

Call2Recycle

Annual Report to the Director

2012 Calendar Year

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Recharging the Planet. Recycling Your Batteries.™

call2recycle®

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1. Executive Summary

Products within plan	Dry cell batteries weighing less than five kilograms (rechargeable and single-use)
Program website	www.call2recycle.ca http://www.call2recycle.ca/british-columbia

Recycling Regulation Reference	Topic	Summary (5-bullet maximum)
Part 2, section 8(2)(a)	Public Education Materials and Strategies	<ul style="list-style-type: none"> • An assortment of materials include brochures, posters and other promotional pieces distributed through collection sites, events or on our website • Hosted several battery recycling drives across the province, particularly in remote regions, generating participation among B.C. residents • Participated in and sponsored a variety of trade shows, conferences and events throughout the province • Develop national and regional partnerships and sponsorships that enhance our education and awareness building capabilities and reach. • Print and online advertising through a variety of provincial, community and national media • Ongoing communication through various types of outreach including face to face, social media and direct marketing
Part 2, section 8(2)(b)	Collection System and Facilities	<ul style="list-style-type: none"> • A combination of public drop-off locations and private collection sites (local businesses, municipalities, retail outlets and public agencies) to maximize convenience and collections. • Experienced 56% growth in collection sites with 1,676 active collection sites (locations accepting batteries toward the program) across the province
Part 2, section 8(2)(c)	Product Environmental Impact Reduction, Reusability and Recyclability	<ul style="list-style-type: none"> • More than 360,000 kg of batteries were diverted from landfills through the Call2Recycle program in British Columbia •

Recycling Regulation Reference	Topic	Summary (5-bullet maximum)
Part 2, section 8(2)(d)	Pollution Prevention Hierarchy and Product / Component Management	<ul style="list-style-type: none"> In 2012, Call2Recycle became the first program of its kind to receive the Responsible Recycling Practices Standard (R2) certification. Batteries collected through the Call2Recycle program are consolidated and sorted by Toxco-Canada, located in Trail, B.C.
Part 2, section 8(2)(e)	Product Sold and Collected and Recovery Rate	<ul style="list-style-type: none"> More than 360,000 kilograms of batteries were collected in 2012, representing 14% of batteries sold into the province, based on our best estimates
Part 2, section 8(2)(e.1)		<ul style="list-style-type: none"> See Section 7 for breakdown per regional district
Part 2, section 8(2)(f)	Summary of Deposits, Refunds, Revenues and Expenses	This section is not applicable to the services of Call2Recycle as our program does not charge deposits nor do we charge visible eco fees.

Comparison of Key Performance Targets		
Part 2 section 8(2)(g); See full list of targets in Plan Performance		
Priority Stewardship Plan Targets (as agreed with ministry file lead)	Performance	Strategies for Improvement
1. Total Battery - 557,850 kg	361,821 kg	<ul style="list-style-type: none"> Continue and increase promotion and public education of the program Reassess targets to reflect more realistic goals
2. Battery collection rate to target	65%	

2. Program Outline

Founded in 1994, Call2Recycle® is North America's first and largest battery stewardship program. We collect and recycle batteries and cellphones from municipalities, businesses and consumers at no cost to them, and we promote environmental sustainability across North America. Our network of public and private collection sites and sortation and processing partners ensures efficiency and cost-effectiveness.

The Call2Recycle program is financed by battery manufacturers and product manufacturers whose products are powered by batteries – including cellphones. Each manufacturer pays a licensee fees. A list of Call2Recycle licensees is provided in Appendices A and B.

Since 1996, Call2Recycle has diverted more than 34 million kilograms of batteries and cellphones from the solid waste stream and established 30,000 collection sites throughout North America. Our convenient drop, seal and ship collection process makes recycling batteries as simple as possible for both consumers and program participants, so that anyone can be a partner in environmental stewardship.

We are committed to being a valued partner to the Province. Developed in consultation with the public and the Ministry of the Environment of British Columbia, the Call2Recycle program has been designed to achieve maximum awareness, participation, efficiency and cost-effectiveness to further the Province's environmental goals. In 2012 Call2Recycle began discussions with MOE contacts regarding provincial targets and possibly making amendments. While it was Call2Recycle who originally set the targets, over the past years it has become evident that they were unrealistically high. With changes to the battery industry including weight reductions, more rechargeable batteries in products, an increasing number of batteries that cannot be removed from products, the number of products no longer manufactured that used to require batteries and products being hardwired to energy sources, have all played a role in our ability to collect batteries. After several discussions it was agreed in early 2013 that at this time Call2Recycle would not formally amend targets as there was an impending election and in 2014 Call2Recycle would need to go through setting a new plan as the current plan would expire. We will continue to strive to increase collections and when setting the new plan would use metrics from our previous years of battery collection data in BC to set realistic targets in the new plan for 2015.

Call2Recycle has strategically selected and established battery collection systems across British Columbia. In 2012, Call2Recycle had more than 1,600 collection sites participating in the program.

We recognize that public awareness of the battery recycling program and of the numerous Call2Recycle collection site locations is a key success factor toward achieving higher battery recycling rates. As such, we employ an integrated, multi-channel approach to raising awareness of the importance and convenience of battery and cellphone recycling in British Columbia.

We are also committed to continuously improving the performance of our battery recycling program. Call2Recycle conducted research to better understand consumer motivators and recycling behaviours, specifically at retail store locations. The results of this research were presented to Call2Recycle's key retail participants in spring of 2013.

In 2012, Call2Recycle also became the first program of its kind to receive the Responsible Recycling Practices Standard (R2) certification, confirmation that Call2Recycle meets stringent standards relating to a range of sustainability criteria.

3. Public Education Materials and Strategies

Call2Recycle promotional activities focus on potential participating organizations, our participating partners and on the consumers whose batteries we collect. Our integrated approach to communications consists of utilizing all types of outreach – advertising, sponsorship, face-to-face, social and traditional media, direct marketing and a variety of online/web based activities.

In March, the Call2Recycle team was well represented at the biennial Globe Trade Show and Conference in Vancouver. From our booth at the event, staff distributed marketing and education materials about our battery recycling program. We also had representatives attend and participate in the conference. In May, we were a Bronze level sponsor of the Recycling Council of British Columbia's Zero Waste Conference, which is B.C.'s premier event on waste reduction and recycling. Several Call2Recycle employees also attended this event. Call2Recycle was also a Bronze sponsor and had staff attendance at the annual Coast Waste Management Association Conference in October.

We make concerted efforts to maintain strong connections with our participants via electronic and print promotions. We provide brochures for in-store marketing, send news about new participants and special events in a monthly e-newsletter, and conduct an outbound calling program that encourages collection sites to promote and monitor their drop boxes and return them when they are full.

