An All-Battery and Mobile Phone Collection and Recycling Plan for British Columbia

Submitted to the Ministry of the Environment by:
Rechargeable Battery Recycling Corporation of Canada (RBRCC)

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PLEASE NOTE: APPENDICES 1, 29 AND 31 ARE INCLUDED WITH THIS DOCUMENT; ALL OTHER APPENDICES CAN BE FOUND AT WWW.CALL2RECYCLE.CA.

PART A – STEWARDSHIP PLAN OUTLINE

1. EXECUTIVE SUMMARY

This stewardship plan has been developed by the Rechargeable Battery Recycling Corporation ("RBRC") and the Rechargeable Battery Recycling Corporation of Canada ("RBRCC") in response to the December 2008 amendment to the British Columbia Recycling Regulation of October 7, 2004, adding primary and rechargeable batteries, and cell phones / smart phones to waste management. A stewardship plan is required for primary and rechargeable battery producers (manufacturers, distributors, importers) and cell phone producters to show responsibility for the life-cycle management of their products.

RBRCC has been appointed as the agency to meet producer obligations for battery manufacturers, manufacturers whose products contain batteries, and certain distributors and retailers of products as may be appropriate. RBRCC also intends to support the cell phone recycling obligations of producer (see attached letter). A list of these stewards can be found in appendices 30 and 32. Under this appointment, RBRCC's Call2Recycle® program is charged with collecting dry cell batteries under 5 kilograms and cell / mobile phones.

This plan was developed in collaboration with the battery manufacturing and retail industries, local government representatives, non-profit and environmental groups, other stakeholders and the general public. This plan is also based on meeting the requirements of the Regulation, experience gained in other jurisdictions and a desire for harmonisation with similar programs in other Canadian and U.S. jurisdictions.

In addition, RBRCC accepted and responded to written comments submitted by October 31, 2009, and held public consultations in 3 cities in the Province:

Monday October 5, 2009 – Vancouver***

Time: 1:30 – 3:30 pm

Location: The Coast Vancouver Airport Hotel
1041 SW Marine Drive
Vancouver, BC V6P 6L6
*** Webcast was also available for those unable to travel to any of the meeting locations listed

Tuesday October 6, 2009 - Nanaimo

Time: 10:30 am – 12:30 pm

Location: The Coast Bastion Inn

11 Bastion Street
Nanaimo, BC V9R 6E4

Wednesday October 7, 2009 – Kelowna
Time: 10:30 am – 12:30 pm
Location: Delta Grand Okanagan
1310 Water Street
Kelowna, BC V1Y 9P3

The proposed plan has been available for the general public and other interested stakeholders at www.call2recycle.ca/bcstewardship.

The results of the consultations, as well as responses to all written input will be placed in *Appendix 1* of this document when they become available.

Main Program Elements

Based on this collective input, the program will be developed as follows:

1. Convenient Collection Systems

Actual collection points and methods will be determined through assessment of such matters as:

- proximity to population
- cost-effectiveness
- environmental health and safety
- ease of access
- facilities available

Collection systems will be designed with user convenience and flexibility in mind.

Major collection methods expected to be used include:

- The Call2Recycle® program offers battery and cell phone recycling plans for retailers, communities, public agencies, and businesses completely free of charge.

- Call2Recycle® provides all collection containers and collateral materials, and pays all shipping and recycling costs, so there is ***no cost to the public to participate.***

- Recycling Council of British Columbia (RCBC) and the RBRCC have partnered to provide an online resource for rechargeable battery recycling facts and collection locations.

2. Processing and Recycling

- The program will not ship any used batteries or cell phones to a processor that has not been qualified by Call2Recycle®. Work to qualify potential processors by Call2Recycle® will be completed by March 1, 2010. Processors will be selected through a competitive process that will require compliance with applicable environmental, health and safety and transportation regulations including (but not limited to) the following:

    - Basel Action Network (BAN) qualification and ISO certification

    - Final destination receipt and disposal documentation/certification, downstream processing material management; and residual material management and residual waste management.

    - Recycling processor standards as adopted by the Electronic Stewardship Association of British Columbia (ESABC)

- Retailers, businesses, communities and public agencies will send the collected batteries and cell phones to a recycling facility for processing. Participation as a collection location is purely voluntary. A thermal recovery process will reclaim the metals (nickel, iron, cadmium, lead, and cobalt) from the batteries and prepare them for use in new products such as new batteries and stainless steel. Cell phones will be refurbished and resold when possible with a portion of the proceeds received from the resale of phones benefits select charities. No battery or cell phone waste will be disposed outside of North America.

3. Public Awareness and Education

The public awareness program will include all identified audiences with messages that, among other topics, will cover:

- The importance of battery collection and recycling
- Identification of materials covered by the program
- Where to take materials
- Where to get additional information
- Disposition of recycled material

Call2Recycle® conducts a national public education campaign to generate awareness and enlist support of the Call2Recycle® program. Through public service announcements, national advertising, and tradeshows, Call2Recycle®'s message reaches a diverse audience.

4. Accountability and Transparency

RBRCC is a non-profit, public service organization dedicated to rechargeable battery and cell phone recycling in Canada. It is a wholly owned subsidiary of the Rechargeable Battery Recycling Corporation (RBRC). RBRC's financial statements are audited by an independent CPA firm annually that fees collected have been applied to recycling and public education program costs in both the USA and Canada.

RBRCC long has employed, and as part of the RBRCC plan in British Columbia will continue to employ, several different audit procedures to assure compliance with required laws and regulations and general efficiency, including:

- Compliance with all local, provincial and federal regulatory agencies
- Independent 3rd party verification of program accomplishments
- Periodic environmental audits of its recycling facilities
- Certificates of recycling to program participants requiring documentation
- Basel Action Network (BAN) qualification for all processors of batteries

5. *Financing Mechanism*

The Call2Recycle® program has been financed by rechargeable battery manufacturers and product manufacturers (whose products are powered by rechargeable batteries) – including cell phones -- for approximately a dozen years. A licensee fee is assessed for units and weights sold into North America. In British Columbia, financial support also will be provided by primary battery manufacturers using a cost plus reimbursement budget allocated to each manufacturer based on its market share. Over time, as more data and collection experience is collected, Call2Recycle® will consider transitioning to a charge per unit sold in the province. However, this will not occur during the first two years of operation in the province.

This plan does not require or speak to any charges that a retailer may or may not choose to impose on consumers to supplement the price of its products. In other words, there is no environmental handling fee required, proposed or recommended in this plan. Participation in this plan is free and voluntary to those collecting and returning batteries.

2.0 PROGRAM PRINCIPLES

A stewardship program will be introduced which will:

- Be consistent with the Canadian Council of Ministers of the Environment Canada-Wide Principles for Product Stewardship (CCME Principles) including harmonisation with other Canadian provinces. (www.ccme.ca/assets/pdf/eps_principles_e.pdf)
- Be consistent with British Columbia stewardship principles as defined in the Ministry of Environment Business Plan, the Recycling Regulation and the Recycling Regulation Guide

- Provide a level playing field and, in the longer term, provide the necessary research and development process to explore and define how environmentally responsible producers might be rewarded in the market place
- Achieve a high level of compliance and minimize the potential for free-riding product manufacturers
- Ensure the program is delivered with the lowest possible cost while achieving maximum environmental efficiency
- Ensure materials are processed and recycled in a responsible manner that safeguards the environment and worker health & safety as well as preventing illegal export to developing countries
- Establish a dispute resolution process by July 1, 2010 per section 5(1)(c)(vi) of the regulation to resolve issues between parties involved in battery collection, sorting and recycling under this program.
- Ensure the program reflects a shared responsibility model with appropriate roles for the provincial government, local government, consumers, industry, and other stakeholders
- Ensure the program provides adequate coverage to all areas of the province including rural areas
- Strive for continuous improvement in environmental and economic performance

3.0 ORGANIZATION STRUCTURE AND MANAGEMENT

RBRCC is a not-for-profit corporation organized under Ontario law. It has operated the Call2Recycle® program in British Columbia since 1997. The Call2Recycle® program has collected used rechargeable batteries and used cell phones. With the approval of this plan in British Columbia, the Call2Recycle® program in the Province will be expanded to also include used primary batteries.

RBRCC operates under the direction of a Board of Directors. With the expansion of the Call2Recycle® in several Provinces to cover primary batteries, it has established an *Expanded Program Operating Committee* to supervise those programs. This *EPOC* includes the President of RBRCC and representatives of rechargeable battery manufacturers, rechargeable product manufacturers, nonrechargeable battery manufacturers, and selected outside members based on expertise and experience.

This *EPOC* also oversees the operations of all-battery collection and recycling programs initiated elsewhere in Canada and serves as a mechanism to strive for hamonisation across programs. Harmonisation will help to keep collection and processing costs down, while enabling clear and compelling communications to all stakeholders.

3.1 Management and Administration

RBRCC is responsible for the management and administration of the program. This includes, but is not limited to, the following tasks:

- Management of the public consultation process required for the stewardship plan

- Identification, registration, and auditing of obligated stewards
- Collection and disbursement of fees through a process which ensures confidentiality of data
- Management of program communications
- An interface for the public and with parties contracted under the program
- Preparing and distribution of an annual report
- Defining and meeting the performance management targets for the program, including the plan for continuous improvement
- Overall day-to-day management of the program, including liaison with other stakeholders and the British Columbia provincial government
- Ensuring compliance with all applicable federal, provincial and municipal requirements
- Management of contracts with the collection, sorting, processing and recycling service provider(s) and the audit functions
- Setting and adhering to operating budgets

4.0 PUBLIC EDUCATION AND AWARENESS

Call2Recycle® has an extensive public education program designed to both encourage all British Columbians to recycle their used batteries and inform them how they can participate in our recycling program. This will provide the foundation for the promotion, education and awareness activities of the Call2Recycle® program in British Columbia.

