British Columbia

Extended Producer Responsibility Plan for Batteries - Draft

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Glossary

Alkaline /Carbon Zinc	A type of primary battery (e.g., AA or AAA, C, D, 9V, and button batteries).
Batteries	Dry-cell rechargeable and primary batteries weighing no more than 5 kilograms each.
Carbon Zinc	A type of primary battery.
Collection Target	Projected quantity of batteries to be collected on an annual basis.
Damaged or Defective Batteries	Batteries that are not intact or are physically damaged.
Environmental Handling Fee (EHF)	A fee per unit sold that is representative of the cost to collect, handle, transport, and responsibly recycle batteries at the end-of -life.
Extended Producer Responsibility (EPR)	An environmental policy wherein the producer is responsible for the reduction of environmental impacts across the life cycle of the product.
Lithium Ion (Li-Ion)	A type of rechargeable battery.
Lithium Primary	A type of primary battery.
Nickel Cadmium (Ni-Cd)	A type of rechargeable battery.
Nickel Metal Hydride (Ni-MH)	A type of rechargeable battery.
Portable Power	A lithium-based, stand-alone rechargeable battery used to supply electrical power to electronic devices external to the device.
Primary Battery	A battery that cannot be recharged by the consumer, commonly known as AA, AAA, 9V, D-cell, and button cell batteries. Primary batteries are also known as single-use batteries.
Private Collection Facilities	A location that actively collects batteries, not open to the public for battery drop-off.
Processing	Manual, mechanical, thermal, or chemical alteration of batteries for the purpose of recycling.
Processor	An entity that engages in end-of-life management of batteries for the purpose of recycling.
Public Collection Facilities	Drop-off locations that are open to the public, even for a minimum amount of time, for collection of batteries. Includes public-facing collection events.
Rechargeable Battery	A type of battery that is capable of being charged again multiple times after its power has been discharged.
Recycling Efficiency Rate	Defined by CSA as the amount of material recycled as a percentage of the amount of targeted material collected (inbound) minus reuse and shrinkage. The measurement of recycling efficiency will differ according to the nature of materials, markets, and processing methods.
Recovery Rate	Part 1(1) of the British Columbia Recycling Regulation defines this as "the amount of product collected divided by the product generated, expressed as a percentage.” Call2Recycle uses weights to determine recovery rates. The recovery rate will be calculated by dividing the weight collected in the reporting calendar year by the average weight sold into the province in the preceding three (3) calendar years.

Responsible Recycling Standard or R2	The R2 standard outlines responsible recycling practices for the recycling of electronics globally. The requirements are comprehensive and cover environmental, health and safety, and data security practices. This standard is provided through an accredited third-party to ensure the program practices are conducted in an environmentally responsible manner, protective of the health and safety of workers and the public, and that the data on media devices is secure until destroyed.
Small Sealed Lead Acid	A type of rechargeable battery.
Stewardship Agencies of BC (SABC)	A group of EPR agencies who work together on common issues.
Wet Cell Batteries	A battery containing liquid electrolyte such as sulfuric acid, a dangerous corrosive liquid.
Zinc-air	A type of primary battery.

1. Introduction

Call2Recycle Canada, Inc., which administers the 'Recycle Your Batteries, Canada!' program, is a Canadian-owned not-for-profit Extended Producer Responsibility (EPR) agency. Call2Recycle has managed a battery collection and recycling program in British Columbia (BC) under an approved EPR plan since 2010. This EPR plan for dry-cell batteries[1] under five (5) kilograms is being submitted by Call2Recycle Canada, Inc. and replaces the previously approved EPR plan initially submitted to the BC Ministry of Environment and Parks (the ministry) in 2020.

2. Duty of Producer

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

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

(b) comply with Part 3 [Extended Producer Responsibility Program Requirements if No Extended Producer Responsibility Plan] with respect to a product in order to use in a commercial enterprise, sell, offer for sale or distribute the product in British Columbia.

3. Appointment of an Extended Producer Responsibility Agency

Representing battery producers, Call2Recycle's members include manufacturers, brand-owners, first-importers, and retailers of dry-cell batteries weighing less than five (5) kilograms in BC. With the 2025 amendments to the BC Recycling Regulation, this will also include vapes and e-cigarettes with an expected launch in the second half of 2027. Call2Recycle also manages the regulatory requirements of obligated producers in other Canadian provinces.

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

Call2Recycle sends producers written notification of their obligation. Once a producer confirms that they are obligated and appoints Call2Recycle as their designated EPR agency for batteries, the producer must enter into a formal membership agreement with Call2Recycle acknowledging that Call2Recycle will manage their obligations under the Regulation. The Membership Agreement is available to the director under the Environmental Management Act upon request.

3.1 Agency Governance

Call2Recycle is incorporated under the *Canada Not-for-Profit Corporation Act and BC Societies Act*, documentation can be found on the website at www.call2recycle.ca/about. Call2Recycle is governed by

[1] Referred to in a previous plan as "consumer batteries" and now referred to as "batteries" in this plan to align with the wording in the Regulation. Please see page 6 for a detailed list of batteries covered under this EPR plan.

a board of directors comprised of producers and independent directors. The board of directors includes representatives from multiple sectors including retail, battery manufacturing (brand-owners), battery distributors, retailers, and independent board members. A list of the Call2Recycle Board of Directors can be found in Appendix A and is available at https://www.call2recycle.ca/board-of-directors/.

