



Reference: 316346

December 12, 2018

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

Dear Kristen Romilly:

Thank you for submitting proposed amendments to the British Columbia Extended Producer Responsibility Plan for Consumer Batteries (the “amendments”) in fulfillment of the requirements of section 6 of the [Recycling Regulation](#) (the “regulation”) made under the *Environmental Management Act*. I appreciate the industry’s continued commitment to achieving compliance in this regard.

Under the regulation, the director has the ability to both amend an approved extended producer responsibility (EPR) plan on his own initiative, and to approve amendments to an approved plan that have been proposed by a producer. I have completed my review of, and approve, the amendments proposed by Call2Recycle Canada, Inc. (Call2Recycle) on November 19, 2018. This amended plan takes effect on December 12, 2018.

Pursuant to section 6 of the regulation and based on the plan’s original approval date of March 1, 2010, Call2Recycle’s next plan review must be completed by March 1, 2020. However, a director under the *Environmental Management Act* may amend the approved plan pursuant to section 5(5) of the regulation or rescind approval of the approved plan pursuant to section 6.1 of the regulation, should Call2Recycle fail to meet the commitments set out in the approved plan. Please also note that failure to comply with an approved plan may result in the imposition of an administrative monetary penalty of up to \$40,000 or a fine of up to \$200,000.

Future plans and amendments

The ministry expects continuous improvement across all future plans and amendments including the following areas of concern:

1. Plan commitments – for example, use specific and measurable language;
2. Consumer access – for example, develop comprehensive province-wide accessibility – particularly in rural areas, or improve upon the current Stewardship Agencies of B.C. accessibility standard;

3. Consumer awareness - for example, include performance requirements tailored for different consumer groups and all product types managed by the program;
4. Financial transparency – for example, provide greater levels of disclosure in financial statements to better serve interests of producers, the ministry, and other stakeholders; and
5. Pollution prevention hierarchy – for example, highlight program areas of influence.

I acknowledge that some plans better address various concerns than others, and that collaboration between some producers/appointed agencies and the ministry is underway. As well, the ministry intends to develop further guidance on select areas of concern.

Related to the above concerns, but beyond my approval in this letter, I note the following opportunities for continuous improvement specific to Call2Recycle:

1. Reviewing the guidance document entitled “[Producers Paying the Cost of Managing Obligated Materials and Dispute Resolution](#)”;
2. Improving on the consultation process and material provided to describe the methodology used by the producers to demonstrate the proposed basis of compensation; and
3. Consideration of the process being undertaken by other producers in this regard in 2019.

Third Party Assurance for Non-Financial Information in Annual Reports

Third party assurance for non-financial information in Annual Reports is required through Section 8(2)(h) of the regulation. The assurance report should be completed in accordance with the document entitled, “Third Party Assurance Requirements for Non-Financial Information in Annual Reports” dated October 2018 and revised from time to time, which is enclosed.

Finally, the ministry expects this approval letter to be forwarded to Call2Recycle’s board of directors as well as its member producers, since each producer is responsible for ensuring its agent fulfills the plan, and compliance proceedings may be taken against a producer if the agent fails to implement the plan.

I look forward to working with you to ensure the success of your program. If you have any questions about this letter, please contact me at 778 698-4860 or ExtendedProducerResponsibility@gov.bc.ca. If you have any questions regarding the implementation of your plan, or suggested opportunities for improvement, please contact your ministry file lead.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob McDonald". The signature is stylized with large, overlapping loops and a long horizontal stroke at the end.

Bob McDonald
Director, Extended Producer Responsibility Section
Environmental Standards Branch

Enclosure (2)

cc: Kris Ord, Executive Director, Environmental Standards Branch
Kristi MacMillan, Ministry file lead, Extended Producer Responsibility Section

British Columbia
Extended Producer Responsibility Plan
for Consumer Batteries

Originally Submitted: 2015

Resubmitted: November 2018

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

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Glossary

Alkaline /Carbon Zinc	A type of primary battery (e.g. AA or AAA, C, D, 9V, and button batteries).
Collection Target	Projected quantity of batteries to be collected on an annual basis.
Consumer Batteries	Rechargeable and primary batteries weighing less than 5 kilograms each.
Damaged or Defective Batteries	Lithium batteries that are not intact or are physically damaged.
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 collect 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 consumer battery collection and recycling program in British Columbia (BC) under an approved Extended Producer Responsibility (EPR) plan. In the province of BC, the Recycling Regulation sets out the requirements for EPR, including the requirement for producers to participate under an EPR plan.