To promote the Call2Recycle program to consumers, we hosted several successful battery recycling events in conjunction with municipalities and partners across the province. In several cases, these events brought attention to battery recycling opportunities in remote regions of the province, where we succeeded in generating high participation in the battery drives.

Call2Recycle's ongoing partnership with London Drugs included participation in the grand opening of the Zero Waste Store in the Vancouver's former Olympic Village. Our staff were on hand at a booth to demonstrate to consumers how easy battery recycling is at London Drugs' new recycling kiosks.

In September, we announced a new national partnership with Earth Day Canada. The first major activity of this collaboration focused on Earth Day Canada's EcoKids program, for which Call2Recycle produced education materials about batteries and responsible battery management. Online lesson plans were developed for teachers to download from the EcoKids website to help them engage students in exercises that teach the importance of batteries and their interaction with the environment.

In another collaboration with Earth Day Canada, Call2Recycle celebrated everyday heroes of environmental action in a 12-page supplement distributed nationally in the November-December issue of *Alternatives* magazine. *Alternatives'* 70,000 readers received the supplement, and an additional 50,000 electronic copies were sent to secondary and post-secondary students across the country.

We continued to be the major sponsor of the Old Timers' Hockey Challenge, which made eight stops in British Columbia on its 31-game cross-Canada tour in 2012. Through this sponsorship, Call2Recycle was profiled in numerous ways, including a full-page advertisement on the back cover of the souvenir program; PA announcements about Call2Recycle; our logo on the venue's Jumbotron (where applicable); an on-ice interview with a Call2Recycle representative; and a branded t-shirt toss whenever a legend scored. Audience surveys consistently reveal that one Call2Recycle activity is most memorable at these events however: the appearance of the Call2Recycle Tykes. Dressed in the same team jersey as the Old Timers—with Call2Recycle logo on the back—children 5 to 7 years old from various local tykes teams take to the ice during second period. The children take shots against the legends and score goals. After their game they get time for photos with a hockey legend and Call2Recycle hockey cards in the dressing room. The Master of Ceremonies mentions Call2Recycle several times during the Tykes' ice time, generating great buzz for the program.

We were also a sponsor of the All Science Challenge, a series of events held at almost every major Canadian university in May – this included the Universities of British Columbia and Victoria. Organized by the charitable organization Let's Talk Science, the All Science Challenge is an opportunity for teams of students from grades 6 to 8 to collaborate on science projects and then represent their schools at a one-day science competition at a local university.

As an active member of the Stewardship Agencies of British Columbia, which promotes awareness of the Province's product stewardship programs to consumers, Call2Recycle was once again featured in a full-page profile on battery recycling in the Stewardship Agencies' B.C. Recycling Handbook and on its website.

In addition to event and partnership promotions, Call2Recycle has a robust communications and advertising program. Executive Director Joe Zenobio was featured in an article in the Recycling and Waste Management insert that ran in the *Vancouver Province* in June. Call2Recycle ran an accompanying advertisement within the insert with a battery recycling call to action. A fall advertising campaign in the *Vancouver Sun*, *The Province*, *Metro Vancouver* and a multitude of community papers throughout the province successfully incited consumers to recycle batteries at Call2Recycle drop-off locations.

We partnered with Shell Busey's HouseSmart Home Services on a range of promotional activities. Two articles about Call2Recycle—*Recycle Your Batteries* and *Batteries Never Die*—

ran in his popular newsletter, and audio promotions for Call2Recycle run regularly on Shell's weekly podcasts. The battery recycling program is also featured in the member section of askshell.com, where all of Call2Recycle's press releases and informational videos are also posted.

Call2Recycle also conducted research to better understand consumer motivators and recycling behaviours, specifically at retail store locations. The research examined recycling awareness, what motivates consumers to recycle, barriers to taking part in recycling activities, and consumer recycling perceptions. We will use the information gained from this research to help us in our future efforts to educate and increase awareness amongst consumers and retailers. The results of this research were presented to Call2Recycle's key retail participants in early 2013.

Point-of-sale signage and promotional materials are available at most of Call2Recycle's retail and public drop-off locations. Many of these partners also have information about the program on their websites. Through e-blasts, a monthly newsletter and an active social media presence on Twitter and Facebook, Call2Recycle regularly updates consumers on recycling activities and the benefits of environmental sustainability. The Call2Recycle website has a dedicated British Columbia section, program information, interactive games, recycling resources and links, FAQs, a feedback mechanism and a handy search tool to help consumers find the drop-off locations nearest them.

Call2Recycle collection site operators are key to the success of our battery recycling program, so recruiting, educating and encouraging our operators are critical elements of our program. Our Customer Service Team responds to consumer and participant enquiries. Our call centre assists consumers in finding our drop-off locations, educates them about battery recycling and provides a variety of other battery-related information. We routinely distribute promotional materials to participant organizations and highlight their activities in our monthly newsletters and media releases.

Call2Recycle also publicly recognizes select participants with our Leader in Sustainability Award through an announcement in our newsletter, online materials and by providing winners with a plaque to display at their locations. The award program, now in its second year, honours organizations that have demonstrated exceptional commitment to environmental sustainability through significant collection returns and promotion of recycling activities to consumers.

There were 35 award winners in British Columbia – seven first-time winners included Hornby Island Recycling, Kitimat Understanding the Environment Society and Sydney Bottle Depot and the rest being second-time recipients included Best Buy Canada Ltd, City of Vancouver, Cowichan Valley Regional District, Future Shop, London Drugs, Nanaimo Recycling Exchange, Overwaite Food Group, Pharmasave National, Salt Spring Island Recycling Depot,

Semiahmoo Bottle Depot, Vancouver General Hospital and Vernon & District Assoc. for Community Living.

4. Collection System and Facilities

Our principal battery collection method from consumers is our drop-off boxes at convenient locations across the province. Call2Recycle has strategically selected and established battery collection systems at public and private drop-off locations within organizations to maximize convenience and collections. Various factors, such as population, proximity to consumers, ease of access, and the likelihood that consumers will associate batteries with the location (e.g. an electronics store) are some of the criteria we consider when selecting a Call2Recycle collection site. Health and safety and, in some cases, a pre-existing battery and/or device return and exchange program within the location are also factors.

In 2012, Call2Recycle had 1,676 collection sites across the province that returned batteries to the program during this 12-month period.

The following chart shows the number of active collection sites by region.

