



# An All-Battery Collection and Recycling Plan for Prince Edward Island 2019-2023

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## Executive Summary

Call2Recycle Canada, Inc. (Call2Recycle®) is a non-profit organization created by battery and product manufacturers committed to responsible recycling. The stewardship program has been operating in Canada since 1997 collecting and recycling primary and rechargeable batteries nationally. In July 2015, Call2Recycle signed a Memorandum of Understanding (MOU) with the Government of Prince Edward Island as represented by the Minister of Communities, Land and Environment. Call2Recycle is seeking formal regulation on primary and rechargeable batteries in Prince Edward Island to continue to increase battery recycling in Prince Edward Island. The current voluntary model provides for limited financial resources. As a result, the ability to increase consumer awareness, consumer accessibility/convenience and ultimately diversion from landfill has substantially been reached.

Regulating primary and rechargeable batteries is extremely important for a program like Call2Recycle which has been collecting and recycling batteries in Prince Edward Island voluntarily. While it is heartening that battery collections continue to increase each year, the financial cost is becoming untenable. Given the absence of regulation, there has been no mechanism to guarantee that manufacturers or first importers fund the program. By clearly outlining who the obligated parties are in a regulation, Prince Edwards Island can be sure that obligated parties will pay their fair share to support battery diversion from landfill. Regulating primary and rechargeable batteries will enable Call2Recycle to pursue those who are obligated and ensure that they understand their regulatory responsibilities and participate under an approved program plan. Furthermore, a regulation on battery recycling would be consistent with four Canadian provinces, as well as Canadian Council of Ministers of the Environment approval of the Canada-wide Action Plan on Extended Producer Responsibility and the State of Vermont.

Since the program was launched in 1997, Call2Recycle has collected almost 120,000 kg of batteries in the province and diverted them from the waste stream. Since 2015, Call2Recycle has employed a strategic and coordinated national marketing campaign intended to reach consumers who do not recycle their batteries when disposing of them or who 'hoard' or hold onto large quantities of used batteries. Using an integrated marketing approach that employed seasonal awareness campaigns, radio and online advertising, social media, retailer engagement, contests, local battery drives and key partnerships with organizations like Earth Rangers and Earth Day Canada, Call2Recycle encouraged battery consumers of all ages to act responsibly by recycling their used batteries. These initiatives have resulted in over 63,000 kilograms collected in Prince Edward Island in just 3-years' time.

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

Call2Recycle has proven its ability to meet the requirements of a stewardship program for Prince Edward Island since 2015. Further, we are an ideal candidate for an approved product stewardship program plan because we are focused on overcoming any challenges present in the marketplace, and we continue to investigate and utilize new technologies and go-to-market strategies. We look forward to continued collaboration with the Government of Prince Edward Island, Island Waste Management Corporation and the residents of the province to advance battery collections and recycling.

## 1. Plan Submission

In July 2015, the Ministry of Communities, Land and Environment entered a MOU with Call2Recycle in relation to the Household Battery Stewardship Program. In keeping with the request of the Government of Prince Edward Island, Call2Recycle Canada, Inc. has developed this five-year battery recycling plan and is submitting it for consideration to the Ministry of Land, Communities and Environment for the years inclusive of 2019 through 2023.

## 2. Call2Recycle Overview

Call2Recycle Canada, Inc. is a Canadian non-profit consumer battery stewardship organization reporting to a Board of Directors. The program was established to fulfill the product stewardship obligations for retailers and distributors of products, battery manufacturers, and manufacturers whose products contain batteries. Since inception in 1997, the program has diverted more than 16 million kilograms of batteries from the solid waste stream and established over 9,000 collection sites across Canada.

For over 20 years, Call2Recycle has operated a robust battery collection and recycling program across Canada, and today works on behalf battery and product manufacturers and retailers. The program collects and recycles dry-cell primary (single use) and rechargeable batteries weighing less than five (5) kilograms from local governments, businesses, and consumers. Call2Recycle is governed by a Board of Directors comprised of manufacturers, retailers, and independent directors.