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

2. Duty of Producer

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

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

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

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

3. Appointment of a Stewardship Agency

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

Call2Recycle's EPR plan is specific to consumer batteries that are sold as stand-alone items or sold for replacement purposes – this also includes 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/. Members represent the majority of obligated battery producers in the province.

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

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 September 2018, the Board of Directors is comprised of representatives from Call2Recycle, Inc, Costco Wholesale Canada Ltd., Familiprix, s, London Drugs Ltd., Lowe’s Canada, Panasonic Canada Inc., Spectrum Brands, Velazquez Consulting Inc., and three (4) independent directors.

Board members as of September 2018

Board Member	Organization
Norman Clubb	Independent, Board Chair
Bernard Gervais	Familiprix
Jules Foisy Lapointe	Lowe's Canada
Jeff Haltrecht	Spectrum Brands
David Houston	Panasonic Canada Inc.
Douglas Jure	Douglas Jure and Associates
Katherine Larocque	Costco Wholesale Canada
Maury McCausland	London Drugs
Alan Moyer	Independent
Carl Smith	Call2Recycle, Inc.
Saquib Vali	Independent
Harriet Velazquez	Velazquez Consulting Inc.

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 (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.

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

Performance Monitoring and Reporting Commitments

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

4. Products Covered under the EPR Plan

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

Accepted Products:

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

Excluded Products

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

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

These programs include:

- BC AlarmRecycle

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

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

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

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

Orphaned/Free Rider Batteries

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

5. Stakeholder Consultation

Consultation Undertaken Prior to EPR Plan Submission

The draft EPR plan and notice of consultation were posted to Call2Recycle’s website (www.call2recycle.ca/bcplanrenewal) on May 22, 2018 and allowed for a 45 days consultation period ending on July 6th, 2018.

Call2Recycle held two (2) consultation sessions via webinar on June 13 and June 26, 2018 with a total of 52 people joining the sessions. The consultation process engaged a cross-section of stakeholders ranging from producers/industry, collection facilities, processor, members, government (local, provincial, and federal), associations, and other EPR programs. All consultation materials, including a recording of the webinar, were made available on Call2Recycle’s website at www.call2recycle.ca/bcplanrenewal. The content of the webinar mirrored the layout and contents provided in this EPR plan renewal document and a summary or all performance measures was shared.

Notice of the consultation and webinars were distributed through the following channels which targeted key stakeholders:

- Notification to registered Call2Recycle collection facilities in BC.
- Notification to BC members/stewards.
- Notification to rechargeable battery stewards who participate under the North America Licensing Agreement.
- Notification via Call2Recycle newsletter to subscribers.
- Notification to Retail Council of Canada members (distributed via RCC).
- Two (2) notifications distributed by Recycling Council of BC (RCBC) .
- Notification of consultation was posted on the RCBC website.
- Distribution of the notice of consultation via the Coast Waste Management Association newsletter.

- Distribution of notice of consultation distributed to all members of the BC Product Stewardship Council.
- Individual email notification to other identified key stakeholders.

During the consultation webinar, 30 minutes was allotted for the presentation and 30 minutes was allotted for questions. During the two (2) webinars over 20 questions were posed (see [Appendix A](#) for summary). Any questions that were not answered during the webinar were responded to by email. Written submissions were also responded to in writing and a summary of comments is also included in [Appendix A](#).

Ongoing stakeholder consultation

Over the course of the plan period, Call2Recycle will continue to engage with stakeholders. Call2Recycle initiates a satisfaction survey which is distributed to program participants and key stakeholders. The intent of the survey is to identify what participants like about the program and to identify areas of improvement. The information gleaned is used improve the program. Call2Recycle will also work with stakeholders when it reviews compensation to qualifying collection facilities.

6. Collection System and Consumer Accessibility

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

Call2Recycle offers reimbursement to public facing collection facilities, such as municipalities or depots, that collect in bulk quantities. A bulk quantity is defined as a shipment of more than 250 kilograms of batteries (approximately the weight of one full drum) contained in drums or Call2Recycle boxes consolidated on a pallet. Qualifying collection facilities must enter into an agreement with Call2Recycle to receive reimbursements to cover costs associated with labour and, in the case of drums, the purchase of the drum⁴. Call2Recycle also covers the cost of transportation.

