

Processor and Sorter Qualification Standards

Processor standards define the minimum operating requirements to qualify as a processor and or sorter of batteries, cell phones and other materials collected for the Call2Recycle® program.

The following processing and sorting standards do not absolve processors or sorters from any federal, provincial/state and/or municipal legislation and regulations applicable to their operation. It is the processors' responsibility to be aware of and abide by all such legislation and regulations.

PROCESSOR STANDARDS

1. Comply with all business licensing and permitting requirements as well as any local, state/provincial and federal environmental operating permit requirements, such as but not limited to, recycling, hazardous waste/material management, storage and treatment, air quality, water quality, import/export permits and any special conditions set forth in the licenses and/or permits.

Including but not limited to:

- Ministry of the Environment Federal and Provincial- Certificates of Approval; Ontario Environmental Protection Act, 1990 (including R.R.O. 1990, O. Reg. 347, General – Waste Management) and Federal Permit of Equivalent Level of Environmental Safety;
- *Transportation of Dangerous Goods Act* (TDGA);
- Export and Import of Hazardous Waste and Hazardous Recyclable Material Regulations, 2005 (EIHWHRMR) under the Canadian Environmental Protection Act;
- United States Environmental Protection Agency;
- United States Department of Transportation;
- International Civil Aviation Organization (ICAO)
- 2. Complete and pass a qualification audit of the facility performed by CHWMEG (in past 3 years) or outside auditor chosen by Rechargeable Battery Recycling Corporation (RBRC) to ensure the facility is in compliance with all regulatory and performance requirements. RBRC and program participants shall be allowed to audit the facility in-person at mutually agreeable specified times. The most recent facility audit summary shall be provided within seven days to RBRC, program participants, auditors or regulators upon request.
- 3. Possess workers' compensation coverage, comprehensive or commercial general liability insurance, including coverage for bodily injury, property damage, complete operations, contractual liability, and closure. With combined single limits of not less than \$1,000,000 per occurrence, \$4,000,000 general aggregate.
- 4. Possess environmental liability insurance with combined single limits of not less than \$5,000,000 per occurrence, \$10,000,000 general aggregate.
- 5. Have a written policy approved by senior management outlining corporate commitment to environmental management and continuous improvement.



Recharging the planet. Recycling your batteries."

- 6. Comply with RBRC's certification requirements under the applicable collection and recycling certification programs not to ship waste batteries to non-OCED countries, i.e. BAN, R2 and The Electronic Processors Stewardship Canadian (EPSC) Recycler Qualification Program for End-of-Life Electronics Recycling. Identify and provide copies of exiting certifications, i.e. ISO 14001, operating permits and provide notification if discontinued. Provide documentation, such as EHS Summary and facility audits showing that the company's management standards meet the required certification criteria, and willingness to sign audit forms.
- 7. Implement and maintain an emergency response plan to prepare for and respond to emergency situations, including fires, spills and medical emergencies. Provide immediate notification of any situation that impacts the Call2Recycle program. A verbal reporting of an incident is provided within 24 hours, with a full written description within 15 days.
- 8. Identify and comply with all applicable occupational health and safety regulations.
- 9. Document the receipt, downstream flow and handling of materials from receipt at facility through final disposition. Documentation shall include but not be limited to descriptions regarding how the materials are received, tracked, and processed, the recycling efficiencies achieved, and procedures and tracking documents involving any downstream processor(s).
 - a. Sorter/Processor shall be responsible for packaging, transporting and ensuring a downstream facility has been audited and Sorter/Processor assumes responsibility for materials sent offsite for further processing.
 - b. Sorter/Processor shall provide copies of all shipping documents, receipt acknowledgments, and certificates of conversion/recycling for materials processed on site and through final disposal facilities. Sorter shall provide shipping documents related to off-site shipments within 2 business days of shipment.
 - c. Batteries must be processed within 180 days of receipt of battery (please note some regs require 1 year).
- 10. Maintain all records for a minimum of three years, or as required by regulation, including manifests, bills of lading and waste records.
- 11. Provide notice of any fines or regulatory orders in the previous five years and within 60 days of any subsequent fine or regulatory order.
- 12. Allow services and information to be subject to audits at the discretion of RBRC or a representative on behalf of RBRC and Rechargeable Battery Recycling Corporation Canada (RBRCC).
- 13. Provide assurance of financial stability, in the form of audited financial statements, Dunn Bradstreet ratings or comparable 3rd party reports.
- 14. Must meet EU Battery Directive 2006/66/EC or Provincial recycling efficiency and/or recycling rate requirements, whichever is most stringent.





SORTER STANDARDS

Include the above requirements (Except 10c and 15)

- 15. When a facility is also providing receiving, sorting and consolidating services:
 - a. All shipping containers received as part of the Call2Recycle program will be entered in a Call2Recycle data collection system within five (5) business days of receipt.
 - b. Sorter shall provide a reconciled daily container inventory.
 - c. Batteries received in bulk loads will be sorted, verified and recorded within 5 business days, with the following exceptions:
 - o Mixed battery chemistries, that have not been pre-sorted, and weighing over 10,000 lbs. shall be processed within 15 business days.
 - d. Sorted batteries will be shipped to processor(s) within 180 days of receipt.
 - e. Data such as collection site information, shipment tracking and battery/cell phone composition will be entered into Call2Recycle information system.
 - f. Record and report non-compliant packaged shipments within 5 days of receipt.
 - g. All batteries that are sent off site for further processing will be properly packaged and meet federal, provincial and international shipping regulations including terminal protection and any applicable special requirements.
 - h. All materials collected through the Call2Recycle program that are not part of the program ("non-conforming material") will be disposed consistent with all local, state and federal requirements.