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

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

## 3. Stakeholder Consultation

As per the MOU, Call2Recycle has established a joint Atlantic Canada Advisory Committee that meets on an annual basis. The intent is for Call2Recycle to inform stakeholders on key initiatives and performance and to provide a platform for feedback on opportunities for program improvement. Subject to a Ministry direction change, Call2Recycle will continue to engage this stakeholder group on an ongoing basis.

## 4. Program Details

### 4.1 Applicable Products

#### **Batteries included:**

- Rechargeable and primary (single-use) battery chemistries;
- batteries, regardless of whether the battery is supplied as a stand-alone product or embedded in a product<sup>1</sup>;
- dry-cell batteries, weighing less than five (5) kilograms each; and,
- batteries generated by both consumers and those generated by private businesses and other organizations.

#### **Battery chemistries included:**

- Nickel Cadmium (Ni-Cd)
- Nickel Metal Hydride (Ni-MH)
- Lithium Ion (Li-Ion) <sup>2</sup>
- Nickel Zinc (Ni-Zn)
- Small Sealed Lead Acid (SSLA/Pb) Lithium Primary
- Alkaline/Carbon Zinc (AA, AAA, 9V etc.)

(See Appendix A: Glossary for detailed definitions.)

#### **Excluded Products**

This stewardship plan does not include management of:

- Motive batteries <sup>3</sup>
- 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/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 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 our program and are diverted from landfill.

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

<sup>2</sup> Including Portable Power Banks.

<sup>3</sup> Managed under the Canadian Battery Association (CBA) program.

## 4.2 Collection System

Call2Recycle operates a simple and highly efficient program. Our primary focus is to recycle consumer batteries wherein batteries collected through our program are diverted from landfill. The program is offered to consumers dropping off their batteries at our collection sites and for those signed up as collection site partners. The program is available to all residents of Prince Edward Island and the industrial, commercial, and institutional sectors. Call2Recycle also partners with Island Waste Management Corporation and utilizes their existing collection network to ensure maximum provincial coverage and accessibility.

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

Call2Recycle collection partners, known as collection facilities, 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 facilities that do not generate large quantities of batteries in a short period of time or do not have the space to collect bulk quantities. These facilities receive collection boxes at no additional cost. The collection box kits include promotional material, plastic bags for battery terminal protection, and pre-paid shipping labels. Each box holds up to 30 kilograms of batteries. Call2Recycle covers the cost of shipping for both the bulk and box programs.

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

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

Public collection locations that are available to Prince Edward Island residents are listed on Call2Recycle's website and mobile phone locator. Residents can search by postal code or city and province to find a battery collection location. In addition, they can select a geographical radius of the entire island or use the 'Recycle on the Way' feature that allows them to provide a start and end address and then generates drop-off locations that are on the way to their destination. Call2Recycle maintains a strong collection network, which currently offers over 30 facilities in addition to the 25 IWMC collection sites throughout Prince Edward Island.

For the duration of the stewardship plan, Call2Recycle will take proactive measures to ensure that battery collection accessibility and convenience in the province is increased. Residents across the island will be served with a variety of battery recycling options that range from permanent drop-off facilities, seasonal and event recycling, and new projects to be explored. (For strategies see section 5 Communication: Consumer Awareness and Education.)

Call2Recycle is committed to supporting the Prince Edward Island economy by working in partnership with Island Waste Management Corporation and will continue to identify solutions to work with local suppliers to transport and consolidate batteries.

### 4.3 Consumer Accessibility

Call2Recycle has serviced the province of Prince Edward Island for 20 years with its collection and recycling program. At the time of this plan development, over 90% of the Prince Edward Island population has a drop off location within 15 kilometers of their home. While coverage in many urban areas exceeds the 15 kilometers accessibility standard, improvements will be made to increase the number of collection facilities and/or collection methods in non-urban communities.

By the end of 2023, Call2Recycle intends to achieve an accessibility rating wherein 95% of the population will be within 15 kilometers of a public collection site. (See section 8 Performance Indicators and Reporting Commitments).

