

British Columbia
Extended Producer Responsibility Plan
for Batteries
Draft for Consultation
December 18, 2019

Submitted to: British Columbia Ministry of Environment and Climate Change Strategy,
Extended Producer Responsibility Section
PO Box 9341, Stn Prov Govt
Victoria, BC V8W 9M1

Prepared by: Kristen Romilly
Director, Western Canada
Call2Recycle Canada, Inc.
201- 2590 Granville Street
Vancouver, BC, V6H 3H1

Table of Contents

GLOSSARY.....	3
1. INTRODUCTION.....	4
2. DUTY OF PRODUCER	4
3. APPOINTMENT OF A STEWARDSHIP AGENCY	4
3.1 AGENCY GOVERNANCE	5
3.2 AGENCY GOVERNANCE PERFORMANCE MONITORING AND REPORTING COMMITMENTS	5
4. PRODUCTS COVERED UNDER THE EPR PLAN.....	5
4.1 PRODUCTS ACCEPTED AND EXCLUDED UNDER THE EPR PLAN	5
4.2 ORPHANED/FREE RIDER BATTERIES.....	6
5. STAKEHOLDER CONSULTATION	6
5.1 CONSULTATION UNDERTAKEN PRIOR TO EPR PLAN SUBMISSION	6
5.2 ONGOING STAKEHOLDER CONSULTATION	6
6. COLLECTION SYSTEM AND CONSUMER ACCESSIBILITY	7
6.1 COLLECTION SYSTEM	7
6.2 COLLECTION TARGETS AND RECOVERY RATES	8
6.3 CONSUMER ACCESSIBILITY	10
6.4 COLLECTION SYSTEMS AND CONSUMER ACCESSIBILITY PERFORMANCE TARGETS AND REPORTING COMMITMENTS.....	10
7. CONSUMER AWARENESS.....	11
7.1 CONSUMER AWARENESS APPROACH	11
7.2 TARGET AUDIENCES	12
7.3 OVERCOMING BARRIERS TO RECYCLING	13
7.4 PERFORMANCE MONITORING AND REPORTING COMMITMENTS.....	13
8. MANAGEMENT OF PROGRAM COSTS.....	14
8.1 PROGRAM FUNDING AND RESERVES	14
8.2 FINANCIAL REPORTING.....	14
8.3 COLLECTOR COMPENSATION	14
8.4 PERFORMANCE MONITORING AND REPORTING COMMITMENTS.....	15
9. MANAGEMENT OF ENVIRONMENTAL IMPACTS.....	16
9.1 DOWNSTREAM PROCESS AND PROGRAM CERTIFICATIONS AND PERMITS	16
9.2 PERFORMANCE MONITORING AND REPORTING COMMITMENTS.....	17
10. DISPUTE RESOLUTION.....	17
11. PERFORMANCE MONITORING AND REPORTING COMMITMENTS	18

Glossary

Alkaline /Carbon Zinc Batteries	A type of primary battery (e.g. AA or AAA, C, D, 9V, and button batteries). Dry-cell rechargeable and primary batteries weighing less than 5 kilograms each.
Collection Target	Projected quantity of batteries to be collected on an annual basis.
Damaged or Defective Batteries	Lithium batteries that are not intact or are physically damaged.
Environmental Handling Fee (EHF)	A fee per unit sold that is representative of the actual cost to collect, handle, transport, and responsibly recycle batteries at the end-of -life.
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 ensure the program practices are conducted in an environmentally responsible manner, protective of the health and safety of workers and the public, and that the data on media devices is secure until destroyed.
SABC	Stewardship Agencies of BC, 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 managing a 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 dry-cell batteries¹ under 5 kilograms is being submitted by Call2Recycle Canada, Inc. and replaces the previously approved EPR plan submitted to the BC Ministry of Environment (the Ministry) in 2018. 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 battery producers, Call2Recycle's members include manufacturers, brand-owners, first-importers, and retailers of dry-cell batteries under 5 kilograms each sold in BC. Call2Recycle also manages the regulatory requirements of obligated producers in other Canadian provinces.