Region	# of Active Collection Sites	Region	# of Active Collection Sites
Alberni-Clayoquot	17	Kootenay Boundary	20
Bulkley-Nechako	23	Mount Waddington	2
Capital	268	Nanaimo	47
Cariboo	27	North Okanagan	21
Central Coast	2	Northern Rockies	2
Central Kootenay	45	Okanagan-Similkameen	44
Central Okanagan	37	Peace River	13
Columbia Shuswap	25	Powell River	10
Comox Valley	27	Skeena-Queen Charlotte	4
Cowichan Valley	27	Squamish-Lillooet	26
East Kootenay	30	Stikine	1

Fraser Valley	83	Strathcona	22
Fraser-Fort George	42	Sunshine Coast	11
Greater Vancouver	702	Thompson-Nicola	75
Kitimat-Stikine	23	Total B.C.	1,676

The following chart outlines the types of Call2Recycle collection sites and their representation as a percentage of all our collection locations.

Participating Sites by Channel	2012	2011	# Increase/ Decrease	% Increase/ Decrease
Business Services	614	269	345	128%
Environmental	80	49	31	63%
Government	369	227	142	63%
Manufacturing	23	19	4	21%
Retail	590	513	77	15%
Grand Total	1,676	1,077	599	56%

Call2Recycle also holds battery collection drives around the province throughout the year. In October, more than 200 people took part in Call2Recycle's battery round-up event in the mountain town of Nelson, on Kootenay Lake. In collaboration with Encorp Pacific Inc., Call2Recycle organized the first ever battery drive event in the remote Haida Gwaii islands in September. The event attracted many of the community's 3,800 members, who brought a range of household batteries and electronic devices for recycling. In October and November, similarly successful drives were held in Fort Nelson, Castlegar, Creston, Nakusp, and Mackenzie.

5. Product Environmental Impact Reduction, Reusability and Recyclability

Call2Recycle's raison d'être is to achieve greater environmental sustainability through the reuse and recycling of batteries and cellphones. In addition to the activities outlined throughout this report, we are focused on continued sustainable development. We seek processing partners that are located in the regions we serve in order to reduce our transportation footprint. Batteries collected through Call2Recycle in B.C. are sorted and some are further process through Toxco, a Trail, B.C. company.

Call2Recycle is also committed to continuously improving the performance of our battery recycling program. In 2012, Call2Recycle became the first program of its kind to receive the

Responsible Recycling Practices Standard (R2) certification. This voluntary and stringent assessment process analyzes Call2Recycle's practices against a range of externally and internally focused criteria. Successfully achieving the R2 designation affirms that Call2Recycle meets stringent standards relating to environmental and public health, worker health and safety, security aspects of electronics recycling, and the collection and distribution of batteries and cellphones to downstream processors for recycling.

Our processors also participate in CHWMEG reviews. CHWMEG Inc. is a non-profit trade association focused on the efficient execution of waste management aspects of environmental stewardship programs. Among its various activities, CHWMEG conducts comprehensive, independent reviews of commercial facilities that treat, store, dispose, recycle or transport waste. Three facilities used by Call2Recycle have had CHWMEG audits, including Toxco in 2011 (and scheduled again for 2013).

In an effort to further streamline our processes, we are always investigating advances in the recycling sector. Although no providers domestically or internationally have the capability to sort collected batteries in a fully automated manner, we continue to explore possibilities for fully automating the sortation of collected batteries. We network with international recyclers, visit overseas sortation plants, share best practices and incorporate any advances we discover into our own processes.

6. Pollution Prevention Hierarchy and Product / Component Management

The Province abides by the pollution prevention hierarchy – reduce, reuse and recycle. This hierarchy is less applicable to batteries than it is to other materials and products. Of the thousands of batteries Call2Recycle received, none were sufficiently fit for reuse, and Call2Recycle does not promote a reduction in the use of batteries. Thus, recycling is the most practical and viable means of keeping toxic waste from entering landfills, and giving reclaimed materials a second life. No batteries that are collected through our program are sent to landfill. The Call2Recycle program is able to efficiently and cost-effectively send batteries for recycling.

Batteries collected through the Call2Recycle program are consolidated and sorted by Toxco-Canada, a Canadian business located in Trail, B.C. Batteries are processed to recover valuable metals such as nickel, iron, cadmium, lead, and cobalt, which are sold back to the metals market. The reclaimed materials are used in the production of a variety of new products, such as batteries, cookware, appliances and hardware.

Call2Recycle's battery processing partners have passed a rigorous selection process to ensure that they comply with applicable environmental, health and safety, and transportation regulations. We continually monitor each processor to ensure competitive

pricing and an ability to adapt to increases in capacity. Through this efficient system, valuable minerals such as nickel, iron, cadmium, lead, and cobalt are extracted and prepared for re-use in new products.

The following chart shows the recycling efficiency rates (recovery rates) for the processors used by the Call2Recycle program.

Battery Type	Rechargeable Battery Chemistry				Primary Chemistry	
	NI-CD	LI-ION	NI-MH	SSLA	ALKALINE	LITHIUM
Processor	Inmetco	Xstrata Toxco	Inmetco	Newalta, QC	Inmetco	Inmetco Toxco
% Material Recovered*						
To Metals	50%	27%	57%	72%	35%	0 to 50%
To co-product, aggregate	2%	0%	14%	0%	15%	37%
To Cadmium	12%	0%	0%	0%	0%	0%
To Secondary Recovery	4%	0%	5%	0%	25%	2%
Plastic Recovery or Reductant	12%	44%	10%	9%	8%	2%
Total Recovery, %	80%	71%	86%	81%	83%	83 to 91%

* Recovery rates provided by processor.

For cellphones, the Call2Recycle program first seeks to refurbish the units. If unable to be refurbished, the phones are recycled. Approximately 90% of the cellphones collected are refurbished. No material managed through recycling is sent overseas as per the requirements of the Basel Convention

7. Product Sold and Collected and Recovery Rate

After 2011's exceptional growth in battery contributions in B.C., collections leveled off in 2012, with a modest 2% increase overall for this reporting year. While rechargeable battery collections continued their healthy growth with a 34% increase this year, primary batteries and cellphone collections lagged. This lag can be attributed in part to a couple of trends. Consumers are using fewer disposable batteries as more and more popular electronics are designed as rechargeable devices. Battery sizes are also decreasing to accommodate smaller devices and thus battery weights are decreasing as well.

Even with modest growth, British Columbia contributed significantly to Call2Recycle's Canadian collection totals, with more than 360,000 kg of the more than one million kilograms collected nationally coming from this province.

Kootenay Boundary, site of one of our battery drives, and Nanaimo demonstrated the strongest per capita participation in the program, while it is no surprise that the Greater Vancouver Area returned the highest amount of batteries by weight.

