eliminate free rider activity. However, it should be noted that both orphaned and free rider batteries are accepted by the program and are diverted from landfill. The program will make best efforts to outreach to obligated parties and encourage participation as a member in the program. Call2Recycle will develop a compliance and enforcement plan in collaboration with the Ministry.

Since Call2Recycle’s voluntary program launch in Saskatchewan more than 20 years ago, small sealed lead acid batteries (SSLA) have been accepted. The collection and recycling of these batteries has been funded by voluntary stewards. Currently, the Regulation does not include lead acid batteries under the rechargeable category and therefore first sellers of SSLA batteries are not obligated to participate in a PSP plan. It is anticipated that given Call2Recycle’s long history of accepting SSLA batteries in Saskatchewan that consumers will continue to deposit SSLA batteries at Call2Recycle’s drop-off locations. Given no funding mechanism exists for SSLA batteries, the management of these non-program batteries may be covered by fees collected to manage accepted program batteries.

4.2 Collection System

Call2Recycle operates a turnkey, highly efficient program. The program’s primary focus is to recycle consumer batteries—wherein all batteries collected are recycled responsibly and diverted from landfill. Call2Recycle’s network of drop-off facilities across the province enables consumers to deposit their used batteries at locations convenient to them. The program has established a qualification process for collection facilities to maximize battery returns. As an additional service offering, Call2Recycle also accepts batteries from business and IC&I sectors. These collection sites may or may not be open to the public. Often, they are significant purchasers of consumer batteries and collectors of used consumer batteries in Saskatchewan.

Any retailer, business, institution, or government entity that meets program collection site requirements can participate as a drop-off location that is open to consumers (public site) or as a private collection

site collecting batteries used internally (private site). Public collection sites are strategically located where they are most likely to be used by consumers. Below are other considerations when establishing collection sites:

- **Accessibility** – To ensure an optimal number of collection sites available to the public 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, recycling/round-up events, or through curbside battery collection special projects.
- **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 wanting to enroll in the collection program to promote environmental health and safety through battery recycling.
- **Association to batteries** – The likelihood that consumers will correlate batteries with the location (e.g. an electronics store or recycling depots).

Call2Recycle collection sites use one of two collection methods: the bulk program or the box program. The bulk program caters to facilities that generate large quantities of batteries for recycling (250 kg minimum per shipment). The box program is designed for sites that do not generate large quantities of batteries in a short period of time or do not have the space to collect bulk quantities. These sites receive collection boxes at no cost to them. The collection box kits include promotional material, plastic bags for battery terminal protection, and pre-paid shipping labels for returning full boxes. Sites that collect in bulk quantities may opt to use Call2Recycle-provided containers or ship in UN rated drums. If shipping in drums, collection sites must acquire and cover the cost associated with purchasing drums. There is no cost for collection sites to ship either bulk and box shipments to Call2Recycle’s consolidation and/or sorting facilities.

Batteries are shipped by collection sites to a designated Canadian sorting facility. There, the batteries are separated by chemistry then sent to processing partners where their component parts are extracted for reuse in such products as new batteries, stainless steel alloy, and roadbed aggregate additives.

4.3 Accessibility

Call2Recycle has serviced the province of Saskatchewan for more than 20 years with a consumer battery collection and recycling program. Convenient and accessible drop-off locations are available across the province. Public collection locations that are available to Saskatchewan residents are listed on Call2Recycle’s website and mobile phone locator. Residents can search by postal code or city and province to find a battery collection location. Call2Recycle’s Customer Service staff is also available to assist the public in locating a collection site nearby. Call2Recycle maintains a strong collection network, which currently offers more than 190 public and private collection sites throughout Saskatchewan.

For the duration of the PSP plan, Call2Recycle will take proactive measures to ensure reasonable and convenient access to battery collection locations in the province. Call2Recycle has a pre-existing collection network established and is committed to expanding the network to increase accessibility. This may include seeking partnership with collection facilities that accept multiple product streams from consumers to maximize provincial coverage and accessibility.

Residents across the province will be offered a variety of battery recycling options that range from permanent year-round drop-off sites to seasonal collection events, including community collection events. In 2018, 62 per cent of Saskatchewan residents resided within a 15 km radius of an available battery drop-off location. Call2Recycle will report on the accessibility in the province with the goal of increasing the percentage of the population with access to a battery drop-off location or a battery collection event within 15 kilometers to 80 per cent over the plan period. 2018 accessibility results will be used as the baseline for measurement.