All relevant reports, policies, bylaws, and guidelines are available to Call2Recycle's members and can be found on the call2recycle website. In addition to the website, Call2Recycle distributes member-specific newsletters a minimum of twice a year to provide relevant program updates and notifications. Call2Recycle's annual general meeting for members is held in June. The newsletters provide financial information, collection results, marketing activities, and more information. Audited financial statements are available to members in the corporate annual report and the BC annual report to the director.

3.2 Performance Monitoring and Reporting Commitments

Any changes in Call2Recycle's governance or structure will be disclosed in the annual report.

4. Products Covered under the EPR Plan

The Regulation's Schedule 3 for Electronic and Electrical Product Category includes 2(1)(m) "batteries that could be used in an electronic or electrical product listed in this section, including primary batteries and rechargeable batteries". In accordance with this section of the Regulation, Call2Recycle collects and recycles dry cell primary and rechargeable batteries weighing less than 5 kilograms each that are sold as a stand-alone product or for replacement purposes. This includes batteries generated by consumers, and industrial, commercial, and/or institutional (IC&I) sectors. In addition, Call2Recycle will be including vapes and e-cigarettes with an expected launch in the second half of 2027.

4.1 Products Accepted and Excluded under the EPR Plan

Accepted Products:

Alkaline	Nickel Cadmium (Ni-Cd)	Vapes / E-Cigarettes
Carbon Zinc	Nickel Metal Hydride (Ni-MH)	Zinc Air
Lithium Ion (Li-Ion)	Nickel Zinc (Ni-Zn)	Damaged and defective batteries[2]
Lithium Primary	Silver Oxide	
Portable Power Banks	Small Sealed Lead Acid (SSLA)	

Excluded Products:

- Batteries weighing more than five (5) kg.
- Damaged or defective batteries sold in or with a device covered solely under another EPR agency's plan.
- Wet cell batteries.
- Automotive batteries

Several programs in BC manage batteries. In many cases if a battery is sold in or with a device covered under another producer appointed EPR agency's program plan, the responsibility of the end-of-life management of the battery or batteries resides with the program that manages the device. These EPR programs include:

[2] Batteries that are sold as a stand-alone product or for replacement purposes (including recalled batteries provided that the battery was sold into the province and an Environment Handling Fee has been paid).

- Product Care Recycling – Light Recycling
- Product Care Recycling – Smoke & CO Alarms
- Electronic Products Recycling Association (EPRA)
- Thermostat Recovery Program
- Outdoor Power Equipment Institute of Canada (OPEIC)
- Telus

Pursuant to subsection 5(2)(l) and (m) of the regulation, Call2Recycle commits to investigate opportunities with other agencies to manage misplaced products.

4.2 Orphaned/Free Rider Batteries

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

5. Stakeholder Consultation

5.1 Consultation Undertaken Prior to EPR Plan Submission

The draft EPR plan and notice of consultation were posted to Call2Recycle's on December 17, 2025 allowing for a 64 day consultation period ending on February 18, 2026.

Call2Recycle will hold 4 consultation sessions via webinar. The consultation process will engage a cross-section of program stakeholders, including producers/industry, collection facilities, processors, members, local government, associations, and other EPR programs. All consultation materials will be made available on Call2Recycle's website.

During the 1-hour consultation webinar, approximately 30 minutes will be allotted for the presentation, and 30 minutes will be allotted for questions. A summary of comments, including written submissions, will be included in Appendix B of the final plan submission. The plan will be updated following the consultation to reflect comments and feedback where possible.

5.2 Ongoing stakeholder consultation

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

Call2Recycle routinely engages other stakeholder groups including the Retail Council of Canada (RCC) to consult and update their members on pertinent program information and changes. Call2Recycle also commits to engaging with members of the BCPSC on an annual basis to provide program updates and

gather feedback on program improvements. Call2Recycle will also meet with other stakeholder groups upon request to capture feedback and address concerns. Dedicated to continuous engagement with stakeholders, the program welcomes ongoing input from all involved parties. A designated feedback email address, bcplan@call2recycle.ca is displayed on the BC landing page of the website. This encourages stakeholders to share their feedback at any time.

6. Collection System and Consumer Accessibility

Call2Recycle offers an extensive network where consumers can drop off batteries for recycling as per section (5(1)(c)(iii) of the Regulation. Call2Recycle collects from 4 sectors including public agencies (health services, schools/post-secondary institutions, local/provincial/federal government), retailers, businesses (including the IC&I sector), and manufacturing.

Any entity that meets the program's collection facility requirements can participate as a drop-off location open to consumers (public collection facility) or collect batteries internally (private collection facility). Public collection facilities are strategically located where consumers are most likely to use them. Below are other considerations when adding public collection facilities:

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

6.1 Collection System

Call2Recycle has a vast network of collection facilities across the province, providing consumers convenient access to drop-off locations for their used batteries. The program uses a qualification process for collection facilities to maximize battery returns. Call2Recycle accepts batteries from the business and IC&I sector. While these collection facilities may or may not be open to the public, they are significant purchasers and users of batteries and collectors of used batteries in BC.

Call2Recycle typically maintains about 1600 Call2Recycle collection facilities in BC. While some of the collection facilities are not open to the public for battery drop-off (offices and other workplaces, hospitals, schools), over 600 collection facilities are available for public drop-off, including:

- Depots
- Landfill or transfer stations
- Retail
- Libraries and community centres
- Municipal offices and city halls

- Collection events[3]

Call2Recycle is committed to picking up full collection receptacles across the province within five (5) business days of a scheduled pick-up. Call2Recycle tracks battery collections from each collection facility by chemistry. Once shipments are received at the sorting facility, the batteries are sorted, weighed, and recorded. Using this information, Call2Recycle regularly reviews the collection results in all regional districts to identify underperforming collection facilities or under-serviced areas of the province. In the case in underperforming collection facilities (facilities that have a slow rate of returning batteries for recycling), Call2Recycle staff outreach to these facilities (via phone, email, or newsletter) to encourage increased participation. In underserviced areas of the province (areas of the province where Call2Recycle's level of accessibility could be improved), Call2Recycle staff pursue additional opportunities to collect, such as identifying and contacting potential new collection locations to encourage registration for the program.