Call2Recycle's EPR plan is specific to batteries that are sold as stand-alone items or sold for replacement purposes – this also includes small portable power banks, a lithium-based, stand-alone rechargeable battery. Call2Recycle represents the majority of obligated producers of primary and rechargeable stand-alone batteries in BC. For a list of all producers who are members of Call2Recycle, please visit www.call2recycle.ca/list-of-stewards/.

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 their designated EPR program, the producer must enter into a formal membership agreement with Call2Recycle acknowledging that Call2Recycle will manage their obligations under the Regulation. The Membership agreements is available to the Director under the Environmental Management Act (the Director) upon request.

¹ Referred to in the previous plan as “consumer batteries” and now referred to as “batteries” in this plan to align with the wording on the Regulation. Please see page 5 for a detailed list of batteries covered under this EPR plan.

3.1 Agency Governance

Call2Recycle is incorporated under the *Canada Not-for-Profit Corporation Act and BC Societies Act* which can be found www.call2recycle.ca/about and is governed by a board of directors comprised of producers and independent directors. As of December 2019, the board of directors is comprised of members representing multiple sectors including, retailers, battery manufacturers (brand-owners), battery distributors, as well as independent board members. A list of the Call2Recycle Board of Directors can also be found at <https://www.call2recycle.ca/board-of-directors/>

All relevant reports, policies, and guidelines are available to Call2Recycle’s members at call2recycle.ca under the steward section of the website. All policies and bylaws can be found: www.call2recycle.ca/resources-support-centre/. In addition to the website, Call2Recycle distributes two member-specific (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 and in the BC annual report to the Director.

Call2Recycle routinely engages other stakeholder groups including Retail Council of Canada to consult and update their members on pertinent program information and changes.

3.2 Agency Governance Performance Monitoring and Reporting Commitments

Any changes in Call2Recycle’s governance or structure 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 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.

4.1 Products Accepted and Excluded under the EPR Plan

Accepted Products:

- Alkaline
- Carbon Zinc
- Lithium Ion (Li-Ion)
- Lithium Primary
- Portable Power Banks
- 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

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 an Environment Handling Fee has been paid).

Excluded Products:

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

Several programs in BC manage 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 EPR 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

4.2 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

5.1 Consultation Undertaken Prior to EPR Plan Submission

Placeholder for summary

5.2 Ongoing stakeholder consultation

Over the course of the plan period, Call2Recycle will continue to engage with stakeholders. The program encourages stakeholders to provide program feedback on an ongoing basis. Some opportunities to provide feedback include annual general meetings for members, collector and member newsletters and program updates, in-person meetings with stakeholders at conferences and events, and in-person visits and phone calls to collection facilities. From time to time, Call2Recycle may initiate a survey which is distributed to program participants and key stakeholders. The intent of the survey is to identify program benefits and areas of improvement.

6. Collection System and Consumer Accessibility

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/local governments, 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 wishing to enroll to promote environmental health and safety through battery recycling.
- **Association to batteries** – The likelihood that consumers will correlate batteries with the location.

6.1 Collection System

Call2Recycle Canada has a vast network of collection facilities across the province, providing consumers with convenient access to drop-off locations for their used batteries. The program uses a qualification process for collection facilities to maximize battery returns. As an added service offering, Call2Recycle also accepts batteries 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 batteries and collector of used batteries in BC.

In 2018, 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, 2018, over 650 collection facilities were available for public drop-off, including:

- Depots
- Landfill or transfer stations
- Retail
- 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 the collection results of all regional districts to identify

underperforming collection facilities 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 seek opportunities to collect.

Product Pathways Not Directly Managed by the EPR Program

There may be some instances when used 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 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 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.

6.2 Collection Targets and Recovery Rates

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

- 1) **Weight of battery:** certain battery chemistries sold into the market decline year over year. For example, heavier battery chemistries, such as nickel cadmium, are being replaced by lighter lithium ion batteries. Changes to battery weights may impact the overall battery weight collected versus what is currently sold into the market.
- 2) **Life of a battery:** Battery life is increasing which reduces the need to replace batteries as frequently.
- 3) **Type of battery:** Products currently requiring primary batteries may be replaced by those that run on rechargeable batteries.
- 4) **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.
- 5) **Hoarding habits:** 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.
- 6) **Multiple programs:** Batteries are managed by multiple EPR programs (see page 6). This poses a challenge because Call2Recycle program batteries may end up in the collection streams of other programs and vice versa. Call2Recycle is the only program required to report on recovery rates for batteries in BC. In the absence of a standard requirement for all programs responsible for the collection and management of batteries to report on associated collection rates, in the form of a recovery rate, there is no ability to measure a true provincial recovery rate for batteries. Call2Recycle recommends a level-playing field for reporting standards for all programs managing batteries.

