British Columbia
Extended Producer Responsibility Plan for Batteries, Vapes, and E-Cigarettes

Consultation 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).
Household 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	Rechargeable power banks and portable external power products, with eligible batteries and accessories (Section 4.1).
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 (RER) for existing household battery products	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 produced, expressed as a percentage." Call2Recycle uses the following calculation only for household battery products weighing no more than 5 kilograms each: weight collected in the reporting calendar year divided by average weight of those products sold into BC 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.
Dry-cell batteries	Batteries with an immobilized electrolyte, such as a paste, gel or electrolyte held in absorbent material, rather than a freely flowing liquid.
Zinc-air	A type of primary battery.
Existing Battery Stream	The primary and rechargeable stand-alone and replacement batteries described in the original battery service. The additional product streams below are identified separately for implementation and reporting.
Vapes and E-Cigarettes	Disposable and reusable electronic cigarettes and vaping devices containing or requiring one or more batteries weighing no more than 5 kilograms each, including nicotine and cannabis devices. Whole devices are covered by Schedule 3, section 5(1)(a)(ix), associated batteries by paragraph (b), subject to section 5(2). Product and component allocation is addressed in Section 4.1.
Large 12-Volt Batteries	Non-lead-acid batteries sold or labelled as 12 volts, whether or not the actual voltage is 12 volts, that have an outer case and can be connected or installed by the consumer, excluding all products described in Schedule 3 of the B.C. Recycling Regulation. Schedule 6 of that Regulation sets no minimum or maximum weight. Consumer connection or installation means that professional services are not required. Throughout this plan, “large 12-volt batteries” refers to batteries within the large battery product category under Schedule 6 of the B.C. Recycling Regulation.
Portable External Power Products	Portable battery-containing products designed primarily to provide an external power source, including engine-starting devices, generators, power packs, power stations and uninterruptable power supply products within Schedule 3, section 5(1)(c), together with eligible batteries and accessories under paragraphs (d) and (e).
Two-Year Pilot	The proposed first 24 consecutive months of approved operation of each new product stream, with network expansion, operating data evaluation and a subsequent target study.

1. Introduction

Call2Recycle Canada, Inc. (referred to as Call2Recycle henceforth), 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 household batteries[1], vapes, and e-cigarettes 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.

This plan covers household batteries weighing no more than 5 kilograms, vapes and e-cigarettes, qualifying large 12-volt batteries including those weighing more than 5 kilograms, and portable external power products. Call2Recycle will provide collection, consumer education, environmental management and separate reporting for these product streams on behalf of appointed producers.

Call2Recycle will implement regulated services for vapes/e-cigarettes, large 12-volt batteries, and new portable external power products on October 1, 2027 under this plan, subject to the director's approval. The proposed two-year operating pilot will evaluate and improve these services for the new product categories. The pilot does not postpone required collection, free access, funding, safe management or reporting.

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.

Products in the battery-containing and large battery product categories will be managed under this plan in accordance with Part 2 of the B.C. Recycling Regulation. Regulated services for these additional product categories will commence on October 1, 2027, subject to the director's approval of this plan. The proposed operating pilot will support service evaluation and improvement without deferring collection, free access, safe management or reporting.

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 no more than 5 kilograms in BC. With the 2025 amendments to the BC Recycling Regulation, this will also include 12 volt batteries, portable power, and vapes and e-cigarettes with regulated services to commence on October 1, 2027 under this plan. Call2Recycle also manages the regulatory requirements of obligated producers in other Canadian

[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 Section 4.1 for a detailed list of batteries covered under this EPR plan.

provinces.

Call2Recycle's EPR plan includes batteries sold as stand-alone items or sold for replacement purposes – this also includes large 12-volt batteries and portable external power products. 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.

Producer appointments and membership agreements will identify the new product streams, brands and duties managed by Call2Recycle. The Board will oversee funding and implementation of the new services using the existing governance structure. Call2Recycle will review producer reporting, collection and downstream arrangements, training, required authorizations and consumer information before launch and will report material program changes in the annual report.

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 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)(n) "batteries, including primary batteries and rechargeable batteries, that could be used in or with an electronic or electrical product listed in this subsection". In accordance with this section of the Regulation, Call2Recycle collects and recycles dry cell primary and rechargeable batteries weighing no more 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 accepting vapes and e-cigarettes, large 12-volt batteries, and new portable external power products with

services to commence on October 1, 2027 under this plan.

Additional product categories

Vapes and e-cigarettes are included under Schedule 3, section 5(1)(a)(ix), with eligible associated batteries under paragraph (b). Portable external power products are included under Schedule 3, section 5(1)(c), with eligible batteries under paragraph (d). Qualifying large 12-volt batteries are included under Schedule 6. These additions are not subject to the existing battery-only exclusion for products weighing more than 5 kilograms.

For vapes, the 5 kilogram condition applies to each battery in the device, not to the total weight of the device and its accessories. Device batteries and separately supplied eligible accessories will be allocated consistently under Schedule 3, sections 5(1)(a), (b) and (e), taking account of section 5(2)(g) and any responsibility under section 2(1). Whole-product quantities and component quantities will not be counted twice.

4.1 Products Accepted and Excluded under the EPR Plan

Accepted Products[2]:

Alkaline	Nickel Cadmium (Ni-Cd)	Vapes and E-Cigarettes
Carbon Zinc	Nickel Metal Hydride (Ni-MH)	Zinc Air
Lithium Ion (Li-Ion)	Nickel Zinc (Ni-Zn)	Damaged and defective batteries[3]
Lithium Primary	Silver Oxide	Large 12-Volt Batteries
Portable Power Banks	Small Sealed Lead Acid (SSLA)	Portable External Power Products

Added Product Scope

Vapes and e-cigarettes

The program will accept eligible disposable and reusable nicotine and cannabis devices as whole products, including batteries and incidental residual contents. Eligible device-associated cartridges and pods will also be accepted separately. Consumers will not be required to dismantle sealed devices, remove integrated batteries or empty residual contents before return.