Product Pathways Not Directly Managed by the EPR Program

There may be some instances when used batteries may not flow through Call2Recycle's program. For example, when market-based commodity values for metals are high, collectors may sell their batteries rather than recycle batteries through Call2Recycle. Batteries may also be improperly disposed of in the garbage or through standard/blue-box curbside recycling. Call2Recycle commits to educating BC residents on the safe and proper recycling of batteries through a minimum of 4 campaigns annually to encourage proper recycling behaviour. As a part of Call2Recycle's annual awareness study, battery recycling behavioural trends are surveyed. Study results are used to inform promotion and education campaigns to inform residents of the appropriate way to dispose of and recycle batteries at end of life.

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

6.2 Consumer Accessibility

Since 2010, Call2Recycle has implemented a highly accessible battery collection and recycling program serving British Columbians. Call2Recycle will continue to engage with and encourage residents to drop off their batteries at one of the many designated collection locations. Call2Recycle's goal is to ensure that at least 95 percent of British Columbians reside within 15 kilometers of an active public collection facility. Accessibility is calculated using commonly accepted Geographic Information System (GIS) practices. While coverage in urban areas may exceed the 15 kilometers accessibility standard, continuous improvements will be made to increase accessibility in non-urban communities.

[3] Collection events are considered public drop-off locations and are included in the total number of public collection locations in the province and used in the accessibility calculation. Some smaller communities do not generate enough used batteries to ship annually or have an appropriate location to host a year-round public drop-off location. Collection events are used to ensure that small, rural, and/or remote communities have access to battery recycling.

Call2Recycle commits to maintain a minimum of 600 active public collection facilities[4] throughout the province, aligning with an accessibility target of 95 percent of British Columbians residing within 15 kilometers of an active collection facility. All public collection facilities are listed on Call2Recycle's website. An active collection facility must meet at least one of the following criteria: has enrolled in the program during the calendar year; has shipped batteries (a minimum of 1 box or 1 bulk shipment) during the calendar year; or has ordered a replacement box within the calendar year. Some Call2Recycle registered facilities may ship infrequently resulting in facilities appearing to be inactive based on the active collection facility criteria. The criteria established for collection facilities to remain active may impact accessibility due to reduced shipping frequency. Call2Recycle's program material is relatively small, and it may take more than a year to collect enough batteries to warrant a shipment, particularly in rural and remote communities. A collection facility may be active one year and inactive the next year.

Call2Recycle commits to free and reasonable access to collection facilities. To ensure an optimal number of collection facilities available based on geography, population density, the needs of a community, and ease of access are considered. The program will work to increase coverage in underserviced or remote areas of the province by seeking opportunities to enroll permanent collection facilities to provide year-round recycling for batteries. Call2Recycle will work with local governments, Indigenous communities, or other stakeholders on collection events if permanent collection facilities are not possible. As a member of the SABC, Call2Recycle participates in the collaborative process with the BCPSC in which local governments provide information to EPR agencies on underserviced communities and identified opportunities to collect. To date, Call2Recycle has not had any requests for additional service through this process but will continue to participate and proactively work with the BCPSC and its members to improve accessibility in underserviced areas of the province.

6.3 Collection Targets and Recovery Rates

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

1) Weight of battery: Certain battery chemistries sold into the market decline year over year. For example, heavier battery chemistries, such as nickel cadmium, are being replaced by lighter lithium ion batteries. Changes to battery weights may impact the overall battery weight collected versus what is currently sold into the market.
2) Life of a battery: Battery life is increasing, reducing the need to replace batteries frequently.
3) Type of battery: Products currently requiring primary batteries in some instances may be replaced by those that run on rechargeable batteries.
4) Purchase habits: Batteries are generally purchased in large or multiple quantities and have a multi-year shelf life. There is generally not an immediate one-to-one relationship between battery purchase and usage. In times of crisis (natural disaster, pandemic), battery sales often increase

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

dramatically. Consumers often purchase batteries in large quantities in case of emergency but may not use them immediately which impacts when they become available for collection.

5) Hoarding habits: Consumers may keep spent batteries for a long time before they recycle them. Since consumer-type batteries are typically small, they can easily be stored at home, thus consumers have no immediate urge to recycle them.
6) Multiple programs: Batteries are managed by multiple EPR programs (see page 6). This poses a challenge because Call2Recycle program batteries may end up in the collection streams of other programs and vice versa. Call2Recycle is the only program in BC required to report recovery rates for batteries. Batteries are not only components of devices but are also regulated products under the Regulation, including batteries sold in or with other regulated products. In the absence of a standard requirement for all programs responsible for the collection and management of batteries to report on associated collection rates, in the form of a recovery rate, there is no ability to measure a true provincial recovery rate for batteries. Call2Recycle recommends a level-playing field for reporting standards for all programs managing batteries and is willing to work with the ministry and other EPR agencies to find a solution to determine provincial diversion rates for batteries.