That said, Call2Recycle will report on recovery rate as a performance target in annual reports. The chart below shows the recovery rate through 2024. Call2Recycle submitted an EPR plan in 2018 which committed to recovery rates until 2022. This plan commits to maintaining those commitments with the aim to increase recovery rates to 52 per cent (%) by 2024.

For 2020 and 2021, the recovery rate calculation will be based on battery weight collected into the province in the reporting calendar year, divided by the weight sold in the same calendar year and expressed as a percentage. Battery weight sold into BC is based on the number of batteries by size and type (primary or rechargeable) reported by Call2Recycle’s BC members. Batteries units are converted to weight based on industry standards. To better address the variability in battery lifespan and availability for collection, beginning in 2022, the recovery rate will be calculated based on the weight sold into the market in the reporting calendar year divided by the weight sold into the market which will be calculated based on a three (3) year rolling average from the three (3) preceding calendar years. For example, in 2022 the recovery rate will be calculated by dividing the weight sold into the market that year (2022) divided by the average weight sold into the market in 2019, 2020, 2021 (the preceding three years) and expressed as a percentage. In addition to reporting on a recovery rate based on a three (3) year rolling average, Call2Recycle will commit to disclosing the total weight sold into BC for the reporting year in the annual report.

Recovery Rate to 2024

Year	2020	2021	2022	2023	2024
Recovery Rate expressed as a %	45%	47%	50%	51%	52%

Call2Recycle has followed a similar recovery rate model as set out in Europe where the European Union Battery Directive (2006/66/EC)³ for member states calls for a 45 per cent (%) recovery rate at the end of 10 years. Call2Recycle’s recovery rate targets follow the same logic as the European Union (EU) with the target of achieving 45 per cent (%) by the end of 2020, which will mark ten years of operation under an approved EPR plan. It should be noted that in the EU batteries removed from waste electrical and electronic equipment (WEEE) are counted in the overall recovery rate targets of the member states⁴ under the European Union Battery Directive. At this time in BC, batteries removed from WEEE or any other product containing batteries managed by other programs are not counted toward Call2Recycle’s recovery rate for batteries. While a recovery rate is one means of measuring program performance, it is limited based on the changing lifespan of the product. The increase in actual collection by weight year over year is also a good indicator of program performance. Call2Recycle also considers awareness and accessibility as meaningful performance indicators.

³ The European Union Directive on batteries can be found at <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02006L0066-20131230&rid=1>

⁴ Frequently Asked Questions on Directive 2006/66/EU on Batteries and Accumulators and Waste Batteries and Accumulator (p. 25 -26) <http://ec.europa.eu/environment/waste/batteries/pdf/faq.pdf>

6.3 Consumer 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 per cent (%) of British Columbians reside within 15 kilometers of an active public collection facility. Accessibility is calculated by using commonly accepted Geographic Information System (GIS) practices. While coverage in urban areas may exceed the 15 kilometers accessibility standard, improvements will continue to be made to increase accessibility in non-urban communities.

The 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 active public collection facilities⁵ throughout the province which aligns to an accessibility target of 95 per cent (%) of British Columbians residing within 15 kilometers of an active public collection facility. An active collection facility must meet at least one of the following criteria: has enrolled in the program during the calendar year; has shipped batteries (a minimum of 1 box or 1 bulk shipment) during the calendar year; or, has ordered a replacement box within the calendar year. Some Call2Recycle registered facilities may ship on an infrequent basis and may not be considered active given the definition of an active collection facility. The criteria for collection facilities to remain active may impact accessibility due to shipping frequency. Call2Recycle's program material is relatively small and it may take more than a year to collect enough batteries to warrant a shipment particularly in rural and remote communities.

