



# Call2Recycle Canada, Inc. **BC E-Transport Program 2024 Annual Report**

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**Submitted to:** Director, Extended Producer Responsibility  
Ministry of Environment and Parks of  
British Columbia

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# 1. Executive Summary

On July 15, 2024, Call2Recycle Canada's British Columbia Extended Producer Responsibility (EPR) Plan for e-Transport Products was approved by the Ministry of Environment and Climate Change Strategy (see the approval letter and the Program Plan [here](#)). Under this EPR plan, Call2Recycle collects and recycles e-transport products sold in BC on behalf of corporate stewards. These e-transport producers appoint Call2Recycle as their EPR agency to meet their regulatory obligation and ensure their e-transport products are recycled responsibly at the end of their useful life. For a complete list of Call2Recycle program members in BC, please see [Appendix 2](#).

Call2Recycle will annually report on its e-transport recycling program performance in BC from January 1 to December 31. Given the mid-year launch of the program in 2024, this inaugural report covers activities from July 15, 2024, to December 31, 2024, only and focuses on Call2Recycle's extensive work to establish the e-transport collection program across the province and set the stage for further collections in 2025. The BC e-transport program offers a fully operational direct pick-up service, complemented by an integrated network of sorters and processors to effectively dismantle and recycle e-Transport products in the province. The program is encouraging e-Transport product users to recycle their used products through extensive public education and awareness campaigns.

All data in this annual report has been subject to a third-party audit of non-financial information. It has been reviewed by the independent audit firm BDO Canada and verified as fairly stated according to the audit criteria. Please see [Appendix 7](#) for the complete auditor's reports.

# 2. Program Outline

Since 2010, Call2Recycle Canada, Inc. has operated a successful regulated household battery collection and recycling program in British Columbia (BC) under an approved Extended Producer Responsibility (EPR) plan. In 2024, the collection program was rebranded as *Recycle Your Batteries, Canada!*.

To complement and expand on its mission to recycle as many types of batteries as possible in full compliance with BC's environmental and recycling regulations, Call2Recycle designed and submitted a dedicated program plan to oversee the end-of-life processing of e-transport batteries and products in the province. On July 15, 2024, Call2Recycle Canada's **BC Extended Producer Responsibility Plan for e-Transport products** was approved by the Ministry of Environment and Climate Change Strategy.

Under British Columbia's Recycling Regulation and the approved EPR plan, Call2Recycle collects and recycles e-transport products in BC on behalf of corporate stewards. E-transport producers appoint Call2Recycle as their EPR agency to fulfill their regulatory obligations, ensuring that e-transport products are responsibly recycled at the end of their useful life.

In compliance with the Regulation, Call2Recycle's BC e-Transport program manages the collection and recycling of entire e-transport products, including the batteries that power them, on behalf of producers obligated in British Columbia. Accepted products include e-bikes and their components (such as batteries, seats, handlebars, pedals, dropper posts, tires, rims, etc.), e-scooters, e-skateboards, hoverboards, and emerging e-transport products. The program covers products purchased by individuals as well as those used in e-transport share programs or businesses.

To meet its e-transport collection and recycling targets, Call2Recycle leverages its existing infrastructure, local employees, partners, suppliers and strong industry relationships. Thanks to this robust network, consumers can conveniently recycle their end-of-life e-transport products safely and in compliance with regulations. As the program grows, consumers will be able to either drop off their e-transport products at designated collection facilities or request direct pick-up services through the Call2Recycle website.

In order to operate an efficient and responsive recycling service, Call2Recycle has implemented a direct pick-up service model, allowing e-transport consumers across British Columbia to request a convenient pick-up for their used e-transport product, to be then disassembled and processed downstream.

To ensure materials are sourced from Call2Recycle members, consumers requesting a direct pick-up must submit an online request and identify the e-transport brand before the request can be processed. Only products from qualifying brands are eligible for pick up; a complete list is available in [Appendix 3](#). Call2Recycle commits to fulfilling 100% of eligible pick-up requests within 10 business days.

The BC e-transport program is funded by an Environmental Handling Fee applied to each e-transport product sold in the British Columbia market. These funds support the costs of collection, transportation and recycling, as well as the development of training and e-transport consumer communication materials related to the program.

### 3. Regulatory Framework and Reporting

In British Columbia, sporting equipment with electrical or electronic components is regulated under the [Recycling Regulation Schedule 3, 2 \(1\)\(g\)](#). As of 2022, this regulation has been enforced to require producers of e-transport products to establish a program to ensure such products are entirely responsibly recycled at the end of useful life.

Representing e-transport producers, the BC e-Transport program includes obligated electric bicycle (e-bike) manufacturers, brand-owners, first importers, and retailers in British Columbia. These obligated producers have appointed Call2Recycle as their designated EPR program through a formal membership agreement that outlines how Call2Recycle will manage their obligations under the regulation.

Call2Recycle is incorporated under the Canada Not-for-Profit Corporation Act and B.C. Societies Act and is governed by a Board of Directors comprising producers currently selling e-

bikes in BC, retailers and independent representatives from multiple sectors. A list of Call2Recycle's Board of Directors can be found in [Appendix 1](#).

In addition to a detailed website that provides information on Call2Recycle's board, its members and operational support, Call2Recycle distributes member-specific newsletters at least twice a year to provide relevant program updates and notifications and hosts an annual general meeting in June of each year. The newsletters provide financial information, collection results, marketing activities and more. Financial reports are available to members in the corporate annual report and the BC annual report to the Director, Extended Producer Responsibility, Program Delivery at the Ministry of Environment and Climate Change Strategy.

## 4. Public Education and Awareness

For over two decades, Call2Recycle has been a leader in raising awareness and driving action on household battery recycling across Canada. Building on that legacy and drawing on its strong partnerships in the EV and retail sectors, the organization is expanding its efforts to promote e-transport battery recycling. Its comprehensive strategy will combine traditional and online media, including print and online campaigns, website content, targeted online advertising, search engine optimization, social media engagement, sponsorships, point-of-sale signage and proactive media outreach.

In 2024, Call2Recycle firmed up the foundation of the BC e-Transport program by [enhancing the content](#) on its corporate [Call2Recycle website](#) and by adding [new e-Transport content](#) to the consumer-focused, [Recycle Your Batteries, Canada!](#) website. The Call2Recycle website provides e-bike manufacturers with easy access to the information they need to sign up as members, while the *Recycle Your Batteries, Canada!* website enables consumers to easily find the [online form](#) to arrange convenient pick-up. The program is prominently advertised as a distinct offering on the front page of the consumer website where it also benefits from significant overflow traffic. In 2024, the *Recycle Your Batteries, Canada!* website (in English) attracted more than 340,000 visitors across Canada.

Building on this foundation, in late 2024, Call2Recycle launched a targeted e-Transport digital campaign featuring both static and [video](#) content, complemented by a strategic outdoor advertising campaign. The digital campaign targeted specifically e-bike users and delivered 410,000 impressions, garnering 3,550 visits to the consumer web page.

The Vancouver-based outdoor campaign reached a broad audience and achieved an estimated 2.8 million impressions. (See [Appendix 9](#) for images from the consumer campaign).

### Market Research

As part of its program plan, Call2Recycle has committed to supporting the recycling of e-Transport products in British Columbia and the evolution of consumers' awareness of e-Transport product recycling, with findings from the market research to be included in the program's annual reports.