Call2Recycle will report on recovery rates as a performance target in annual reports. Battery weight sold into BC is based on the number of batteries by size and type (primary or rechargeable) reported by Call2Recycle's BC members. Battery units are converted to weight based on industry standards. To better address the variability in battery lifespan and availability for collection, the recovery rate will be calculated by dividing the weight collected in the reporting calendar year by the average weight sold into the province in the preceding 3 calendar years. For example, in 2025 the recovery rate will be calculated by dividing the weight collected that year (2025) divided by the average weight sold into the market in 2022, 2023, and 2024 (the preceding 3 years) and expressed as a percentage.

To address faltering recovery rates in previous years, Call2Recycle increased compensation rates to contracted bulk collectors in BC in 2023 to incentivize the generation of additional collection volume (see section 8.2 for more information on collector compensation). With the new compensation structure in place, Call2Recycle has generated additional interest from new bulk collection partners wishing to participate in the program, resulting in new bulk collection sites and additional sources of collection volumes. Call2Recycle will continue to conduct public education campaigns focusing on raising awareness of where batteries can be dropped off, which will generate additional consumer traffic at collection sites and increase collection volume. In 2024, Call2Recycle collaborated with the district of Squamish to pilot a battery curbside collection program in both June and November. With the success of 2024, battery curbside collection was repeated with the district of Squamish again in 2025. Further opportunities to collaborate with communities will also be explored.

6.4 Performance Targets and Reporting Commitments

Performance Targets:

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

- Recovery Rate of 56% in 2029.

Reporting Commitments:
In the annual report to the director, Call2Recycle will report on the following:

- The total weight of primary and rechargeable batteries (both by type and as an aggregated total) collected during the reporting year.
- Number of active collection facilities in the province by sector.
- Number of active public and private collection facilities.
- Number of active collection facilities in each regional district.
- Total kilograms collected in each regional district, including collections per capita.
- Location of collection facilities.
- Changes in the number of collection facilities from the previous report.
- Total kilograms of batteries sold into BC during a calendar year.
- Result of the SABC facilitated waste composition audit with respect to batteries.
- Dates, location, and results of collection events (if applicable).

All information in this section is consistent with the requirements for the assurance on non-financial information, including program specific definitions and applicable criteria.

7. Consumer Awareness

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

7.1 Consumer Awareness Approach

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

- Call2Recycle website
- Social media
- Customer service call centre
- RCBC Recycling hotline and Recyclepedia
- Point-of-sale signage and handouts available to all retailers
- Sponsorships and collaborations with like-minded associations
- Advertising (Print/Online/Radio/Television)
- Media relations outreach

To gauge the effectiveness in positively moving the 'recycling' needle, Call2Recycle commits to conducting an annual provincial consumer awareness survey[5].

[5]Call2Recycle contracts with reputable market research companies to conduct consumer awareness studies.

The survey sample size will reflect the BC population according to census information. The survey helps Call2Recycle quantify levels and trends in consumer awareness (i.e., level of awareness that batteries can be recycled) and behaviours and the effectiveness of its outreach campaigns to increase battery recycling incidence among target audiences. Call2Recycle commits to reporting the results of its annual consumer awareness survey in support of its goal to maintain an awareness level of 88 percent (%) or higher[6]. The program will also disclose the question's wording to measure awareness in the annual report. As part of the consumer awareness survey, Call2Recycle also measures the percentage of British Columbians who recycled batteries each year (incidence). The behaviour target for 2029 will be 58%.

To help raise awareness, drive participation, and maximize collections with BC residents, Call2Recycle will offer collection network participants opportunities to participate in various education and promotion campaigns. Call2Recycle will communicate at least semi-annually to member producers and collection site partners on public education and awareness updates via its newsletter and Public Relations outreach through a minimum of 2 press release distributions. Call2Recycle is dedicated to enhancing awareness about battery recyclability. As part of this commitment, Call2Recycle encourages battery producers to include messages on battery packaging, informing consumers about the option to recycle batteries wherever it is possible.

Objectives for consumer awareness campaigns are as follow:

1) **Educate and Motivate:**
   Inform BC residents:
   a. That batteries can and should be recycled,
   b. Why it's important to recycle batteries,
   c. How and where to safely recycle batteries; and
   d. Share the environmental and economic benefits of battery recycling.

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

[6] Call2Recycle also participates in the SABC initiatives; however, for the purpose of the annual report to the director, the results from Call2Recycle's initiated study will be used.

7.2 Target Audiences

Target Audiences will include:

BC Residents	Collection Network	Stakeholders
• Consumers • Businesses	• Public Sites (open to the public for battery drop-off) including, local government, retailers, and depots. • Private Sites (not open to the public for battery drop-off) including, offices, hospitals, and schools.	• Local Government • Indigenous Communities • Call2Recycle Members/Obligated Producers • Industry and Trade Associations • Non-Governmental Organizations • Media • Influencers

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

- Annual public awareness and education campaigns (e.g., Always On, National Battery Day, Earth Month, Battery Safety, Circular Economy Month)
- Targeted awareness programs
- Promotional Events
- Program material available at point of sale[7]
- Outreaching to businesses that generate large quantities of batteries through their internal operations to ensure they are aware that they can participate in the battery recycling program
- Engaging with school-aged children to provide education about the importance of battery recycling
- Ongoing communication with all active and inactive collection facilities (in-person, over the phone, and in writing)
- Newsletters to collectors and members
- Sponsorships of local conferences (e.g., RCBC and CWMA)

Call2Recycle commits to working with other programs to increase awareness and encourage recycling behaviour. Initiatives include:

- Maintaining membership with the SABC, a group of producer appointed EPR agencies seeking synergies and common solutions whenever possible.

[7] Point of sale materials are available to all members. It is at the discretion of the member whether to supply them to consumers. Materials include information on fees and accepted products.