The program 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 batteries. If this is not possible, Call2Recycle will work with local government, Indigenous communities, 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. The program continually seeks new way to collect batteries and will work with the Ministry to update this target in the event of changes to program delivery.

6.4 Collection Systems and Consumer Accessibility Performance Targets and Reporting Commitments

Performance Targets:

- Accessibility rate using Call2Recycle's accessibility metric of percentage (%) of the population residing within 15 kilometers of an active collection facility. Call2Recycle commits to maintain a minimum of 95 per cent accessibility rate.
- A minimum of 600 active public collection facilities.

⁵ The number of active public collection facilities may fluctuate each year. An enrolled collection facility may be participating while not meeting the criteria to be defined as an active collection facility for the calendar year. Occasionally, Call2Recycle consolidates collection facilities in high density areas to maximize efficiencies; this does not impact accessibility but can impact the number of active public collection facilities available in the province.

- 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 percentage⁶ (see page 9 for targets).

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 active public and private collection facilities.
- Number of collection facilities in each regional district.
- Total kilograms collected in each regional district including collections per capita.
- Location of collection facilities.
- Changes in number of collection facilities from previous report.
- Total kilograms of batteries sold into BC during a calendar year.
- Result of the SABC facilitated waste composition audit with respect to batteries.
- Dates, location, 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

Call2Recycle’s promotion and education initiatives are designed to inform consumers of the benefit of battery recycling and where and how to safely do so as per section 5(1)(iv) of the Regulation.

7.1 Consumer Awareness Approach

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
- Advertising (Print/Online/Radio/Television)
- Media relations outreach

To gauge its effectiveness to positively move the ‘recycling’ needle, Call2Recycle conducts annual consumer awareness studies⁷. The study helps Call2Recycle quantify levels and trends in consumer awareness (i.e. level of awareness that batteries can be recycled) and behaviors and the effectiveness of its outreach campaigns to increase battery recycling incidence among target audiences. Call2Recycle

⁶ Beginning in 2022, the reported recovery rate will be calculated using the total weight sold into the province during the reporting year divided by the average weight sold into BC during the preceding 3 years.

⁷Call2Recycle contracts with reputable market research companies to conduct consumer awareness studies.

commits to reporting the results of its annual consumer awareness study in support of its goal to maintain an awareness level of 87 per cent (%) or higher⁸. The program will also disclose the wording of the question posed to measure awareness in the annual report. As part of the consumer awareness survey, Call2Recycle also measure the percentage of British Columbians who recycled batteries each year (incidences). These numbers will be included in each annual report.

To help raise awareness, drive participation, and maximize collections with BC residents, Call2Recycle will offer opportunities to collection network participants to take part 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 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 and Motivate:** Inform BC residents:
 - a. Batteries can and should be recycled
 - b. Why it's important to recycle batteries
 - c. How and where to safely recycle batteries

- 2) **Move to action:** Demonstrate the ease of accessibility to battery drop-off sites and provide options to help the public identify convenient collection locations via online and telephone locators.

7.2 Target Audiences

Target Audiences will include:

BC 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/Local government, 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 • Collectors • Media, Experts, Influencers

⁸ 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.

Strategies for engaging the target audiences include but are not limited to:

- Annual public awareness and education campaigns (e.g. National Battery Day, Daylight Saving Time, Earth Week, Canadian Environment Week and Waste Reduction Week)
- Targeted awareness programs
- Promotional Events
- Program material available at point of sale⁹
- Outreaching to businesses generating large quantities batteries through their own internal operations to ensure they are aware that they can participate in the battery recycling program
- Engage school students to provide education about the importance of battery recycling
- Ongoing communication with collection facilities (in-person, over the phone, and in writing)
- Newsletters to collectors and members
- Sponsorships of local conferences (e.g. RCBC and CWMA)

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

Initiatives include:

- 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.

7.3 Overcoming Barriers to Recycling

While consumer awareness related to battery recycling is high, Call2Recycle recognizes that there are opportunities to increase battery recycling behaviour. In order to encourage consumers to recycle used batteries, Call2Recycle will focus on education regarding why, how, and where to recycle their batteries with the objective of increasing battery recycling behavior. Through market research, the program has identified segments of the population that are most likely to use batteries and therefore have the greatest need to recycle batteries at end-of-life. In order to encourage consumers to recycle used batteries rather than disposing of them in the garbage, promotion and education outreach will be geared to target demographics. This approach will be balanced with overall awareness-building promotion and education initiatives across the province.