Accordingly, Call2Recycle engaged the research firm Leger to perform a survey on British Columbia residents and establish a baseline for consumers' awareness and behaviours related to e-transport recycling.<sup>1</sup> One in seven survey participants (16%) owned an e-transport device (e.g. e-bike, e-scooter, e-skateboard or hoverboard) and roughly one in 20 had disposed of an e-transport product in the previous 12 months; more than half (55%) used an environmental service to do so.

Just over half of the survey respondents believe that it is safe to recycle lithium-ion batteries (54%), and that they know how to store (52%) and dispose of (56%) used lithium batteries. A similar proportion (55%) believe that e-bike batteries can be recycled in their entirety. When asked where they can safely recycle used lithium-ion batteries, 51% cited a municipal recycling centre, 48% said a recycling/bottle depot and 17% cited a local retailer. Slightly fewer than half (46%) believed entire e-transport products and their batteries could be recycled at a municipal recycling centre.

Some aspects of battery safety awareness among residents are higher, with 78% knowing that used lithium-ion batteries should never be placed in the trash or recycling bin and 66% aware that one should never charge a battery or device under a pillow, on a bed, or near a couch. Half of the respondents (48%) knew that e-bike accessories (including the charger) should never be mixed-and-matched, and 34% knew that e-transport products should never be charged near the primary entrance or exit to a home or office.

Call2Recycle is committed to leveraging the insights from its research to boost e-transport recycling awareness in 2025, encourage e-transport users to recycle responsibly, and support the growth of the BC e-Transport program.

## 5. Collection System and Facilities

The BC e-Transport program's collection system operates through a pick-up system from battery owners' residences. British Columbian consumers can recycle their e-transport product by requesting an [e-transport Direct Pick-Up](#) from Call2Recycle.

As the program continues expanding in 2025 and beyond, consumers will also be able to drop off their e-transport product at a network of designated e-transport collection facilities, including independent bicycle retailers.

Call2Recycle's province-wide network of collection facilities will offer consumers in high-density areas convenient access to drop-off locations for used e-transport products. To ensure optimal performance, each facility must meet Call2Recycle's established qualification criteria. The program is designed to track collected products, by type, through both direct pick-up and facility

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<sup>1</sup> The survey was conducted online with a panel of 1,001 B.C. residents between January 21 and 24, 2025. No margin of error can be associated with this web panel (a non-probability sample), however for comparative purposes, a probability sample of 1,001 respondents would have a margin of error of  $\pm 3.1\%$ , 19 times out of 20.

drop-off channels. Regular reviews of the collection results of all regional districts will identify under-serviced areas and underperforming collection facilities.

Call2Recycle will leverage its strong relationships across industry, waste management and municipalities to host collection events in strategic locations to maximize collections and convenience.

## 6. Product Environmental Impact Reduction

Call2Recycle must abide by the Pollution Prevention Hierarchy (PPH) as required by British Columbia's Recycling Regulation. Call2Recycle's direct pick-up service is the optimal collection method for this program to do so. It streamlines the transportation process by minimizing the number of intermediary steps between the consumer and the processor. Call2Recycle maintains a diverse group of approved downstream vendors or third-party logistics providers used for the transportation, dismantling, and processing of e-transport products. All contracted service providers will be vetted according to ISO 9001 and will be subject to an annual auditing process. See [Appendix 4](#) for details of the e-transport physical flow map and [Appendix 5](#) for a full list of downstream vendors.

As leader of the program, Call2Recycle specifies the program material flow for all downstream vendors through to end-of-life, including not exporting to developing countries or sending materials to local landfills. A robust information system tracks material as it moves through the downstream vendor network. These safeguards reflect our commitment to the proper downstream management of e-transport products.

## 7. Pollution Prevention Hierarchy and Product/Component Management

The BC e-transport program is designed to offer a fully environmentally friendly service and minimize its footprint. To this end, all operations follow a strict Pollution Prevention Hierarchy (PPH) process in order to identify and reduce pollution in all collection, transportation, and processing aspects of the program. The BC e-Transport program's PPH is presented in detail in Appendix 5 of this report.

E-transport products collected through the Call2Recycle program are managed under the following certifications:

- ISO 9001 – Quality Management System Standard
- ISO 14001 – Environmental Management Systems Standard
- ISO 45001 – Occupational Health and Safety Management System Standard

Although Call2Recycle is the only organization of its kind certified to four standards of excellence, including the Responsible Recycling (R2) Standard, this standard currently does not cover e-bikes and other e-transport products.

## 8. Product Sold/Collected

The following volumes of e-transport units were reported to have been sold in British Columbia in 2024 by the members of the Call2Recycle BC e-Transport program. As Call2Recycle’s efforts from July 15, 2024, to December 31, 2024, focused primarily on the further development and successful implementation of the program and supporting promotion, collection volumes will be included starting in the 2025 annual report and forward.

It is important to highlight the lifecycle of e-Transport products. These products, including e-bikes, have an average lifecycle of at least five years. As the sales and use of e-Transport devices has only recently increased in British Columbia and across Canada, we expect to see rising volumes of devices recycled in the coming years. By launching this program in 2024, Call2Recycle is ready to respond to any early e-Transport recycling requests while offering British Columbia a fully operational and sustainable disposal process for future e-Transport units to be recycled in the province.

### E-Transport Products Sold (number of units)

E-Transport Program	2024
E-bicycles (Entire Bike)	8,744
<b>Total</b>	<b>8,744</b>

## 9. Program Deposits, Refunds, Revenues and Expenditures

Call2Recycle funds the British Columbia e-transport product collection program through environmental handling fees (EHF), a fee applied to each unit sold. EHF’s are determined based on the cost to manage the collection and responsible recycling of each product. The calculation takes into account factors such as labour and handling time, equipment costs, space and storage requirements, and administration, among others. For full details on the management of program costs, please refer to Section 8 of the approved EPR plan.

Call2Recycle continually monitors revenues to ensure the fee structure of its collection and recycling program accurately reflects program costs. Please see [Appendix 7](#) for Call2Recycle’s audited financial statements.

## 10. Program Performance and Monitoring

During the second half of 2024, Call2Recycle concentrated on launching the e-transport collection program by onboarding service providers, establishing processes and related collateral, and promoting the program. In 2025, the program will scale up significantly with future annual reports capturing key performance data and collection metrics.

E-transport products have only recently increased in popularity with the move toward more environmentally friendly modes of transportation. These products are durable with long lifespans. Thus, at this early stage of their market growth, the number of products sold in the province significantly surpasses the number of products available for recycling. Due to the long lifespan of the product category, a target recovery rate is difficult to estimate. Units available for collection are anticipated to increase in subsequent years as products near the end of their useful life.

Call2Recycle has committed to conducting a feasibility study by June 1, 2027 (year three of the approved program plan) on the feasibility of recovery rates for e-transport products and sharing the results with the Ministry. If the findings do not support the feasibility of a recovery rate, Call2Recycle will propose an alternative performance measure or target and begin reporting against it in 2028.

Various factors may influence the recovery rate, such as product lifespan, no standard weight for e-bikes, and consumers reusing components of their old e-bike when purchasing a new one, resulting in a lighter product being returned than the one originally purchased. The recovery rate calculation will need to reflect this unique market.