The service will manage incidental nicotine or cannabis residues already in returned devices and components through qualified partners.

Large 12-volt batteries

The program will accept batteries sold or labelled as 12-volt batteries, whether or not their actual voltage is 12 volts, that have an outer case and can be connected or installed by the consumer. Lead-acid batteries and all products described in Schedule 3 are excluded from this stream. Schedule 6 sets no minimum or maximum weight; qualifying batteries over 5 kilograms are included. All non-lead-acid chemistries meeting the definition are included, including lithium-ion and lithium iron phosphate. (Schedule 6, section 1.)

[2] Additional obligated batteries sold with electronics, beyond what is required to power the device, are accepted

[3] Batteries sold as a stand-alone product or for replacement purposes, including recalled batteries subject to the applicable specialised handling route. Qualifying Schedule 6 batteries are accepted without proof of purchase or proof that an Environmental Handling Fee was paid.

Potential applications include separately supplied RV or marine house batteries, consumer-connected backup batteries and non-lead-acid starting batteries. Eligibility depends on the actual battery meeting Schedule 6; products covered by Schedule 3 remain in their applicable stream.

A separately supplied battery may qualify under Schedule 6 even if the equipment it powers is excluded. Batteries requiring professional connection or installation are excluded, and acceptance of the battery does not extend to the equipment.

Portable external power products

The program will accept eligible portable jump starters and other engine-starting devices, battery-containing generators, power packs, power stations and uninterruptable power supply products as whole products. Eligible associated batteries, expansion batteries and accessories within Schedule 3, section 5 will be managed with their applicable product stream. These products are classified separately from Schedule 6 batteries even where they have a 12-volt output or weigh more than 5 kilograms. Existing small portable power banks remain accepted and will be allocated consistently to avoid duplicate reporting.

Producer appointment will help identify accepted products, exclusions and available collection arrangements for each stream as services begin.

Excluded Products:

- Existing household battery stream only: batteries weighing more than five (5) kg. This limit does not exclude qualifying Schedule 6 batteries or eligible portable external-power products and their batteries.
- Damaged or defective batteries sold in or with a device covered under another EPR agency's plan.
- Wet cell batteries excluded from the existing small-battery service. For the Schedule 6 stream, chemistry and product eligibility are assessed under the Schedule 6 definition and exclusions.

Large 12-volt batteries (Schedule 6): Lead-acid batteries and products described in Schedule 3 are excluded. Existing approved small sealed lead-acid services will continue within their applicable scope.

Battery-containing products (Schedule 3): Exclusions include whole motor vehicles, boats and aircraft; firearms and ammunition; medical devices and equipment; wheelchairs and other mobility aids; products requiring professional installation in a building or structure; products designed exclusively for industrial, agricultural or military settings; and products described in section 2(1). These exclusions do not remove obligations under other applicable categories. Lead-acid chemistry alone does not exclude a portable power product. Component responsibilities and processing routes will be confirmed with the relevant appointed agencies.

Collection arrangements: Facility handling limits do not change product eligibility. Where a facility cannot safely accept an eligible item, Call2Recycle will identify a suitable participating facility, appointment or supported collection service. Consumers will be directed to contact the program before transporting damaged, unusually heavy or otherwise unsuitable items.

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 end-of-life management of the battery or batteries resides with the program that manages the device. These EPR programs include:

- 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)

Pursuant to subsection 5(2)(l) and (m) of the regulation, Call2Recycle commits to investigate opportunities with other agencies to manage misplaced products. Additional opportunities to collaborate with other agencies are routinely identified through participation in conjunction with SABC, and associated meetings.

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. The same consumer acceptance approach will apply to eligible orphaned and free-rider products within the new streams.

Eligible Schedule 6 consumer returns will include current and previously supplied products, including orphaned and free-rider products. Brand and producer information available at collection or sorting will support producer outreach and cost-allocation review without restricting consumer access. (Section 5(1)(c)(i).)

5. Stakeholder Consultation

5.1 Consultation Undertaken Prior to EPR Plan Submission

The original draft EPR plan and notice of consultation were posted to Call2Recycle's on December 17, 2025 allowing for a 71 day consultation period ending on February 25, 2026.

Call2Recycle held 5 consultation sessions via webinar. The consultation process engaged a cross-section of program stakeholders, including producers/industry, collection facilities, processors, members, local government, associations, and other EPR programs. All consultation materials were made available on Call2Recycle's website.

During the 1-hour consultation webinar, approximately 30 minutes was allotted for the presentation, and 30 minutes allotted for questions. A summary of comments and questions are included in Appendix B in the final submission.

Focused consultation on the additional product categories

Call2Recycle is undertaking focused consultation on the additional product categories and the proposed two-year operating pilot from October 22 to December 8, 2026, before submitting this plan for approval. The complete draft plan will be publicly available throughout this period, providing at least a 45-day consultation window. Call2Recycle is hosting four consultation webinars to offer varied opportunities for participation. Written and online feedback is invited, with comments accepted until 5 p.m. Pacific on December 8, 2026. Consultation addresses accepted products, collection services, funding, safety, proposed pilot commitments, data collection and the subsequent target-setting study. The consultation

events are scheduled for:

- Tuesday, November 10, 2026, at noon PCT
- Thursday, November 12, 2026, at 11 a.m. PCT
- Monday, November 16, 2026, at 10 a.m. PCT
- Wednesday, November 18, 2026, at noon PCT

The final submission will include the actual consultation dates, events, written feedback and responses.

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.

During implementation and the pilot, Call2Recycle will use its existing feedback channels to seek input from new-stream producers, collectors, and consumers. Progress and resulting program changes will be described in annual reporting.

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). Participating household battery facilities must enroll in the program, use approved collection receptacles, provide suitable storage, and follow the program's applicable handling, terminal-protection, packaging and shipping instructions. Staff must follow these procedures, including applicable contingency and shipment-record requirements. Public collection facilities provide free returns during their operating hours using approved collection receptacles and 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. This includes locally appropriate collection locations, storage, training and transport arrangements, including seasonal and low-volume service needs.
- **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.