- Participation in programs such as the First Nations Recycling Initiative (FNRI), a program supported by several producer appointed EPR agencies in BC. Stewarded materials, including batteries, are recycled through collaboration between EPR agencies, IZWTAG, and Indigenous communities. Call2Recycle is committed to engaging in projects like the FNRI that work with Indigenous communities to raise recycling awareness and foster the collection of EPR products.

7.3 Overcoming Barriers to Recycling

Call2Recycle recognizes that there are opportunities to increase battery recycling behaviour. To encourage consumers to recycle used batteries safely, Call2Recycle focuses on education regarding why, how, and where to recycle their batteries. Additionally, to further understand potential barriers to recycling, Call2Recycle has integrated questions relating to battery recycling behavior into the awareness study which will be identified and reported on in annual reports beginning in the 2025.

Market research has pinpointed population segments most likely to use batteries and need recycling options. Promotion and education efforts are tailored to these groups to encourage proper battery recycling instead of disposal in the trash. This approach is balanced with overall awareness-building promotion and education initiatives across the province. Call2Recycle continues investigating alternative approaches to highlight program convenience and increase participation. Call2Recycle's public education campaign in 2025 included a significant emphasis on retail partners, collection partner displays, incentivized contests, and proximity to drop-off locations on TV, online and outdoor advertising to raise awareness of where batteries could be dropped off. Through the annual marketing plan, Call2Recycle commits to continuing to raise awareness about battery recycling and promote the network of convenient locations across the province where batteries can be dropped off.

7.4 Performance Monitoring and Reporting Commitments

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

Performance Targets:

- Maintain an awareness level of 88% or higher.
- Report the percentage of British Columbians who recycled batteries as reported in the annual consumer awareness study, with incremental increases, reaching a 58% target in 2029.

Reporting commitments:

- The questions asked to measure awareness in the annual consumer awareness study.
- The percentage of British Columbians who recycled batteries as reported in the annual consumer awareness study.
- The number and type of marketing and awareness activities executed within the calendar year.
- Number of resulting searches on the web based Call2Recycle collection facility locator.
- Call2Recycle commits to a biennial barriers to recycling study with results reported in the corresponding annual report.

8. Management of Program Costs

8.1 Program Funding and Reserves

Call2Recycle's funding mechanism is based on a "fee per unit sold" model called Environmental Handling Fees or EHFs. The fees are set through a budgeting process and then reviewed and approved by Call2Recycle Canada's board of directors. Based on the number of units of batteries sold into BC, members report quantities at pre-set periods using an online system.

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

The organization maintains a reserve fund, where Call2Recycle Canada's board of directors determines reserve amounts. This fund ensures the stability of the current program and the organization's ability to deliver on any future financial obligations that may arise, including wind-down costs if necessary.

8.2 Collector Compensation

In accordance with section (5)(1)(c)(i) of the Regulation, on behalf of producers, Call2Recycle commits to collecting and paying for the costs associated with collecting and managing batteries covered under this EPR plan. This includes batteries that were previously or are currently sold, distributed, or offered for sale in BC.

Call2Recycle offers compensation to public-facing collection facilities collecting batteries in bulk quantities. A bulk quantity is defined as a shipment of more than 250 kilograms of batteries (approximately the weight of one full drum) contained in drums or Call2Recycle-provided containers (e.g., Call2Recycle boxes) consolidated on a pallet. Qualifying collection facilities must enter into an agreement with Call2Recycle to receive compensation.

Call2Recycle engaged MNP, a Canadian national accounting, tax, and business firm, in 2019 and 2022/2023 to review the cost compensation provided to contracted collectors. The objective of the 2019 study was to determine whether contracted compensated collectors are paid fairly for their efforts in collecting and handling Call2Recycle program material. As part of public consultation of this EPR plan in 2020, the compensation methodology was presented for comment as were the MNP findings. The 2022/2023 study, which employed the same methodology developed for the 2019 study, was initiated by Call2Recycle in recognition of an opportunity to increase participation and enhance the data set used to determine if contracted collectors are compensated fairly. Participation did increase, allowing for the analysis of more data points.

Call2Recycle invited a representative sample of compensated collectors to participate in compensation studies. Locations that collected and shipped large volumes were selected given that these collectors spend the most time handling program materials. The results yielded from their participation also benefited those compensated collectors who manage smaller volumes of program material. Collectors

in the province's rural and urban areas were invited to participate to address cost variables.

To assess fair compensation, the study compared the revenue collectors received from Call2Recycle to the costs associated with managing Call2Recycle's products. Call2Recycle provided MNP with the existing compensation rates, the average weight per container, the average weight per shipment, and the program requirements. Participating depots provided MNP with cost inputs related to both direct and overhead costs. Direct labour costs were evaluated using both the time and motion study conducted as part of the 2019 study and time estimates provided by collectors in 2022/2023. Both approaches to labour costs were compared to ensure compensation adequately accounted for time spent managing materials.

The calculation for collector compensation includes Direct Costs and Overhead Costs.

Direct Costs	Overhead Costs
Direct Labour • Handling labour • Salaries • Benefits • Employer Costs Building • Mortgage/Rent • Renovations • Utilities • Repairs and Maintenance • Insurance	Labour and Miscellaneous • Overhead labour • Salary • Benefits • Employer Costs • Office Expenses • Telephone • Other Admin Equipment • Material Expense • Depreciation • Equipment Rental • Repairs and Maintenance

Collection facilities using Call2Recycle-provided containers receive the materials at no cost. Call2Recycle commits to covering transportation costs related to the shipping of program-provided containers to and from collectors.