Prior to 2014, the reimbursement program was limited to one (1) collection facility per municipality. During the 2014 consultation of Call2Recycle's draft plan, stakeholders expressed that this reimbursement policy should be revised. Following consultation, Call2Recycle expanded the qualification to any public collection facility, such as municipalities and depots, that could collect a prerequisite volume. At that time, the reimbursement amount was also adjusted. Call2Recycle continuously reviews its policies and the reimbursement rate will be reviewed in the future.

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

⁴ Drum costs are based on a provincial average and has been included in the compensation formula.

of the province where bulk collection may not be possible because of population density. The box program also benefits collection facilities that generate used batteries during daily activities. Many collectors have realized cost-savings, such as the benefits of onsite pick up offered by Call2Recycle which eliminates the need for employees to take time out of their day to drop off batteries at a public collection facility.

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

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

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

Collection System

Call2Recycle Canada has a vast network of drop-off facilities across the province, which enables consumers to deposit their used batteries at locations convenient to them. The program uses a qualification process for collection facilities to maximize battery returns.

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 and not eligible for reimbursement, they are a significant purchaser of consumer batteries and collector of used consumer batteries in BC.

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

- 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 collection results of all regional districts to identify underperforming collections 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 seeks opportunities to collect.

Product Pathways Not Directly Managed by the EPR Program

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

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

Performance Monitoring and Reporting Commitments

Collection Targets and Recovery Rates

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

- 1) Multiple programs: batteries (with or without its host product) are managed by multiple programs.
- 2) Weight of battery: certain battery chemistries sold into the market declines year over year - Heavier battery chemistries, such as nickel cadmium, are being replaced by lighter lithium ion batteries. This will have implications on the overall battery weight sold into the market.
- 3) Life of a battery: Battery life is increasing which reduces the need to replace batteries as frequently.
- 4) Type of battery: Products that currently require primary batteries may be replaced by those that run on rechargeable batteries.
- 5) Purchase habits: Batteries are generally purchased in large or multiple quantities and have a multi-year shelf life. There is generally not an immediate 1:1 relationship between battery purchase and usage.

- 6) Hoarding issues: Consumers may keep spent batteries for a long time before they recycle them. Since consumer-type batteries are typically small, they can easily be stored at home, thus consumers have no immediate urge to recycle them.

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

Recovery Rate to 2022

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

Recovery rate can be difficult to project. The denominator used in determining total weight sold in BC is based on reported fee per unit sales from Call2Recycle members. Call2Recycle introduced Environmental Handling Fees (EHFs) on primary batteries on Feb 1, 2017. While members now represent the majority of the market, the ramp up time to bring producers on board impacted the reported sales in 2017. As of January 2019, EHFs will be applicable for stand-alone rechargeable batteries in BC. Should the data change significantly, thus impacting the recovery rate, Call2Recycle will notify the Ministry in writing.

Call2Recycle has followed a similar recovery rate model as set out in Europe where the European Union Battery Directive (2006/66/EC)⁵ for member states calls for a 45 percent (%) 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 percent (%) by the end of 2020, which will mark 10 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 states⁶ under the European Union Battery Directive. At this time in BC, batteries removed from WEEE is not counted toward Call2Recycle’s recovery rate for consumer batteries.

Collection Accessibility

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

An active collection facility 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

⁵ 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>

⁶ 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>

calendar year; or, has ordered a replacement box within the calendar year. Call2Recycle has registered facilities that may ship on an infrequent basis and may not be considered active given the definition of an active collection facility.

Call2Recycle's 2010 plan called for 2000 private and public collection facilities by 2014. The Regulation speaks to public accessibility and therefore it is a more meaningful metric to report on public collection facilities as a target. Call2Recycle commits to maintain a minimum of 600 collection facilities⁷ throughout the province which aligns to an accessibility target of 95% of British Columbians residing within 15 kilometers of an active public collection facility. The program continually seeks new way to collect batteries and if will work with the Ministry to update this target in the event of changes to program delivery.

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

Summary of 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 percent accessibility rate.
- A minimum of 600 public collection facilities.
- Recovery Rate -Total weight (kilograms) collected in BC during each calendar year divided by the total weight sold in the province and expressed as a percentage (see page 11 for target commitment)

Reporting Commitments:

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

- Number of active collection facilities in the province by sector.
- Number of active public and private collection facilities.
- Number of collection facilities in each regional district.
- Total kilograms collected in each regional district.
- Total weight collected per capita by regional district.
- Location of collection facilities.
- Changes in number of collection facilities from previous report.