Call2Recycle will track collection activity by the provincial regions listed below, and regional results will be outlined in this report annually, along with per capita totals and year-over-year comparisons.

Regional Districts	
Alberni-Clayoquot	Kootenay Boundary
Bulkley-Nechako	Mount Waddington
Capital	Nanaimo
Cariboo	North Coast
Central Coast	North Okanagan
Central Kootenay	Northern Rockies
Central Okanagan	Okanagan-Similkameen
Columbia Shuswap	Peace River

Comox Valley	Quathet/Powell River
Cowichan Valley	Squamish-Lillooet
East Kootenay	Stikine Region
Fraser Valley	Strathcona
Fraser-Fort George	Sunshine Coast
Greater/Metro Vancouver	Thompson-Nicola
Kitimat-Stikine	

## Appendix 1: Board of Directors

Below is a list of Call2Recycle Canada, Inc.’s Board of Directors as of December 31, 2024

**David Collie, Chair**, Independent

**Joe Borsellino**, Chateau Manis Electronics Inc.

**Annalise Czerny**, Independent

**Peter Daley**, Dollarama Inc.

**Tammy Giroux**, General Motors of Canada

**Marc Guitor**, Panasonic Canada Inc.

**Raman Johal**, London Drugs Ltd.

**Kevin Rejent**, Energizer Holdings, Inc.

**Paul Neilsen**, Live to Play Sports

**James McPhedran**, Independent

**Alan Moyer**, Independent

**Alma Obeid**, Canadian Tire Corporation

**Tim Reuss**, Canadian Automobile Dealers Association

**Harriet Velazquez**, Velazquez Consulting Inc. (Independent)

**Brian Timmins**, Cassels Brock & Blackwell (Board Secretary)

Call2Recycle keeps an updated list of Board of Directors available at <https://call2recycle.ca/about>

## Appendix 2: Call2Recycle BC e-Transport Program Members

**As of January 1, 2025**

Bike Co LLC (500166)

Cycles Devinci Inc. (192280)

Cycles Lambert Inc./HLC (184662)

EUCAN Distribution Inc. (507616)

Gazelle USA, LLC (510401)

Giant Bicycle Canada Inc. (179460)

Kona Bicycle Company Inc. (500168)

Live to Play Sports Group Inc. (Vancouver) (183920)

Marin Bikes Canada (510339)

Mica Sport Canada Inc. (200133)

Outdoor Gear Canada (165124)

Rad Power Bikes LLC (182051)

Rocky Mountain, Div. of Industries RAD Inc. (Procycle) (192323)

Specialized Bicycle Components Canada (183747)

Trek Bicycle Canada ULC (184586)

Voltage Bikes Ltd. (Pedego Can) (184000)

Yeti Cycling LLC. (511213)

## Appendix 3: Eligible e-Transport Brands

Manufacturer	Brand
Bike Co LLC	<ul style="list-style-type: none"> <li>• FUJI</li> <li>• Breezer</li> </ul>
Cycles Devinci Inc.	<ul style="list-style-type: none"> <li>• Devinci</li> </ul>
Cycles Lambert Inc./HLC	<ul style="list-style-type: none"> <li>• EVO</li> <li>• Yuba</li> <li>• Look</li> </ul>
EuCan Distribution Inc	<ul style="list-style-type: none"> <li>• Cube</li> </ul>
Gazelle USA, LLC	<ul style="list-style-type: none"> <li>• Gazelle</li> <li>• Urban Arrow</li> </ul>
Giant Bicycle Canada Inc.	<ul style="list-style-type: none"> <li>• Giant</li> <li>• Liv</li> <li>• Momentum</li> </ul>
Kona Bicycle Company Inc.	<ul style="list-style-type: none"> <li>• Kona</li> </ul>
Live to Play Sports Group Inc.	<ul style="list-style-type: none"> <li>• Norco branded BMZ</li> <li>• Norco branded Simple</li> <li>• Bosch</li> </ul>
Marin Bikes Canada	<ul style="list-style-type: none"> <li>• Marin</li> </ul>
Mica Sport Canada Inc.	<ul style="list-style-type: none"> <li>• Scott Sports</li> </ul>

Outdoor Gear Canada (OPUS)

- Opus Bikes
- Mondraker

Rocky Mountain Bikes, Div. of Industries RAD Inc.  
(Procycle)

- Rocky Mountain

Specialized Bicycle Components Canada

- Specialized

Trek Bicycle Canada ULC

- Trek-Electra

Velec Inc.

- COMPANO
- Valec

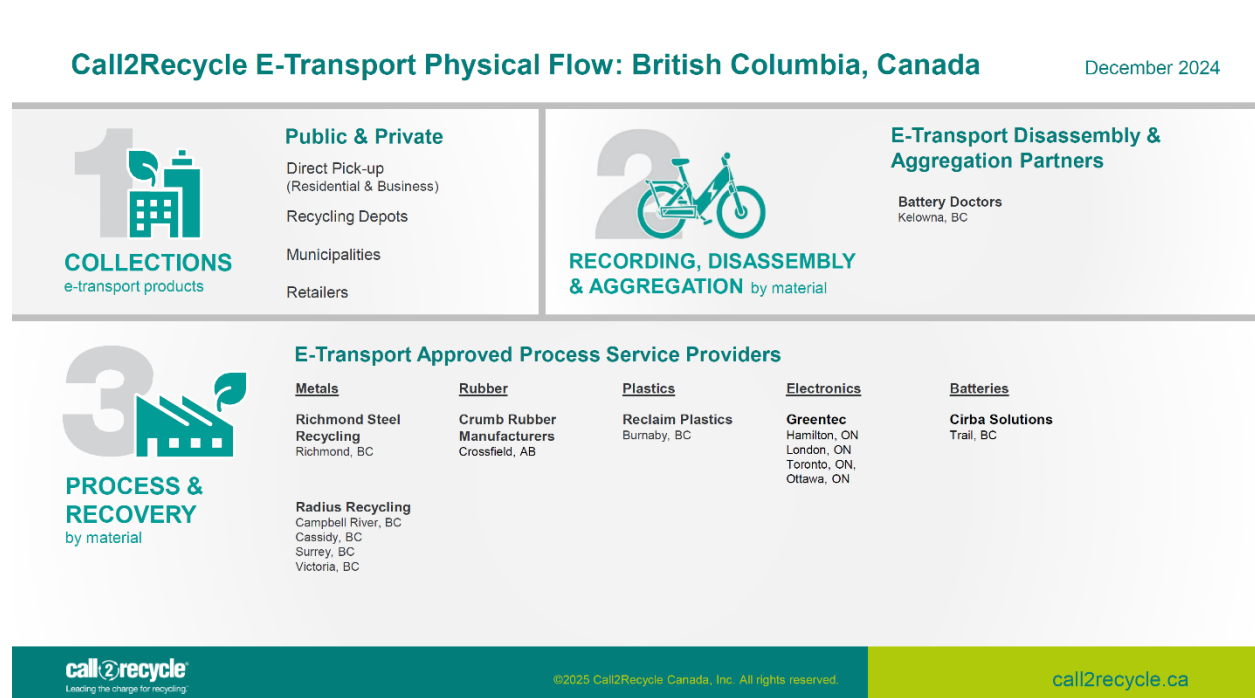
Voltage Bikes Ltd (Pedego Canada)