7.4 Performance Monitoring and Reporting Commitments

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

Performance Targets:

- Maintain an awareness level of 87 per cent (%) or higher.

⁹ Point of sale materials are available to all members. It is at the discretion of the member whether to supply them to consumers.

Reporting commitments:

- The question asked to measure awareness in the annual consumer awareness study.
- The percentage of British Columbians who recycled batteries as reported in the annual consumer awareness study.
- The number and type of marketing and awareness activities executed within the calendar year.
- Number of resulting searches on the web-based Call2Recycle collection facility locator.

8. Management of Program Costs

8.1 Program Funding and Reserves

On February 1, 2017, Call2Recycle implemented a new funding model. Notice of this program modification was provided to the Ministry 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 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 apprised of any upcoming changes pertaining to the Schedule of EHFs.

EHFs are calculated based on the actual cost to collect and responsibly manage batteries at end-of-life in BC. EHFs are used to fund the program including but not limited to promotion and education, collection, transportation, processing, and administration. Call2Recycle will ensure accurate member remittances through a system that includes periodic audits to verify compliance and completeness of reporting of EHFs. It is solely the decision of the individual member whether to charge the EHF as a visible line item on the receipts at the time of sale or to internalize the EHF into the cost of the product.

The organization maintains a reserve fund, where reserve amounts are determined by Call2Recycle Canada’s Board of Directors. This fund ensures the stability of the current program and the organization’s ability to deliver on any future financial obligations that may arise including wind-down costs if necessary.

8.2 Financial Reporting

Call2Recycle complies with all annual reporting requirements as stipulated by the Regulation. The organization’s finances, including financial statements specific to the BC program, are audited annually by an independent third-party auditor in accordance with generally accepted accounting principles and industry practices. The results are made public and provided to stakeholders in the provincial and corporate annual reports.

8.3 Collector Compensation

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

Call2Recycle offers compensation to public facing collection facilities collecting batteries in bulk quantities. A bulk quantity is defined as a shipment of more than 250 kilograms of batteries (approximately the weight of one full drum) contained in drums or in Call2Recycle provided containers (e.g. Call2Recycle boxes) consolidated on a pallet. Qualifying collection facilities must enter into an agreement with Call2Recycle to receive compensation. Multiple factors are considered when calculating compensation for contracted collectors to accept and manage Call2Recycle program materials including:

- Labour including handling time
- Equipment costs to manage the product
- Space and storage requirements
- Average cost per square foot (including overhead) to manage Call2Recycle's program material
- Administration required to manage the product and complete required paperwork

For collection facilities who opt to use drums, the cost of purchasing drums has also been included in the compensation calculation¹⁰. Collection facilities using Call2Recycle provided containers receive the materials at no cost. Call2Recycle directly covers transportation costs related to shipping collection program provided containers to collectors and picking up program materials from collectors.

Call2Recycle engaged MNP in 2019 to review its cost compensation to contracted collectors including time and motion studies. During the consultation of this EPR plan, the methodology (basis for compensation) and findings from MNP's review will be provided. Call2Recycle will continue to review compensation rates in the future.

The box program is designed for small volume generators or for those without space to collect large volumes of batteries. There is no reimbursement for this program offering as the program is designed to limit the amount of labour required to manage it. There are incentives for entities to participate in the program beyond compensation, including increased foot traffic and recognition as a socially responsible member of the community. The entire cost of the box from distribution to collection is covered by the program. The box program is critical for the program to maintain high accessibility, particularly in provincial locations where bulk collection may not be possible because of low population density. The box program also benefits collection facilities generating used batteries in daily operations. Many collectors have realized cost-savings including the benefits of onsite pick up offered by Call2Recycle which eliminates the need for employees' time to drop off batteries at a public collection facility.

8.4 Performance Monitoring and Reporting Commitments

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

¹⁰ Drum costs are based on a provincial average and has been included in the compensation formula.

