



Reference: 411439/411440

July 15, 2024

Call2Recycle Canada, Inc.
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Dear Kristen Romilly,

Thank you for submitting the Call2Recycle Canada, Inc. (“Call2Recycle”) British Columbia Extended Producer Responsibility Plan for E-Transport Products (the “plan”) initially on February 28, 2022, in fulfillment of the requirements of Part 2, Section 6 of the [Recycling Regulation](#) (the “regulation”) made under the *Environmental Management Act*. The most recent revision of the plan submitted by Call2Recycle on July 2, 2024 is attached to this letter.

I acknowledge the efforts of Call2Recycle and the ongoing dialogue between Call2Recycle and the Extended Producer Responsibility (EPR) section staff to develop revisions and improvements to the plan to better meet the requirements of the regulation.

Under the regulation, the director, otherwise known as the Statutory Decision Maker (SDM), has the ability to approve an extended producer responsibility plan submitted under section 4. I have completed my review of the submitted plan, and Call2Recycle’s revisions of the plan in response to the proposed amendments as outlined in my preliminary decision letter of May 1, 2024. I am satisfied that the revised plan submitted to the ministry on July 2, 2024, and attached to this letter, meets the criteria set out in Section 5(1) of the regulation and previous direction regarding plan improvements. I hereby approve the plan for E-Transport Products.

Prior to the issuance of this decision letter, Call2Recycle was provided with feedback on the proposed plan amendments and has had the opportunity to propose further amendments or provide additional information for consideration. While Call2Recycle has addressed the major deficiencies, I expect continuous improvement across future plans and amendments submitted by Call2Recycle, which are identified under the Ministry Expectations section below.

Ministry Expectations

The ministry expects continuous improvement across all future plans and amendments submitted by Call2Recycle, including the following areas of concern:

A. Producers Paying the Cost

To provide for producers paying the cost, as required by the regulation, Part 2, Section 5(1)(c)(i), Section 8.2 of the plan (Collector Compensation) must be transparent and detailed enough to enable interested parties to clearly determine implications to their interests. The current version of the Collector Compensation section of the plan includes a range of variables for calculating the compensation for contracted collectors but does not present further detail for the compensation rate methodology. While a range of variables to be considered is presented, there is no detail on how these variables would be used to arrive at compensation.

For the next plan iteration, I recommend that the compensation rate methodology be presented as the steps taken/methods used, in a step-by-step description (e.g., a step-by-step process for how compensation will be calculated for physical drop-off locations; whether a variable was averaged, which factors are considered, etc.) which will allow interested parties to determine implications to their interests. More information is included in new guidance on producer paying the costs: [Paying the Costs under Recycling Regulation Section 5\(1\)\(c\)\(i\) and Dispute Resolution Guidance 2024](#).

B. Management of Environmental Impact and Pollution Prevention Hierarchy (PPH)

Reporting on the environmental effects of the direct pick-up service is a missing element of the plan. Currently, the direct pick-up service is the exclusive method for transporting products under the plan. For the next plan iteration, if direct pick-up continues to be the primary mode of collection, I recommend that Call2Recycle identify how it is actively reducing the environmental effects from this service (e.g., greenhouse gas emissions).

C. Consultation

Moving forward with consultation, Call2Recycle is expected to include extensive efforts towards informing Indigenous communities and governments of the Call2Recycle program and impacts, including informing the Indigenous Zero Waste Technical Advisory Group as a method to reach a broad Indigenous audience.

D. Collection System

Given that Call2Recycle currently relies on direct pick-up as its exclusive method of collection, it is the ministry's expectation that, for the next plan iteration, Call2Recycle commits to reporting on number of units collected via direct pick-up and number of units collected via depots (once established). It is understood that some products may be returned as incomplete at their end-of-life as certain accessories may be absent. Regardless of whether number of units collected is used in the future calculation of a recovery rate or alternative, it is a tangible metric that allows for additional comparison of year-to-year change alongside with weight of product collected. As stated by Call2Recycle, it is expected that units available to collect will increase in subsequent years as products near the end of their useful life. Reporting on number of units collected may allow for identification of any regional trends and could assist in targeting consumer awareness.

Reporting Expectations

The ministry expects this approval letter to be forwarded to Call2Recycle's board of directors as well as its member producers, since each producer is responsible for ensuring its agent fulfills the plan, and compliance proceedings may be taken against a producer if the agent fails to implement the plan.

Third Party Assurance for Non-Financial Information in Annual Reports

Third party assurance for non-financial information in Annual Reports is required through Section 8(2)(h) of the regulation. The assurance report should be completed in accordance with the document entitled, "Third party assurance for non-financial information in annual reports" dated November 2022 and revised from time to time, which is enclosed.

Additionally, please be advised, under Part 2, Section 8(2)(h) of the regulation, the director can specify any other information required in the annual report. To ensure the continuity of all performance measures, performance requirements, and targets in the plan, reporting on each of these metrics will be maintained until they are superseded by an approved plan renewal.