- Pedego

Yeti Cycling LLC

- Yeti

# Appendix 4: BC E-Transport Physical Flow



# Appendix 5: E-Transport Downstream Service Providers

Service	Service Provider
<p><b>Transporter/pick-up</b> (supports the direct pick-up service and collection facilities)</p>	<p><b>Battery Doctors</b> is a subsidiary of the parent company <b>Matichuk Holdings Ltd.</b> (Kelowna Recycling   Kelowna, B.C.).</p>
<p><b>Disassembly, storage, and shipping of batteries</b></p>	<p><b>Matichuk Holdings Ltd.</b></p>
<p><b>Disassembled e-transport materials are transported to five recycling streams:</b></p>	

<p><b>Metals</b> recycling</p>	<ul style="list-style-type: none"> <li>• <a href="#">Richmond Steel Recycling</a>, a leading scrap metal recycler located in the heart of British Columbia</li> <li>• <a href="#">Radius Recycling</a> is a global leader in the metals recycling industry.</li> </ul>
<p><b>Rubber</b> recycling</p>	<ul style="list-style-type: none"> <li>• <a href="#">Crumb Rubber Manufacturers</a> established in 1998 and with five manufacturing plants in the United States and Canada.</li> </ul>
<p><b>Plastics</b> Recycling</p>	<ul style="list-style-type: none"> <li>• <a href="#">Reclaim Plastics</a>, based in Burnaby, B.C., handles a range of plastics, primarily from the automotive industry.</li> </ul>
<p><b>Electronics and Wiring</b> Recycling</p>	<ul style="list-style-type: none"> <li>• <a href="#">Greentec</a> is an R2-certified electronics recycling company.</li> </ul>
<p><b>Lithium-ion Batteries</b> Recycling</p>	<ul style="list-style-type: none"> <li>• <a href="#">Cirba Solutions</a>, Operating in Trail, B.C., has built its reputation as a global leader in battery recycling and management.</li> </ul>

**Battery Doctors**, a subsidiary of parent company **Matichuk Holdings Ltd.** (Kelowna Recycling | Kelowna, B.C.), is the **transporter/pick-up service provider** supporting the direct pick-up service and future collection facilities for the program. Battery Doctors is a recycling leader in B.C. and operates as part of a full-service recycling centre (Kelowna Recycling), offering both drop-off and pick-up services for various recyclable products. Battery Doctors is currently a transportation service provider for Call2Recycle’s household battery recycling program, servicing bulk collection sites in the Kelowna and Lower Mainland areas.

Disassembly of the e-transport products is handled by:

**Matichuk Holdings Ltd.** (see above) also disassemble the e-transport products collected by the BC e-Transport program. Disassembling products at the consolidation point of the transporter offers considerable efficiencies. Upon disassembly, Matichuk Holdings Ltd. sends the parts to the recycle streams provided below upon disassembly. By recycling bicycles, it takes bikes out of the waste stream, offers affordable bikes for sale, and encourages cycling as a sustainable, healthy transportation choice.

After disassembling the e-transport products, Matichuk Holdings Ltd. handles, stores and ships batteries using Call2Recycle’s approved and patented containers. Transportation of batteries will be governed by Call2Recycle’s existing permits (see section 8.1) to ensure safety. Matichuk Holdings Ltd. have been trained to handle this responsibility.

Matichuk Holdings Ltd. sends disassembled e-transport material into five recycling streams: metals, rubber, plastics, electronics/wiring, and batteries. The downstream vendors recycling the materials are:

- **Metals** are handled by:

- **Richmond Steel Recycling** ([A Leader in Scrap Metal Recycling | Richmond Steel Recycling](#)) is a leading scrap metal recycler located in the heart of British Columbia. It is committed to the principles of environmental sustainability and works to protect our planet by recycling a wide range of scrap metals. Over four decades of experience in the recycling industry, it maintains top-notch safety standards in addition to providing world-class service. The metal it recovers is used in making new steel-based products.
- **Radius Recycling** is a global leader in the metals recycling industry. For more than a century, Radius Recycling has developed robust networks to collect, process, and deliver recycled metals to customers around the world. As one of North America's largest manufacturers and exporters of recycled metal products, Radius Recycling's integrated operating model advances a circular economy where metals never become waste and instead are redesigned into new products. For more than a century, Radius Recycling has developed robust networks to collect, process, and deliver recycled metals to customers around the world. As one of North America's largest manufacturers and exporters of recycled metal products, Radius Recycling's integrated operating model advances a circular economy where metals never become waste and instead are redesigned into new products.
- **Rubber** parts are sent to **Crumb Rubber Manufacturers** ([CRM Rubber Manufacturers | CRM Rubber](#)). Established in 1998 and with five manufacturing plants in the United States and Canada,
- **Plastics are sent to Reclaim Plastics** ([Burnaby Plastic Recycling- Reclaim Plastics](#)). Based in Burnaby, B.C., Reclaim Plastics handles a range of plastics, primarily from the automotive industry. Under this program, the plastics are separated by type. After processing, the plastics can be used in a wide range of plastic products, from new electronics to carpet to containers. None are used for fuel.
- **Electronics and wiring are** managed by **Greentec** ([Greentec](#)). Greentec is a certified electronics recycling company. It helps businesses and organizations securely dispose of electronic devices in a compliant and cost-effective manner. It is committed to a circular economy by supporting clients with secure and sustainable electronics recycling solutions. Greentec is currently an approved downstream vendor of Call2Recycle. Greentec is R2 certified.
- Lithium-ion **batteries are** shipped to **Cirba Solutions** in Trail, B.C. ([Cirba Solutions](#)). For over 25 years, Cirba has built its reputation as a global leader in battery recycling and management. It has a well-respected record of accomplishment in research and development, excellent client services, and the highest level of environmental compliance, which demonstrates its unwavering commitment to the best recycling practices. Cirba primarily extracts cobalt and nickel from the batteries it receives. The

cobalt is used as an input into new lithium-ion batteries; the nickel is sold into the steel industry.

## Appendix 6: Pollution Prevention Hierarchy

Call2Recycle abides by the pollution prevention hierarchy (PPH) as required by the Recycling Regulation, Part 2, Section 5(3).

Section 5(1) of the Recycling Regulation provides that:

(c) the plan adequately provides for

(viii) the management of the product in adherence to the order of preference in the pollution prevention hierarchy.