Batteries are commonly used at home, work and play. Therefore, all aspects of BC society are considered part of the communication outreach strategy for the existing and expanded Call2Recycle® program.

Building on our existing program's dynamics, our target groups will be categorized along the following dimensions:

- Program licensees (the approximately 175 companies that currently fund the RBRCC) and product stewards (6 primary battery companies that have committed to date to participate in this program).
- Collection sites (retail, community, public agency and business participants).
- Battery users (residents, business, community locations such as schools).
- Media (industry and consumer).

In 2009, Call2Recycle® will invest approximately $100,000 for BC outreach and promotion activities. Based on anticipated 2010 collections of 251,000 kilograms, RBRCC anticipates the promotion and education budget to be $200,000.

At the core of the Call2Recycle® public education program is the focus on information accessibility. This is accomplished through both electronic services and staff availability.

RBRCC maintains (and will continue to maintain) two websites (www.call2recycle.ca; www.appelarecycler.ca; *Appendix 2*) and two toll-free information lines: 877-2-RECYCLE (recorded) and 888-224-9764 (staff monitored). The websites provide

comprehensive program information of relevance to all interests/support groups: retail, municipality, public agency, business, consumer, and media. Program participants (both existing and potential) as well as consumers can access information about the location of nearby retail collection sites, extensive details on the operational dynamics of the Call2Recycle® program as well as sign-up guides for retailers/municipalities/public agencies and businesses. These guides provide a registration application and detail recycling guidelines, including storage, safety, packing and shipping including necessary documentation for non- Call2Recycle® containers (*Appendix 3*). Program participants can also download support materials such as web banners (*Appendix 4*), signage, and other communication support materials from Call2Recycle®'s website. Upon approval of the Call2Recycle® program in the Province, BC-specific information will be added to these information sources.

In addition to the information provided on Call2Recycle®'s website, awareness of the Call2Recycle® "all battery" program will be promoted in many ways and through a variety of mediums.

For years, Call2Recycle® has maintained and increased involvement by program participants, and this effort will continue. Support initiatives will continue to involve direct phone calls, postcard mailings and updates on collection results, all designed to inform and remind existing collection sites of their vital roles. In-store/organization signage is and will continue to be provided with collection box shipments (*Appendix 5*). Upon approval of the Call2Recycle® "all battery" program, this signage will be updated to promote an all battery collection and acknowledge BC's leadership role in this initiative.

Call2Recycle® purchases advertising space in select publications such as *Harrowsmith*, *Municipal World, Solid Waste & Recycling, Hazardous Materials Management, PhotoLife* and *Canadian Home Workshop/Mon Chalet,* and this will continue upon approval of the Call2Recycle® "all battery" program. Examples of recent advertising outreach may be found in *Appendix 6*. The directness of our communication message will be even more pronounced once Call2Recycle® expands to all battery recycling program.

Supplementing purchased advertising will be the distribution and airing of a series of radio and television Public Service Announcements (PSAs) encouraging battery recycling (*Appendix 7*). RBRCC will cooperate with the Ministry of Environment in preparing new PSAs upon approval of the Call2Recycle® "all battery" program.

Presence at targeted consumer and trade shows are additional components of Call2Recycle®'s outreach campaign. In 2008/2009, Call2Recycle® has exhibited at *Canada Blooms, Federation of Canadian Municipalities, Recycling Council of British Columbia Conference*, and this will continue. At these shows, Call2Recycle® answers inquiries and provides handout materials to support awareness and drive program participation. In addition, Call2Recycle® has established a partnership with home improvement expert Shell Busey and his *HouseSmart Referral Network* to promote battery recycling through radio, print, electronic media and appearance schedules. A

series of “how to” info-videos also have been developed, tied in with Call2Recycle’s battery recycling for distribution electronically and in Public Service Announcements (*Appendix 8*).

Call2Recycle® expects to continue for at least the near future as a prime sponsor of the *Old Timers’ Hockey Tour* to outreach in communities across British Columbia and Canada. During winter 2009, Call2Recycle®’s tour sponsorship involved specific events in 8 cities in British Columbia (Fort St. John, Kamloops, Kelowna, Nanaimo, Penticton, Prince George, Vancouver and Victoria). Call2Recycle®’s in-game presence is significant as evidenced through postcard handouts, PSA airings, arena announcements and interviews, rink board advertising, program advertising and the sponsorship of the *Hockey Tykes* (*Appendix 9*).

The inclusion of primary batteries in our already well-established battery recycling program provides an excellent opportunity to improve the simplicity of our recycling message and program, streamlining the communication from a “rechargeable batteries” focus to “recycle batteries”. Our already extensive roster of communication vehicles and forums will be able to incorporate this streamlined and heightened message right from the program’s outset, enabling us to invigorate our collection partners to deliver exponential program growth and collection results.

The specific communication outreach objectives and strategies by target group are and will continue to be as follows:

i. *Program Licensees / Product Stewards*

Objectives

- To encourage RBRCC Licensees / Stewards to inform their sales base and target groups to recycle the battery post use and how this can be done.
- To involve RBRCC Licensees / Stewards in our recycling program at their place of business.

Strategies

- RBRCC Licensees generally must include the RBRCC Recycling Seal on their products within 6 months of program sign-up and will be encouraged to include the expansion of the program in BC in their promotional activities and advertising. RBRCC Stewards will similarly be urged to promote their participation in this program in BC within 6 months of program introduction.
- Specific section on websites: www.call2recycle.ca developed for Licensee training and program information.
- Toll-free information line (1-888-224-9764) to access support staff for inquiries and supply requirements/replenishment.
- Continued issuance of annual report, as well as yearly update reviews with RBRCC Licensees and product stewards regarding recycling performance and program outreach advances.

- RBRCC to host industry training meeting concerning the expansion of the Call2Recycle® program, key participation requirements and in-house participation
- Individual phone calls to RBRCC Licensees/Key Contact by Company within 2 months of program implementation to reinforce program requirements and encourage in-house participation.
- All battery program successes will be highlighted in Call2Recycle®'s Quarterly e-newsletter distributed to Licensees and program participants.

ii. *Collection Sites*

Objectives

- To inform existing Call2Recycle® collection sites about the expansion of the program, and reinforce their roles and responsibilities within the program
- To secure additional collection sites within retail, business, municipality, public agency, and community locations

Strategies

- Detailed instructions are provided in the sign-up guide advising of overall Call2Recycle® program and the steps involved in collecting and shipping Call2Recycle® containers for recycling
- Specific section on websites: www.call2recycle.ca developed for collection site training and program information
- Toll-free information line (1-888-224-9764) to access support staff for inquiries and supply requirements/replenishment
- Series of correspondence and phone calls to existing Call2Recycle® sites (1150+) to inform and remind them of their program participation and responsibilities (*Appendix 10*)
- Re-designed Call2Recycle® collection containers to accommodate and inform about expanded battery chemistry collection
- Adjustments to existing sign-up guides to reflect expanded chemistry
- Training video development for participants explaining program dynamics and outreach requirements
- Distribution of posters in collection containers for use in-store/at work to promote recycling program and participation details
- Presence at trade shows via presentation as well as exhibits to announce expansion and encourage added participation
- Semi-annual updates on individual site location collection results, including suggestions for further collection gains
- Advertising in select trade publications (retail, business, public agencies) to build awareness and participation
- Dedicated sections on www.call2recycle.ca for program information and training as well as availability of pre-developed communications materials that can be customized for individual needs

- Ongoing phone calls and postcard mailings to program participants to confirm program delivery and participation
- All battery program successes will be highlighted in Call2Recycle® Quarterly e-newsletter distributed to program participants.
- Development and implementation of co-promotion opportunities with collection partners to promote their involvement and the availability of battery recycling at their site.

iii. *Battery and Mobile Phone Users*

Objectives

- To inform and encourage all battery and cell phone users to recycle their used product

Strategies

- Licensee/steward-developed communication with product sale explaining the need to recycle their battery post-use (*Appendix 12*)
- Use of www.call2recycle.ca including a Postal Code-driven locator to inform of nearby collection drop-off locations
- Availability of bilingual toll-free 1-877-2-RECYCLE to inform of participating retail drop-off locations
- Articles and ongoing press releases advising of specific collection initiatives and events as well as the "for more information" vehicles: www.call2recycle.ca/,www.appelarecycler.ca and 1-877-2-RECYCLE
- Development and implementation of location-specific and provincial events (e.g. *Battery Recycling Week*) to encourage battery "round-ups" and ongoing participation. At the centerpiece of these events will be the Call2Recycle® Mobile Educational Unit – an interactive education and entertainment vehicle used to raise awareness about the importance and ease of battery recycling.
- Release of Public Service Announcements (PSAs) and targeted advertising campaigns to inform and encourage battery recycling
- Partnership with *Old Timers' Hockey* and *Kids Help Phone*, specific events and BC-specific tours to highlight battery recycling

iv. Media

Objectives

- To raise awareness of the dynamics of our collection and recycling program for used batteries and cell phones

Strategies

- Monthly press releases advising of initiatives and recycling successes
- Distribution of contributed articles for community newspapers

- Dedicated media newsroom on www.call2recycle.ca featuring background information, photos and other relevant support materials to assist in media coverage
- Development of newsworthy location-specific and provincial events/ announcements
- Leverage social media (e.g. Facebook) outlets to educate and promote program events and support.
- All battery program launch media event to announce program expansion

Program Support Vehicles/Tactics

In addition to the specifics identified above, *Appendix 13* provides samples of existing Call2Recycle® initiatives that have been used to communicate and support our collection program. Building on 12-years of BC and Canadian experience, these recognized examples of comprehensive marketing campaigns, involving both grassroots and consumer-oriented efforts, will be the foundation of the expansion of our all battery recycling focus. RBRCC and Call2Recycle® look forward to working with the BC Ministry of Environment to further develop these materials and take advantage of joint communication opportunities.