COLLECTION RATES FOR BATTERIES AND CELLPHONES	WEIGHT IN KILOGRAMS
Batteries sold in province	2,591,000*
Primary (Single Use) collected	270,719
Rechargeables collected	85,422
Sub-Total	356,141
CWTA**	1,363
Toxco***	4,317
Total Collected	361,821

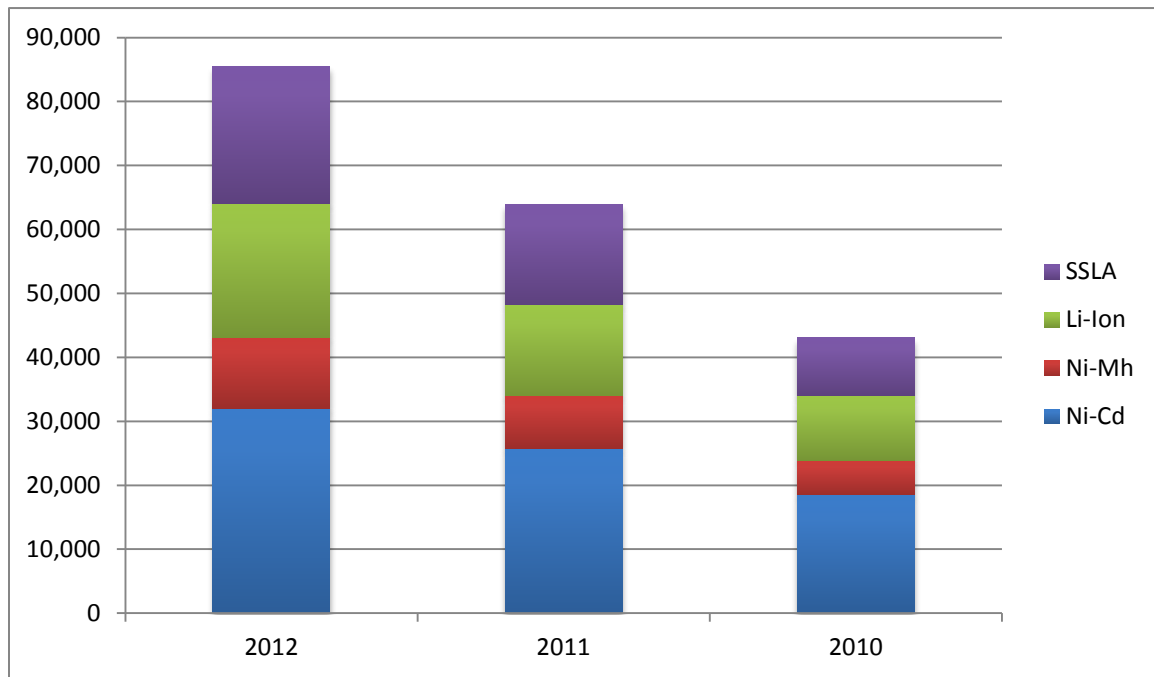
*Represents estimates developed by industry stewards based on total Canadian battery sales allocated by provincial population

**Batteries collected by CWTA in BC through their phone collections program Recycle My Cell. Call2Recycle has also provided CWTA with the number of phones collected through our program in the province for their reporting.

***Batteries collected at Toxco Trail facility – permission granted in 2011 by MOE to include these in our reporting numbers.

Below is a summary chart and bar graph of the Call2recycle battery collections by chemistry (in kilograms) from rechargeable batteries in 2012:

	2012	% Change	2011	2010
Ni-Cd	32,026	24%	25,798	18,505
Ni-Mh	11,102	34%	8,264	5454
Li-Ion	20,956	48%	14,179	10,148
SSLA	21,339	36%	15,676	8953
Rechargeable Chemistry Total	85,422	32%	63,918	43,060



Below is a summary chart of the materials reclaimed from single-use batteries in 2012.

Primary Battery Chemistries			
Material Name	2012	2011	% Chg
Alkaline/ Zinc Carbon	263,992	280,314	-6%
Lithium	6,704	4,794	40%
Mercury	20	6	235%
Silver Oxide	0	0	0%
Total	270,716	285,114	-5%

A breakdown of the collections (by weight) across B.C.'s 28 regions is provided below.

Region	2012 Total Collections* (Kg)	2011 Total Collections* (Kg)	% Change
Alberni-Clayoquot	1,106	765	45%
Bulkley-Nechako	1,185	1,132	5%
Capital	49,260	36,136	36%
Cariboo	1,870	1,338	40%

Central Coast	105	195	-46%
Central Kootenay	3,531	2,659	33%
Central Okanagan	20,766	23,937	-13%
Columbia Shuswap	2,437	1,600	52%
Comox Valley	5,390	2,714	99%
Cowichan Valley	6,607	7,914	-17%
East Kootenay	2,354	1,904	24%
Fraser Valley	12,072	11,741	3%
Fraser-Fort George	4,518	2,771	63%
Greater Vancouver	170,433	206,449	-17%
Kitimat-Stikine	2,850	1,046	172%
Kootenay Boundary	10,098	4,810	110%
Mount Waddington	51	61	-17%
Nanaimo	26,622	14,404	85%
North Okanagan	8,592	6,202	39%
Okanagan-Similkameen	3,657	2,601	41%
Peace River	1,355	1,728	-22%
Powell River	1,583	985	61%
Skeena-Queen Charlotte	1,723	1,591	8%
Squamish-Lillooet	4,303	2,478	74%
Stikine	34	21	59%
Strathcona	2,725	1,968	38%
Sunshine Coast	2,556	2,845	-10%
Thompson-Nicola	8,357	7,040	19%
Total B.C.	356,141	349,036	2%

Although the Province's official cellphone recycling program, Recycle My Cell, is managed by the Canadian Wireless Telecommunications Association (CWTA), Call2Recycle boxes continue to be a popular option for consumers to recycle their cellphones. Consumers deposited 27,418 cellphones this year. Call2Recycle refurbishes cellphones that are in good, reusable condition and recycles the phones for which refurbishing is not a viable option.

8. Summary of Deposits, Refunds, Revenues and Expenditures

This section is not applicable to the services of Call2Recycle as our program does not charge deposits nor do we charge visible eco fees.

9. Plan Performance

Plan Target*	2012 Results	Strategies for Improvement
1. Batteries sold in B.C. ** 2,591,000 kg	Unknown – No public disclosure	Due to a complex sales chain, obtaining actual sales information was not possible. The Stewardship Plan acknowledged the ambitiousness of the targets that were set to align with the European Union Battery Directive. As mentioned in the plan, Call2Recycle will revise the targets in the coming year to reflect more realistic performance objectives based on actual performance yet ambitiously attainable recycling objectives.
2. Primary batteries 446,280 kg	270,719 kg	
3. Secondary batteries 111,570 kg	85,422 kg	As always, Call2Recycle will continue to actively promote the battery recycling program to consumers and participating locations in an effort to achieve greater results in the future. New targets will be set in 2014 while working on the new plan for submission for the 2015 year.
4. Total batteries 557,850 kg	361,821 kg***	

*The program launched in June 2010 and reporting for that period represented targets for a 6-month period from launch. Since 2012 targets are reported on the previous year's 6-month targets and the current year 6-month targets from the plan.