Call2Recycle evaluated existing compensation rates against identified costs using the study findings to determine fair compensation. The total cost per kilogram was calculated as follows:

$$\frac{(\Sigma\ Direct\ Labour\ Costs + Overhead\ Cost)}{Reported\ Weight}$$

As a result of both the 2019 and 2022/2023 studies, Call2Recycle increased compensation to all collectors who have agreements with the program. Both compensation rate increases were higher than MNP's recommended rate increase. With a baseline established, Call2Recycle commits to reviewing compensation rates every two (2) years from 2026 onward to address any substantive material changes in the market, including variables such as inflation, operation costs, and market trends within the battery category. Compensation reviews will be conducted through data collection via surveys, site visits, and interviews/phone calls with compensated collectors. In 2026 in collaboration with other BC programs, Call2Recycle will be participating in a province-wide cost study

in order to efficiently harmonize data collection and collector engagement. Call2Recycle will report on progress on this initiative in the respective annual report.

8.3 Financial Reporting

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

8.4 Performance Monitoring and Reporting Commitments

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

9. Management of Environmental Impacts

The Call2Recycle program efficiently and cost-effectively recycles batteries of all types, and no battery collected through the program that can be recycled goes to landfill. Reclaimed materials from the batteries can be used in the manufacturing of products, including new batteries, cookware, appliances, and hardware. Call2Recycle is committed to reducing the program's environmental impact including selecting local sorting and processing partners when possible, working with transportation partners committed to reducing emissions, and using reusable and/or recyclable collection receptacles.

Local Sorting and Partners: In addition to the sorting facility in Trail, BC. Call2Recycle expanded its sorting network in 2023 with the onboarding of a second sorting facility in BC located in Metro Vancouver. The additional sorting partner decreases the transportation distance and related emissions generated from batteries collected in the lower mainland and Vancouver Island must travel to be sorted, and in the case of certain battery chemistries, processed.

Most of the batteries collected in BC stay in BC for processing thereby creating economic value and reducing emissions. By supporting local processing, Call2Recycle is committed to helping build a circular economy in the province.

Transportation Partners: Call2Recycle collaborates with transportation partners dedicated to minimizing emissions. The organization remains focused on engaging qualified British Columbia-based suppliers to further mitigate transportation-related emissions. Additionally, a direct pick-up service in the greater Vancouver area is currently being operated. This service offering eliminates one leg of freight related to box fulfillment to collection sites, as the dedicated service provider can replenish the containers during the same trip they are collected, streamlining the process.

Collection Receptacles: Call2Recycle continues to evaluate the collection receptacles provided by the program to decrease the program's environmental impact. To date, the program has introduced a

reusable flame-retardant box liner made from recycled material and has sourced FCS certified boxes in Canada. The boxes are recycled once they have fulfilled their useful life as a battery collection receptacle. In 2024, Call2Recycle piloted a new reusable container with telemetric capabilities, which have now been deployed in numerous retail locations. This container reduces the number of single use boxes required by the program and the telemetric functionality is designed to ensure all containers being transported are full, thereby minimizing the transportation of partially full containers. Additionally, once a portion of these collection receptacles begin reaching end-of-life, end of life management will be further explored.

9.1 Pollution Prevention Hierarchy

Call2Recycle abides by the pollution prevention hierarchy (PPH) as required by the Recycling Regulation, Part 2, Section 5(3). The PPH —reduce, reuse, and recycle— can be more difficult to apply to batteries than to other materials and products.

Approximately 75 percent of the batteries managed by Call2Recycle program are primary batteries, otherwise known as single use. Primary batteries are not reusable or able to be reconditioned or refurbished. Once dropped off for recycling these batteries have typically exhausted their useful life. Primary batteries are often used when it is inappropriate or cost prohibitive to use rechargeable batteries and in times of emergency when recharging batteries may not be possible or practical. The best option along the PPH for single-use batteries is recycling which allows usable materials to be reclaimed through processing and used for other purposes.

Rechargeable batteries constitute the remaining 25 percent of the collected batteries under the program, with the majority being lithium-based batteries. According to best practice and manufacturer guidelines, refurbished lithium batteries must be tested to UL 1642 standards. Call2Recycle is unable to assure the adherence of lithium battery refurbishers to this standard. With a priority on public safety, Call2Recycle currently does not endorse the practice of battery refurbishment at this time. Instead, the program maintains its emphasis on recycling batteries in a safe and environmentally friendly manner. Similarly, there are no official guidelines regarding the refurbishment of other rechargeable batteries; therefore, Call2Recycle does not support these activities due to safety concerns and lack of standards. Call2Recycle is committed to thought leadership on the viability of repurposing rechargeable batteries in a safe and compliant manner and is committed to exploring partnership opportunities with organization such as fire departments to better understand the viability of the battery reuse and reconditioning market.

9.2 Downstream Process and Program Certifications and Permits

Call2Recycle is certified under the Responsible Recycling (R2) Standard, the electronics recycling industry's leading recycling certification. The R2 Standard provides a common set of processes, safety measures, and documentation requirements for businesses that repair and recycle used electronics. The Standard lays out the proper procedures for recycling electronics with a key focus on protecting the environment and worker health and safety. The R2 Standard is based on continuous improvement, requiring Call2Recycle to improve processes and procedures around the environment, health, and safety through internal process and documentation. Organizations certified under the R2 Standard must maintain a Quality, Environmental and Occupational Health and Safety Management System. To

meet these requirements, Call2Recycle is certified to ISO 9001, 14001 and 45001.

Call2Recycle maintains a diverse group of approved downstream vendors or third-party logistic providers used to transport, sort, and process program material. All contracted partners have gone through an initial and recurring annual auditing process consistent with the requirements found in the provisions of the R2 Standard. Call2Recycle's vendor due diligence is among the most stringent in North America.