⁷ 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 (see page 11 for definition). 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.

- Total kilograms of consumer batteries sold into BC during a calendar year.
- Result of the SABC facilitated waste composition audit with respect to consumer 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

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

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

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

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

Recycling Incidences in British Columbia

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

Call2Recycle also participates in the SABC consumer awareness survey; however, for the purpose of the annual report to the Director, the results from Call2Recycle’s initiated study will be used. Call2Recycle is committed to continued education and awareness initiatives to ensure that British Columbians

understand the value of recycling batteries and are inspired to do so. Call2Recycle will implement a suite of new and recurring promotion and education initiatives to achieve the following:

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

Target Audiences will include:

A. British Columbia Residents:

- Consumers
- Businesses

B. Collection Network:

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

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

Initiatives include:

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

Performance Monitoring and Reporting Commitments

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

Performance Targets:

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

Reporting commitments:

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

8. Management of Program Costs

On February 1, 2017, Call2Recycle implemented a new funding model. 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 themselves are set through a budgeting process and then reviewed and approved by the Call2Recycle Canada, Inc. Board of Directors. Based on the number of units of batteries sold into BC, members report quantities at pre-set periods using an online system. Call2Recycle will continue to keep the Ministry apprised of any upcoming changes pertaining to the Schedule of EHFs.

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

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

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

Performance Monitoring and Reporting Commitments

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

9. Management of Environmental Impacts

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

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

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

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

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

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

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

Call2Recycle regularly monitors the landscape to keep abreast of the activities, regulations, and new capabilities within processing facilities both locally and nationally, if available. The program also

commits to regularly reviewing processors to ensure that they can demonstrate an ability to adapt to Call2Recycle’s program growth and volume increases in recyclable materials.

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

Performance Monitoring and Reporting Commitments

Performance Targets:

Recycling Efficiency Rate

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

Reporting Commitments:

In the annual report to the Director, Call2Recycle will report on product end fate as per the requirements of the non-financial assurance including program specific definitions and program applicable criteria.

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 Measure	Annual Targets														
<p>Recovery Rate</p> <ul style="list-style-type: none"> Calculated by total weight collected in each calendar year divided by the total weight sold in the calendar year and expressed as a percentage <table border="1"> <thead> <tr> <th>Year</th> <th>2018</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>Recovery Rate expressed as a %</td> <td>40%</td> <td>42%</td> <td>45%</td> <td>47%</td> <td>50%</td> </tr> </tbody> </table>	Year	2018	2019	2020	2021	2022	Recovery Rate expressed as a %	40%	42%	45%	47%	50%			
Year	2018	2019	2020	2021	2022										
Recovery Rate expressed as a %	40%	42%	45%	47%	50%										
<p>Accessibility</p> <ul style="list-style-type: none"> Accessibility rate using Call2Recycle’s accessibility metric of percentage (%) of the population residing within 15 kilometers of a public collection facility. Call2Recycle commits to maintain a minimum of a 95 percent accessibility rate. 															
<p>Consumer Awareness</p> <ul style="list-style-type: none"> Maintain an awareness level of 87 percent or higher. The percentage of British Columbians who recycled consumer batteries with a commitment to increase by one (1) percent each year until 2022. <table border="1"> <thead> <tr> <th></th> <th>2018</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>% of British Columbians who recycled batteries in a calendar year</td> <td>49%</td> <td>50%</td> <td>51%</td> <td>52%</td> <td>53%</td> </tr> </tbody> </table>		2018	2019	2020	2021	2022	% of British Columbians who recycled batteries in a calendar year	49%	50%	51%	52%	53%			
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Reporting Commitments	Description
Agency Governance	<ul style="list-style-type: none"> Any changes in Call2Recycle’s structure and governance from one year to the next will be disclosed in the annual report.
Collection System and Consumer Accessibility	<ul style="list-style-type: none"> Number of active collection facilities in the province by sector. Number of active public and private collection facilities. Number of collection facilities in each regional district. Total kilograms collected in each regional district. Total weight collected per capita by regional district. Location of collection facilities. Changes in number of collection facilities from previous report. Total kilograms of consumer batteries sold into BC during a calendar year. Result of the SABC facilitated waste composition audit with respect to consumer batteries. Dates, location, and results of collection events (if applicable).
Consumer Awareness	<ul style="list-style-type: none"> The number and type of promotion and education activities within the calendar year. Number of website hits to the BC page. Number of BC searches on the Call2Recycle web-based collection facility locator.
Management of Program Costs	<ul style="list-style-type: none"> Independently audited financial statements will be produced annually and available in the provincial annual report. These statements will detail revenues and expenditures for fees collected from the sales of batteries in the calendar year.
Management of Environmental Impacts:	<ul style="list-style-type: none"> Product Ends Fate