Next Plan Review Due Date

Section 6 of the regulation requires a plan review every five years. As per this requirement, Call2Recycle must review its approved plan and submit proposed amendments to the director, or notify the director in writing that no amendments to the plan are necessary, by **July 15, 2029**. Guidance on this process can be found on the Extended Producer Responsibility webpage at: [Extended Producer Responsibility - Province of British Columbia \(gov.bc.ca\)](https://www2.gov.bc.ca/gov2/industry/epres/epres.htm).

Right to appeal

If you disagree with this decision, Division 2 of Part 8 of the *Environmental Management Act* provides for appeal of my decision to the Environmental Appeal Board (EAB). In accordance with the *Act* and with the Environmental Appeal Board Procedures regulation, the EAB must receive notice of the appeal no later than 30 days after the date you receive this decision. For further information, please contact the Environmental Appeal Board at (250) 387-3464.

Thank you for your efforts on this plan, and I appreciate Call2Recycle's continued commitment to achieving compliance in this regard. If you have any questions regarding the implementation of the plan, please contact me at andreas.wins-purdy@gov.bc.ca or through the Extended Producer Responsibility inbox at ExtendedProducerResponsibility@gov.bc.ca.

Sincerely,



Andreas Wins-Purdy, P.Ag.
Director, Extended Producer Responsibility, Program Delivery
Authorizations and Remediation Branch
Environmental Protection Division

cc: Joe Zenobio, President, Call2Recycle, jzenobio@call2recycle.ca
Michael Partab, CFO, Call2Recycle Canada, mpartab@call2recycle.ca
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Enclosure:

British Columbia Extended Producer Responsibility Plan for E-transport Products. Prepared by Call2Recycle Canada, submitted July 2, 2024.

Third party assurance for non-financial information in annual reports, November 2022

British Columbia
Extended Producer Responsibility
Plan for E-Transport Products

Submitted: February 28, 2022

2nd Revised Plan Submitted: March 24, 2023

3rd Revision Submitted: November 8, 2023

Submitted to: British Columbia Ministry of Environment and Climate Change Strategy,
Extended Producer Responsibility Section
P.O. Box 9341, Stn Prov Govt
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Prepared by: Call2Recycle Canada, Inc.
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Glossary

Batteries	Dry-cell rechargeable batteries – typically lithium-ion batteries used to power e-transport products.
Collection Facilities	A location that has been approved to collect e-transport products under this program.
Damaged or Defective Batteries	Lithium batteries that are not intact or are physically damaged.
Disassembler	A contracted third party that receives an e-transport product and separates the parts into different streams for recycling e.g., batteries, electronics/wiring, rubber, metal and plastics.
Electric Bicycle (E-Bike)	A bicycle-style transportation device with an integrated rechargeable battery, typically lithium-ion. Drive system can either be activated by pedaling or by a throttle such as a grip-twist, trigger, or button and available in Class 1, 2, or 3.
Electric Scooters(E-Scooter)	A rechargeable battery-powered transportation device with a stem, handlebars, and designed to be stood on (or standing with a seat rest option) by the operator during travel. Batteries are typically lithium-ion. In most cases, the batteries will propel the device with or without human assistance.
E-Transport Products	A category of battery-powered products that include electric bicycles but can also include electric scooters, electric skateboards, and hoverboards.
Environmental Handling Fee (EHF)	A fee per unit sold that is representative of the cost necessary to collect, handle, transport, and responsibly recycle products at the end-of-life.
Electric Skateboard (E-Skateboard)	A battery-powered device with an electric motor where the battery is typically mounted below the deck, between the wheels or inside the wheels.
Extended Producer Responsibility (EPR)	An environmental policy wherein the producer is responsible for reducing environmental impacts across the life cycle of the product.
Focus Material	Materials that required greater care during processing.
Hoverboards	A battery-powered personal transportation device consisting of two motorized wheels connected to a pair of articulated pads on which the rider places their feet.
Lithium-Ion (Li-Ion)	A type of rechargeable battery.
Processing	Manual, mechanical, thermal, or chemical alteration for the purpose of recycling.
Processor	An entity that engages in processing e-transport products including batteries for the purpose of recycling.
Rechargeable Battery	A type of battery that is capable of being recharged.
Recycling Efficiency Rate	Defined by CSA as the amount of material recycled as a percentage of the amount of targeted material collected (inbound) minus reuse and shrinkage. The measurement of recycling efficiency will differ by program.
Recovery Rate	Part 1(1) of the British Columbia Recycling Regulation defines this as “the amount of product collected divided by the product generated, expressed as a percentage.”
SABC	A group of EPR agencies who work together on common issues.

1. Introduction

Call2Recycle Canada, Inc., which administers the Call2Recycle® program, is a Canadian-owned not-for-profit product stewardship organization. Since 2010, Call2Recycle has managed a successful battery collection and recycling program in British Columbia (B.C.) under an approved Extended Producer Responsibility (EPR) plan. For more information on Call2Recycle, please visit www.call2recycle.ca.