Collection facilities will be qualified separately for each new stream before they are listed as accepting those products. Qualification will address public-service arrangements, compatible containers, secure storage, safe handling, and pickup routes. Facilities accepting large 12-volt batteries or power products will also need appropriate space and handling capacity. Call2Recycle will supply relevant training and collection materials and work with partners to meet the requirements of the service they offer.

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.

In 2025, Call2Recycle reported 2,038 active household battery collection facilities in BC, comprising 774 public and 1,264 private facilities (2025 BC Annual Report, Collection System and Facilities). Private facilities collect internally, including at offices and other workplaces, hospitals and schools. Public drop-off facilities include:

- Depots
- Landfill or transfer stations
- Retail
- Libraries and community centres
- Municipal offices and city halls
- Collection events[4]

[4] 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.

For existing household battery products (individual products weighing no more than 5 kg), 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.

Pickup, replenishment and special-handling arrangements will be established with participating collection partners before the affected services begin and adjusted using operating experience. Service gaps and improvements will be addressed through the annual service reviews and existing annual reporting.

Vape collection

Call2Recycle will begin a province-wide voluntary vape and e-cigarette collection program in January 2027, predominantly through municipal and bulk collectors, ahead of regulated launch on October 1, 2027. Call2Recycle will adapt the Quebec Recycle Your Vapes collection model to BC requirements. The vape collection network may include qualified vape and cannabis retailers, depots, local government facilities and other suitable partners using dedicated, labelled containers. Containers will be stored in a cool, dry, secure location under staff supervision, away from heat sources and outside customer reach. Adult-facing information at the counter will explain the return service.

Vapes will be collected separately from ordinary loose-battery boxes. Call2Recycle will arrange collection and replenishment of the dedicated containers through its program service providers. Collection partners will use only the packaging and carriers approved for their service.

Vape collection services will be reasonable and free to consumers from commencement. The public locator will list only facilities qualified and available to accept vapes, with accepted products, public hours, access conditions and a damaged-item contact.

Large 12-volt battery and portable power collection

Qualifying large 12-volt batteries and portable external power products will be collected through facilities equipped for their weight and dimensions. Potential partners include qualified battery retailers, recreational and marine suppliers, electronics retailers, depots and local government facilities. During the pilot, large 12-volt battery services will be expanded or adjusted where demand is determined. Consolidation or supported collection services will be used where standard drop-off is unsuitable.

The large 12-volt battery service will provide reasonable and free consumer access from the regulated commencement date. Qualified battery retailers, depots and other suitable facilities may provide drop-off or appointment services.

Collection instructions will address terminal protection where applicable, intact casings, safe lifting, secure storage and packaging. Consumers will not be required to remove integrated batteries from

portable power products. Pickup and storage arrangements will be established with each participating facility according to the products it accepts.

Call2Recycle will use end-fate study findings to prioritize primary battery recovery in non-urban communities, cooperation with other agencies and education to prevent disposal in garbage and standard recycling.

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 household battery education 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. For existing household battery products, Call2Recycle's goal is to ensure that at least 95 percent of British Columbians reside within 15 kilometers of an active public collection facility. For the existing household battery program, Call2Recycle conducts Geographic Information System (GIS) analysis each year to update the accessibility rate reported in the annual report. In this metric, accessibility refers to geographic access to collection facilities. While coverage in urban areas may exceed the 15 kilometers accessibility standard, continuous improvements will be made to increase accessibility in non-urban communities.

For existing household battery products, Call2Recycle commits to maintain a minimum of 650 active public collection facilities[5] 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.

[5] 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.

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. Call2Recycle will continue to participate in this process and work with the BCPSC and its members to consider service needs and improve access in underserviced areas of the province.

Access for new product streams

The existing battery collection network will not be represented as a network for all new products. The public locator and customer service channels will identify qualified facilities for each stream. A facility may accept one new stream without accepting the others.

During the two-year pilot, Call2Recycle will review vape and large 12-volt battery collection services annually and expand or adjust services as needed to address access gaps and meet approved commitments. Findings and resulting service improvements will be reported through existing annual reporting. Portable power collection services will be expanded or adjusted as needed to address access gaps and meet approved commitments. Outreach will prioritize where products are sold or used and gaps in rural, remote, and Indigenous communities.

Annual reporting will separately describe the facilities and services available for each new stream, and collection activity. Call2Recycle proposes to develop numerical accessibility targets for vapes and qualifying large 12-volt batteries after the two-year operating pilot, informed by pilot experience and the subsequent study, for the director's consideration and approval.

During the two-year operating pilot, Call2Recycle will assess consumer access to collection services for vapes and qualifying large 12-volt batteries using the geographic distribution, demand, and actual availability of qualified public collection facilities and alternative services. Assessments will consider material access conditions and use consumer and partner feedback to identify gaps, including barriers affecting rural, remote, island and First Nations communities. An enrolled site that cannot accept large 12-volt batteries will not count as large 12-volt battery public access. Reasonable and free consumer access will remain a program commitment throughout this period. (Sections 5(1)(c)(iii) and 5(2)(h), (i).)

Call2Recycle will also explore opportunities for additional vape and qualifying large 12-volt battery collection in remote and First Nations communities through the First Nations Recycling Initiative (FNRI).

6.3 Collection Targets and Recovery Rates

The 75 percent (%) recovery rate as set out in the Regulation is challenging when applied to existing household battery products weighing no more than 5 kilograms each 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 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 Section 4.1). 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 recovery rates for household battery products weighing no more than 5 kilograms each as performance targets in annual reports. The weight of these household battery products 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 for these household batteries only is their weight collected in the reporting calendar year divided by their average weight sold into BC in the preceding three (3) calendar years. For example, the 2025 rate is household battery weight collected in 2025 divided by average household battery weight sold in 2022, 2023 and 2024, expressed as a percentage.