Pursuant to Part 2, Section 5(3)(a) -(g) in descending order of preference, Call2Recycle’s BC e-Transport program manages its products as follows:

<p><i>(a) reduce the environmental impact of producing the product by eliminating toxic components and increasing energy and resource efficiency;</i></p>	<p>Call2Recycle encourages producers to manufacture e-Transport devices to have a longer lifespan, including batteries that have high efficiency, and are energy-dense. This reduces the number of units introduced into the market.</p>
<p><i>(b) redesign the product to improve reusability or recyclability;</i></p>	<p>Call2Recycle encourages E-Transport producers to design and use batteries to improve reusability and recyclability.</p>
<p><i>(c) eliminate or reduce the generation of unused portions of a product that is consumable;</i></p>	<p>This level of the PPH does not apply to program materials managed by Call2Recycle, as E-Transport devices and batteries are not consumable products.</p>
<p><i>(d) reuse the product;</i></p>	<p>Rechargeable e-Transport batteries, by design, can be reused until they can no longer hold a reliable charge.</p> <p>In the context of battery refurbishment as a form of reuse, lithium-based e-Transport rechargeable batteries are the most commonly eligible for refurbishment. Best practices and manufacturer recommendations stipulate that refurbished lithium e-Transport batteries should undergo</p>

	<p>testing in accordance with UL 1642 standards. Call2Recycle is unable to guarantee compliance with these standards by lithium battery refurbishers. Given the importance of public safety, Call2Recycle does not endorse the practice of battery refurbishment at this time.</p> <p>Similarly, there are no official guidelines regarding refurbishing other rechargeable e-Transport batteries; therefore, Call2Recycle does not support these activities due to safety risks and a lack of standards.</p>
<p><i>(e) recycle the product;</i></p>	<p>The e-Transport products and batteries collected as part of the program are recycled. Rechargeable e-Transport batteries enter Call2Recycle’s stream at the end of life. E-Transport Batteries that are collected as part of the program are recycled.</p> <p>Call2Recycle facilitates connections between interested e-Transport product and battery processors and e-Transport product and battery manufacturers, promoting the reuse of reclaimed materials from recycled e-Transport products and batteries to produce new ones.</p> <p>Other materials recovered through the recycling process (e.g. metals) are sold as commodities for use in the manufacturing of new products.</p>
<p><i>(f) recover material or energy from the product;</i></p>	<p>Any component of the e-Transport product or battery that cannot be recycled will be managed via waste-to-energy.</p>
<p><i>(g) otherwise, dispose of the waste from the product in compliance with the Act.</i></p>	<p>In rare instances where Call2Recycle downstream processors have exhausted all the above options, any residual material will be disposed of in compliance with the Act.</p>

## Appendix 7: Audited Financial Statements

**Call2Recycle Canada, Inc.**

**Financial Statements**

**For the Year Ended December 31, 2024**



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## Independent Auditor's Report

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**To the Members of  
Call2Recycle Canada, Inc.**

### **Opinion**

We have audited the financial statements of Call2Recycle Canada, Inc. (the "Entity"), which comprise the statement of financial position as at December 31, 2024, and the statements of changes in net assets, operations and cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Entity as at December 31, 2024, and its results of operations and its cash flows for the year then ended in accordance with Canadian accounting standards for not-for-profit organizations.

### **Basis for Opinion**

We conducted our audit in accordance with Canadian generally accepted auditing standards. Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Statements* section of our report. We are independent of the Entity in accordance with the ethical requirements that are relevant to our audit of the financial statements in Canada, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### **Other Information**

Management is responsible for the other information. The other information comprises the information included in the Annual Report but does not include the financial statements and our auditor's report thereon.

Our opinion on the financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information identified above and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If, based on the work we have performed on this other information, we conclude that there is a material misstatement of this other information, we are required to report that fact in this auditor's report. We have nothing to report in this regard.



### **Responsibilities of Management and Those Charged with Governance for the Financial Statements**

Management is responsible for the preparation and fair presentation of these financial statements in accordance with Canadian accounting standards for not-for-profit organizations, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Entity's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Entity or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Entity's financial reporting process.

### **Auditor's Responsibilities for the Audit of the Financial Statements**

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with Canadian generally accepted auditing standards will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with Canadian generally accepted auditing standards, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Entity's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Entity's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Entity to cease to continue as a going concern.



- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

*BDO Canada LLP*

Chartered Professional Accountants, Licensed Public Accountants

Toronto, Ontario  
June 18, 2025

**Call2Recycle Canada, Inc.**  
**Statement of Financial Position**

December 31	2024	2023
<b>Assets</b>		
Cash (Note 2)	\$ 3,292,795	\$ 2,141,682
Accounts receivable	8,460,093	5,709,862
Marketable securities (Note 3)	24,215,362	29,250,959
Other assets	715,975	540,795
	<b>\$ 36,684,225</b>	<b>\$ 37,643,298</b>
<b>Liabilities and Net Assets</b>		
Accounts payable and accrued liabilities (Notes 4 & 8)	\$ 8,551,679	\$ 5,711,095
<b>Unrestricted Net Assets</b>		
Undesignated	10,430,905	8,969,026
Board Designated (Note 5)	17,701,641	22,963,177
	<b>28,132,546</b>	<b>31,932,203</b>
	<b>\$ 36,684,225</b>	<b>\$ 37,643,298</b>

The accompanying notes and schedules are an integral part of these financial statements.

**Call2Recycle Canada, Inc.**  
**Statement of Changes in Net Assets**

<b>For the year ended December 31</b>	<b>Undesignated</b>	<b>Board Designated</b>	<b>2024 Total</b>	<b>2023 Total</b>
<b>Balance, beginning of the year</b>	<b>\$ 8,969,026</b>	<b>\$ 22,963,177</b>	<b>\$ 31,932,203</b>	<b>\$ 36,890,818</b>
<b>Excess (deficiency) of revenues over expenses</b>	<b>1,461,879</b>	<b>(5,261,536)</b>	<b>(3,799,657)</b>	<b>(4,958,615)</b>
<b>Balance, end of the year</b>	<b>\$ 10,430,905</b>	<b>\$ 17,701,641</b>	<b>\$ 28,132,546</b>	<b>\$ 31,932,203</b>

The accompanying notes and schedules are an integral part of these financial statements.

**Call2Recycle Canada, Inc.**  
**Statement of Operations**

For the year ended December 31	2024	2023
<b>Revenues</b>		
Steward fees	\$ 34,727,143	\$ 27,508,479
Investment income	1,844,053	1,850,542
Other	894,417	240,177
	<b>37,465,613</b>	<b>29,599,198</b>
<b>Expenses</b>		
Material management and processing (Note 6)	27,228,644	22,742,710
Public education and awareness	6,491,928	5,017,534
Other (salary, professional, administrative)	7,544,698	6,797,569
	<b>41,265,270</b>	<b>34,557,813</b>
<b>Deficiency of revenues over expenses</b>	<b>\$ (3,799,657)</b>	<b>\$ (4,958,615)</b>

The accompanying notes and schedules are an integral part of these financial statements.

**Call2Recycle Canada, Inc.**  
**Statement of Cash Flows**

For the year ended December 31	2024	2023
<b>Cash flows from operating activities:</b>		
Deficiency of revenues over expenses	\$ (3,799,657)	\$ (4,958,615)
Items not affecting cash:		
Net realized and unrealized (gain) loss on investments	(944,557)	(1,028,928)
	(4,744,214)	(5,987,543)
Changes in non-cash working capital:		
Accounts receivable	(2,750,231)	1,292,531
Accounts payable and accrued liabilities	2,840,584	108,582
Other assets	(175,180)	(117,554)
	(4,829,041)	(4,703,984)
<b>Cash flows from investing activities:</b>		
Marketable securities	5,980,154	2,535,654
<b>Net increase (decrease) in cash</b>	1,151,113	(2,168,330)
<b>Cash, beginning of the year</b>	2,141,682	4,310,012
<b>Cash, end of the year</b>	\$ 3,292,795	\$ 2,141,682

The accompanying notes and schedules are an integral part of these financial statements.

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# Call2Recycle Canada, Inc.