4.6 EVALUATION

The program will periodically evaluate public awareness of the program and report on its results. RBRCC uses the Call2Recycle® brand as the primary means to communicate with its stakeholders. In this regard, RBRCC annually measures the awareness of this brand and its ability to communicate appropriate behaviors and actions. Baseline data was compiled in 2009 and will be updated annually to gauge increases in overall awareness and to establish / report on awareness in British Columbia.

Call2Recycle® also quarterly assesses the accessibility of its collection sites, which is a critical dimension in maximizing collection. By comparing collection sites with demographics of the British Columbia population, Call2Recycle® can identify underserved areas and populations. In this regard, while Call2Recycle®'s current 1150 collection locations serve as an effective foundation for this program, Call2Recycle® anticipates significant growth in sites, particularly during the first few years of implementation of an all-battery plan, with the target of reaching 2000 sites within 5 years.

5.0 COLLECTION, PROCESSING AND RECYCLING

Retailers, businesses, communities and public agencies send the collected batteries and cell phones to a recycling facility for processing. A thermal recovery process reclaims the metals (nickel, iron, cadmium, lead, and cobalt) from the batteries and prepares them for use in new products such as new batteries and stainless steel. Cell phones are refurbished and resold when possible. All rechargeable batteries from cell

phones are recycled. A portion of the proceeds received from the resale of phones benefits selected charities.

5.1 Collection

The Call2Recycle® BC Plan will build upon and expand Call2Recycle®'s existing 1,150+ collection locations. These and future sites implement and will implement one or more of the following programs, all of which impose no charges to the collection site participant or used battery generators:

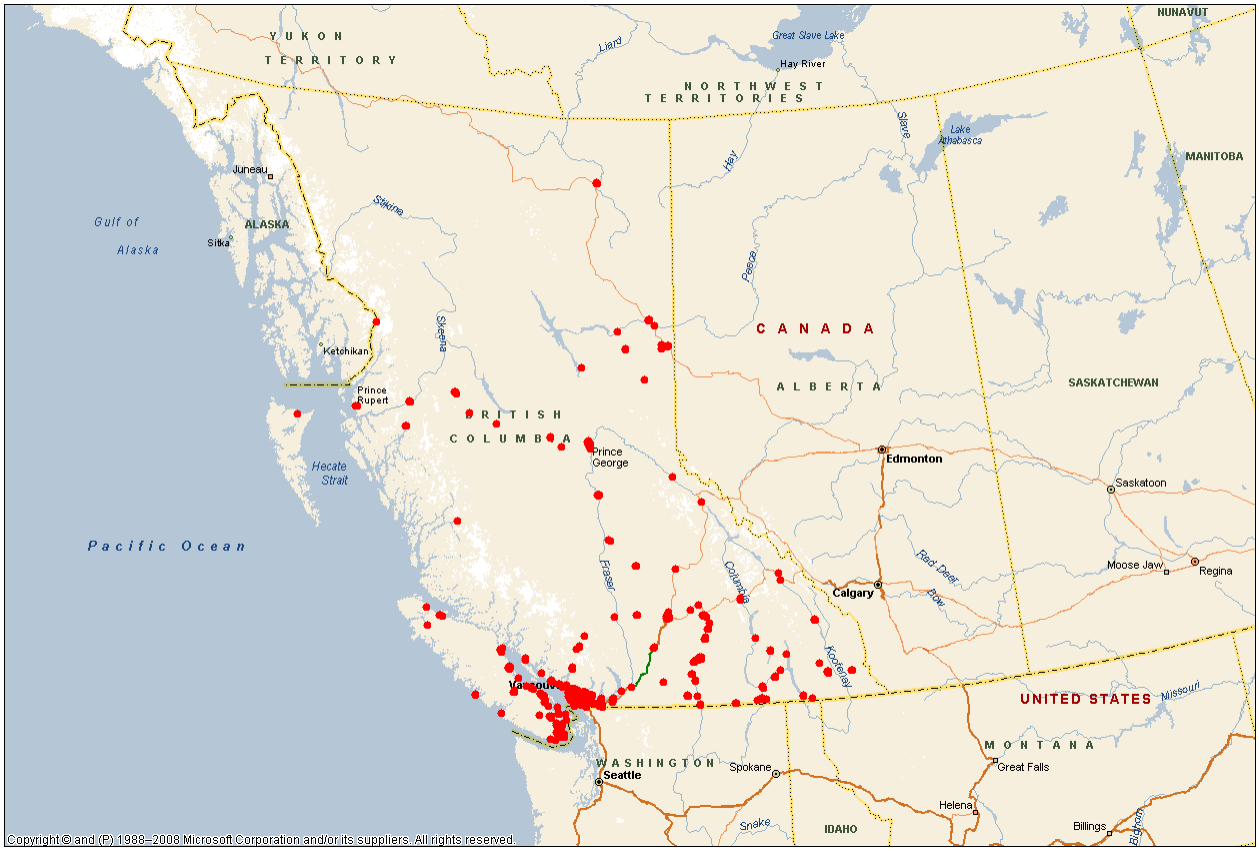
- *Retail Recycling Plan*: This program, a principal focus of the Call2Recycle® education program, aims at reaching consumers through retailers who sell batteries and battery-powered products. Participating retailers who serve British Columbia include Battery Experts, Canadian Tire, Future Shop, The Home Depot, London Drugs, Makita Factory Service Centers, Personal Edge/Centre de Rasoir, and The Source by Circuit City, Sears, Sony Style and Zellers. In addition to these national retail chains, however, the Call2Recycle® program is available to independent retail stores and regional retail chains. The full listing of BC retail sites that have signed up with the Call2Recycle® program are listed in *Appendix 14.*

- *Community & Public Agency Recycling Plan*: The Community and Public Agency Recycling Plan are targeted to municipalities, communities, public agencies (such as hospitals, police and fire departments), institutions and government agencies. The 147 BC sites already participating in this program are listed in *Appendix 15*. Included among the many collection initiatives for communities and public agencies are curbside collection, special waste collection events and household recycling centre collection.

- *Business Recycling Plan:* The Business Recycling Plan helps structure and manages the collection of qualified non-household batteries in the workplace, including bar code readers, laptop computers, two-way radios, cordless power tools, portable printers and PDAs. Approximately 80 businesses in BC are currently participating in the Call2Recycle® program. (*Appendix 16*).

The scope of collection locations indicated below may be significantly affected by the Ministry of the Environment's ultimate interpretation of what constitutes a hazardous waste collection site.

Map of British Columbia Collection Sites (As of September 1, 2009)



The Call2Recycle® British Columbia plan will expand this existing collection base using both RBRCC's existing resources and the additional contacts that will arise by virtue of its new support from non-rechargeable battery and cell phone producers. Participating as a collection location is purely voluntary for all organizations and companies. It is important to note that RBRCC operates in both official languages, with all-inclusive support from customer service to the full array of communication and support material.

The expansion of British Columbia's e-waste collection program also should contribute to increased battery collection locations by RBRCC in the province. RBRCC has well established working partnership with e-waste recyclers across the province, from which it already accepts rechargeable batteries through the Call2Recycle® program. This relationship will be further intensified to ensure that all batteries collected through e-waste initiatives are channeled in the Call2Recycle® program for recycling. Any e-waste depots or other battery collection and recycling processors who are not Call2Recycle® participants / partners will be asked to provide their collection data for inclusion in RBRCC's annual report of overall battery collection results in British Columbia.

To become a collection site, interested program participants are provided instructions and required to complete a sign-up application form *(Appendix 17).* Upon completion of

the application, each new participant is then assigned a unique identification number. These numbers, like those assigned to existing participants ('sites"), allow tracking of all materials assigned and returned by the site. The site will then receive collection boxes (including plastic bags in which to place the individual battery to ensure safe storage and shipping as well as the "site I.D." marked on the box along with a pre-paid/pre-addressed return label), posters and safety/handling instructions to begin their collection initiative (*Appendix 18*).

The collection containers, made of corrugated cardboard with 92% post-consumer / 8% pre-consumer recycled content, are currently and will continue to be available in two sizes: one capable of holding approximately 9 kilograms of batteries (primarily used for collection at retail) and the other capable of holding approximately 18 kilograms (primarily used with higher quantity generators such as municipalities and business). These materials, along with transportation and recycling services, are and will be provided free-of-charge.

Larger quantity generators also have and will continue to have the option to utilize their own shipping containers, utilizing pre-approved labeling *(Appendix 19)* and adhering to the same preparation requirements (i.e. use of plastic bags to contain each collected battery) as per the Call2Recycle® collection containers. Bulk containers are preferred by Call2Recycle® as a more cost-effective means of collection, sorting and transportation. For those Call2Recycle® municipal collection locations that generate at least 150 kilograms of batteries per shipment, RBRCC will negotiate a fee to support the municipalities' costs for sorting, packaging and handling material.

Adherence to transportation and safety guidelines for battery collection is an ongoing priority within the Call2Recycle® program. All personnel handling Call2Recycle® collection containers must be instructed to read the preparation and shipping instructions for proper battery collection *(Appendix 20)* as well as watch Call2Recycle®'s safety training video. This video can be viewed online at http://www.rbrc.org/safety/safety_video.html.

When a used battery or cell phone is turned in for recycling, each is to be placed and sealed in an individual plastic bag provided by Call2Recycle®. Bags are used to comply with Federal transport laws in Canada which require that certain types of primary and rechargeable batteries be insulated from possible electrical short circuit during transport (excerpts from regulations of relevance include: *the cells are separated to prevent short circuits*; *These dangerous goods may be handled, offered for transport or transported under this shipping name if the dangerous goods are (a) protected from short circuits. . . .* See *Appendix 21*). If bags are not available, Call2Recycle® also allows the use of non-conductive electrical tape to cover the battery terminals.