To support the household battery recovery targets, Call2Recycle will continue collection-site outreach, targeted consumer education and cooperation with local governments and other EPR agencies as described in this plan. Education will encourage consumers to return stored batteries during routine trips to collection locations. The increased bulk-collector compensation introduced in 2023 supports collector

participation and collection capacity, alongside these efforts to encourage consumer returns. Where an annual recovery target is not met, Call2Recycle will review available collection data, consumer research and partner feedback to identify contributing factors and adjust these existing activities as appropriate. The annual report will explain the shortfall and actions taken or planned.

Call2Recycle collaborated with the District of Squamish on household battery curbside collection events in June and November 2024, followed by events on April 21–25 and November 3–7, 2025. Building on this experience, Call2Recycle commits to expanding the household battery curbside pilot program over the duration of this program plan by pursuing opportunities with interested communities. Participation depends on each community's interest and willingness to take part, together with suitable local collection arrangements. Options for ongoing curbside service will be considered with participating communities using operating experience.

Two year pilot and target development for new products

Pilot operation and data collection

The province-wide voluntary vape and e-cigarette program beginning in January 2027, predominantly through municipal and bulk collectors, will establish the collection network and test handling, transport, processing and reporting. Results will inform the October 1, 2027 regulated launch and subsequent two-year pilot.

Call2Recycle proposes a two (2) year pilot for vapes and e-cigarettes, qualifying large 12-volt batteries and portable external power products. The pilot will comprise 24 consecutive months from the approved commencement of each stream. With an October 1, 2027 commencement, the pilot period will be October 1, 2027 to September 30, 2029. Any change to the approved commencement dates will be disclosed with the corresponding pilot dates.

In the first year, Call2Recycle will establish stream-specific reporting, maintain initial partner qualifications and review service gaps. For vapes and large 12-volt batteries, annual service reviews will guide changes needed to address access gaps and meet approved commitments. Portable external power collection services will be expanded or adjusted as needed, informed by pilot experience. Collection and education activities will be adjusted using the findings.

Vape and qualifying large 12-volt battery collections will be reported by weight in kilograms. During the pilot, Call2Recycle will collect and report actual supply, collection and operating data for these streams to establish respective baselines. Annual reporting will describe results, material data limitations and service improvements, including progress toward a reliable vape recovery calculation. Vape information will distinguish disposable and reusable devices, eligible components and nicotine and cannabis products where the reporting information permits. Large 12-volt battery information will distinguish chemistry, size or weight band where applicable. Portable power information will distinguish product formats and associated batteries. Sales and collection records will use comparable units and weights, with whole-product and battery-component quantities identified separately.

Post-pilot study and target development

Information currently available to Call2Recycle is insufficient to establish defensible numerical collection or recovery targets for qualifying large 12-volt batteries during the initial operating period. The relationship between products supplied and products available for collection is not yet sufficiently

understood for the B.C. program.

Before final plan approval, Call2Recycle will submit proposed launch and interim commitments, measurement boundaries and any justified requests regarding targets or timing for the director's determination, including the proposed approach to large 12-volt battery collection and recovery targets.

Following the pilot, Call2Recycle will study BC sales and collection information and the experience of consumers, producers, collection facilities and downstream partners. The study will evaluate product lifespan, quantities remaining in use, storage and hoarding, return pathways, collection coverage, operating costs and environmental management. Informed by pilot data, it will establish vape collection and recovery performance measures and targets and propose collection and recovery measures, numerical targets and implementation timeframes for qualifying large 12-volt batteries. It will also evaluate refinements to other performance measures, target levels and implementation timeframes, taking account of approved launch and interim commitments. Findings and proposed targets will be presented to the director for approval upon completion.

The existing household battery stream's targets will continue to be reported separately in accordance with the approved plan. The new streams will not be included in the existing battery recovery calculation without an agreed reporting basis.

Collection and management of the new products will continue throughout the pilot and subsequent study and target-approval process. Approved access, funding, product-management and reporting commitments and any interim measures or requirements established by the director will apply throughout. Other applicable director-established and plan performance commitments remain in force.

6.4 Performance Targets and Reporting Commitments

Household Batteries (no more than 5 kilograms) 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 650 active public collection facilities.
- Recovery Rate of 56% in 2029.

Household Batteries (no more than 5 kilograms) 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).

New Product Streams (Vapes/E-Cigarettes, Large 12-Volt Batteries and Portable External Power Products):

For each new product stream, Call2Recycle will report separately on products supplied into BC and collected during the reporting year, including weight where applicable, and actual collections by regional district.

The annual report will identify public and private collection facilities, and sector, for available services for each new stream. It will also describe operational improvements, consumer education, and relevant safety and downstream-management findings.

Large 12-volt battery reporting will distinguish Schedule 6 from other streams and report total product collection weights in kilograms. Actual collection weights will also be reported in kilograms by regional district of collection. Annual reporting will include education, facilities and services, supply and collection data, hierarchy outcomes and will be submitted to the director and posted online by July 1. For calendar-year reporting, the first operating-year results will identify the October to December 2027 period. (Sections 8(1) and 8(2)(a) to (h).)

The first report will identify the October to December 2027 partial operating period separately. Subsequent reports will show the applicable calendar-year results and progress through the 24-month pilot, including the portions of 2027 and 2029 falling within that pilot. Completion of the pilot, progress on the subsequent study and the proposed targets will be reported without treating study-based targets as approved before the director's determination. Pre-launch vape voluntary program activity and findings will be identified separately in the applicable annual report.

The annual vape disclosure will include BC product supply, total product collection weight in kilograms, actual collection weights by regional district, collection network and access, education, and hierarchy outcomes. For calendar-year reporting, October to December 2027 will be shown as a partial operating period. Reporting will be submitted to the director and posted online by July 1, with the first calendar-year operating report due July 1, 2028. (Sections 8(1) and 8(2)(a) to (h).)

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
- Call2Recycle 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 (earth rangers, fire services, etc.)
- 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 on household battery recycling[6].