## Notes to Financial Statements

December 31, 2024

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### 1. Significant Accounting Policies

#### Nature and Purpose of Operations

Call2Recycle Canada, Inc. (the "Entity") is a not-for-profit organization formed on January 1, 2017. The Entity's head office is registered in Toronto Ontario, and conducts its operations throughout all of Canada.

The Entity's purpose is to promote social welfare by addressing environmental concerns related to the recycling or proper disposal of consumer batteries. The Entity operates battery collection and recycling programs and educates the public with respect to the proper disposal and recycling of batteries, and related products.

The Entity seeks to be the leader in the environmentally sound collection, transportation and recycling of batteries and related products. The Entity is committed to a cleaner, healthier environment through public education on battery recycling. All aspects of the Entity's business are conducted in an environmentally sensitive manner, as the Entity is convinced that sound environmental product stewardship and sound business practices go hand in hand.

The Entity is exempt from income tax under Section 149(1) of the Income Tax Act (Canada).

#### Basis of Accounting

The financial statements have been prepared using Canadian accounting standards for not-for-profit organizations.

#### Revenue Recognition

The Entity follows the deferral method of accounting for revenues.

Unrestricted revenues are recognized as revenue when received or receivable if the amount to be received can be reasonably estimated and collection is reasonably assured. Restricted revenues are recognized as revenue in the year in which the related expenses are incurred.

Steward fees are received from legally obligated stewards in regulated provinces (QC, ONT, BC, MB, PEI, SK and NS), and from non-legally obligated battery manufacturers in all other jurisdictions based on sales into those jurisdictions. The Entity recognizes these fees as revenue in the year that battery units are sold by the stewards to consumers and businesses.

The costs of the corresponding collection and recycling for some of these batteries may occur in future years, and those associated costs are reported as expenses of the Entity in the year that they are incurred. Call2Recycle Canada, Inc. is committed to the collection and recycling of these batteries.

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# Call2Recycle Canada, Inc.

## Notes to Financial Statements

December 31, 2024

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### 1. Significant Accounting Policies (continued)

<b>Revenue Recognition - Continued</b>	<p>Unrestricted net investment income is recognized as revenue when earned.</p> <p>Unrestricted revenues from the sales of recycled materials are recognized in income when the recovered materials are sold and the amount to be recovered can be estimated and collection is reasonable assured.</p>
<b>Financial Instruments</b>	<p>Financial instruments are recorded at fair value at initial recognition.</p> <p>In subsequent periods, equities traded in an active market and derivatives are reported at fair value, with any change in fair value reported in income. All other financial instruments are reported at cost or amortized cost less impairment. Transaction costs on the acquisition, sale or issue of financial instruments are expensed for those items measured at fair value and charged to the financial instrument for those measured at amortized cost.</p> <p>Financial assets are tested for impairment when indicators of impairment exist. When a significant change in the expected timing or amount of the future cash flows of the financial asset is identified, the carrying amount of the financial asset is reduced and the amount of the write-down is recognized in net income. A previously recognized impairment loss may be reversed to the extent of the improvement, provided it is not greater than the amount that would have been reported at the date of the reversal had the impairment not been recognized previously, and the amount of the reversal is recognized in net income.</p>
<b>Use of Estimates</b>	<p>The preparation of the financial statements requires management to make estimates and assumptions that affect certain reported amounts and disclosures. Items subject to such estimates and assumptions include:</p> <ul style="list-style-type: none"><li>- accrued expenses</li><li>- allocation of expenses</li><li>- allowance for doubtful accounts</li></ul>
<b>Accounts Receivable</b>	<p>Uncollectable amounts receivable are written off at the time the accounts are determined to be uncollectable. There is no allowance for doubtful accounts at December 31, 2024 as management of the Entity considers any possible bad debts to be negligible.</p>
<b>Expenses</b>	<p>Material management and processing costs are recorded when the collection and processing services (freight, handling, recycling of materials) has been provided. Other expenditures are recognized as incurred.</p>

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## Call2Recycle Canada, Inc. Notes to Financial Statements

December 31, 2024

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### 2. Cash

The Entity maintains the majority of its cash balance in a Canadian financial institution. The Canada Deposit Insurance Corporation (CDIC) insures this account up to \$100,000 for this financial institution. From time to time the aggregate funds held in this institution may exceed the CDIC insured limits and may not be covered by CDIC insurance. Management does not anticipate any material effect on the financial position of the Entity as a result of this concentration.

### 3. Marketable Securities

The carrying amounts of investments are comprised of the following:

	<u>2024</u>	<u>2023</u>
At fair value:		
Cash held for long-term investment	\$ 1,288,669	\$ 889,018
Bonds	15,215,224	17,451,919
Equity investments	5,188,026	8,528,393
Real estate funds	1,179,394	1,335,543
Hedge fund investments	1,233,290	920,999
Precious metals and commodity funds	110,759	125,087
	<u>\$ 24,215,362</u>	<u>\$ 29,250,959</u>

## Call2Recycle Canada, Inc. Notes to Financial Statements

**December 31, 2024**

#### 4. Government Remittances

Included in accounts payable and accrued liabilities are government remittances payable of \$297,817 (2023 - \$147,899).

#### 5. Board Designated Net Assets

The Entity's governing board has designated \$17,701,641 (2023 - \$22,963,177) as of December 31, 2024 for future use in the regulated provinces of Quebec, Ontario, British Columbia, Manitoba, Prince Edward Island, Saskatchewan and Nova Scotia. The designated balances by regulated province are as follows:

	2024	2023
Quebec	\$ 10,452,773	\$ 12,035,871
Ontario	(4,649,997)	(244,067)
British Columbia	8,148,982	8,175,136
Manitoba	2,388,077	2,388,515
Prince Edward Island	(170,352)	(181,468)
Saskatchewan	1,239,176	789,190
Nova Scotia	292,982	-
Total	\$ 17,701,641	\$ 22,963,177

#### 6. Material Management and Processing

Material management and processing is comprised of the following:

	2024	2023
Material management and processing	\$ 28,587,793	\$ 23,735,105
Recycled materials income	(1,359,149)	(992,395)
	\$ 27,228,644	\$ 22,742,710

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## Call2Recycle Canada, Inc. Notes to Financial Statements

December 31, 2024

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### 7. Allocation of Expenses

Expenses are charged directly to their respective jurisdiction based on actual costs as incurred. When expenses are not identified to a specific jurisdiction, but benefit all jurisdictions, they are allocated among the jurisdictions based on the Entity's allocation methodology. Collections and processing costs are allocated based on battery collections for each jurisdiction. Salary and benefits are allocated based on employee time allocation by jurisdiction. Other expenses, including professional fees, general marketing, communication and promotion, shared service costs, office supplies, and occupancy, which cannot be identified with a specific jurisdiction are allocated based on the total population at the end of the year in the jurisdiction.

### 8. Significant Contractual Arrangements

The Entity is governed by a Board of Directors that is separate and independent of its former parent entity, but continues to contract IT services (2023 included accounting and managerial services) from Call2Recycle, Inc. US. Fees paid for contracted services to Call2Recycle, Inc. US for 2024 were CDN \$1,004,074 (2023 - \$1,075,586). This fee is assessed to the Entity net of a US \$Nil (2023 - \$272,187) fee recovery collected by Call2Recycle, Inc. US for battery sale license fees collected from US battery companies who are selling into certain Canadian markets. Included in accounts payable and accrued liabilities is CDN \$Nil (2023 - \$199,742) in respect of these contracted services.