Once the collection container is filled and adherence to the "one battery/cell phone – one bag" preparation standard is confirmed, the assigned person responsible for the Call2Recycle® program at the collection site must write his/her address on the shipping label and securely seal the box when full. He or she must then call Purolator Canada, Call2Recycle®'s shipping service, or just include in his/her outgoing Purolator pick-up

services. The pre-paid, pre-addressed container is then scanned by Purolator and, as of the time of this submittal, delivered to Newalta (Fort Erie, ON) where the content of the containers are sorted according to battery chemistry, weights recorded and readied for shipping to the designated-according-to-chemistry recycling processor. Newalta is assigned the management of shipping documentation and any manifesting of shipments to the final recycling destination. This destination may change depending on the outcome of identifying and selecting a processor and sorting capability.

The current Call2Recycle® program operates, and will operate, in accordance with intra- and inter-provincial shipping and transportation approvals provided by Transport Canada, the BC Ministry of Environment and all other provincial environment and transportation ministry approvals (*Appendix 22*). All shipments that are transported internationally are manifested in compliance with the Basel Convention and ISO standards (*Appendix 23*).

5.2 Processing and Recycling

The constituents of all of the used batteries and mobile phones collected through the Call2Recycle® program and RBRCC BC plan are and will be reclaimed. However, different battery chemistries and phones require different reclamation methods. Therefore, RBRCC utilizes and will continue to utilize several service providers.

Unsorted used batteries (and used cell phones) collected under the Call2Recycle® program are sent, as of the time of this submittal, to Newalta Services in Fort Erie, Ontario for sorting. Newalta has been providing sorting services for Call2Recycle ® since 1997 and has an exemplary record. Call2Recycle will investigate another sorting location in Western Canada as battery volumes grow. From Newalta, sorted materials will be sent to licensed and well-operated commercial reclamation facilities in Canada, the U.S and Europe. Nickel-containing batteries will be processed at Inmetco's facility, Ellwood City, Pennsylvania facility; lead-containing batteries will be sent to Nova Pb in Ville Ste-Catherine, Quebec, Ontario; Lithium Ion batteries will be sent to Xstrata in Sudbury, Ontario and non-rechargeable batteries will be sent to a yet to be determined processor.

Sorted alkaline batteries may be sent in bulk directly to a recycling center. Details on this arrangement are in development and will be in place by time of launch.

Cell / mobile phones are also currently sent to Newalta for sorting and then sent to a processor for potential refurbishment or recycling. No waste from this process will be disposed outside of North America.

All of these facilities use thermal recovery processes to reclaim materials. Recovered metal materials include: nickel, iron, lead, cadmium and cobalt. These metals are either returned to rechargeable battery manufacturers or used to make other products such as stainless steel. Some processes also recover plastic and other constituents.

To expand their existing extensive recycling network, Call2Recycle® has issued a Request for Proposal (RFP) (*Appendix 24*) to potential primary battery processors and

sorters who will bid on fulfilling services in the future. All providers will be held to the same standards of environmental and efficiency excellence as demanded from existing service providers.

6.0 PERFORMANCE MEASURES

In the past three years, Call2Recycle® has collected 55,727 kilograms of batteries in British Columbia, with 25,413 kilograms having been collected in 2008.

Here is a summary of British Columbia battery collections of the Call2Recycle® program (in kilograms) in the last three full years:

	2008	2007	2006
Ni-Cd	13,492	11,079	13,638
Ni-Mh	2,444	1,595	184
Li-ion	5,214	1,206	201
SSLA	3,456	1,509	351
Primary	806	507	43
Total	25,413	15,897	14,417

Call2Recycle® measures its performance both on the amount it collects and the amount reclaimed from each battery that can be used in secondary products. The program abides by the European Union Battery Directive on "Recycling Efficiency" in both how to calculate these rates and also what benchmarks for recovery are appropriate based on battery chemistry.

Below are the expected battery recovery rates under the Call2Recycle® program:

Call2Recycle® Recycling* Rates

Battery Chemistry	Recovery Rates
Primary Alkaline	50%
Small Sealed Lead Acid (SSLA)	65%
Nickel Cadmium	75%
Other Rechargeables	50%

** "**Recycling**" rate in this context refers to the weight of each battery reclaimed for use in a secondary product. This is sometimes referred to as "**recovery rate**."*

Calculating the amount of batteries collected as a percentage of the batteries sold is often highly problematic for two reasons. First, batteries are often sold through a complex sales chain, from manufacturer to battery-powered product manufacturer to wholesaler to distributor to retailer. Most battery stewards can only estimate sales into BC. Second, depending on the chemistry of the battery, as many as 95% of batteries are sold in or with a product, further complicating tracking, disposal and recycling.

Below represents the best faith estimate of the amount (by weight) of batteries sold into British Columbia and the target collection rate[1] for the Call2Recycle® program:

Call2Recycle® Collection Targets
(Weights in Kilograms)

Batteries Sold / Collected	Base Year*	2010	2011	2012	2013	2014
Batteries Sold Into BC**	2,465,000	2,514,000	2,565,000	2,616,000	2,668,000	2,721,400
Primary Batteries Collected***	1,000	241,340	369,360	523,200	683,008	870,848
Secondary Batteries Collected***	30,000	60,340	92,340	130,800	170,752	217,712
Total Collected	31,000	301,680	461,700	654,000	853,760	1,088,560
Collection Rate Targets						
Primary Batteries	NA	12%	18%	25%	32%	40%
Secondary Batteries	6.1%	12%	18%	25%	32%	40%
Total Collection Rate	1%	12%	18%	25%	32%	40%
Grams Collected Per Capita	7	68	105	148	193	246

** Assumes that program years, including based year, runs from July 1 – June 30.*
*** "**Batteries Sold into BC**" represents estimates developed by industry stewards based on total Canadian battery sales allocated by provincial population. Years 2010-2012 assume an annual increase in sales of 2%. Upon launch, more accurate baseline information will be used based upon collection of sales data from battery stewards.*
****"**Batteries Collected**" will be reported by major chemistry and will not simply be reported as "**primary**" and "**secondary**". Estimates of subcategories of batteries collected would be too speculative at this time.*

There are no available estimates on primary batteries currently collected in BC. Many programs collect primary batteries and there is no central source for this information.

In the spirit of establishing stretch goals and assisting the province in being recognized as one of the most "green" jurisdictions in the world, Call2Recycle's plan includes collection targets matching the European Union Battery Directive, which calls for a 25% collection rate in 2012. Given the ambitiousness of these targets, Call2Recycle® will reassess plan design and targets compared with actual sales after two years of program operation to ensure that targets are realistic and program design is sufficiently robust.

Even at a very ambitious collection rate of 40% in year five of the plan, performance still falls short of the Ministry's target of 75%. As a result, over the next 3 years, Call2Recycle® will conduct a study on how and if the non-recycle batteries are disposed at end of life in the marketplace and include the results of this study in its annual report to the Ministry at the end of the 2012 performance year.

[1] "***Collection Rate***" used throughout this document mirrors BC's regulatory use of the term "***Recovery Rate***", that is, the batteries collected for recycling in the market divided by the number available for collection (expressed as a percentage).

While sales and collection targets listed above are only broken down into “primary” and “rechargeable” categories, actual collections will be reported to the Ministry by major chemistry. These major chemistries are listed in section 8.0. For the purposes of this plan, it was not meaningful to create overall targets by specific chemistries given the dynamic nature of the marketplace.

The outcome of the current discussions regarding permitting regulations for collection sites may affect the number of collection locations and total battery collections. As a consequence, targets may need to be revised.

The above numbers include batteries that are in electronic products covered by the Electronic Stewardship Association of British Columbia (ESABC) to fulfill provincial regulatory requirements. As more stewardship organizations are designated to handle product that contain and / or use batteries, Call2Recycle® is prepared and committed to working with them to the safe, effective and efficient end-of-life disposal of these batteries.

Within two years after formal approval, Call2Recycle® commits to providing recovery rates for cell phones in its annual report filings. Going forward, Call2Recycle® proposes that the results of the first year of the program be used as a basis for discussions with the province to develop specific targets. Given current collections, Call2Recycle® expects to collect a recycle approximately 1400 kg / 8000 units the first full year of operation.

6.1 CONTINUOUS IMPROVEMENT

RBRCC, in conjunction with RBRC, analyzes numerous metrics to determine more effective methods of increasing participation in the Call2Recycle® program. RBRCC measures the amount of designated waste recycled by weight. RBRCC collects weight data on a monthly basis and compares the amount collected with previous months and years. RBRCC then calculates a BC diversion rate in accordance with the methodology set forth in *Appendix 25*. All these practices will be continued as part of the RBRCC BC plan.

RBRCC also employs sophisticated tracking and reporting software that allows for the preparation of various reports pertinent to the Call2Recycle® plan and reporting requirements.

The reporting capabilities allow RBRCC to generate reports with unique and detailed data *(Appendix 26),* such as:

- By City, Region, postal code, and overall Province
- By individual site
- By day/month/year or any other required time period
- Retail store or chain
- By collection channel

- By weight and containers received
- By battery type (chemistry)
- Comparative analysis including participation rates

Call2Recycle® also expects to report on collection information on a per capita basis and by regional district within the province. The annual report will also track the program's performance, particularly in regards to materials reclaimed from end-of-life battery disposal, compared with the pollution prevention hierarchy.

RBRCC will continue to directly communicate with individual collection sites regarding their activities by tracking monthly totals of rechargeable batteries and cellular phones collected, RBRCC can use targeted outreach efforts to increase collections and participation rates at individual collection sites or areas.