4.4 Transportation, Sorting, and Processing

Call2Recycle will continue to utilize a variety of service providers including those for transportation and sorting. To optimize participation, improve efficiency, and increase battery collection rates, Call2Recycle is committed to an open, transparent, and fair process in selecting service providers.

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

Currently there are no sorters operating in Saskatchewan, therefore batteries collected through Call2Recycle in the province are sorted and consolidated at service providers throughout Canada. Once batteries are sorted according to chemistry, their weights are recorded, and they are readied for shipping to the appropriate recycling processor based on their chemical composition.

Call2Recycle is committed to meeting the highest global standards for safe and effective battery processing. The program seeks to maximize the amount of material that is captured from processing to direct it to secondary uses. Through the Call2Recycle program, all the batteries' constituent parts are reclaimed and diverted from the waste stream. Different battery chemistries require different reclamation methods; therefore, Call2Recycle seeks partnerships with various processors to ensure optimal performance. All Call2Recycle's processing facilities use the latest and proven-effective thermal, mechanical, or chemical processes to recover materials such as nickel, iron, lead, cadmium, and cobalt. When possible, Call2Recycle utilizes local partners to help reduce its transportation footprint. Call2Recycle will continue to seek viable local opportunities should they come available. All partners must meet Call2Recycle requirements, standards, and policies and must comply with governmental regulations.

4.5 Environmental Standards

The Province of Saskatchewan is committed to the reduction, reuse, recycling, and safe disposal of hazardous materials. 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 labelled as such.

Recycling is the most viable way of keeping battery waste from entering landfills. The Call2Recycle program efficiently and cost-effectively recycles batteries of all types, and no battery collected through the 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 is the first program of its kind to receive R2 certification, affirming that Call2Recycle meets stringent R2 standard requirements relating to environmental and public health, worker health and safety, security aspects of electronics recycling, and the management of the collection and distribution of batteries and cellphones to downstream processors for recycling. The Responsible Recycling Practices Standard (R2) certification, is a set of voluntary principles and guidelines designed to promote and assess responsible practices for electronics recyclers. A management system is required that is accountable for practices affecting worker health and safety, security, the environment, and the downstream management, both domestically and internationally, of end-of-life electronic material and equipment, including and batteries.

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.

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. Call2Recycle manages contracts with collectors, processors, and third parties in compliance with municipal, provincial, and federal laws and legislation.

4.6 Management of Greenhouse Gas Emission

The program selects downstream service providers according to the Call2Recycle environmental policy, which serves as a guideline to mitigate the program's environmental impact. The Call2Recycle environmental policy upholds the following best practices:

- 1) Optimization of third-party transportation networks for Call2Recycle:

- Call2Recycle operates two fulfillment centres for the distribution of collection boxes: one for central and eastern Canada and one for western Canada. This ensures that customers are serviced effectively while at the same time addressing the concern of having program boxes traverse the most optimal distance to their collection destination.
- In 2018, Call2Recycle commissioned its third-party logistic transportation partner to carry out a network analysis of the program's entire Canadian operation. This assessment yielded actionable data to ensure that all collected program material traverses the minimum distance between a collection site and a contracted sorted partner. This ensures that program material generates the least greenhouse gas emissions possible as a result of transport to Call2Recycle's sorting partners.
- Call2Recycle contracts a third-party transporter for the distribution and pick-up of collection boxes. Program boxes are shipped in multi-purpose truckloads to help reduce overall environmental footprint.
- Batteries are only transported from sorting facilities in full truckloads to designated processors to maximize available truckload volume.
- When available, Call2Recycle contracts local processors to manage the different types of battery chemistries collected. The intent is to have sorted program material processed as close as possible to where it is collected, thus reducing the environmental impact of transporting batteries for recycling.

2) Call2Recycle collection boxes are recyclable and the flame-retardant liners are re-used, alleviating the requirement for additional resources.

Call2Recycle will develop a methodology to gauge the greenhouse gases associated with the collection, transportation, and processing of batteries at end-of-life.

4.7 Safety

The safety of consumers, collection sites, transporters, sorters, and processors are a top priority for Call2Recycle. When certain types of batteries reach end-of-life, they may still retain a residual charge that presents a safety risk if not handled properly. To advance the program's commitment to safety, Call2Recycle has introduced a patent pending flame retardant liner affixed in all boxes distributed in Canada. This innovation offers an additional layer of protection from a thermal event during the battery journey – from collection to transportation to sorting and processing. When used in conjunction with Call2Recycle's program guidelines and terminal protection requirements, the liner helps prevent flames escaping from the battery box should an event occur. Collection boxes are also UN4GY rated and have been approved by Transport Canada.