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## Call2Recycle Canada, Inc. Notes to Financial Statements

December 31, 2024

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### 9. Financial Instruments

#### Credit risk

Credit risk is the risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation. The Entity is exposed to credit risk resulting from the possibility that the registrants of the Entity defaults on their financial obligations; if there is a concentration of transactions carried out with the same counterparty; or of financial obligations which have similar economic characteristics such that they could be similarly affected by changes in economic conditions. The Entity's financial instruments that are exposed to concentrations of credit risk relate primarily to its accounts receivable. The Entity's registrants are numerous and diverse, which reduces the concentration of risk. Management closely evaluates the collectibility to mitigate this risk.

#### Market Risk

Market risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices.

The Entity is exposed to financial risk that arises from fluctuations in the sale of recyclable batteries and consumer electronic products. This risk is minimized by an expected corresponding decrease in program delivery and recycling process expenses and by the regulations established by the respective Department of the Environment in each jurisdiction in which the Entity operates.

The Entity is exposed to market risk through its investment in marketable securities, the value of which changes through fluctuations in market values. The investment policies of the Entity are designed to mitigate this risk through diversification of the portfolio.

#### Currency Risk

Currency risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in foreign exchange rates. The Entity is exposed to currency risk as a result of its significant contractual arrangement for IT services (2023 - including accounting and managerial services) with a US organization and its stock portfolio holdings denominated in US currency.

## Call2Recycle Canada, Inc. Notes to Financial Statements

**December 31, 2024**

### 10. Commitments

The Entity has entered into various lease commitments for building rentals. Expected payments over the next five years are as follows:

	2025	2026	2027	2028	2029
Quebec	\$ 37,933	\$ 3,178	\$ -	\$ -	\$ -
British Columbia	20,526	-	-	-	-
Ontario	37,215	113,104	116,038	116,772	118,975
	<b>\$ 95,674</b>	<b>\$ 116,282</b>	<b>\$ 116,038</b>	<b>\$ 116,772</b>	<b>\$ 118,975</b>

### 11. Contingencies

During fiscal 2021, the Entity conducted reviews of various service providers in the Province of Ontario who collected recyclable materials on behalf of the Entity. As a result of the reviews, certain service providers had their contracts terminated for non-compliance with program requirements.

At the time of the terminations one service provider had previously submitted invoices to the Entity for materials collected in the amount of \$1.4 million which are included in accounts payable. Subsequent to the date of termination of the agreement, no further materials have been accepted from the service provider and no further payments have been made against the outstanding accounts payable balance.

Upon termination of the agreement the Entity has demanded a refund of prior amounts paid to the service provider based upon the observations made in its compliance reviews.

In addition to the \$1.4 million in accounts payable in dispute, the service provider has filed a claim for an additional \$10.5 million in costs plus damages. The Entity in turn has filed a claim for \$5.2 million in damages plus interest and costs.

Management is not able to estimate the likelihood of either any recovery or losses as the outcome of this matter and therefore no further provisions have been made in these financial statements. Any gains or losses will be recorded at the time they become known.

The Entity is subject to other possible legal claims of which the legitimacy or magnitude cannot be determined at this time. Subsequent to year end, a legal claim was filed against the Entity for \$15.0 million in damages. As management is not able to estimate the likelihood of any loss at this time, no provision for these claims have been made in these financial statements. Any loss will be recorded at the time they become known.

Subsequent to year end, three of the Entity's members in Ontario are subject to Administrative Penalty Orders from the Regulator amounting to \$2.8 million. These orders are currently being appealed, and the final amount and timing are still uncertain. The Entity could be impacted by the outcome of the appeals. No provisions have been made in the financial statements. Any losses will be recorded at the time they become known.

**Call2Recycle Canada Inc.**  
**Schedule of Operations - British Columbia**  
 BC e-Transport Program

For the year ended December 31	2024
<b>Revenue</b>	
Steward fees	\$ 73,970
Investment income	-
	73,970
<b>Expenses</b>	
Material management and processing	-
Public education & awareness	11,166
Other (salary, professional, administration)	22,109
	33,275
<b>Excess of revenue over expenses</b>	<b>40,695</b>
Net assets, beginning of year	
Net assets, end of year	\$ 40,695

## Appendix 8:

### Auditor's Report on Non-Financial Information

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## Independent Practitioner's Reasonable Assurance Report

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### To the Directors of Call2Recycle Canada Inc.

We have undertaken a reasonable assurance engagement of the accompanying Management Assertion in Appendix A related to the Call2Recycle Canada Inc. ("Call2Recycle" or the "Entity") Recycling Program Disclosures, comprised of the following disclosures within Call2Recycle's Annual Report to the Ministry of Environment & Parks in Appendix B (the "subject matter information") for the year ended December 31, 2024:

- The Entity's description of the total amount of product sold and collected and, if applicable, the Entity's recovery rate in accordance with Section 8(2)(e) of the Recycling Regulation.

### Management's responsibility

Management is responsible for the preparation of the subject matter information in accordance with the evaluation criteria as listed in Appendix B (the "applicable criteria"). Management is also responsible for such internal control as management determines is necessary to enable the preparation of the subject matter information such that it is free from material misstatement, whether due to fraud or error.

Management is responsible for the selection of suitable evaluation criteria in accordance with the Recycling Regulation Guidance on Third Party Assurance for Non-Financial Information in Annual Reports 2024 Reporting Year, dated November 2024 ("assurance requirements"), pursuant to Section 8(2)(h) of the Recycling Regulation made under the Environmental Management Act of the Province of British Columbia.

### Our responsibility

Our responsibility is to express a reasonable assurance opinion on the subject matter information based on the evidence we have obtained. We conducted our reasonable assurance engagement in accordance with Canadian Standard on Assurance Engagements 3000 (CSAE 3000), *Attestation Engagements other than Audits or Reviews of Historical Financial Information*. This standard requires that we plan and perform this engagement to obtain reasonable assurance about whether the subject matter information is prepared, is free from material misstatement.

Reasonable assurance is a high level of assurance, but is not a guarantee that an engagement conducted in accordance with this standard will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users of our report. The nature, timing and extent of procedures selected depends on our professional judgment, including an assessment of the risks of material misstatement, whether due to fraud or error, and involves obtaining evidence about the preparation of the subject matter information in accordance with the applicable criteria.

The main elements of our work were to:

- Obtain an understanding of internal control over the preparation of the subject matter information to assist in risk assessment and the design of assurance procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Entity's internal control over the subject matter information
- Identify and assess the risks of material misstatement in the subject matter information
- Design and perform procedures responsive to those risks and obtain sufficient, appropriate evidence to support our opinion, including selecting samples of transactions for review of substantive support
- Evaluate the sufficiency and appropriateness of evidence obtained in the context of the engagement.



We believe the evidence we obtained is sufficient and appropriate to provide a basis for our opinion.