**Batteries Sold into B.C. represents estimates developed by industry stewards based on total Canadian battery sales allocated by provincial population. The program launched in June 2010 and reporting for that period represented targets for a 6-month period from launch. Since 2012 targets are reported on the previous year's 6-month targets and the current year 6-month targets from the plan. Products sold have been adjusted to reflect the previous 6 month target.

***Includes batteries of CWTA and Toxco as per government approval

Appendices / Additional Information and Third Party Assurance

Appendix A

**RECHARGEABLE BATTERY STEWARDS (LICENSEES) OF THE CALL2RECYCLE
PROGRAM – As of March 31, 2013**

3M COMPANY - OH&ES DIVISION	CHERVON NORTH AMERICA/MASTERCRAFT
ACCESS BATTERY & POWER SYSTEMS	MAXIMUM
ACER SERVICES CORP	CISCO SYSTEMS, INC.
ADVANCED BATTERY SYSTEMS, INC.	COLEMAN COMPANY, INC
ADVANCED ELECTRONICS ENERGY LIMITED	COLUMBIA SPORTSWEAR COMPANY, INC
AGILENT TECHNOLOGIES	CONAIR CORPORATION
AIR STRUCTURES INTERNATIONAL, UK	COVIDIEN
ALEXANDER TECHNOLOGIES EUROPE, LTD	DANTONA INDUSTRIES
ALLIED INTERNATIONAL/ALLIED TOOLS	DELL INC.
ALLTRADE TOOLS LLC	DIGI-KEY CORPORATION
AMBIENT CORP.	DONGGUAN GOLDEN CEL BATTERY CO.
AMERICAN LAWNMOWER COMPANY	DOUGLAS QUICKUT
AMERICAN TOPPOWER INC.	DR. BATTERY
AMPERGEN	DURACELL a Division of P & G
ANTON/BAUER INC.	DURACELL CANADA INC.
APPLE, INC.	EASTMAN KODAK COMPANY
APPLIED POWER INC.	ECHELON, INC.
ARROW FASTENER CO., LLC	ELECTROLUX HOME CARE PRODUCTS
AVED GENERATIONS ELECTRONICS	ENERCO GROUP, INC.
AVEX ELECTRONICS CORPORATION	ENERGY SALES, INC.
BATTERY SPECIALTIES	ENERSYS DELAWARE INC.
BISSELL HOMECARE, INC.	EPSON AMERICA, INC.
BLACK & DECKER CORPORATION	ESI CASES & ACCESSORIES
BLOUNT, INC.	ETICA BATTERY INC.
BMR GROUP INC.	EVEREADY BATTERY COMPANY, INC.
BOREN ELECTRONICS CO., LTD.	(ENERGIZER)
BOSE CORPORATION	EXACT BATTERY
BRAUN, A DIVISION OF P&G	EXCELL BATTERY COMPANY
BROTHER INTERNATIONAL CORPORATION	FDK AMERICA, INC.
BYD BATTERY (USA) CO.	FEDCO ELECTRONICS
CANADIAN SATELLITE RADIO	FEIN POWER TOOLS, INC
CANADIAN TIRE	FESTOOL
CANON U.S.A., INC.	FINISH THOMPSON INC.
CAR-GO BATTERY CO.	FLYING DRAGON DEVELOPMENT LTD.
CASIO AMERICA, INC.	FREIGHT SECURITY NET
CELL-CON INC.	FRESHBATTERY.COM
CENTURY OPTRONIC, INC.	FRONTROW

FUJIFILM HOLDINGS AMERICA CORP.
FUNAI CORPORATION
GARMIN INTERNATIONAL, INC.
GENERAL DYNAMICS ITRONIX
GERBING'S HEATED CLOTHING
GIANT TIGER STORES LIMITED
GILLETTE, A DIVISION OF P&G
GLOBAL TECHNOLOGY SYSTEMS, INC.
GOLD PEAK INDUSTRIES
GOLDEN CEL BATTERY CO. LTD.
GREATBATCH, LTD.
GREEN SMOKE, INC.
GREENRON ENERGY LIMITED
GS BATTERY (USA) INC.
HENAN HUANYU POWER SOURCE CO., LTD.
HEWLETT-PACKARD COMPANY
HILTI (CANADA) CORPORATION
HILTI, INC.
HITACHI - KOKI U.S.A. LTD.
HITACHI-KOKI CANADA CO.
HOBBICO - HOBBY CORPORATION OF
AMERICA
HONG KONG HIGHPOWER TECHNOLOGY
CO., LTD
HOOVER COMPANY (TTI FLOOR CARE
NORTH AMERICA)
HOT-SHOT PRODUCTS CO., INC.
HOUSE OF BATTERIES
HTC CORPORATION
ICOM AMERICA, INC.
IDX SYSTEM TECHNOLOGY
ILLINOIS TOOL WORKS
INDUSTRIAL BATTERY SERVICE, INC.
INDUSTRIAL SCIENTIFIC CORPORATION
INSPIRED ENERGY, LLC
INTEC INDUSTRIES CO. LTD.
INVOX HARDWARE LIMITED
IOTTIE
ITECH "INTELLEAGENT TECHNOLOGIES"
ITO CO., LTD.
JEAN COUTU GROUP INC.
JIANGSU HIGHSTAR BATTERY
MANUFACTURING CO., LTD
JLG INDUSTRIES, INC.
JVC AMERICAS CORP.

KENSINGTON COMPUTER PRODUCTS
GROUP, A DIVISION OF ACCO BRANDS
USA LLC
KENWOOD AMERICAS CORPORATION
KING OF FANS
L'MAGE HOME PRODUCTS INC.
LEICA CAMERA, INC.
LENMAR BATTERY SOLUTIONS
LENOVO (UNITED STATES) INC.
LEXEL BATTERY (SHENZHEN) CO., LTD.
LG ELECTRONICS, INC.
LOBLAW INC
MAG INSTRUMENT, INC.
MAKITA CANADA INC.
MAKITA U.S.A., INC.
MAX CO., LTD.
MAXELL CORPORATION OF AMERICA
MCNAIR TECHNOLOGY CO., LTD.
MEASUREMENT LTD., INC.
MEDTRONIC PHYSIO-CONTROL CORP.
MERITool LLC
MILWAUKEE ELECTRIC TOOL CORPORATION
MOTOROLA, INC.
NEC CASIO HITACHI MOBILE
NEPTUNE TECHNOLOGY GROUP, INC.
NIKON CANADA INC.
NOKIA
NORELCO CONSUMER PRODUCTS CO.
NORMARK INNOVATIONS
NOVATEL WIRELESS
NYLUBE PRODUCTS COMPANY, LLC
OKI DATA AMERICAS, INC.
OLYMPUS AMERICA, INC.
ONLIVE, INC.
OOMA, INC.
OPTEX, INC.
ORAL-B, A DIVISION OF P&G
PALLADIUM ENERGY
PANASONIC CORPORATION OF NORTH
AMERICA
PANTECH CO. LTD.
PASLODE
PERSONAL COMMUNICATION DEVICES, LLC
(PCD)
PHILIPS CONSUMER ELECTRONICS
PHOTO CONTROL CORPORATION
PHYSIO-CONTROL CORPORATION