5. Program Funding

Environmental Handling Fees (EHFs) are used to fund the program, including but not limited to communications, collections, transportation, processing, and administration. It is solely the decision of the individual member whether or not to recover the EHFs paid into the program from consumers through a separate invoice item or product price. Call2Recycle provides its members with promotional

materials to help educate the public about EHF. Call2Recycle will execute consumer campaigns to ensure public education on EHF and battery collection and recycling.

EHF are reviewed annually and set through a budgeting process and are reviewed and approved by the Call2Recycle Canada, Inc. Board of Directors. Based on the number of units of batteries sold into the province, members report quantities at pre-set periods using an online system. Members are provided with a minimum of 90 days' notice of any changes to the EHF schedule. Call2Recycle will keep the ministry apprised of any upcoming changes pertaining to the schedule of EHF.

EHF may be applied to some products containing easily removable batteries. Products are selected based on the likelihood that their batteries will end up in Call2Recycle's recycling stream due to frequency of battery replacement associated with usage. The program's goal is to ensure that applicable batteries are safely managed at end-of-life while also minimizing the potential for cross-subsidization between products and categories. Applicable products may include garden tools, construction and renovation tools, smoke and carbon monoxide alarms, portable flashlights and spotlights, electronic toys, electric bicycles, and electric scooters. Any fee placed on these categories is intended to manage the batteries and not for the device itself. Product categories are subject to change; however, the Ministry of Environment will be consulted in advance of category changes or adjustments.

The organization maintains a reserve fund, the amount of which 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.

6. Auditing and Qualifications:

Call2Recycle is committed to ensuring that registered obligated entities (members) and service partners, and the program itself are compliant with Call2Recycle standards and industry best-practices.

6.1 Service Partner Qualification Process and Call2Recycle Certification Process

Call2Recycle maintains a diverse group of approved downstream vendors or third-party logistic providers (3PLs) used for transportation, sortation and processing of program material. All contracted partners have gone through an initial and recurring annual auditing process consistent with the requirements found in the provisions of the R2:2013 standard. The program's vendor due diligence is the most stringent in North America.

The program specifies material flow for all downstream vendors through to end of life. A robust information system tracks focus material as it moves through the program's downstream vendor network. These safeguards help affirm Call2Recycle's commitment to proper downstream management of battery collections, including not exporting to developing countries or sending materials to local landfills.

Call2Recycle maintains an R2:2013 Certification. The R2:2013 standard is the latest version of R2, the electronics recycling industry's leading recycling certification. This distinction reinforces Call2Recycle's commitment to following stringent requirements regarding safe, secure battery collection and

processing. Call2Recycle is committed to an open, fair and transparent process to select the best service providers based on several criteria.

Some highlights of Call2Recycle's program include:

- As a program manager, Call2Recycle specifies the program material flow for all approved downstream vendors through to end-of-life.
- A robust information system tracks program material as it moves through all approved downstream vendor network through to end-of-life.
- These safeguards help affirm Call2Recycle's commitment to proper downstream management of battery collections, including not exporting to developing countries or sending materials to local landfills.

In addition, Call2Recycle also maintains the following certifications and permits:

Certifications

- OHSAS 18001:2007 – Occupational Health and Safety Standard
- ISO 14001:2015 – Environmental Management Systems Standard
- Certificate of E-Waste Qualification - Issued by the Basel Action Network (BAN), ensuring that no materials collected are dumped in developing countries, local landfills, or incinerators.

Permits

- Permit of Equivalent Level of Environmental Safety (PELES) – Allows Call2Recycle to move batteries intended for recycling between provinces across Canada
- Transport Canada Equivalency Certificate - authorizes Call2Recycle and its program participants to handle, offer for transport or transport products accepted for recycling within the program parameters.
- Temporary Certificate for Damaged, Defective or Recalled (DDR) Batteries - authorizes Call2Recycle and its program participants to handle, offer for transport or transport DDR products accepted for recycling within the program parameters.

6.2 Member Audits

Call2Recycle conducts periodic audits of its members with respect to the sale, supply, distribution and importing of obligated products in the relevant provinces where the programs are being implemented and operated. These audits verify the accuracy of the remittances of EHF's by the members to Call2Recycle.