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

Appendix A: Consultation Summary

The following stakeholder groups were consulted during the stewardship planning process:

- Producers/Industry
- Governments (local, provincial, and federal agencies)
- Service Providers
- Collection Facilities/Program Participant
- Associations
- Stewardship Agencies

Retail Council of Canada (RCC), as a representative of the retail industry, submitted a letter of support for Call2Recycle’s EPR Plan. Within the letter, RCC acknowledges the significant progress Call2Recycle has made in the areas of building strong Canadian-based governance, introduction of a new funding model and environmental outcomes. The letter is supportive of Call2Recycle’s approach to recovery rate and willingness to review the rate of reimbursement to collectors. With respect to the recovery rate, RCC is supportive of a realistic recovery rate and Call2Recycle’s commitment to continuous improvement. The letter concludes with a recommendation to the Government to approve the EPR plan following stakeholder consultation and any consequential amendments,

Questions and comments received during the consultation period generally centered around point of clarification. There were no issues raised regarding the overall merit of the plan. A summary of questions and comments during the consultation periods along with Call2Recycle’s responses are included below and on the following pages.

Public Consultations - Webinars	
Question	Call2Recycle’s Response
<p>Question from Local Government: For a collection site, what does it mean when you say that you are no longer accepting batteries that are sold with or in a product? If a battery is brought in separately from a product, can we assume it was stand-alone or a replacement?</p>	<p>If a device is brought in and includes the battery, we ask that the battery is not removed from the device and sent to our program for recycling. If a battery is brought in and is independent of a device, the discretion of the collection facility to determine whether it is a stand-alone battery</p>
<p>Question from Local Government: Can you provide more information on the methodology you used to determine the compensation rate \$/kg for collection sites?</p>	<p>To determine the compensation rate for qualifying bulk collectors, we first looked at the rates for those who opt to purchase their own drums. We took an average cost for of the purchase of a drum and an estimate of labour associated the preparation of the batteries for shipment. For collection facilities that use Call2Recycle boxes for bulk shipping, we used the same estimate of labour associated the preparation of the batteries for shipment. Call2Recycle boxes for bulk collection are provided to collection facilities at no cost.</p>

Question	Call2Recycle's Response
<p>Question from Local Government: Call2Recycle has spent a lot of time and effort to meet the shipping requirements for these materials. Is there an increased risk in leaving batteries in products during shipping in mega bags, would they be safer if removed and put in your boxes?</p>	<p>The risks associated with batteries in devices must be handled by the program that manages the devices. Please do not remove batteries from devices managed by other program and send them to Call2Recycle for recycling.</p>
<p>Question from a Collection Facility: There is new lining in the boxes. How does this affect the Transport Canada regulations and worries about lithium battery transport?</p>	<p>The flame-retardant box liner does not impact our permits from Transport Canada. Terminal protection guideline for lithium chemistries, small sealed lead acid, and alkaline 12 V an over must still be followed. The flame-retardant box liner does not replace the requirement for terminal protection but is an additional level of defense should a thermal event occur during the battery recycling journey.</p>
<p>Question from a Collection Facility: As I understand it, the program will no longer be responsible for cellphones. Is this correct, and if so, what happens if you still receive cellphones in your boxes?</p>	<p>Subject to plan approval, Call2Recycle's program will no longer serve as an EPR program for cellphones. Therefore, cellphones will not be within the scope of covered products moving forward. If cellphones do enter Call2Recycle's stream, to reduce consumer confusion, Call2Recycle will continue to handle the cellphones through a Call2Recycle approved processor.</p>
<p>Question from Local Government: What is your current recovery rate?</p>	<p>Around 40%</p>
<p>Question from Local Government: How long has Call2Recycle been doing consumer awareness surveys?</p>	<p>We've been doing consumer awareness studies since 2010, however, in 2015 we began conducting the surveys annually.</p>
<p>Question from Local Government: What happens to the batteries?</p>	<p>Contracted sorters, and for BC collections the sorter is Retrieval Technologies in Trail, receive the batteries at their warehouses, record details about the weight and battery types of the shipment, then separate the batteries by chemistry. Depending on battery type and chemistry, batteries either remain at the sorter for processing or are sent to the appropriate processor.</p> <p>Processors extract useable chemicals and metals to be used in the manufacture of new products. Waste products are responsibly and safely disposed of according to industry and regulatory standards</p>