### 4.4 Transportation, Sorting, and Processing

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

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

Currently there are no sorters operating in Prince Edward Island, therefore, batteries collected through Call2Recycle in the province are sorted and consolidated in Ontario. 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. When possible, Call2Recycle utilizes local processing partners to help reduce its transportation footprint. 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.

## 4.5 Safety

The safety of consumers, collection facilities, transporter, 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 present a safety risk if not handled properly. To advance its commitment to safety, Call2Recycle has introduced a patent pending flame retardant box liner in Canada. This innovation offers an additional layer of protection in the prevention of 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 regulatory terminal protection requirements, the liner helps prevent flames escaping from the battery box should an event occur. Our collection boxes are also UN4GY rated and have been approved by Transport Canada.

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

Call2Recycle has been relying on a hazardous waste generator registration for the storage of waste rechargeable batteries and spent electronics that it handles, but there is no requirement to use a manifest or have individual collection sites licensed.

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.

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

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, 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

## 5. Communication: Consumer Awareness and Education

### 5.1 Strategic Approach

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

While Call2Recycle operates a national program across Canada, it also appreciates the unique characteristics of individual provinces, its residents, and available communication channels. Knowing who to reach and how to reach them is critical to the success of any outreach and education plan. To that end, Call2Recycle will engage in specific research to further understand the nuances of the Prince Edward Island market.

To ensure a successful education and awareness campaign, the marketing 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.

### 5.2 Objectives

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

### 5.3 Target Audiences

#### A. Prince Edward Island Residents:

- Consumers
- Businesses

#### B. Collection Network:

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

#### C. Stakeholders:

- Key Influencers [(Local Government, Industry and Trade Associations, and Non-Governmental Organizations(NGOs)
- Call2Recycle Members/Obligated Parties
- Media, Experts, Influencers

## 6. Program Funding and Obligated Parties

### 6.1 Obligated Parties

Determination of “brand owner” i.e. the obligation entity should mirror that of the current lead acid definition. The obligated entity will be determined by using a hierarchy, which will obligate the parties based on the following:

- First, the manufacturer of a primary and/or rechargeable battery with physical residency in the province.;
- second, a distributor of the primary and/or rechargeable battery in or into the province.; and,
- finally, where the primary and/or rechargeable battery is imported into the province, the first person to sell the primary and/or rechargeable battery in or into the province including via internet or catalogue sales.

Call2Recycle will actively pursue obligated parties to participate under the approved program plan and will actively seek to enroll free-riders. It is crucial that the province also assist the approved program in bringing free riders into compliance through appropriate legislation and proactive outreach. Call2Recycle will provide an annual list of compliant stewards in the annual report and will provide a list to the Ministry of potentially non-compliant organizations.

### 6.2 Program Funding

Call2Recycle would be funded by an Environmental Handling Fee (EHF), the “fee per unit sold” on applicable products that are sold into a regulated province. This approach is similar to the funding model in BC, QC, and MB, as well as standard among other industries. The EHF is applicable to all batteries sold to consumers and to the Industrial, Commercial, Institutional (ICI) sector in the designated province. There is no cross-subsidization between provinces. The EHF reflects the cost of:

- Collection, transportation, sorting, and processing
- Communication and public awareness initiatives
- Program administration
- Audits (financial and environmental)
- Research and Development to increase collections and accessibility

The organization maintains a reserve fund, whose amount is determined by Call2Recycle Canada, Inc.’s Board of Directors. This fund ensures the stability of the current program and any future financial obligations that may arise. Call2Recycle members are the obligated parties for batteries in the province and members must remit EHF’s to Call2Recycle. The program does not dictate how a steward (retailer, distributors, or others) applies the EHF. A steward may or may not choose to impose the fee onto its consumers - either via charging at point of purchase or building the EHF into the costs of the product.

## 7. Audits

### 7.1 Facility Audits and Other Certifications

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

- Under the 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, including those listed below:

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

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

### 7.2 Audits of Members/Obligated Entities

Call2Recycle may from time to time, audit and inspect the records of the Member with respect to the sale, supply, distribution and importing of the applicable Products in Prince Edward Island to verify the accuracy of the remittances of EHF's by the Member to Call2Recycle.