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 household batteries can be recycled) and behaviours and the effectiveness of its outreach campaigns to increase household battery recycling incidence among target audiences. Call2Recycle will report annual survey results against a 2029 target of 89 percent (%) awareness that household batteries can be recycled[7]. 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 household batteries each year (incidence). The household battery 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. Call2Recycle encourages producers to include clear battery recycling and collection information on packaging when possible.

Promotion and education for the new streams will explain which products are accepted, where they can be returned and how to manage them safely. Producer, distributor, retailer and online-sales channels will be used where applicable to provide information at the point of purchase and to identify qualified collection options. The effectiveness of these activities will be evaluated during the pilot and used to inform subsequent study and targets.

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

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

[7] 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.

locators.

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[8]
- 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)
- Rural primary-battery campaigns with local partners

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.
- Participation in programs such as the First Nations Recycling Initiative (FNRI), a program administered by the Indigenous Zero Waste Technical Advisory Group (IZWTAG) and supported by several producer-appointed EPR agencies in BC. Stewarded materials, including batteries, are

[8] 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.

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.

Vape communications for adults

Vape communications will be directed to adult consumers aged 19 and older in BC and to participating collection partners. Materials will focus on collection and safe recycling and will not promote vaping, make health claims or offer incentives to purchase vaping products. The program will use neutral information at suitable adult-facing retail and community channels. Vape collection will not be promoted through school battery campaigns or youth sponsorships, and vape receptacles will be kept outside customer reach under staff control.

Vape information will explain accepted whole devices and components, free returns, the product-specific locator, and safe storage. Messages will tell consumers not to dismantle sealed devices, empty liquids or place vapes in ordinary battery boxes, garbage or curbside recycling. During the pilot, annual awareness survey questions will measure awareness that vapes can be recycled among adult consumers of vapes aged 19 and older in BC. (Section 5(1)(c)(iv).)

Large 12-volt battery and portable power communications

Information for large 12-volt battery and portable power users will distinguish qualifying large 12-volt batteries from lead-acid products. Education will use channels suited to how eligible products are purchased, used and serviced, supported by program information and the collection locator. Materials will explain collection options and safe handling.

Large 12-volt battery communications will explain the 12-volt sale or label, outer case and consumer-connection criteria. Participating partners and relevant audiences will receive consistent product and service information.

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. The household battery barriers-to-recycling study is conducted through questions included in the annual provincial consumer awareness survey. The corresponding annual report will include the study's findings and the actions and program enhancements Call2Recycle will implement in response.

Household battery education will use existing campaigns and partner communications to respond to the research findings. For adults aged 18–34, who are more likely to dispose of batteries in the garbage, messages will emphasize safe battery recycling and nearby drop-off options. For adults aged 55 and older, who are more likely to store batteries until recycling is convenient, messages will encourage safe storage and regular drop-off during routine trips. For rural and non-urban communities, where the research identified declining primary-battery recovery, messages will clarify that single-use batteries are recyclable and identify locally available collection locations and events. 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.

During the pilot, Call2Recycle will evaluate barriers specific to the new streams, including knowledge of accepted products, retailer participation, residual contents in vaping devices, product lifespan and storage before return. Consumer research and collection partner feedback will inform education and service changes and the post-pilot target study.

7.4 Performance Monitoring and Reporting Commitments

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

Household Battery Performance Targets:

- Reach an awareness level that household batteries can be recycled of 89% by 2029.
- 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.

Household Battery Reporting Commitments:

- Conduct an annual provincial consumer awareness survey and report the questions asked to measure awareness as well as barriers to recycling and the results.
- The percentage of British Columbians who recycled batteries as reported in the annual consumer awareness study.
- Conduct a minimum of four household battery education campaigns annually and report the number and type of marketing and awareness activities, including each campaign.
- Number of resulting searches on the web based Call2Recycle collection facility locator.
- Conduct the barriers-to-recycling study within the annual provincial consumer awareness survey. The corresponding annual report will include the study's findings and the actions and program enhancements Call2Recycle will implement in response.

New-product awareness reporting and targets

Annual reporting will describe promotion and education activities for the new streams and actions taken. For vapes, it will include the questions, methods and results used to measure awareness of recyclability among adult vape consumers through the annual awareness survey. For large 12-volt batteries, it will describe available pilot findings, including consumer and partner feedback. Vape awareness targets will be established following the two-year pilot, informed in part by annual awareness survey data on awareness of recyclability among adult consumers of vapes. The existing general battery awareness and behaviour percentages will not be presented as established targets for the new streams. Large 12-volt battery awareness targets will be established following the two-year pilot, based on learnings from the pilot. Proposed awareness targets will be submitted to the director for approval.

Research results will support subsequent improvements; the study after the operating pilot does not postpone the launch communications.

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.

The new product streams where applicable and no other funding mechanism exists will be funded by their appointed producers through EHFs set using Call2Recycle's budgeting and Board approval process. Budgets will account for collection materials, handling and storage, transportation, whole-product processing and residual-content management, promotion and education, data collection, the pilot study, administration and required assurance. Product format, chemistry, and size will be considered in the cost assessment.

Call2Recycle will maintain category-specific sales reporting and sufficient cost information to assess the funding of each new stream. The cost assessment will consider future end-of-life obligations and will not assume that the sale of recovered materials alone can fund the service. Consumer returns will remain free of charge.

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. Compensation rate consider time to package, and 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 for existing household battery products (individual products weighing no more than 5 kg) 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. These household battery 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.

Compensation for new product streams

Collection and compensation arrangements for the new streams including large 12-volt batteries and vapes / e-cigarettes will be based on the existing bulk-battery threshold, applied separately to each product category. Agreements will identify the applicable services and cost arrangements. Collector compensation for large 12-volt batteries and vapes/e-cigarettes will be available to qualifying bulk collectors operating under a compensation agreement with Call2Recycle.