Question	Call2Recycle's Response
<p>Question from a Collection Facility: Do I have to do anything to batteries before recycling them?</p>	<p>It depends on the battery. Transportation Canada safety regulations require that the terminals of certain battery types must be protected to prevent contact with each other, as this can cause sparks and lead to a fire. Before depositing any lithium batteries, small sealed lead acid or alkaline batteries that are 12V or more, or batteries you are unsure of, make sure they are placed in a clear, sealed bag or taped terminals with duct tape, electrical tape or another non-conductive tape. Ensure to keep the battery chemistry visible if you tape it.</p>
<p>Question from a Collection Facility: How should damaged batteries be packed for shipment?</p>	<p>The first thing to do if you receive a damaged or defective lithium ion battery is to place it in a non-flammable material such as sand or kitty litter. If the battery was returned independent of a device, please call Call2Recycle' customer service to request a free specialized kit. Damaged and defective lithium batteries cannot be placed in a regular Call2Recycle receptacle.</p>
<p>Question from a Collection Facility: How should the button batteries be packaged for shipment?</p>	<p>Button cells that are lithium require special packaging. If you are unsure of the chemistry, it is always best to terminally protect all button cells. The best way to terminally protect multiple button cells is to:</p> <ol style="list-style-type: none"> 1. Lay down a piece of clear packing tape, sticky side up. 2. Place the button batteries on the tape with space between each battery. 3. Cover with a second layer of clear tape.
<p>Question from a Producer/Industry: How are you able to determine the percentage of batteries that are recovered? Is this based on sales from original importers (Duracell, Panasonic etc.). If you are able to determine the incoming #'s into the country, why are the fees not levied at origin?</p>	<p>Recovery rate is determined based on the total weight collected by the program divided by total weight sold into the market by Call2Recycle members in a calendar year. Using Environmental Handling Fees is the best and most accurate way of determining actual sales into the province in a year and therefore we have changed our funding mechanism to reflect this. Previously, the weight sold into the province was based on estimates which is less accurate.</p>

Question	Call2Recycle's Response
Question from a Service Provider: What are the current collection targets as set by the BC MOE? Are they different from your proposed targets?	Call2Recycle works with the Ministry to establish appropriate target.
Question from Local Government: There appears to be growing concerns about Li-Ion batteries, especially commingled with other materials. Is Call2Recycle intending to ask collectors to segregate Li-Ion batteries in the future?	At this point, there is no requirement to segregate batteries. Call2Recycle does require that Transport Canada guideline are followed with respect to terminal protection of certain battery chemistries, including lithium ion.
Question from a Collection Facility: How is Call2Recycle going to satisfy the government's guidance on fees and dispute resolution?	Call2Recycle's EPR plan has followed the requirements as laid out in the guidance document on producers paying costs and dispute resolution.
Question from a Collection Facility: Is Call2Recycle considering giving collectors higher handling fees to increase recovery fees, as they're doing in Ontario?	Reimbursement to qualifying collectors will be reviewed in the coming years.
Question from a Producers/Industry: Will we still be paying licensing fees to Call2Recycle (US) for batteries sold in/with products?	When Environmental Handling Fees (EHF) are introduced on rechargeable batteries, stewards under the North American Rechargeable Licensee Agreement will no longer have to pay for rechargeable batteries sold in BC as per the agreement. If the steward is an obligated producer under the BC Recycling Regulation, the steward will have the option to join Call2Recycle Canada as a member and remit EHF's. Producers also have the option to submit their own EPR plan to the Ministry
Question from a Collection Facility: Is it possible to set up collection in my 164 unit condominium building?	It may be possible if the location meets our qualification requirements. The best way is to apply to be a collection facility by following this link: https://www.call2recycle.ca/become-a-collection-partner/
Question from a Collection Facility: You mentioned "recyclepedia." Is there such a thing?	Yes, this is managed by the Recycling Council of British Columbia. The Recyclepedia allows British Columbian to search for locations where they can drop off certain materials. You can find the Recyclepedia at https://www.rcbc.ca/
Question from a Collection Facility: Are the recovery rate targets based on just public-facing collection locations? And if so, are there targets or data on private, internal collection sites?	Recovery rates are based on all collection facilities – both public and private. Accessibility targets are based on public collection facilities only.