Historically, RBRCC's strategic planning has been grounded on facts obtained through consumer awareness surveys. These marketing plans were developed partly by segmenting consumers with similar recycling characteristics to better disseminate Call2Recycle® 's message. For instance, in a recent analysis, consumer segments included heavy use recyclers, light use but dedicated, hoarders, reforming heavy users, abashed trashers, unabashed trashers, those who didn't care and those with no occasion to recycle. This analysis helped RBRCC create more effective promotional materials and thus increase participation among consumers. Analogous efforts will continue in support of the ongoing success of the Call2Recycle® British Columbia plan.

Furthermore, in keeping with the *continuous improvement* mandate established from the beginning of the Call2Recycle® program's implementation, Call2Recycle® British Columbia staff will monitor results on a monthly, quarterly and annual basis. In addition to quantitative performance indicators such as site participation and collected tonnage, this will allow success to be measured according to website visits, media impressions and targeted surveys.

Finally, RBRCC has long required vendors to meet rigorous qualification standards for collection and processing of batteries. Details of the standards are provided in *Appendix 24*. These will continue to be used as part of the Call2Recycle® British Columbia Plan.

Continuous improvement is fundamental to the current and future success of Call2Recycle®. As such, ongoing investment in research and development to enhance our collection and recycling infrastructure has been essential.

To ensure continued leadership in learning and program effectiveness, RBRCC and its parent RBRC participate in an extensive number of initiatives to coordinate and develop best practices with analogous battery and cell phone organizations operating around the world, such as RECHARGE in Europe and PRBA in the U.S. In addition, RBRCC and RBRC support and cooperate in research and development programs seeking better mechanisms to recycle rechargeable and primary batteries. Most recently,

through the American Recovery and Reinvestment Act of 2009 (the "Stimulus Act"), RBRC has been included in two applications that have been filed with the U.S. Department of Energy to improve the recycling of lithium ion and primary batteries.

Industry-wide investments are further supplemented by individual R&D initiatives spearheaded by our battery stewards, all of whom also support the Call2Recycle® British Columbia plan and collection/recycling network. Details pertaining to various process investments may be found in *Appendix 27*.

In addition to processing and efficiency improvements, RBRC/RBRCC annually invests to improve marketing outreach and communication programs to maximize collections.

To do this, we have implemented and will continue to implement a number of initiatives to sharpen our message:

1. *Collection Infrastructure*

   Through research and development, RBRC/RBRCC periodically assesses the program offerings, including collection boxes, plastic bags, shipping guidelines, and informational materials. When the Call2Recycle® British Columbia plan is expanded, research and development will remain an important element, including the investigation of a collection box redesign to improve safety and transportation requirements.

2. *Brand Awareness*

   To better understand driving forces behind consumers' "green" practices and attitudes, and to determine consumer recycling habits in general, Call2Recycle® has been tracking consumers' attitudes and practices for the past three years. The information gained from these surveys is distributed to media outlets and participants, and gives Call2Recycle® an opportunity to further spread the word about battery recycling. (*Appendix 27*)

   Additionally, program awareness will be tracked among key audiences, including Retail Partners, Collection Site Managers, Key Opinion Leaders, and Green Business Executives. A brand awareness study performed among US and Canada audiences, will explore the current awareness and perception of the Call2Recycle® program, the importance of recycling, environmentalism and sustainability and how it impacts their organization, the relative importance of battery recycling within their activities (including awareness of the difference between rechargeable and regular batteries), and attitudes and motivation for environmental activities (including revenue opportunities). The brand awareness study will provide a reliable and actionable baseline measure and tracking measurement for Call2Recycle® 's branding efforts. This study is currently scheduled to be conducted in 2009 and again in 2010; however, may be expanded upon acceptance of the proposed Call2Recycle® plan.

RBRC/RBRCC is undergoing a brand enhancement project to establish Call2Recycle® as its primary brand identifier by associating itself with environmental stewardship and "doing the right thing" in the broader sustainability sense. To do this, a branding effort is being developed to identify batteries and their environmental characteristics within the larger context of sustainability. Call2Recycle® will reposition itself to be synonymous with environmental stewardship by serving as the best mechanism for battery manufacturers (as well as consumers) to fulfill their product stewardship responsibilities. Through this branding project, the Call2Recycle® brand will serve the goal of unifying its purpose, mindset and mission.

3. *Program Efficiencies*

   On behalf of RBRC, the Product Stewardship Institute (PSI) has developed a set of metrics for assessing the performance of programs that collect and recycle primary and rechargeable batteries that policy makers, program participants, and other stakeholders can use to evaluate and strengthen battery collection initiatives. Through this study, Call2Recycle® gained even further insight into performance-based metrics that will help supplement measures of the number of batteries collected, or a collection rate that is based on the number of batteries available for collection. (See *Appendix 28*)

   Additionally, RBRC commissioned a research study to gain information on the market shares of key companies in the portable rechargeable battery market in the U.S. and Canada. Included in this study is also an estimate on the number of batteries sold separately versus those sold in products. The results from this study will assist RBRC/RBRCC in understanding the landscape of the primary players and the collection potential in both the U.S. and Canada.

4. *Processing*

   Pursuing the automation of sorting process for collected batteries will significantly improve the efficiencies of the battery recycling infrastructure. This initiative in addition to other continuous improvement opportunities will form the foundation of ongoing R&D initiatives for RBRCC.

Call2Recycle commits to continuous research and development efforts over the next several years. Some of the important areas of inquiry will include: logistics infrastructure necessary to handle an increasing breadth of product and materials; consumer behavior towards disposing electronics with batteries compared with just batteries; and, life cycle assessment of battery recycling. Results of this investment will be annually reported to the BC Ministry and available to the public.

The battery industry believes in continuous improvement in broader life cycle management of its products, examples of which will be highlighted in the Call2Recycle's annual report.

7.0 PROGRAM SCHEDULE – MILESTONE DATES

Public Consultations:

Monday October 5, 2009 – Vancouver***
Time: 1:30 – 3:30 pm
Location: The Coast Vancouver Airport Hotel
1041 SW Marine Drive
Vancouver, BC V6P 6L6
*** Webcast also was available

Tuesday October 6, 2009 - Nanaimo
Time: 10:30 am – 12:30 pm
Location: The Coast Bastion Inn
11 Bastion Street
Nanaimo, BC V9R 6E4

Wednesday October 7, 2009 – Kelowna
Time: 10:30 am – 12:30 pm
Location: Delta Grand Okanagan
1310 Water Street
Kelowna, BC V1Y 9P3

Final submission of the stewardship plan to the Ministry of Environment:

- December 22, 2009

Program operational:

- July 1, 2010

8.0 PROGRAM INCLUDED AT STARTUP

The program will commence with the list of products required by the regulation:

- Batteries eligible for collection and recycling are those weighing less than 11 lbs/5 kg each of the following chemistries::
    - **Nickel Cadmium (Ni-Cd)**
    - **Nickel Metal Hydride (Ni-MH)**
    - **Lithium Ion (Li-ion)**
    - **Nickel Zinc (Ni-Zn)**
    - **Small Sealed Lead (Pb)**
    - **Alkaline-Manganese and Zinc-Carbon**
    - **Zinc-air**
    - **Silver Oxide**
    - **Lithium (li)**

- Rechargeable batteries power cordless power tools, cellular and cordless phones, laptop computers, camcorders, two-way radios and digital cameras. All types of cell phones are accepted - any size, make, model, digital or analog, with or without battery or charger.
  - The program does not recycle household cordless phones, mobile installed or bag phones, two-way radios, or pagers.

- Cell phones / mobile phones including “smart phones” but not cordless phones.

- Call2Recycle® **DOES NOT ACCEPT** the following types of batteries:
  - Small Sealed Lead Acid weighing **more than** 11 lbs/5 kg each
  - Wet celled batteries (including car batteries)

9.0 FUNDING

As of the submission of this plan, more than 175 rechargeable battery manufacturers and marketers finance the *Call2Recycle®* program. These companies support RBRCC by licensing from RBRC the right to place a trademarked *Battery Recycling Seal* (“Seal”) on their Ni-Cd, Ni-MH, Li-ion, Ni-Zn and Pb batteries and/or battery-powered products sold in the United States and Canada. *(Appendices 29 & 30)* Fees are based on the total number of licensed battery cells sold into North America, without distinction on the nation, state or province in which the sales occur, and cover the total cost of the RBRC/RBRCC North American rechargeable battery program. Those RBRC licensees selling products in BC would be considered stewards. No additional fees will be assessed against those licensees to support the RBRCC BC plan described here.

Funding for costs of the RBRCC BC plan attributable to non-rechargeable batteries will be provided on a quarterly basis by stewards of those products who have chosen to support the Call2Recycle® stewardship plan.

As of the date of submission of this plan, Energizer Inc., Panasonic North America, Inc., Duracell, Inc. (Procter & Gamble), Rayovac (Spectrum Brand), Sony Canada and Kodak Canada have agreed to support expansion of RBRCC’s British Columbia program to cover non-rechargeable batteries. (See *Appendix 31*) With Ministry approval of our plan, RBRCC will work to alert all battery manufacturers of their financial and regulatory responsibilities for the implementation of this plan. Assessed fees will be based on relative sales into BC amongst the non-rechargeable battery industry.

10. RESPONSIBILITIES AND OBLIGATIONS

The program plan is based on a shared responsibility model where all affected parties have a role to play.

10.1 Processing and Recycling Contractors

The current RBRCC program operates, and RBRCC BC plan will operate, in accordance with intra- and inter-provincial shipping and transportation approvals

provided by Transport Canada, the BC Ministry of Environment and all other provincial environment and transportation ministry approvals. All shipments that are transported internationally are manifested in compliance with the Basel Convention and ISO certifications.