7. Promotion and Education

7.1 Strategic Approach

While Call2Recycle operates a national program across Canada, it also appreciates the unique characteristics of individual provinces, its residents, and available communication channels. Knowing who to reach and how to reach them is critical to the success of any outreach and education plan. To

that end, Call2Recycle will engage in specific research to further understand the nuances of the Saskatchewan market.

To ensure a successful education and awareness campaign, the promotion and education budget will support a range of new and recurring outreach and education efforts. Consumer awareness, attitudes, and actions will be monitored using third-party surveys, and programs will be evaluated against key metrics, including annual collection results and accessibility to collection network. Based on continued learnings and outcomes, strategies and plans will be adjusted accordingly. Call2Recycle will report on the awareness survey results in the annual report.

7.2 Objectives

To help raise awareness, drive participation, and maximize collections with residents of Saskatchewan, Call2Recycle will offer opportunities to collection network participants including retailers, businesses, and municipalities to participate in various education and promotion campaigns. On a parallel track, Call2Recycle will implement a proactive outreach program targeting opinion leaders, stakeholders, and media outlets. This will be complemented by integrated, multi-channel promotions through traditional, non-traditional, and digital media, as well as sponsorships and partnerships to efficiently reach the defined target audiences and further battery diversion goals. Objectives for consumer awareness campaigns are as follow:

- 1) **Educate:** Inform Saskatchewan residents:
 - a. Household batteries can and should be recycled
 - b. Why it’s important to recycle household batteries
 - c. How and where to recycle household batteries
- 2) **Motivate:** Inspire the audience to recognize the role they play—raising awareness of the importance of battery recycling.
- 3) **Move to action:** Demonstrate the accessibility of battery drop-off sites and provide options to help the public identify convenient collection locations via online, partner, and telephone locators.

<u>Target Audiences</u>		
Saskatchewan Residents	Collection Network	Stakeholders
<ul style="list-style-type: none"> • Consumers • Businesses 	<ul style="list-style-type: none"> • Public Site (collects directly from residents): Municipalities, Retailers, Communities • Private Site (internal collections): Solid Waste Facilities, Businesses 	<ul style="list-style-type: none"> • Key Influencers (Local Government, Industry and Trade Associations, and Non-Governmental Organizations) • Call2Recycle Members/Obligated Parties • Media, Experts, Influencers

Call2Recycle will also seek opportunities to work collaboratively with other approved product stewardship programs when possible, with the goal of increasing convenience and enhancing program efficiencies.

8. Contracts and Dispute Resolution

For entities that enter into an agreement for the collection, transportation, and processing of batteries, a contract is put in place that outlines the dispute resolution process. For entities 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 it 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. Call2Recycle operates in good faith with its partners and will try to resolve a dispute without arbitration. Arbitration will only be used if both parties cannot come to a reasonable solution.

9. Reporting

9.1 Annual Reporting

As per Section 9 of the Regulation, Call2Recycle will submit a written annual report to the minister on or before June 30th of each year. The annual report will cover the period starting January 1 and ending December 31 of the previous year. The annual report will include:

- A description of program activities during the report year;
- The total weight of primary and rechargeable batteries (both by type and as an aggregated total), covered under this program plan, that were collected during the reporting year;
- The weight or percentage of batteries attributed to each management option including recycling, reconditioning, or safe disposal;
- Total EHF's collected in Saskatchewan to fund the program;
- The amount spent to operate the program in Saskatchewan;
- Recycling incentives paid out, if any;
- The cost incurred to administer to the program; and,
- The amount spent on public education or public awareness and communication.

9.2 Performance Measures and Continuous Improvement

Call2Recycle will commit to reporting on the following performance measure in each annual report:

- Collections: The percentage change over the previous year for the duration of the program plan.
- Accessibility: Continue to increase the proportion of Saskatchewan residents who reside within 15 kilometers of a battery drop off site or collection event with the goal of reaching 80 per cent accessibility over the course of the PSP. Starting with the 2018 baseline of 62% of Saskatchewan residents live within a 15 km radius of an available drop-off site

- Awareness: With the goal of increasing awareness, Call2Recycle will report on the percentage of Saskatchewan residents who are aware that batteries can be safely recycled.
- Financial Information: The program will provide audited financial statements for its operations in Saskatchewan in each annual report.

10. Review of the Product Stewardship Plan

In accordance with section 6 of the Regulation, Call2Recycle will review the PSP plan every five (5) years after the date of approval. Call2Recycle will either:

- Request approval from the Minister of any proposed amendments to the approved PSP plan; or
- Notify the minister if no amendments are proposed.