The two-year pilot will provide additional information on operating costs and collection arrangements. Call2Recycle will evaluate this information through its budgeting and compensation review processes and use the findings to inform new-stream fees and service arrangements. Changes and the basis of the review will be described in the two-year pilot study.

The large 12-volt battery funding assessment will cover the reasonable costs of collection materials, secure storage, transport, processing, education, data, studies and assurance. Costs required to deliver the service will be addressed through producer funding and service agreements, and consumer returns will remain free. (Sections 5(1)(c)(i) and (v).)

Vape producer funding will cover reasonable costs including dedicated containers, training, transport, processing and residual-content treatment, education, data, studies and assurance. The existing 250 kilogram bulk-battery compensation threshold will determine access to vape collector cost arrangements. Agreements and cost reviews will reflect the services required from each collector. (Sections 5(1)(c)(i) and (v).)

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.

Annual financial reporting will present revenues and expenditures separately for household batteries, large 12-volt batteries, and vapes/e-cigarettes. Product-specific supply, collection and performance information will remain identifiable within the household battery financial reporting group.

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.

Annual financial reporting will include the expanded program using a consistent method to identify new-stream revenues, expenditures and relevant reserves or cost allocations. New-stream collection, sales and environmental-performance information will be included in the applicable independent non-financial assurance process using the agreed criteria.

Annual independent non-financial assurance will address the large 12-volt battery information within the Ministry-required scope and agreed criteria, including collection facilities, product management and relevant supply, collection and performance information. Financial reporting will identify large 12-volt battery revenues and expenditures through the expanded program accounts, including the audited information required for separately identified consumer fees. (Sections 8(2)(f) and (h); Recycling Regulation Guide 2026, printed pages 26 to 27.)

Vape revenues, expenditure and relevant reserves or shared-cost allocations will be identifiable in the expanded BC accounts. Independent financial audit and applicable non-financial assurance will cover the expanded scope using documented criteria. Separately identified consumer fees will be disclosed in the audited information required by section 8(2)(f).

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. In 2026 Call2Recycle also expanded sorting with Davis Trading to sort at their facility in Richmond, BC. The additional sorting partners 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.

For the new streams, Call2Recycle will select qualified collection, transportation, sorting and processing partners according to the products, components and hazards they are equipped and authorized to manage. Local services will be considered where suitable, without assuming that an existing battery sorter is authorized or equipped to process whole vapes, large 12-volt batteries or power stations.

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 full pollution prevention hierarchy in section 5(3) of the Recycling Regulation is set out in Appendix C.

Primary batteries managed by the Call2Recycle program are single-use batteries. 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.

Refurbishment has not been established as a safe and practical management pathway for rechargeable batteries collected through Call2Recycle's existing household battery program. Call2Recycle cannot currently assure safe refurbishment for its collected stream and therefore continues to direct these batteries to recycling.

The new streams will be assessed against the pollution prevention hierarchy in section 5(3), as set out in Appendix C. Devices may contain plastics, metals, electronics and incidental consumable residues in addition to batteries. Their management will therefore be evaluated at product and component level. Lower hierarchy options will be used after all feasible higher-level opportunities have been taken, with departures explained in reporting.

The study following the two-year pilot will assess the viability of reuse pathways for qualifying large 12-volt batteries; this assessment does not commit Call2Recycle to a refurbishment program. Any future reuse arrangements will require demonstrated feasibility and suitable safety. Producer newsletter information will encourage durability and recyclability.

Call2Recycle will not undertake vape refilling or redistribution, or assume that battery refurbishment is appropriate for a collected product, for health and safety purposes.

For vapes, the hierarchy assessment will address safe component separation, and feasible recovery of metals, electronics and plastics. Collection does not authorise refilling or redistribution of used vapes. Where recycling is not feasible, the program will document the treatment, energy recovery or disposal route. (Sections 5(1)(c)(vii), (viii) and 5(3).)

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 recyclable materials to local landfills. Unrecoverable residues will be managed at authorized facilities in accordance with the pollution prevention hierarchy and applicable requirements.

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.

Before launch, Call2Recycle will confirm the applicable environmental and transport requirements for each new stream and verify the scope of the authorizations held by the program and its service providers. The review will address whole vapes and incidental nicotine or cannabis contents, large 12-volt batteries, batteries contained in equipment, and damaged, defective or recalled products. Any additional or amended permits, certificates or arrangements required for the BC service will be obtained before the affected operations begin.

The EPR product definitions and hazardous-waste handling provisions will be assessed separately. In particular, standalone batteries weighing 5 kilograms or more require assessment outside the relevant moderate-risk e-waste provisions. Existing small-battery certificates, container markings and Quebec vape arrangements will not be presumed to cover all BC new-stream activities. Only packaging, storage, carriers and downstream routes appropriate to the actual product, condition and applicable authorization will be used.

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.

Household battery processing measures

In accordance with the requirements of the third-party assurance of non-financial information,

Call2Recycle will report annually on product end-fates and, for existing household battery products (individual products weighing no more than 5 kg), recycling efficiency rates (RER) by chemistry. A third-party auditor will review any changes to the household battery RER or product end fate disclosed in the annual report.

RER targets for existing household battery products 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 RER target performance by chemistry for these household battery products, 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%

Call2Recycle will report the reasons for material not being recovered, using available processor information and operating data. For existing household battery products (individual products weighing no more than 5 kg), 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.

New-product processing and pilot reporting

During the two-year pilot, reporting on unrecovered materials for the new product streams will use available processor information and operating data, identifying estimates and data limitations where applicable.

Qualified downstream facilities will manage whole vaping devices and their incidental contents, separating batteries, metals, plastics, electronics and other components for appropriate recovery or treatment. Residual nicotine or cannabis contents and contaminated materials will also be managed.

Large 12-volt batteries and portable power products will be sorted by product type and battery chemistry. Processing arrangements will address intact casings, disassembly, battery treatment and recovery or management of non-battery components.