The program specifies material flow for all downstream vendors through to end-of-life. A robust information system tracks focus materials (materials that require greater care during processing) as they move through the prescribed downstream vendor network. These safeguards help affirm Call2Recycle's commitment to proper downstream management of battery collections, including not exporting to developing countries or sending materials to local landfills.

Call2Recycle is committed to an open, fair, and transparent process to select the best service providers based on the provider's technology, process employed, and cost to process.

Some highlights of Call2Recycle's program are presented below:

- As program manager, Call2Recycle specifies the program material flow for all our downstream vendors through to end-of-life.
- A robust information system tracks program material as it moves through the program's downstream vendor network through to end-of-life.

Call2Recycle maintains the following certifications and permits:
Certifications:

- R2 – Responsible Recycling Standard
- ISO 9001 – Quality Management System Standard
- ISO 14001 – Environmental Management Systems Standard
- ISO 45001 – Occupational Health and Safety Management System Standard

Permits:

- Permit of Equivalent Level of Environmental Safety (PELES) – allows Call2Recycle to move batteries intended for recycling between provinces across Canada.
- Transport Canada Equivalency Certificate - authorizes Call2Recycle and its program participants to handle, offer for transport or transport products accepted for recycling within the program parameters.
- Certificate for Damaged, Defective, or Recalled (DDR) Batteries - authorizes Call2Recycle and its program participants to handle and transport DDR products accepted for recycling within the program parameters.

Call2Recycle regularly monitors the landscape to keep abreast of the activities, regulations, and new capabilities within processing facilities both locally and nationally, if available. The program also commits to annual reviews of processors to ensure they can demonstrate an ability to adapt to Call2Recycle's program growth and volume increases in recyclable materials.

In accordance with the requirements of the third-party assurance of non-financial information, Call2Recycle will report annually on product end-fates and battery recycling efficiency rates (RER) by chemistry. A third-party auditor will review any changes to the RER or product end fate disclosed in the annual report.

Targets for RER are not necessarily a suitable measure of a program's overall performance. These targets are contingent on individual processors and can shift with changes to or advancements in their technology. Call2Recycle is actively exploring other more meaningful measures to replace RER targets. Call2Recycle commits to report annually on the recycling efficiency rate target performance by battery chemistry for each chemistry type Call2recycle manages including but not limited to:

Alkaline, Carbon Zinc, Zinc Air	75% - 95%
Lithium	50% - 65%
Nickel Cadmium (Ni-Cd)	65% - 80%
Nickel Metal Hydride (Ni-MH)	70% - 85%
Lithium Ion (Li-Ion)	70% - 95%
Small Sealed Lead Acid (SSLA)	70% - 95%

Any material not recovered is due to the absence or limitations of technology or has been consumed during the recycling process. Call2Recycle will disclose the percentage of unrecovered materials and the management method for the outputs that are not recovered for use in secondary markets in the annual report.

9.3 Safety

Safety is a core tenet of the Call2Recycle program and is reflected in every aspect of its daily operations. Call2Recycle is committed to the safety of the employees, collection sites, transporters, members, sorters, and processors involved in the used battery collection and recycling process. When certain types of batteries reach end-of-life, they may still retain a residual charge that presents a safety risk if the batteries are not handled properly. To advance the program's commitment to safety, Call2Recycle uses a patented flame-retardant liner insert in all boxes distributed in Canada. This innovation offers an additional layer of protection should a thermal event occur during the battery journey – from collection to transportation to sorting and processing. When used in conjunction with Call2Recycle's program guidelines, the liner helps prevent flames from escaping from the battery box should an event occur. Collection boxes are UN4GY-rated and have been approved by Transport Canada.

Call2Recycle is continually improving its safety policies and best practices to ensure that batteries are safely collected, transported, and recycled. The program continues to invest in innovative solutions that help mitigate risks and will ensure that any program-provided collection receptacles introduced in the future will meet all regulatory requirements and ensure the safe storage and transportation of batteries. Call2Recycle also initiates year-round public awareness campaigns on how to safely store used batteries before dropping them off for recycling, and in 2025 built out a safety campaign toolkit with resources designed to support stakeholders in educating their community on battery safety. The

safety campaign toolkit is available on the Call2Recycle website.

9.4 Performance Monitoring and Reporting Commitments

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

10. Dispute Resolution

A contract is in place for collection facilities that enter into an agreement for cost reimbursement associated with collection of batteries in bulk quantities, which outlines the dispute resolution process. The same approach will be followed for collection facilities that do not have a formal agreement with Call2Recycle. As a first step, once the issue has been raised in writing, representatives from Call2Recycle and the other party will attempt to resolve the issue within 30 days or a mutually agreed upon timeframe. If the parties cannot come to a resolution within the given timeframe, the two parties will jointly select a third party to arbitrate and settle the dispute with his/her decision. The dispute resolution procedure also applies to members and vendors, transporters, processors, and sorters.

Any arbitration would be consistent with the *BC Arbitration Act* RSBC 1996. Call2Recycle will operate in good faith with its partners and will try to resolve a dispute without arbitration. Arbitration will only be used if both parties cannot come to a reasonable solution.