PORTACELL USA LLC
POSITEC TOOL CORPORATION
POWER PRODUCTS
POWERGENIX
PRO TEAM THE VACUUM COMPANY
PROCTER & GAMBLE
PROFESSIONAL TOOL PRODUCTS, LLC
PROGRESSIVE TECHNOLOGIES, INC.
PROMARK ELECTRONICS
QUANTUM INSTRUMENTS INC.
QUICKIE MANUFACTURING CORPORATION
RADIOSHACK
RAYOVAC CORPORATION, A DIVISION OF
SPECTRUM BRANDS
REALFLEET CO., LTD.
REMINGTON, DIVISION OF SPECTRUM
BRANDS, INC.
RESEARCH IN MOTION LIMITED
RESISTACAP, INC.
RIDGE TOOL COMPANY (RIDGID)
RKI INSTRUMENTS
ROBERT BOSCH TOOL CORPORATION
RRC POWER SOLUTIONS INC
RYOBI NORTH AMERICA, INC.
SAFT AMERICA INC.
SAMSUNG
SANYO ENERGY (U.S.A.) CORPORATION
SATO AMERICA INC
SEIKO INSTRUMENTS USA, INC.
SENSIDYNE/GILIAN
SHARP ELECTRONICS CORP
SHENZHEN BOFUNENG BATTERY CO., LTD.
SHENZHEN LTT ELECTRONICE CO., LTD.
SHOPPERS DRUGMART INC.
SIGMA CORPORATION
SIRIUS XM RADIO INC.
SNAP-ON INCORPORATED
SONY ELECTRONICS INC
SONY OF CANADA LTD
SOUTHWICK TECHNOLOGIES
SPECTRUM BRANDS, INC.
SRAM LLC
STAR MICRONICS CO., LTD.
STIHL INCORPORATED
STIHL LIMITED
STRYKER
SUNBEAM PRODUCTS

SWISSVOICE
TECHNICAL POWER SYSTEMS, INC.
TECHTRONIC INDUSTRIES CO., LTD.
TECHTRONIC INDUSTRIES GMBH
TERRALUX
TEST RITE PRODUCTS CORP.
TEXAS INSTRUMENTS EDUCATION
TECHNOLOGY
THE FURUKAWA BATTERY CO., LTD.
THE SOURCE
TNR TECHNICAL INC. / THE BATTERY STORE
TOSHIBA AMERICA, INC.
TRAXXAS
TREK BICYCLE CORPORATION
TTEK ASSEMBLIES INC.
ULTRALIFE CORPORATION
UNIDEN AMERICA CORPORATION
UNISYS
UNIVERSAL POWER GROUP
VARTA BATTERIES INC.
VENOM POWER
VERNIER SOFTWARE & TECHNOLOGY
VTECH COMMUNICATIONS LTD.
WACOM TECHNOLOGY CORP.
WAHL CLIPPER CORP.
WALMART CANADA CORPORATION
WINTONIC BATTERY & MAGNET CO. LTD.
WOHLER USA, INC.
XPLORE TECHNOLOGIES CORP.
YIYANG CORUN BATTERY CO., LTD.
YUASA BATTERY INC.

Appendix B

PRIMARY BATTERY STEWARDS OF THE CALL2RECYCLE PROGRAM

BATTERIES EXPERT
BEST BUY CANADA (INCLUDING FUTURE SHOP)
CANADIAN TIRE
COSTCO CANADA
DURACELL CANADA (PROCTER & GAMBLE)
ENERGIZER CANADA
HOME DEPOT
HOME HARDWARE
KODAK CANADA
PANASONIC NORTH AMERICA, INC.
RAYOVAC CANADA (SPECTRUM BRAND)
RONA
SEARS CANADA
SONY CANADA
THE SOURCE

Appendix C

Samples of Educational and Promotional Activities

Advertisements



Recharging the Planet. Recycling Your Batteries.™

call2recycle®

**Recycle your batteries
with Call2Recycle®**

Call2Recycle® provides an eco-friendly way
to recycle batteries (weighing up to 5 kg)
and cellphones.

It's free and easy. Simply bring them
to one of our many drop-off locations
throughout the province.

To find a location near you visit
call2recycle.ca/bc-locations
or call **1.888.224.9764**

 **With Call2Recycle
Batteries Never Die.**

Call2Recycle's fall campaign advertisement appeared in newspapers in various cities, including Vancouver, Victoria, Campbell River, Cranbrook, Fort St. John, Kamloops, Kelowna, Nanaimo, Parksville, Penticton, Prince George, Burns Lake, Houston, Prince Rupert, and Smithers.



Call2Recycle Executive Director Joe Zenobio
at an All Science Challenge event,
with event participants.



3 • JUNE 2012

AN INDEPENDENT SECTION BY MEDIA PLANET TO THE PROVINCE

INSPIRATION

QUESTION & ANSWER



Who decides what products are included in EPR programs?

Products included in EPR programs are set by the BC Ministry of Environment and governed by the Recycling Regulation. Recently, the Canadian Council of Ministers of the Environment (CCME) established nationwide deadlines for a range of product categories. The BC Ministry of Environment is required to meet these deadlines and product lists, but may also choose to expand the program further.

SOURCE: COURTESY OF THE RECYCLING COUNCIL OF B.C.

Cradle to grave – it's our responsibility

Product stewardship; holding each other accountable to sustain our future

When you're buying anything from antifreeze to a new TV, there's a good chance you're not immediately thinking about the end-of-life plan.

Fortunately, the producers of these products are.

That's why a fee is attached to many products - everything from paint to smoke alarms - this eco levy is collected so proper steps are taken.

Product stewardship programs have been in place for about 20 years. Instead of general taxpayers paying for the cost of recycling hazardous materials in common products, the responsibility is shifted onto the user through a fee. The fee then goes back into industry, who manages and properly recycles the product.

Joe Zenobio, Executive Director of Call to Recycle, says "the cost of a fee is determined based on the product."

"It's dependent upon the product in question and vary depending upon what is required to collect, divert, recycle and in some cases recover funds from the recycling," he explains.

President of Product Care Association Mark Karschner says "most producers have joined together to form a common stewardship program, rather than run their own." He adds that every program does the same thing, but in a different way.

"They all provide some sort of post-consumer take-back system," he says.