#### **Our independence and quality management**

We have complied with the relevant rules of professional conduct / code of ethics applicable to the practice of public accounting and related to assurance engagements, issued by various professional accounting bodies, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

Our firm applies Canadian Standard on Quality Management (CSQM) 1, *Quality Management for Firms that Perform Audits and Reviews of Financial Statements, or Other Assurance or Related Services Engagements*, which requires the firm to design, implement and operate a system of quality management, including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

#### **Significant inherent limitations**

Due to the nature of non-financial information, there are inherent limitations to this information and it cannot be tested with the same level of precision and clarity as financial and quantitative information. Further, there are varying approaches in how non-financial reporting can be tested and audited, whereas for financial reporting, rigorous and standardized procedures have been established. As such, the relevance, completeness, reliability, neutrality, and understandability of the criteria selected are dependent on the reader's perception. As such, this report should be read keeping in mind the specific evaluation criteria that has been identified in Appendix B.

#### **Opinion**

In our opinion, the Management Assertion in Appendix A related to the Call2Recycle's Recycling Program Disclosures, comprised of the disclosures within Call2Recycle's Annual Report to the Ministry of Environment & Parks in Appendix B for the year ended December 31, 2024 is prepared, in all material respects, in accordance with the applicable criteria presented in Appendix B.

#### **Specific purpose of applicable criteria**

The subject matter information has been prepared in accordance with the applicable criteria referred to above. As a result, the subject matter information may not be suitable for another purpose.

*BDO Canada LLP*

Chartered Professional Accountants, Licensed Public Accountants

Toronto, Ontario  
June 20, 2025

## Appendix A

### Management Assertion

We have prepared the Recycling Program Disclosures, comprised of the following disclosures within Call2Recycle Canada Inc's Annual Report to the Ministry of Environment and Parks ("subject matter information") for the year ended December 31, 2024:

- The description of the total amount of the producer's product sold and collected and, if applicable, the producer's recovery rate in accordance with Section 8(2)(e) of the Recycling Regulation.

We confirm, to the best of our knowledge and belief, that:

- (a) The subject matter information was prepared in accordance with the Evaluation Criteria stated in Appendix B (the "applicable criteria").
- (b) we are responsible for implementing internal controls necessary to enable the preparation of the subject matter information such that it is free from material misstatement, whether due to fraud or error.
- (c) We are responsible for the selection of suitable evaluation criteria in accordance with the Recycling Regulation Guidance on Third Party Assurance for Non-Financial Information in Annual Reports 2024 Reporting Year, dated November 2024 ("Assurance Requirements"), pursuant to Section 8(2)(h) of the Recycling Regulation made under the Environmental Management Act of the Province of British Columbia.

*Michael Partab*

Michael Partab, CFO  
Call2Recycle Canada Inc.

## Appendix B

### Recycling Program Disclosures

**Assessment of the description of the total amounts of the producer’s product sold and collected and, if applicable, the producer’s recovery rate in accordance with Section 8(2)(e) of the Recycling Regulation**

Specific Disclosures in Call2Recycle Canada Inc’s (“Call2Recycle”) Annual Report to the Ministry of Environment and Parks for the year ended December 31, 2024 (“Annual Report”)	
Disclosure per Annual Report	Reference
E-bicycles Sold in 2024: 8,744	Page 8

Call2Recycle did not have any collection during the year ended December 31, 2024 and therefore the disclosure of collection and the recovery rate is not applicable.

Call2Recycle received the environmental handling fees for E-bicycles from members. Members report their sales of E-bicycles in BC on a monthly basis using a portal.

#### **Evaluation Criteria**

The following evaluation criteria were applied to the assessment of the description of the total amounts of producer’s product sold and collected and, if applicable, the producer’s recovery rate in accordance with Section 8(2)(e);

- The amount of product sold has been calculated using source data from independent sources;
- The source data for the amount of product sold is complete;
- The amount of product sold reconciles to the amounts published in the Annual Report; and
- The environmental handling fees received for the amount of product sold reconciles to the Call2Recycle’s audited financial statements.

## Appendix 9: Consumer Ad Campaign

Fig 1: 1080x1080 Static Feed Image Ad Posted to Meta



Fig 2: 1080x1920 Static Story Image Ad Posted to Meta



Fig 3: 1080x0180 E-Transport Video Ad posted to Meta



Fig 4: Static Vancouver Outdoor Billboard



Fig 5: Animated Vancouver Outdoor Billboard



Fig. 6: Prominent advertising on the home page of Recycle Your Batteries, Canada! Website

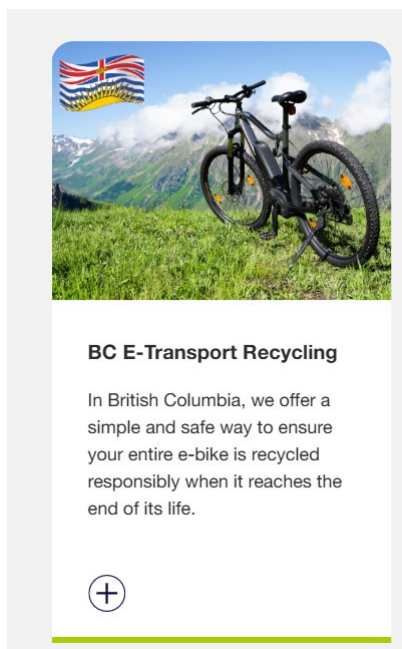




Fig 7: E-Transport Page on Recycle Your Batteries, Canada! Website




Get Started!
For Kids
Safety
EN FR



## BC E-Transport Recycling

A complete recycling solution for e-transport devices



### Recycle your complete e-bike including the battery, with ease!

In British Columbia, we offer a simple and safe way to ensure your entire e-bike is recycled responsibly when it reaches the end of its life.

Our direct pickup service is designed for your convenience, ensuring that your e-bike is recycled safely and responsibly.

On behalf of select bike manufacturers, we ensure the safe recycling of their products. Check the list below to see if your e-bike qualifies.

**Help protect the environment. Complete the form below to schedule a direct pickup today!**

### E-Bike pickup form

Please check the list of eligible brands before submitting the form.

Don't see your brand listed? Please contact [EPRA](#) for recycling options.

Questions? Please contact customer service at 1.888.224.9764 or [customerservice@call2recycle.ca](mailto:customerservice@call2recycle.ca).

**Pickup Details**

Full Name \*

Email Address \*

Mobile Phone \*

Street Address \*

Street Address 2

City \*

Province \*

Postal Code \*

[Next>](#)

### Eligible Brands

Manufacturer	Brand
Bike Co LLC	<ul style="list-style-type: none"> <li>FUJI</li> <li>Breezer</li> </ul>
Cycles Devinci Inc.	<ul style="list-style-type: none"> <li>Devinci</li> </ul>
Cycles Lambert Inc./HLC	<ul style="list-style-type: none"> <li>EVO</li> <li>Yuba</li> <li>Look</li> </ul>
EuCan Distribution Inc	<ul style="list-style-type: none"> <li>Cube</li> </ul>
Gazelle USA, LLC	<ul style="list-style-type: none"> <li>Gazelle</li> <li>Urban Arrow</li> </ul>
Giant Bicycle Canada Inc.	<ul style="list-style-type: none"> <li>Giant</li> <li>Liv</li> <li>Momentum</li> </ul>
Kona Bicycle Company Inc.	<ul style="list-style-type: none"> <li>Kona</li> </ul>
Live to Play Sports Group Inc.	<ul style="list-style-type: none"> <li>Norco branded BMZ</li> <li>Norco branded Simple</li> <li>Bosch</li> </ul>
Marin Bikes Canada	<ul style="list-style-type: none"> <li>Marin</li> </ul>