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 supports the reconditioning and reuse of batteries provided that 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 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.

9.1 Downstream Process and Program Certifications and Permits

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 Responsible Recycling standard (R2:2013). Our vendor due diligence is among 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 prescribed downstream vendor network. These safeguards help affirm our 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 the provider's technology, process employed, and cost to process.

Some highlights of Call2Recycle's program are presented below:

- As a program manager, Call2Recycle specifies the program material flow for all our downstream vendors through to end-of-life.
- A robust information system tracks program material as it moves through our downstream vendor network through to end-of-life.
- These safeguards help affirm our 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 our program participants to handle, offer for transport or transport DDR products accepted for recycling within the program parameters.

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 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 RER or product end fate will be disclosed in the annual report. Targets for RER are not appropriate as they are processor specific and may change from time to time if there is a change in processor or updates to the processor's technology.

9.2 Performance Monitoring and Reporting Commitments

In the annual report to the Director, Call2Recycle will report on product end fate by chemistry type and RER by chemistry type as per the requirements of the non-financial assurance including program specific definitions and program applicable criteria. Call2Recycle commits to maintaining certification under the R2 standard or an equivalent standard.

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 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 METRIC ¹¹	TARGET OR REPORTING COMMITMENT	SUBJECT TO AUDIT
COLLECTION SYSTEM AND ACCESSIBILITY		
Maintaining a minimum of a 95 per cent accessibility rate using the accessibility metric of percentage (%) of the population residing within 15 kilometers of a public collection facility.	Target	No
Number of active public and private collection facilities. Maintain a minimum of 600 active public collection facilities.	Target	Yes
Calculated by total weight collected in each calendar year divided by the total weight sold in the calendar year and expressed as a percentage <ul style="list-style-type: none"> • 2020: 45% • 2021: 47% • 2022*: 50% • 2023: 51% • 2024: 52% <p><i>*Starting in 2022, the recovery rate will be based on a 3-year rolling average of sales into the BC market.</i></p>	Target	Yes
Number of active collection facilities in the province by sector.	Reporting Commitment	Yes
Number of collection facilities in each regional district.	Reporting Commitment	No
Total kilograms collected in each regional district including collections per capita.	Reporting Commitment	No
Location of collection facilities.	Reporting Commitment	Yes
Changes in number of collection facilities from previous report.	Reporting Commitment	Yes
Total kilograms of batteries sold into BC during a calendar year.	Reporting Commitment	Yes

¹¹ All performance metrics will be reported annually

PERFORMANCE METRIC	TARGET OR REPORTING COMMITMENT	SUBJECT TO AUDIT
COLLECTION SYSTEM AND ACCESSIBILITY cont.		
Result of the SABC facilitated waste composition audit with respect to consumer batteries.	Reporting Commitment	No
Dates, location, and results of collection events (if applicable).	Reporting Commitment	No
CONSUMER AWARENESS		
Maintain an awareness level of 87 per cent (%) or higher.	Target	No
The question asked to measure awareness in the annual consumer awareness study.	Reporting Commitment	No
The percentage of British Columbians who recycled batteries as reported in the annual consumer awareness study.	Reporting Commitment	No
The number and type of promotion and education activities within the calendar year.	Reporting Commitment	No
Number of resulting BC searches on the Call2Recycle web-based collection facility locator.	Reporting Commitment	No
The percentage of British Columbians who recycled consumer batteries with a commitment to increase by one (1) per cent over the previous year until 2024.	Reporting Commitment	No
MANAGEMENT OF PROGRAM COSTS		
Audited Financial Statements. Detail revenues and expenditures for fees collected from the sales of batteries in the calendar year in BC.	Reporting Commitment	Yes
MANAGEMENT OF ENVIRONMENTAL IMPACTS (END FATE)		
Maintain certification under the R2 standard or an equivalent standard. ** <i>** Auditor may verify the information for the comply with NFA reporting Requirements</i>	Reporting Commitment	No
Management of product ends fate.	Reporting Commitment	Yes
Recycling efficiency rate by chemistry type.	Reporting Commitment	Yes
AGENCY GOVERNANCE		
Any changes in Call2Recycle's governance or structure from one year to the next.	Reporting Commitment	No