Zenobio explains that consumers should care about these programs because it affects them on a large and small scale.

"Product stewardship supports sustainability," he says. "Products are reused, landfills are reduced and in some product categories toxins or other hazardous items are diverted from landfills and treated properly."

As for the future, Karschner predicts there will be more programs developed, as new products are included in recycling regulations.

Ron Driedger, Executive Director of the BC Used Oil Management Association, agrees.

"I see more cooperation from the BC Stewardship Program operators in working together with local governments to provide a common voice to the consumers in public education and information and in working together to providing more one-stop eco-depots. So consumers can take back many different types of products and packaging under stewardship programs."

ELIJAH LEV
editor@mediaplanet.com



HSR Services, Ltd.

TAKING JUNK AND RECYCLING IT SINCE 1988

www.happystan.com | 604 464 0242

With Call2Recycle® Batteries Never Die

Call2Recycle® provides an eco-friendly way to recycle used batteries and cellphones.

It's free and easy. Simply bring them to one of our many drop-off locations.

To find a drop-off location near you, visit call2recycle.ca/bc or call 1.888.224.9764

call2recycle® Recharging the Planet. Recycling Your Batteries.™

Do you have an old thermostat?
Drop it off for recycling!

Over 60,000 thermostats already collected!
Tell your contractor or sign up for free today.

Your old thermostat may contain mercury!

SWITCH THE STAT

Member of:

To register or find drop-off locations:
www.switchthestat.ca

Switch the Stat is a BC Stewardship program.

Advertisement and editorial featuring Call2Recycle's Executive Director in Media Planet, an independent pullout section of the Vancouver Province – June 24 2012

British Columbia's Recycling Handbook

Featuring a page about Call2Recycle's battery recycling program



Call2Recycle 2012 Annual Report to Ministry of the Environment British Columbia



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Toll Free Referral Line:
1-888-266-8806
ASK SHELL A QUESTION!



With Call2Recycle®, Batteries Never Die

September 14, 2012

From laptops to cordless drills, cellphones to calculators, battery-powered devices are everywhere in our home and work lives. On average, North Americans use six wireless products a day, each requiring rechargeable batteries. And that doesn't include devices that take single use batteries, like remote controls or children's toys. We rely on these compact carriers of electrical power to stay connected, be entertained, conduct our work, and provide help in emergencies.

While some rechargeable batteries can operate for as long as five years, even rechargeables eventually run out of power. Approximately three billion – yes, billion – batteries are disposed of every year across America. The number of AA batteries alone, lined up end to end, would circle the earth six times. We've all heard that we shouldn't throw batteries out with the regular trash, and there is good reason for this. Batteries are considered hazardous waste, containing toxic materials that over time can build up in the soil and water table; therefore, it's important to dispose of them responsibly and keep them out of our landfill. So what is the best way to handle a battery that has reached the end of its life?

Perhaps the most responsible—and convenient—thing we can do with our used batteries is to recycle them. Many people don't know that expired batteries contain a number of valuable, reusable metals, such as nickel, iron, lead, and cobalt. And that is where Call2Recycle® comes in.

Call2Recycle, a free battery recycling program offers drop-off boxes in convenient locations such as stores, municipal buildings and corporate offices all across Canada. You can find the one nearest you on their website call2recycle.ca. Once you drop off your battery, it is shipped to a sorting facility where batteries are separated by chemistry. From there, the sorted batteries go to processing facilities where their reusable components are removed and collected.

In this way, your battery is able to take on a new life. Through the process, none of the broken down material goes to landfill. Instead it is reused to make new batteries, stainless steel products and cement additives. Call2Recycle also accepts cellphones, which it refurbishes, resells or recycles. Since 1996, more than 34 million kilograms of batteries have been diverted from landfills through the program.

We can all do our part to make the most of the life of our batteries, both while we use them at home or at work, and afterward when we are done with them. Following the steps below will help to extend the life of your batteries, and through the Call2Recycle program, you can ensure that your batteries never become e-waste, but are put to valuable reuse. Recycling batteries through Call2Recycle is a responsible and easy way for all of us to do our part to protect the environment.

www.asksell.com/Newsletter-1999-With-Call2Recycle-Batteries-Never-Die

CERTIFIED HOME SERVICE PROVIDERS

Shell Busey's
Home Improvements
& Renovations

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[Click Here](#) for more certified home service providers

FEATURED VIDEO



Appendix D

Audited Financial Statement

RECHARGEABLE BATTERY RECYCLING CORPORATION AND AFFILIATE

Condensed 2012 and 2011 Combined Financial Statements

Condensed Combined Statements of Financial Position

Reported in U.S. Dollars

	2012			2011
	(\$'000)			(\$'000)
Years Ended December 31,	USA	Canada	Combined	Combined
ASSETS:				
Cash and cash equivalents	\$ 134	\$ 226	\$ 360	\$ 380
Receivables, no allowance deemed necessary	2,957	1,015	3,972	2,890
Due from (to) affiliate	455	(455)	-	-
Prepaid expense and other assets	413	11	424	489
Long-term investments	22,576	-	22,576	21,640
Net property and equipment	281	11	292	350
Total Assets	26,816	808	27,624	25,749
LIABILITIES and NET ASSETS				
Accounts payable and accrued expenses	840	704	1,544	1,063
Unearned revenue	7,079	-	7,079	7,085
Total liabilities	7,919	704	8,623	8,148
Net assets				
Unrestricted net assets	18,897	186	19,083	17,667
Cumulative translation adjustment	-	(82)	(82)	(66)
Total net assets	18,897	104	19,001	17,601
Total liabilities and net assets	\$ 26,816	\$ 808	\$ 27,624	\$ 25,749

INDEPENDENT AUDITORS' REPORT

Board of Directors

Rechargeable Battery Recycling Corporation and Rechargeable Battery Recycling Corporation of Canada

We have audited, in accordance with auditing standards generally accepted in the United States of America, the combined statement of financial position of the Rechargeable Battery Recycling Corporation and Rechargeable Battery Recycling Corporation of Canada (non-profit organizations collectively referred to as "RBRC") as of December 31, 2012 and 2011, and the related statements of activities, changes in net assets, and cash flows for the years then ended (not presented herein); and in our report dated April 22, 2013, we expressed an unqualified opinion on those combined statements.

In our opinion, the information set forth in the accompanying condensed combined financial statements is fairly stated, in all material respects, in relation to the combined financial statements from which it has been derived.