Call2Recycle will maintain available downstream records of product and component quantities received and materials recovered during the two-year pilot. During the two-year pilot, Call2Recycle will use available processor information and operating data to assess actual processing outcomes. Findings, data limitations and improvements will be reported through existing annual reporting. The study following the pilot will evaluate additional reporting measures and assess the viability of reuse for large 12-volt batteries. Call2Recycle will report processing outcomes using available processor information and operating data, identifying estimates and data limitations where applicable.

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 existing household battery collection 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. These household battery 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.

New-stream partners will receive appropriate training and operating instructions before accepting the products. Controls will address secure storage and emergency response.

Call2Recycle will review incidents and handling issues with collection and downstream partners and use the findings to improve training, packaging and collection arrangements. Shipment classifications, packaging, routes and training will follow the applicable requirements and actual certificate conditions. Consumer information will direct users to the safe service for their product and condition.

Vape operating instructions will address secure handling and staff escalation. The applicable hazardous-waste and dangerous-goods classifications, exemptions or certificate conditions will be verified for each route before use; no generic small-battery or Quebec authorisation will be assumed to cover the BC vape service.

9.4 Performance Monitoring and Reporting Commitments

For existing household battery products (individual products weighing no more than 5 kg), Call2Recycle will report annually to the director on product end fate 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.

For household batteries, the annual report will address each of the seven levels of the pollution prevention hierarchy, describing how collected products were managed.

The annual report will describe new-stream product and component end-fates and management of incidental contents and non-recovered materials, using available processor information and operating data during the two-year pilot. Performance methods, data limitations and relevant corrective actions will be disclosed for each new stream.

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 *B.C. Arbitration Act, S.B.C. 2020, c. 2, where applicable*. 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.

The dispute resolution procedure will also apply to producers and collection, transportation, sorting and processing partners for the new streams. Large 12-volt battery service agreements will make the existing dispute procedure available for collection, handling, transport, and processing disputes during implementation and operation. Vape collection and management partners will have access to the dispute process for service and issues during implementation and operation.

11. Summary of Performance Monitoring and Reporting Commitments

Household Batteries (no more than 5 kilograms)

PERFORMANCE METRIC[9]	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 650 active public collection facilities.	Target	Yes
Recovery Rate: The amount of product collected divided by the product produced, expressed as a percentage Call2Recycle uses the following calculation only for household battery products weighing no more than 5 kilograms each: weight collected in the reporting calendar year divided by average weight of those products sold into BC 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

PERFORMANCE METRIC[9]	TARGET OR REPORTING COMMITMENT	SUBJECT TO AUDIT
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

[9] All performance metrics will be reported annually.

PERFORMANCE METRIC[10]	TARGET OR REPORTING COMMITMENT	SUBJECT TO AUDIT
CONSUMER AWARENESS		
Reach an awareness level that household batteries can be recycled of 89 percent (%) by 2029.	Target	N/A
Conduct an annual provincial consumer awareness survey and report the questions asked to measure awareness as well as barriers to recycling and the results.	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
Conduct a minimum of four household battery education campaigns annually and report the number and type of promotion and education activities, including each campaign.	Reporting Commitment	N/A
Number of resulting BC searches on the Call2Recycle web-based collection facility locator.	Reporting Commitment	N/A
Barriers-to-recycling study within the annual survey; report findings and the actions and program enhancements Call2Recycle will implement in response in the corresponding annual report.	Reporting Commitment	N/A
MANAGEMENT OF PROGRAM COSTS		
Audited Financial Statements. Detail annual BC revenues and expenditures for the household battery product group.	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
Existing household battery recycling efficiency rate targets 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

PERFORMANCE METRIC[10]	TARGET OR REPORTING COMMITMENT	SUBJECT TO AUDIT
AGENCY GOVERNACE		
Any changes in Call2Recycle's governance or structure from one year to the next.	Reporting Commitment	N/A

Additional performance and reporting commitments for the new product streams

PERFORMANCE METRIC	TARGET OR REPORTING COMMITMENT	SUBJECT TO AUDIT
ADDITIONAL PRODUCT STREAMS		
New product services Begin a province-wide voluntary vape and e-cigarette program in January 2027, predominantly through municipal and bulk collectors. Commence the regulated vape, qualifying large 12-volt battery and portable external power services on October 1, 2027.	Reporting Commitment Report annually	As applicable (Section 8.4)
Two-year pilot 24 consecutive months from approved commencement of each new stream; October 1, 2027 to September 30, 2029 if commencement is unchanged.	Reporting Commitment Report annually	As applicable (Section 8.4)
Collection service reviews and development Review vape and large 12-volt battery services annually and expand or adjust services as needed to address access gaps and meet approved commitments. Expand or adjust portable power services as needed to address access gaps and meet approved commitments. Report review findings and service changes separately by stream.	Reporting Commitment	Applicable NFA criteria
Sales and collections Report supply and collections by stream, with vape and qualifying large 12-volt battery collections in kilograms.	Reporting Commitment	Applicable NFA criteria
Facilities and regional services Report public/private status, locations, sectors, and actual regional collections.	Reporting Commitment	Applicable NFA criteria
Study after the pilot Use the post-pilot study, informed by pilot data, to establish vape collection and recovery performance measures and targets, propose numerical large 12-volt battery collection and recovery targets, develop numerical accessibility targets for vapes and qualifying large 12-volt batteries, and refine other performance measures and targets; submit findings and proposed timing to the director for approval. Approved service and reporting commitments apply throughout the pilot and study.	Reporting Commitment Report progress and findings	As applicable (Section 8.4)

