

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

QUESTIONS ARISING AT PUBLIC CONSULTATION SESSIONS

Does it matter where the batteries come from?

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

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

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

Can more than one battery be put in a bag?

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

More information needed regarding drums and shipping requirements.

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

Who are our marketing partners?

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

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

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

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

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

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

Are cell phone accessories accepted as well?

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

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

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

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

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

QUESTIONS RECEIVED POST OUR PUBLIC CONSULTATION SESSIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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