10.2 Provincial Government

The provincial government is expected, through its enforcement authority, to ensure that regulations allow for adequate fines and penalties to be levied against those individuals not in compliance with the regulation or the approved program. The provincial government is expected to enforce program compliance in a timely and effective manner. The provincial government is also expected to implement policies to ensure that government procurement officials only procure batteries and cell phones from program compliant corporations.

10.3 Local Government

Local government may wish to act as collection sites for designated material with appropriate reimbursement for services provided. Nothing in this plan is intended to dictate whether a local government participates as a collection site.

10.4 Consumer or End User

Consumers will be responsible delivering designated batteries to collection points.

10.5 RBRCC

RBRCC will manage Call2Recycle® to provide an environmentally effective program at the lowest responsible cost and will ensure that the public is kept informed of program costs and activities.

11.0 RECYCLED MARKET DEVELOPMENT

In contrast to some other materials collected through recycling efforts, markets are well developed for the metals and other materials reclaimed from used batteries. Ready insight into these markets can be obtained at the website www.metalprices.com/FreeSite.

The diligence of RBRCC and its' recycling suppliers to ensure that the maximum reuse potential of recovered metal is a cornerstone of the longevity and credibility of the Call2Recycle® program.

12.0 ANNUAL REPORT

RBRCC will provide an annual report to the British Columbia government as stated in the regulation. The annual report will also be available on the program website as a

PDF file. The report will include, but not be limited to, the following:

- A summary of the educational materials and educational strategies used for Call2Recycle

- The location of collection facilities, events and any changes in the number and location of collection facilities

- A description of how the recovered products were managed in accordance with the pollution prevention hierarchy

- An estimate of the total amount of designated products sold into the province by producers that have designated Call2Recycle® and the total amount collected

- Independently audited combined financial statements of RBRC (USA) and RBRCC (Canada) and performance results specific to British Columbia

- A comparison of the approved plan performance for the year with the performance requirements and targets in the regulation and the approved plan. The plan performance measures will include batteries collected by chemistry, collection per capita, cell phones collected and collections per the 28 regional districts within the province. Also critical to this annual report will be a discussion of performance relative to the pollution prevention hierarchy.

- A summary of the research and development efforts conducted during the last year and results that they have yielded.

PART B – ALIGNMENT WITH MINISTRY OF ENVIRONMENT BUSINESS PLAN PRINCIPLES

Producer/User Responsibility

- Responsibility for waste management is shifted from general taxpayers to producers and users
- The management of used batteries covered by this stewardship plan is solely the responsibility of producers and users of these products
- Responsibility is not shifted to other levels of government without consent

Responsibility, detailed by agreed contracts, will take place only where local governments willingly consent to involvement in the recovery system.

Level Playing Field

- All brand owners within each material category are subject to the same stewardship obligations.
- 180 manufacturers of batteries and products that contain batteries, and those cell

phones producers that have selected Call2Recycle® to serve as their agent in collecting cell phones, have agreed to participate in a common collection and recycling program. Through market monitoring, retail competition and collection audit, non-participating brand owners will be identified and brought into the system through cooperation or, if necessary, through the enforcement provisions of the Regulation.

- All consumers, businesses, municipalities and public agencies have free access to Call2Recycle® collection facilities.

The combination of collection sites and systems to be used for batteries will ensure that consumers in all regions of the province have reasonable access.

Results Based

- Programs focus on results and provide brand owners with flexibility to determine the most cost-effective means of achieving the desired outcomes with minimum government involvement.
- The program outlined in this stewardship plan allows for maximum flexibility in determining the most cost-effective method of achieving satisfactory recovery results. Government involvement will be minimized at all levels.

Continued innovation is the hallmark of the battery industry. Collection programs as detailed in this stewardship plan provide the segregation of products necessary to produce the most beneficial environmental and economic outcomes available.

Transparency and Accountability

With the RBRCC being already well-established through our 12 years of in-market experience, the infrastructure and processes are in place to allow the RBRCC BC Plan to commence immediately upon approval. Operation will proceed as it has in the past, building upon already trained collection sites, service chain providers, and existing communication relationships in the marketplace. To ensure that we tap into every BC resource to maximize collections and the success of the Call2Recycle® program, we intend to establish an internal advisory committee that will track our success and innovate additional programs. The members of this committee will include representatives of rechargeable battery manufacturers, rechargeable product manufacturers and primary battery manufacturers in addition to representatives from our collection chain and invited representatives from the BC Ministry of Environment.

February 2, 2010

Mr. David Ranson, Director
Environmental Quality Branch
Ministry of the Environment
P.O. Box 9341
Victoria, British Columbia
V8W 9M1 Canada

Dear Mr. Ranson,

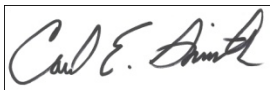
This letter is a follow-up to conversations we have had with Ministry staff regarding the our producer responsibility plan submitted to your offices on December 22, 2010.

We are advising you that to the extent that companies are obligated under s. 2.1 (c) of the British Columbia *Recycling Regulation* commencing July 1, 2010, as producers of mobile devices designed primarily to connect to a cellular or paging network, including, without limitation, phones, cellular personal digital assistants and pagers, the following companies have indicated that it is their current intention to appoint Call2Recycle® as their agent to discharge these obligations pursuant to the provisions of s. 2(2) of the *Recycling Regulation*, once the Call2Recycle® program stewardship program for these products is approved by the Director:

- Best Buy Canada
- HP Canada
- Ingram Micro Canada
- Sony of Canada Ltd.
- London Drugs Canada

Please also be advised that LG Canada has advised that they wish to have the option of joining the Call2Recycle® program. Please let me know if you require further clarification of this matter.

Sincerely,



Carl E. Smith, LEED® AP
CEO / President
Call2Recycle® | Rechargeable Battery Recycling Corporation of Canada

Cc: Teresa Conner, Environmental Quality Branch, Ministry of the Environment
David Lawes, Environmental Quality Branch, Ministry of the Environment
Joyce Thayer, ESABC

SELECTED APPENDICES

(Others can be found online at www.call2recycle.ca)

Appendix 1.1

Questions and Comments (along with responses) from the Public Regarding Call2Recycle's All-Battery Product Stewardship Plan

QUESTIONS ARISING AT PUBLIC CONSULTATION SESSIONS

Does it matter where the batteries come from?

No. All consumer battery chemistries will be accepted in our Call2Recycle® program.

Will Call2Recycle® provide the packing tape for the boxes and batteries to be collected?

Free collection boxes provided to all Call2Recycle® collection sites contain plastic baggies that should be used to contain each battery collected and put into our collection box. Once full, the collection box can be sealed with the double-sided tape that is on the top flap of our box. If a site runs out of plastic baggies, they can call our team (888-224-9764) and they will send additional supplies. Alternatively, they can use non-conductive electrical tape to separate the battery terminals from others.

Can more than one battery be put in a bag?

No. The objective of the bag is to provide a physical separation between batteries as a safety measure.

More information needed regarding drums and shipping requirements.

Thank you. We will ensure that our "how to ship" communication materials properly explain how large quantity collection sites can ship in drums rather than using our 20 lb or 40 lb collection boxes. Details about our safety & shipping instructions may be found by visiting: http://www.call2recycle.org/safety-guidelines.php?c=79&d=103&w=2&r=Y

Who are our marketing partners?

Call2Recycle® has a wide range of program supporters who help to advance the awareness and participation in our battery collection program. Included on our list are: our Licensees (each of whom markets and sells batteries; in addition to incorporating the RBRC Seal on their batteries, we encourage them to educate their customers how to participate in Call2Recycle®); our collection sites (each collection site interacts with customers and battery users on a regular basis; education and promotion materials in addition to our collection containers are provided to them for their ongoing communication use); government (provincial, regional, local as well as federal --- all of whom who have ongoing interaction with the public who are interested in environmental initiatives and how they can participate); Recycling Council of British Columbia as well as Kids Help Phone and other organizations with whom Call2Recycle® works to advance our communication and program support messages.

Municipalities are going to incur costs for preparing shipments. Will these be reimbursed by Call2Recycle?

Larger quantity generators such as municipalities have and will continue to have the option to utilize their own shipping containers, utilizing pre-approved labeling and adhering to the same preparation requirements (*e.g.,* use of plastic bags to contain each collected battery) as with the Call2Recycle® collection containers. For those Call2Recycle® municipal collection locations that generate at least 150

kilograms of batteries per shipment, Call2Recycle® will entertain a negotiated fee to support the municipalities' costs for sorting, packaging and handling material.

Regarding the collection of cell phones, are cordless phones included?

Any cellular phone and cellular phone rechargeable batteries are accepted in the Call2Recycle® program. Any size, make, model, age of phone, digital or analog, with or without battery will be accepted. However, household cordless phones, mobile installed or bag phones, two-way radios and pagers cannot be included for recycling.

Are cell phone accessories accepted as well?

Yes, both the cell phone and any accompanying accessories are accepted for collection in Call2Recycle®.

Are you going to impose an "eco-fee" on (alkaline) batteries collections?

Right now, there is no charge to participate in our collection and recycling program for rechargeable batteries, with the program support funds being paid for by the manufacturers and marketers of batteries who are licensees of the Call2Recycle® program. This will be the same approach used when Call2Recycle® expands our collection to all batteries in British Columbia.

Consider promoting your program in our municipal calendars that we distribute to our residents.

Thank you for this suggestion. We will include this in our review of available communication options to reach the public and program participants.

QUESTIONS RECEIVED POST OUR PUBLIC CONSULTATION SESSIONS

1. What are the details for the Pollution Prevention side of things - what are the component materials of the batteries & cell phones? What happens to those materials (in terms of process, reuse, recycling, waste)? These details should be included in the plan as well as how the program plans to move the materials up the waste hierarchy.