Question	Call2Recycle's Response
<p>Question from a Collection Facility: I have 45-gallon drums filled with cell phones that are ready to ship. Are you saying I can't ship these now?</p>	<p>Call2Recycle is still operating under our 2010 plan until this plan is approved. Therefore, Call2Recycle is still responsible for cellphones until the plan is approved. You may continue to send cellphones to Call2Recycle at this time.</p>
<p>Question from a Collection Facility: Can I find poster for awareness on your website? We are picking the batteries for a third party and we can educate them as well as our staff</p>	<p>You can find a variety of information and posters on our website. Here is the link where the information is available here: https://www.call2recycle.ca/collection-site-support-centre/</p>

Public Consultations – Written Feedback	
Question	Call2Recycle's Response
<p>Question from Local Government: Collection System and Consumer Accessibility, Page 7. As battery technology evolves, and risks of collecting batteries are better understood, Call2Recycle's approach of reimbursing municipal depot collectors must also evolve to acknowledge changes in collection practices. For example, if Call2Recycle determines that it is preferable to collect Li-Ion batteries in segregated manner, the payment to local government collectors must recognize, and compensate, for changes in collection.</p>	<p>As indicated on page 7 of the Draft EPR Plan and during the webinar, Call2Recycle plans to review compensation to all qualifying collectors under our reimbursement agreement over the coming years. At this point in time, there is no requirement to separate any batteries; however, should this change, Call2Recycle will consider the additional labour required within its compensation methodology.</p>
<p>Question from Local Government: Product Pathways Not Directly Managed by the EPR Program, Page 9. Although the Call2Recycle program has achieved significant gains in performance over the past few years, household batteries continue to be found in Metro Vancouver's waste composition studies. The program is encouraged to continue to build on recent performance improvements to divert batteries from the garbage.</p>	<p>As part of continuous improvement, the program will continue to seek alternate ways to collect batteries to ultimately minimize batteries from entering the waste stream. Call2Recycle will also continue to increase program awareness with the intent to improve consumer recycling behaviour.</p>
<p>Question from Local Government: Collection Target and Recovery Rates, Page 10. Has Call2Recycle considered an absolute tonnage target, instead of a recovery rate? This may help indicate true performance, which acknowledges the challenges identified in the plan.</p>	<p>In working with the Ministry, at this time, it has been determined that a recovery rate would be the preferred performance target. Call2Recycle may look at an absolute tonnage target in the future.</p>

Public Consultations – Written Feedback – Comments for all EPR programs	
Question	Call2Recycle’s Response
<p>Question from Local Government: Data Collection. Formalize the collection of data, including product pathways that are not directly managed by the stewardship program.</p>	<p>The issue is complex especially with multiple programs responsible for consumer batteries when sold in or with devices. Call2Recycle continues to seek better ways to understand product pathways that are not managed by our program.</p>
<p>Question from Local Government: Options for Local Government. All EPR programs should develop arrangements for local governments who receive, or pick-up illegally dumped material, to be paid for managing and handling this material, whether or not the facility is designated as a depot. Local governments, generally, do not seek to compete with private depot operators, yet still receive this material from residents and businesses. (Stewardship Agencies of BC members should consider a study to find out the root causes for people who dump illegally, who bring materials to transfer stations even when there are permanent depots available, prefer ‘round-up’ events to permanent depot locations, and ‘hide’ banned materials in residential loads. Such a study is recommended to include possible solutions to address these issues, such as enhanced collection models that go beyond the drop-off approach (depot model), and illegal dumping cost recovery models for local government, similar to the program implemented by producers in California.)</p>	<p>As the comment demonstrates, this topic may require many programs to work together on a common position. If not already done so, I would encourage Metro Vancouver to raise this issue in writing with SABC for consideration.</p>