11. Summary of Performance Monitoring and Reporting Commitments

PERFORMANCE METRIC[8]	TARGET OR REPORTING COMMITMENT	SUBJECT TO AUDIT
COLLECTION SYSTEM AND ACCESSIBILITY		
Maintain a minimum of a 95 percent accessibility rate using the accessibility metric of percentage (%) of the population residing within 15 kilometers of a public collection facility.	Target	N/A
Maintain a minimum of 600 active public collection facilities.	Target	Yes
Recovery Rate: The amount of product collected divided by the product generated, expressed as a percentage Call2Recycle uses weights to determine recovery rates. The recovery rate is calculated by dividing the weight collected in the reporting calendar year by the average weight sold into the province in the preceding three (3) calendar years. • 2025: 52% • 2026: 53% • 2027: 54% • 2028: 55% • 2029: 56%	Target	Yes
The total weight of primary and rechargeable batteries (both by type and as an aggregated total) collected during the reporting year.	Reporting Commitment	Yes
Number of active public and private collection facilities.	Reporting Commitment	Yes
Number of active collection facilities in the province by sector.	Reporting Commitment	Yes
Number of collection facilities in each regional district.	Reporting Commitment	Yes
Total kilograms collected in each regional district including collections per capita.	Reporting Commitment	Yes
Location of collection facilities and the changes in the number of collection facilities from previous report.	Reporting Commitment	Yes
Total kilograms of batteries sold into BC during a calendar year.	Reporting Commitment	Yes
Result of the SABC facilitated waste composition audit with respect to program batteries.	Reporting Commitment	N/A
Dates, location, and results of collection events (if applicable).	Reporting Commitment	N/A

[8] All performance metrics will be reported annually.

PERFORMANCE METRIC[9]	TARGET OR REPORTING COMMITMENT	SUBJECT TO AUDIT
CONSUMER AWARENESS		
Maintain an awareness level of 88 percent (%) or higher.	Target	N/A
The question asked to measure awareness in the annual consumer awareness study.	Reporting Commitment	N/A
The percentage of British Columbians who recycled batteries as reported in the annual consumer awareness study. By 2029: 58%	Target	N/A
The number and type of promotion and education activities within the calendar year.	Reporting Commitment	N/A
Number of resulting BC searches on the Call2Recycle web-based collection facility locator.	Reporting Commitment	N/A
Biennial barriers to recycling study	Reporting Commitment	N/A
MANAGEMENT OF PROGRAM COSTS		
Audited Financial Statements. Detail revenues and expenditures for fees collected from the sales of batteries in the calendar year in BC.	Reporting Commitment	Yes
MANAGEMENT OF ENVIRONMENTAL IMPACTS (END FATE)		
Maintain certification under the R2 standard or an equivalent standard. *Auditor may verify the information to comply with NFA reporting Requirements*	Reporting Commitment	N/A
Management of product end fate.	Reporting Commitment	Yes
Recycling efficiency rate by type: • Alkaline, Carbon Zinc, Zinc Air : 75% - 95% • Lithium Primary: 50% - 65% • Nickel Cadmium (Ni-Cd): 65% - 80% • Nickel Metal Hydride (Ni-MH) 70% - 85% • Lithium Ion (Li-Ion) 70% - 95% • Small Sealed Lead Acid: 70% - 95%	Target	Yes
AGENCY GOVERNACE		
Any changes in Call2Recycle's governance or structure from one year to the next.	Reporting Commitment	N/A

[9] All performance metrics will be reported annually.

Appendix A: Board of Directors as of December 2025

Call2Recycle Canada, Inc.'s Board of Directors is comprised of:

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 (CTC)

Tim Reuss, Canadian Automobile Dealers Association

Brian Temins, Cassels Brock & Blackwell LLP

Harriet Velazquez, Velazquez Consulting Inc. (Independent)

Call2Recycle keeps an updated list of board of directors which is available at call2recycle.ca/board-of-directors/

Appendix B: Consultation Summary

A summary of included stakeholder groups, questions and comments during the consultation periods along with Call2Recycle's responses will be included in this appendix and on the following pages.

Appendix C: 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 manages its products as follows:

PPH Order of Preference	**Call2Recycle's Product Management under the PPH**
(a) *reduce the environmental impact of producing the product by eliminating toxic components and increasing energy and resource efficiency;*	Call2Recycle encourages producers to manufacture batteries that have high efficiency, are energy-dense, and have a longer lifespan. This reduces the number of units introduced into the market.
(b) *redesign the product to improve reusability or recyclability;*	Call2Recycle encourages battery producers to design batteries in a manner that improves reusability and recyclability.
(c) *eliminate or reduce the generation of unused portions of a product that is consumable;*	This level of the PPH does not apply to program materials managed by Call2Recycle, as batteries are not consumable products.
(d) *reuse the product;*	Rechargeable batteries, by design, can be reused until they can no longer hold a reliable charge. In the context of battery refurbishment as a form of reuse, lithium-based rechargeable batteries are those most commonly eligible for refurbishment. Best practices and manufacturer recommendations stipulate that refurbished lithium batteries should undergo 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 currently endorse the practice of battery refurbishment at this time. Similarly, there are no official universal guidelines regarding refurbishing other rechargeable batteries; therefore, Call2Recycle does not support these activities due to safety risks.

(e) *recycle the product;*	The single-use batteries collected as part of the program are recycled, as by design, they cannot be reused. Rechargeable batteries enter Call2Recycle's stream at end of life. Batteries that are collected as part of the program are recycled. Call2Recycle facilitates connections between interested battery processors and battery manufacturers, promoting the reuse of reclaimed materials from recycled batteries to produce new ones. Other materials recovered through the recycling process (e.g. metals) are sold as commodities for use in the manufacturing of new products.
(f) *recover material or energy from the product;*	Any component of the battery that cannot be recycled will be managed via waste to energy.
(g)*otherwise, dispose of the waste from the product in compliance with the Act.*	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.