Considerable proactive investment of time, effort and money has been devoted in recent decades to respect and incorporate 3Rs (Reduce, Reuse and Recycle) programs in the design, manufacture and end-use management of portable batteries by licensees of the Call2Recycle® program and the primary battery manufacturers included in our program plan for British Columbia. The reduction/elimination of mercury in primary alkaline & carbon zinc batteries and discontinuation of mercuric oxide batteries were completed in 1996. Zinc air button cells were introduced in the same year (as a replacement to mercuric oxide button cells) with a no-added mercury version having been technically developed and to be introduced by 2010. In addition to the above, a voluntary recycling program for Nickel-Cadmium (NiCd) rechargeable batteries was introduced across Canada in 1997 which then resulted in further collection enhancements in recent years to include the recycling of all rechargeable batteries and cell phones. Consumers have a wide range of choices of battery product types that can address 3Rs and our industry has demonstrated throughout many decades our commitment (past, ongoing and future) to proactively reflect environmental respect within our product offerings.

Regarding the specifics of our Call2Recycle® program, when collected, the batteries and cell phones are sent to our consolidation centre (Newalta Services) for sorting according to chemistry. Newalta has been providing sorting services for Call2Recycle® since 1997 and has an exemplary record. From Newalta, sorted materials are sent for recycling, incorporating thermal recovery processes which reclaim the metals, at licensed commercial reclamation facilities in Canada, the US and Europe. At least initially, nickel-containing batteries will be processed at Inmetco's facility in Ellwood City, Pennsylvania; lead-containing batteries are sent to Nova Pb in Ville Ste-Catherine, Quebec; Lithium Ion batteries are sent to Xstrata in Sudbury, ON and non-rechargeable batteries will be sent to a yet-to-be-determined processor. The recovered materials are then made available for use in new products such as batteries and stainless steel. Cell phones are refurbished and resold when possible with a portion of the proceeds received from the resale of phones benefiting select charities including *Kids Help Phone*.

Our program will not ship any used batteries or cell phones to a processor that has not been qualified by Call2Recycle®. Work to qualify potential processors by Call2Recycle® is in the process of completion. Processors will be selected through a competitive process that will require compliance with applicable environmental, health and safety and transportation regulations including, but not limited to, the following:

- Basel Action Network (BAN) qualification and ISO certification
- Final destination receipt and disposal documentation/certification, downstream processing material management and residual material and waste management
- Recycling processor standards as adopted by the Electronic Stewardship Association of British Columbia (ESABC)

2. What is your organization doing to encourage design for the environment? (such as reuse, reduction in materials used or the toxicity of the materials, etc). There should be a DfE component in the plan.

As mentioned above (Question 1), considerable proactive investment of time, effort and money has been devoted in recent decades to respect and incorporate 3Rs (Reduce, Reuse and Recycle) programs in the design, manufacture and end-use management of portable batteries by licensees of the Call2Recycle® program and the primary battery manufacturers included in our program plan for British Columbia. The reduction/elimination of mercury in primary alkaline & carbon zinc batteries and discontinuation of mercuric oxide batteries were completed in 1996. Zinc air button cells were introduced in the same year (as a replacement to mercuric oxide button cells) with a no-added mercury version having been technically developed and to be introduced by 2010. In addition to the above, a voluntary recycling program for Nickel-Cadmium (NiCd) rechargeable batteries was introduced across Canada in 1997 which then resulted in further collection enhancements in recent years to include the recycling of all rechargeable batteries and cell phones. Consumers have a wide range of choices of battery product types that can address 3Rs and our industry has demonstrated throughout many decades our commitment to proactively reflect environmental respect within our product offerings.

All of the above have been done well in advance of <u>regulated</u> *Extended Producer Responsibility* programs, reflective of an industry committed, both in the past, ongoing and into the future, to incorporating environmental stewardship within the context of business actions.

3. What are all the performance measures that will be used? There should be consumer awareness, collection per capita, recovery or capture rate, GHG impact of the program and accessibility measures.

As identified in our plan (Section 6), Call2Recycle® has developed a wide-range of performance measures that will help track achievements and develop insight to enhance continued program success.

RBRCC uses the Call2Recycle® brand as the primary means to communicate with our stakeholders. With baseline program awareness data being compiled in 2009, RBRCC will continue to measure our brand awareness and program understanding, helping to assess our ability to communicate appropriate behaviours and actions and incorporate improvements as appropriate.

Our collection performance is tracked on a daily, weekly, monthly and yearly basis, both overall, by chemistry and accounts, as well as a wide range of other analytical measures to ensure that we maximize our performance and collection results. Call2Recycle® also routinely assesses the accessibility of its collection sites, which is a critical dimension in maximizing collection. By comparing collection sites with demographics of the British Columbia population, Call2Recycle® identifies underserved areas and populations. In this regard, while Call2Recycle's current 1150 collection locations serve as an effective foundation for this program, Call2Recycle® anticipates significant growth in sites, particularly during the first few years of implementation of an all-battery plan.

4. The plan mentions a seal to be shown on batteries. Are all the manufacturers on board with this and how long will it be until it is implemented? Sounds like a great idea.

Our Battery Seal has been an integral part of our program since its inception in the mid 1990s. As a Licensee of the Call2Recycle® program (Rechargeable Battery Manufacturer), it is a requirement to place the seal on all rechargeable batteries sold in North America within 6 months of becoming a Licensee. The use of this seal accompanies the payment of license fees which fund Call2Recycle's efforts to provide for the environmentally-sound collection and recycling of used rechargeable batteries and a nationwide public education program about rechargeable battery recycling. Reflective of the concentrated focus of Call2Recycle's proposed incorporation of primary batteries in our program plan for British Columbia, the placement of our Battery Seal is not a requirement for our primary battery program participants at this time. It is important to note that regardless if a rechargeable or primary battery has-or-does-not-have our Battery Seal, it is still accepted for collection in our program.

5. How will the program handle the sale of batteries within products? It will be a challenge but what are the steps the program will take to ensure a level playing field in this regard? These steps should be included in the plan.

Brand owners that are part of our Call2Recycle® program contribute funding for both standalone batteries as well as the batteries that are sold into the marketplace that are part of another product. "Easily removable" has been a mantra now for well over a decade for most products that contain batteries to permit their replacement as well as collection for recycling.

6. As your program is international, how will you deal with the separate communications for the BC market? (i.e. all batteries collected in BC but I assume still only rechargeables in most other jurisdictions).

While Call2Recycle® operates both nationally and into the United States, much of our communication program is focused locally through our program collection sites as well as the outreach utilized in our public relations, social marketing and advertising initiatives. Our marketing and communication intent is to ensure that British Columbians understand that batteries can be recycled through Call2Recycle® and how they can participate in our program.

7. What is the success rate of your communications to-date (i.e. level of consumer awareness of the program) in BC or even in Canada?

Please refer to Appendix 27 for details of our market research investigations that have been conducted over the past 3 years to assess current brand awareness of Call2Recycle®. Section 6.1 of our plan – Continuous Improvement – also details our efforts to use current awareness of Call2Recycle® as the basis for annual and ongoing assessments of awareness developments as our program continues to expand and entrench itself into all aspects of BC society.

8. The plan mentions cooperating with the BC MOE to develop new PSAs. Why would the program need the MOE cooperation? Would this not be the responsibility of the program to advertise its service?

It will be the responsibility of Call2Recycle® to create, develop and promote the Public Service Announcements (PSAs) as well as the support programs to create awareness and participation in Call2Recycle® in British Columbia. Securing the input of the BC Ministry of the Environment is a component of a good working relationship and partnership whose participants are operating with the same objective: offering and providing a battery recycling program for the citizens of British Columbia.

9. How will the program interact with the other cell phone programs in terms of communications, collections of others' materials and reporting on performance measures?

Call2Recycle® will continue to collect and recycle cell phones as part of our battery collection program. Reflective of the voluntary nature of our program, this does not obligate any business, organization, public agency, municipality or resident to use our program for the collecting of cell phones (or batteries). It is their choice as to how and whether they want to participate in Call2Recycle®. Currently, Call2Recycle® sends all cell phones to Market Velocity for recycling/refurbishing and has no plans to use other companies or organizations upon the approval of our collection program in British Columbia. While ours is not the only cell phone collection program, Call2Recycle® welcomes partnerships with existing and potentially additional cell phone collection initiatives with, at minimum, offering free collection and recycling services for any batteries collected by other cell phone programs through Call2Recycle®.

10. The targets are too low. As the program already has a collection network in place and communications developed, there is no reason not to set a much higher target and develop steps to get there (whether it be waste audits, working on landfill bans, community based social marketing projects, more targeted communications or research to understand what the barriers are). A low collection rate in Europe with very different systems to ours is no reason to not strive for higher here in BC where we are starting to develop a culture of using EPR programs to deal with products responsibly. If the lack of accurate sales data into BC is a problem, start working with Regional Districts to do waste audits to determine how much program product is leaking from the program.

The objective of Call2Recycle® is to collect and recycle batteries (and cell phones) from all aspects of society in British Columbia. We have developed and, with this proposed expansion, will provide the most comprehensive, free collection and recycling service for batteries in British Columbia. We welcome everyone's participation and support.

The setting of the targets identified in our plan reflects the reality of battery collection from many, many years of in-market experience in a wide number of countries. The best performing countries to-date: Germany, Belgium & France – have had mandatory, all-battery recycling programs in place for several years. In their first number of years, none of these countries realized a 25% collection rate. The learning gained from this is that consumer behaviour simply does not change overnight; a sustained effort over many years is essential to success.

Collection efforts in Canada to-date have been purely voluntary; it is the choice of the individual whether to recycle their batteries or not. The considerable difference in population concentrations between European countries and Canada also can have an impact on accessibility and convenience of collection efforts.