April 22, 2013

Smith & Howard



RECHARGEABLE BATTERY RECYCLING CORPORATION AND AFFILIATE

Condensed 2012 and 2011 Combined Financial Statements

Condensed Combined Statements of Activities and Changes in Net Assets

Reported in U.S. Dollars

	2012			2011
	(\$'000)			(\$'000)
Years Ended December 31,	USA	Canada	Combined	Combined
OPERATING ACTIVITIES:				
Revenue				
License fees	\$ 9,106	\$ -	\$ 9,106	\$ 9,686
Primary battery collection program fees	-	3,728	3,728	1,625
Recovered metals proceeds, net	2,000	332	2,332	3,413
Other	281	-	281	147
Total Revenues	11,387	4,060	15,447	14,871
Expenses:				
Program expenses				
Collection and recycling	6,855	3,454	10,309	8,580
Public education	1,952	408	2,360	2,536
Seal administration	253	-	253	282
Total program expenses	9,060	3,862	12,922	11,398
Management and general expenses	1,967	1,172	3,139	2,386
Total Expenses	11,027	5,034	16,061	13,784
Increase (decrease) in unrestricted net assets before non-operating activities	360	(974)	(614)	1,087
NON-OPERATING ACTIVITIES:				
Intercompany fees	(993)	993	-	-
Investment Income	2,028	-	2,028	(197)
Increase in unrestricted net assets	1,395	19	1,414	890
Unrestricted net assets, beginning of year	17,502	99	17,601	16,759
Translation adjustment	0	(14)	(14)	(48)
Unrestricted net assets, end of year	\$ 18,897	\$ 104	\$ 19,001	\$ 17,601

Appendix E

Auditor's Report on Non-Financial Data Contained within This Report



Tel: 250 426 4285
Fax: 250 426 8886
www.bdo.ca

BDO Canada LLP
35 - 10th Avenue S
Cranbrook BC V1C 2M9 Canada

INDEPENDENT ASSURANCE REPORT TO RECHARGEABLE BATTERY RECYCLING CORPORATION OF CANADA STEWARDSHIP AGENCY

We have audited the following Sections within Rechargeable Battery Recycling Corporation of Canada Stewardship Agency ("RBRCC" or "Stewardship Agency") Annual Report for the year ended December 31, 2012 (together the "Subject Matter") in accordance with the evaluation criteria presented in Attachment 1:

- Section 8(2)(b) *collection facilities*;
- Section 8(2)(e) *product sold and collected*;
- Section 8(2) (e) *recovery rate*; and
- Section 8 (2)(b)&(e) *performance for the year in relation to targets in the approved Stewardship Plan*.

The Subject Matter is the responsibility of the Stewardship Agency's management who has prepared the Subject Matter in accordance with the evaluation criteria which are an integral part of the Subject Matter. Our responsibility is to express an independent opinion on this Subject Matter in accordance with the evaluation criteria presented in Attachment 1, based on our audit. Our audit does not constitute a legal determination on the RBRCC's compliance with the BC Recycling Regulations.

EVALUATION CRITERIA

The suitability of the evaluation criteria is the responsibility of management. The evaluation criteria presented in Attachment 1 are an integral part of the Subject Matter and address the relevance, completeness, reliability, neutrality and understandability of the Subject Matter.

SCOPE OF THE AUDIT

We carried out our audit in accordance with the International Standard on Assurance Engagements 3000 (ISAE 3000) published by the International Federation of Accountants. This Standard requires, amongst others, that the assurance team possesses the specific knowledge, skills and professional competencies needed to understand and audit the information included within the Subject Matter, and that they comply with specific requirements to ensure their independence.

An audit includes examining, on a test basis, evidence supporting compliance with the evaluation criteria, evaluating the overall compliance with the evaluation criteria, and the use of judgment in gathering and evaluating evidence and forming conclusions based on that evidence.

continued

BDO Canada LLP, a Canadian limited liability partnership, is a member of BDO International Limited, a UK company limited by guarantee, and forms part of the international BDO network of independent member firms.



Independent Assurance Report to
Rechargeable Battery Recycling Corporation of Canada
Stewardship Agency (continued)

The main elements of our work were:

- Understanding and evaluating the design of the key processes and controls for managing and reporting the selected data used in preparing the annual report as it pertains to the Subject Matter;
- Assessing the risk that the subject matter information may be materially misstated;
- Responding to assessed risk through testing, on a selective basis, the preparation and collation of selected data prepared by management and reported in the Annual Report by management;
- Performing further procedures such as inquiring, inspecting, observing, vouching to independent sources, recalculating and re-performing procedures to obtain corroborating information to address identified risks linked to the subject matter; and
- Evaluating the sufficiency and appropriateness of evidence

OPINION

In our opinion, the Subject Matter within the Stewardship Agency's Annual Report for the year ended December 31, 2012 presents fairly in accordance with the evaluation criteria presented in Attachment 1, in all material respects:

- the location of collection facilities, and any changes in the number and location of collection facilities from the previous report in accordance with Section 8(2)(b) of the Recycling Regulation;
- the description of how total amounts of the producer's product collected and, if applicable, the producer's recovery rate has been calculated in accordance with Section 8(2)(e); and,
- the description of performance for the year in relation to targets in the approved stewardship plan under Section 8(2)(b) and (e) of the Recycling Regulation.

Our opinion has been formed on the basis of, and is subject to the inherent limitations outlined elsewhere in this independent assurance report.

Our report has been prepared solely for the purposes of management's stewardship under the BC Recycling Regulations and is not intended to be and should not be used for any other purpose. Our duties in relation to this report are owed solely to RCRCC, and accordingly, we do not accept any responsibility for loss incurred to any other party acting or refraining from acting based on this report.

BDO Canada LLP

Chartered Accountants

Cranbrook, British Columbia
June 28, 2013



Attachment 1 to the Assurance Report

Evaluation Criteria

The following evaluation criteria were applied to the assessment of the location of collection facilities, and any changes in the number and location of collection facilities from the previous report in accordance with Section 8(2)(b) of the Recycling Regulation.

- The list of collection facilities is complete;
- Any change in the number of collection facilities is appropriately explained;
- The facility meets the requirement of a collection facility; and
- The number of collection facilities disclosed in the annual report are supported by evidence, neutral and understandable.

The following evaluation criteria were applied to the assessment of the description of how the total amounts of the producer's product sold and collected and, if applicable, the producer's recovery rate has been calculated in accordance with Section 8(2)(e) of the Recycling Regulation.

- Product sold has been calculated using the source data from the independent sources described in the annual report;
- Product recovered has been calculated using the source data from independent sources described in the annual report;
- Product re-used has been calculated using the source data from independent sources described in the annual report;
- Source data for sold, recovered and re-used is complete; and
- Data used to calculate the recovery rate in the annual report is accurate and complete.

The following evaluation criteria were applied to the assessment of the description performance for the year in relation to targets in the approved stewardship plan under Section 8(2)(b) and (e) of the Recycling Regulation.

- The list of targets is complete;
- The targets are neutral and consistent with the targets approved in the stewardship plan; and
- The performance of the targets are supportable by independent evidence.