PERFORMANCE METRIC	TARGET OR REPORTING COMMITMENT	SUBJECT TO AUDIT
Consumer awareness Report new-stream education activities, methods, findings and improvements; establish awareness targets for vapes and qualifying large 12-volt batteries after the two-year pilot.	Reporting Commitment Report annually	As applicable (Section 8.4)
Program costs Report revenues and expenditures separately for household batteries, large 12-volt batteries, and vapes/e-cigarettes, together with relevant reserves, and cost allocations..	Reporting Commitment	Financial audit
Environmental management Report product/component end-fates, actual processing outcomes, and hierarchy outcomes by stream, using available processor information and operating data during the two-year pilot and identifying estimates and data limitations where applicable.	Reporting Commitment	Applicable NFA criteria
LARGE 12-VOLT BATTERIES		
12V launch and network Provide the Schedule 6 service from October 1, 2027 and report qualified public facilities, service coverage, network changes and alternatives annually.	Reporting Commitment Report annually	As applicable (Section 8.4)
12V collection and safety arrangements Qualify sites and handling routes for the batteries accepted. Report material service gaps and corrective actions.	Reporting Commitment Report annually	As applicable (Section 8.4)
12V pilot data and reporting Report large 12-volt battery supply and collection data annually, including collection weights in kilograms by regional district, to establish pilot baselines.	Reporting Commitment Report annually	As applicable (Section 8.4)
12V pilot study and subsequent targets Evaluate pilot data to develop collection and recovery measures and targets during the subsequent study. Continue collection through study and approval.	Reporting Commitment Report progress and findings	As applicable (Section 8.4)
12V consumer awareness Explain accepted products, collection options and safe handling; report findings and improvements. Establish awareness targets after the two-year pilot based on pilot learnings.	Reporting Commitment Report annually	As applicable (Section 8.4)
12V costs Fund the required large 12-volt battery service through producers, provide free consumer returns and report program costs through the expanded accounts.	Reporting Commitment	Financial audit

PERFORMANCE METRIC	TARGET OR REPORTING COMMITMENT	SUBJECT TO AUDIT
12V environmental outcomes Report actual processing outcomes and life-cycle efforts. Assess reuse viability and evaluate additional reporting measures through the study following the two-year pilot, informed by pilot experience.	Reporting Commitment	Applicable NFA criteria
12V assurance and annual reporting Include large 12-volt battery information in annual reporting and applicable financial audit and independent non-financial assurance.	Reporting Commitment	Annual reporting and applicable assurance
VAPES AND E-CIGARETTES		
Vape launch and consultation Begin the province-wide voluntary vape program in January 2027. Commence regulated services under this plan on October 1, 2027, subject to approval.	Commitment Sections 2, 5.1 and 6.3	As applicable (Section 8.4)
Vape network and handling Qualify the advertised network before acceptance.	Reporting Commitment Report annually	As applicable (Section 8.4)
Vape pilot collection reporting Report vape collection by weight in kilograms and use actual supply, collection and operating data to establish a baseline. Report results, data limitations and improvements through existing annual service reviews and reporting.	Reporting Commitment Report annually	As applicable (Section 8.4)
Vape pilot and later study Use data collected during the two-year pilot to establish vape collection and recovery performance measures and targets during the subsequent study; submit them to the director for approval and continue approved services.	Reporting Commitment Report progress and findings	As applicable (Section 8.4)
Vape consumer awareness Provide neutral adult-facing return and safe-handling information; report annual survey results on recyclability awareness among adult vape consumers. Establish awareness targets after the two-year pilot, informed in part by these results.	Reporting Commitment Report annually	As applicable (Section 8.4)
Vape costs and compensation Fund the required whole-product service through producers.	Reporting Commitment	Financial audit
Vape environmental outcomes and safety Verify handling routes and partners; report actual pilot processing outcomes using available processor information and operating data. Evaluate additional reporting measures through the subsequent study.	Reporting Commitment	Applicable NFA criteria

PERFORMANCE METRIC	TARGET OR REPORTING COMMITMENT	SUBJECT TO AUDIT
Vape annual reporting and assurance Report separate vape results by July 1, beginning July 1, 2028 for the October to December 2027 calendar-year period.	Reporting Commitment	Annual reporting and applicable assurance

[10] All performance metrics will be reported annually.

Appendix A: Board of Directors as of October 2026

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 https://call2recycle.ca/about/

Appendix B: Consultation Summary

A summary of stakeholder questions and comments, together with Call2Recycle's responses, will be included in the final submission. Feedback will be categorized by topic, with duplicate questions and comments consolidated. Focused consultation on the additional product categories runs from October 22 to December 8, 2026.

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. These efforts will also include the new product streams of vapes and 12 volt batteries. Design and manufacturing changes remain the responsibility of producers.
(b) *redesign the product to improve reusability or recyclability;*	Call2Recycle encourages battery producers to design batteries in a manner that improves reusability and recyclability. These efforts will also include the new product streams of vapes and 12 volt batteries.
(c) *eliminate or reduce the generation of unused portions of a product that is consumable;*	Household batteries, large 12-volt batteries and portable external power products: This level does not apply to non-consumable components. Vapes and e-cigarettes: Producer engagement will consider designs that prevent leakage and unintended waste. Consumer information will address safe returns and will not encourage consumption or ask consumers to empty devices.

(d) *reuse the product;*	Rechargeable batteries, by design, can be reused until they can no longer hold a reliable charge. Refurbishment has not been established as a safe and practical management pathway for rechargeable batteries collected through Call2Recycle's existing household battery program. Call2Recycle cannot currently assure safe refurbishment for its collected stream and therefore continues to direct these batteries to recycling. The study following the two-year pilot will assess the viability of reuse pathways for qualifying large 12-volt batteries; this assessment does not commit Call2Recycle to a refurbishment program. Continued use and appropriate repair before end of life will be distinguished from collected-product management. Call2Recycle will not refill or redistribute used vapes.
(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. Qualified partners will separate whole vapes and portable power products into batteries and other components. Large 12-volt battery processing will account for chemistry and casings. Reporting will identify recovered quantities.
(f) *recover material or energy from the product;*	Components that cannot be recycled will be assessed for material or energy recovery,

	following the pollution prevention hierarchy. Where recovery is not feasible, residual material will follow an authorized disposal route, with actual outcomes reported. Material or energy recovery will be reported only where a component actually follows that route after feasible higher hierarchy options are considered.
(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. Residual material requiring disposal will only follow this route after feasible higher hierarchy options are assessed.