Waste audits of residential garbage have been conducted in the past to assess the number and amount of batteries available for recycling. Relative to the amount of other "traditional" recyclable materials (pop cans, newspapers) as well as organics that were thrown out, the number of rechargeable batteries was very low and primarily contained in electronic equipment. With the availability of an all battery program as well as the expansion of e-waste programs, it is anticipated that our collection efforts will capture most batteries available for recycling.

I appreciate the efforts that you have made to develop the program and the fact that the program existed even before legislation (for rechargeables and cell phones). I also applaud the fact that there are no visible fees with the program so that it is treated the same as any other business cost. Well done in getting started on your program.

Appendix 1.2

Participants at the October 5th, 2009 Vancouver BC Stewardship Public Consultation Meeting

In Person (at The Coast Vancouver Airport Hotel)
Maury McCausland, London Drugs
Paul Iverson, Residuals Management Group Ltd.
Martin Dickson, Thompson-Nicola Regional District
Kim Day, Ridge Meadows Recycling
Jeff Levitt, Target Zero Waste Consulting Inc.
Neil James, Ralph's Auto Supply (BC) Ltd.
John Hibbard, HAZCO Environmental Services
Daniel Chau, HAZCO Environmental Services
Richard Aikema, Abbotsford Mission Recycling Program
Bruce Shore, Genesis Recycling
Mona Fadl, Keystone Environmental
Bruce Turkinglon, Xentel DM
Michael Gibson, HouseSmart Network
Shell Busey, HouseSmart Network
John Bailie, Sonsonate Consulting

Call2Recycle® Staff
Carl Smith
Susan Antler
Dana Uhl-Griffiths
Barb Zabinsky

Via Webcast (from The Coast Vancouver Airport Hotel)
Paul Knight, eCycle Solutions
Ilse Sarady, Society Promoting Environmental Conservation
Jagdeep Grewal, Newalta
Bill Whelan, HEWLETT-PACKARD
Richard Unyi, Raw Materials
Karina Mehta, Hewlett-Packard
Barb Jusiak, CCGD
Mourad Chergui, Cadex Electronics
Emy Sai, City of Richmond
David Lawes, Ministry of Environment
Teresa Conner, Ministry of Environment
Frank (Last Name Withheld)
Alex Shelley, EarthCycle Planning - Staples Canada
Craig Ware, Loblaw Companies Limited
Donna Chau, Hewlett-Packard (Canada) Co.
John Yeider, Apple Inc.
Susan Nieuwhof, Procter & Gamble
Stephen Rathlou, S.C. Johnson and Son, Limited
Gregory G. Moeller, Eastman Kodak Company
Laurie Gallant, Regional District of Kitimat-Stikine
Sarah Webb, Canadian Tire Retail
Jacquelyn Desloges, Canadian Tire Retail
Ali A. Hamid
Jennifer Meier, District of Mission
Janet DeMarcke, City of Chiliwack
Sue Maxwell, Ecoinspire Consulting
Petra Wildauer, Regional District of Fraser-Fort George

Participants at the October 6th, 2009 Nanaimo BC Stewardship Public Consultation Meeting

In Person (at The Coast Bastion Inn)

Paul Shorting, Nanaimo Bottle Depot
Wendy Dunn, Capital Regional District
Gary Franssen
Joe Chatlain, Lafarge Canada
Michael Schellnick, Nanaimo Recycling Exchange
Teresa Conner, Ministry of Environment
Bob Paul, Ministry of Environment
Alex King, Nanaimo Recycling Exchange
Kathleen Milward, CVRD
Adam Newton, Nanaimo Bottle Depot
John Bailie, Sonsonate Consulting

Call2Recycle® Staff
Carl Smith
Susan Antler
Dana Uhl-Griffiths
Barb Zabinsky

Participants at the October 7th, 2009 Kelowna BC Stewardship Public Consultation Meeting

In Person (at The Delta Grand Okanagan)

Karmen Peace, Regional District of North Okanagan
Ed Columbus, Vernon and District Association for Community Living
Bill Matichuk, The Battery Doctors
Rae Stewart, Regional District of Central Okanagan
Eve-Lyn Wolters, Regional District of Central Okanagan
Beth Cavers
John Bailie, Sonsonate Consulting

Call2Recycle® Staff
Carl Smith
Susan Antler
Dana Uhl-Griffiths
Barb Zabinsky

October 8th, 2009 Prince George BC Stewardship Public Consultation Meeting Cancelled due to limited advance registration

List of the Rechargeable Battery Stewards (Licensees) of the RBRCC Program
05/05/2009

UT Starcom
3M Company - OH&ES Division
A&M Electrical
Access Battery & Power Systems
ACER Services Corp
Advance Battery Systems, Inc.
Aiphone Corporation
Alexander Technologies Europe, Ltd
Allied Intl Tool
ALLSTAR MARKETING
ALLTRADE TOOLS
American Lawn Mower Company
Amptech
ANDIS COMPANY
Anton/Bauer Inc.
Aoneng Electrical Appliances
APPLE
Applica
Applied Power Inc.
Arrow Fastener
ATICO INTERNATIONAL USA INC
Avex Electronics Corporation (DUPLICATE)
AVT Inc.
Batteries Plus Limited
Battery Specialties
Bissell
BLACK & DECKER CORPORATION
Braun Inc.
BYD Battery (USA) Co.
CANADIAN TIRE CORP
Canon U.S.A. Inc.
Car-Go-Battery Co.
Casio Hitachi Mobile Comm
Casio Inc.
CENTURION INTERNATIONAL INC
CHERVON N.A.
Conair Corp.\
DC Battery Products
DELL
Digi-Key Corporation
DORCY INTL INC
Douglas Quick Cut
Du-Bro Products Inc.
DURACELL (P & G)
Energy Sales
Engineered Assemblies
Epson America Inc.
Eureka Co.

EVEREADY BATTERY CO.
Evergreen (C.P.)USA, Inc.
Excel Battery
FCI USA, INC./FRAMATONE
Fedco Electronics Inc.
Freight Security Net
FRESHBATTERY.COM
Fuji Photo Film USA Inc.
Fujimic Inc
FUJITSU COMPUTER SYSTEMS
GARRITY INDUSTRIES INC
GATEWAY INC
Gemini Industries, Inc.
General Dynamics Itronix
GLJ LLC / 02 COOL
GP BATTERIES (HONG KONG)
GP Batteries(USA)
Great batch LTD
Great Power
Hewlett-Packard Company
High Tech Computer
Hitachi-Koki USA Ltd.
Hobbico
Hot-Shot Products Co., Inc.
House of Batteries
Hunan Corun Hi-Tech Co Ltd (radio shack/Vtech)
Icom America Inc.
IDX TECHNOLOGY
INTEC INDUSTRIES CO, LTD
INTERACTIVE SAFETY PRODUCTS
Iota Engineering Company
ITECH
ITW PASLODE
Iwatsu America Inc.
JB Energy (HK) Ltd.
JIANGSU HIGHSTAR CHEMICAL
JVC Corporation (U.S.)
KENDALL COMPANY LP
Kensington Computer products
Kenwood Americas Corporation
Leica Cameria
LENMAR
LENOVA/IBM
LG ELECTRONICS
Lumedyne Inc.
MAG Instrument Inc.
Makita U.S.A. Inc.
Matsushita Elect. Corp.
MAX COMPANY LTD
Megatech Internalational
Meritool
Microsun Technologies

Milwaukee Electric Tool Corp.
MITSUBISHI DIGITAL ELECTRONICS
Motorola Inc.
MOXIA ENERGY
MPC COMPANY
Multiplier Industries Corp. - (purchased by Uniross)
NABC
National Power
Nikko America Inc.
Norelco Consumer Products Co.
Normark Inovations
Novatel Wireless, Inc
Olympus America Inc.
Ooma, Inc
P&G (TAC FACILITATED)
Pentax Technologies Corp
PHYSIO-CONTROL CORPORATION
Porter-Cable Corp.
POWER PRODUCTS
PowerGenix Systems, Inc
Pro Team, Inc
Professional Dental Technologi
Professional Tool Products
Progressive Technologies Inc.
Promark Electronics Division
QUALITECH
QUANTUM INSTRUMENTS INC
Rayovac/remmington - Spectrum branns
RESEARH IN MOTION
Resistacap Inc.
Ridge Tool Compnay
RONWAY BATTERY CO LTD (McNair) - Vtech
Royal Appliance Mfg. Co.
Ryobi North America Inc
SAFT AMERICA INC
SAMSUNG
SANYO ENERGY (U.S.A.) CORP
S-B Power Tool Company
SEARS
Shenzhen Elite Electronic Co., Ltd
Sigma
Snap-On Incorporated
Solaris Scientific, LLC
SONY ELECTRONICS INC
Southwest Electronics Energy
SPM/Micro Power Electronics
Stanly Tool (BYD)
Starlight Videeo
Streamlight Inc.
Stryker
Tandy Corporation
TECHTRONIC APPLIANCES HK LTD

TECHTRONIC INDUSTRIES CO LTD
Teledyne Water Pik
Terralux inc
TERRATEK INC
The Hoover Company (Purchased by TTI NA)
The Stanley Works
Thomson Consumer Electronics
TNR Technical Inc.
Tocad America Inc.
TOSHIBA AMERICA INC
Trinity Products Inc.
TRUMPF Power Tools
UNIDEN AMERICA CORPORATION
Uniross
UNIVERSAL POWER GROUP
VARTA BATTERIES INC
Venonom Racing
Vernier Software
VICTORY CINEVIDEO
VTECH Communications Ltd
W & W ASSOCIATES
Wahl Clipper Corp.
XUZHOU ENERGY ELECTRONICS CO

List of Primary Battery Stewards of the proposed RBRCC British Columbia Program

Duracell Canada (Procter & Gamble)
Energizer Canada
Kodak Canada
Panasonic North America, Inc.
Rayovac Canada (Spectrum Brand)
Sony Canada