### 7.3 Audit of Financial Information

Call2Recycle will comply with annual reporting requirements as stipulated by the Government of Prince Edward Island. Its consolidated finances are audited annually by an independent third-party auditor, and the results are made public and provided to stakeholders. The audit covers all the organization’s North American operations.

A report specific to the province will be provided to the Government of Prince Edward Island annually. The report will provide an account of activities in the Province as it relates to the waste management of batteries, including all reporting requirements, targets, and commitments (limited to consumer outreach and education, and collection performance).

## 8. Performance Indicators and Reporting Commitments

On a bi-annual basis, Call2Recycle will meet with the Ministry of Communities, Land and Environment to review the program and discuss performance. An annual report on the reporting commitments below will be submitted to Minister of Environment. Once approved, the report will be publicly available via posting on Call2Recycle’s websites.

INDICATOR	REPORTING COMMITMENT
<b>Collection</b>	<ul style="list-style-type: none"> <li>• Number of collection facilities</li> <li>• Total weight of batteries collected</li> <li>• Batteries collected per capita</li> </ul>
<b>Accessibility</b>	<ul style="list-style-type: none"> <li>• Percentage of population within 15 kilometers of a Call2Recycle public facing collection facility or Call2Recycle partner</li> </ul>
<b>Awareness</b>	<ul style="list-style-type: none"> <li>• Percentage of residents aware that batteries can be recycled in PEI</li> </ul>
<b>Management of Environmental Impacts</b>	<ul style="list-style-type: none"> <li>• Disclosure of Recycling Efficiency Rate by Processor</li> </ul>
<b>Financial</b>	<ul style="list-style-type: none"> <li>• Audited Financial Statement for PEI</li> </ul>
<b>Obligated Entities</b>	<ul style="list-style-type: none"> <li>• List of all Prince Edward Island members of Call2Recycle</li> </ul>

## 9. Appendices

### Appendix A: Glossary

The following is a glossary of key terms and definitions related to the products covered in this plan.

TERM	DEFINITION
Alkaline /Carbon Zinc	A type of single-use battery (e.g., AA or AAA batteries).
Lithium Ion (Li-Ion)	A type of rechargeable battery. Li-Ion batteries are typically found in portable devices, such as cellular telephones, tablets, laptop computers, and digital camcorders.
Lithium Metal/Lithium	A type of single-use battery.
Nickel Cadmium (Ni-Cd)	A type of rechargeable battery. Ni-Cd can typically be found in cordless power tools, digital cameras, two-way radios, and cordless phones.
Nickel Metal Hydride (Ni-MH)	A type of rechargeable battery. Ni-MH can typically be found in cordless power tools, digital cameras, two-way radios, and cordless phones.
Portable Power Banks	A rechargeable battery, typically Li-Ion, surrounded by a casing used for the purpose of recharging a device.
Primary Battery	A battery that cannot be recharged by the consumer (for example, but not limited to, alkaline, Carbon Zinc, lithium and zinc-air commonly known as AA, AAA, 9V, D-cell, and button cell batteries). Also referred to as single-use batteries.
Rechargeable Battery	A type of battery that is designed to be used for a longer period of time than single-use and is capable of being recharged. It can also be referred to as a "secondary" battery (for example but not limited to, Li-Ion, Ni-MH, SSLA, Ni-Cd).
Single-Use Battery	Also referred to as primary batteries. A battery that cannot be recharged by the consumer (for example, but not limited to, alkaline, lithium and zinc-air commonly known as AA, AAA, 9V, D-cell, and button cell).
Small Sealed Lead Acid (SSLA)	A type of rechargeable battery. These relatively heavy batteries can typically be found in emergency devices, emergency exit signs, security systems, mobility scooters, and UPS back-ups.
Zinc-air	A type of single-use battery. These batteries can typically be found in small devices such as hearing aids.

## Appendix B: Process Flow Chart