This EPR plan for e-transport products is being submitted by Call2Recycle Canada, Inc. to the B.C. Ministry of Environment and Climate Change Strategy (the ministry). The e-transport program leverages Call2Recycle's existing infrastructure, local staff, existing partners and suppliers, positive relationships with a wide range of stakeholders, industry support, and Board representation from the e-transport industry. Call2Recycle EPR program for batteries in the province, that includes e-transport batteries, facilitates a seamless transition to the entire e-transport product.

2. Duty of Producer

Call2Recycle's purpose is to assist producers in meeting their regulatory obligation with respect to collecting products in accordance with provincial regulations. This EPR plan is submitted by Call2Recycle on behalf of the e-transport producers, who have appointed Call2Recycle as their EPR agency, in accordance with Section 2 (1) of the British Columbia Recycling Regulation (the regulation), wherein a producer must:

- (a) have an approved plan under Part 2 [Extended Producer Responsibility Plans] and comply with the approved plan, or*
- (b) comply with Part 3 [Extended Producer Responsibility Program Requirements if No Extended Producer Responsibility Plan] with respect to a product in order to use in a commercial enterprise, sell, offer for sale or distribute the product in British Columbia.*

3. Appointment of an EPR Agency

Representing e-transport producers, Call2Recycle's members include manufacturers, brand-owners, first importers, and retailers in B.C. Call2Recycle's e-transport plan is submitted on behalf of obligated electric bicycle (e-bike) producers. The plan can also include other e-transport products, including electric scooters (e-scooters), electric skateboards (e-skateboards), and hoverboards upon the appointment of obligated producers to manage their products. For a list of producers who are members of Call2Recycle as of plan submission, please visit www.call2recycle.ca/bc-ettransport/.

Call2Recycle sends all producers written notification of their obligation. Once the producers confirm that they are obligated and appoint Call2Recycle as their designated EPR program, the producer must enter into a formal membership agreement with Call2Recycle acknowledging that the program will manage their obligations under the regulation. The membership agreement is available to the director under the Environmental Management Act (the director) upon request.

An e-transport product whose obligated producer is not covered under an approved EPR plan is considered a “free-rider”. Call2Recycle makes concerted efforts to register obligated entities under the regulation to eliminate free-rider activity. When specific products are managed under another program, Call2Recycle will redirect products to the associated agency.

3.1 Agency Governance

Call2Recycle is incorporated under the *Canada Not-for-Profit Corporation Act and B.C. Societies Act* which can be found at www.call2recycle.ca/about and is governed by a board of directors comprised of producers and independent directors representing multiple sectors, including retailers, producers, and independent board members. It also includes producers currently selling e-bikes in B.C. A list of Call2Recycle’s Board of Directors can be found in Appendix A and can also be found at www.call2recycle.ca/board-of-directors/.

All relevant reports, policies, and guidelines are available to Call2Recycle’s members at <https://www.call2recycle.ca/> under the steward section of the website. In addition to the website, Call2Recycle distributes member-specific newsletters at least twice a year to provide relevant program updates and notifications and hosts an annual general meeting in June of each year. The newsletters provide information on financials, collection results, marketing activities and more. Financial reports are available to members in the corporate annual report and in the [B.C. annual report](#) to the director.

3.2 Agency Governance Performance Monitoring and Reporting Commitments

Any changes in Call2Recycle’s governance or structure from one year to the next will be disclosed in the annual report.

4. Products Accepted and Excluded under this EPR Plan

In British Columbia, sporting equipment, electrical or electronic components is regulated under the Recycling Regulation Schedule 3, 2 (1)(g). In accordance with this section of the Regulation, Call2Recycle will collect and recycle e-transport products including both the product and the batteries that power them.

4.1 Products Accepted and Excluded under this EPR Plan

Accepted Products:

At the time of plan submission, e-bikes) and associated components (including but not limited to batteries, seats, handlebars, pedals, dropper posts, tires, rims, etc.) are covered under this plan. E-scooters, e-skateboards, and hoverboards, and emerging e-transport products covered under the Regulation can be managed under this plan on behalf of producers who appoint Call2Recycle as their EPR agency. The plan can include e-transport products purchased by individuals and those operated by e-transport share programs or businesses.

Excluded Products:

- Mopeds
- Treadmills
- Bicycle trainers (e.g., stationary bikes)
- Motorcycles
- Golf carts
- Mobility chairs
- Go-karts
- Outdoor electric power equipment
- Toy scooters that are not battery powered
- Bikes, scooters, skateboards and hoverboards that are not battery powered

A similar program is also offered in the province by the Electronic Products Recycling Association (EPRA). Pursuant to subsection 5(2)(l) and (m) of the regulation, Call2Recycle commits to investigate opportunities with other agencies to manage misplaced products. Replacement and extra batteries for e-transport products (e-bikes, e-scooters, e-skateboards, and hoverboards) are managed under Call2Recycle's battery program.

To ensure that the program is managing the materials produced by Call2Recycle members, consumers requesting a direct pick-up are required to submit a request online and must identify the e-transport brand before the request can be completed. Only the qualifying brands will be picked up. Should Call2Recycle begin collecting e-transport products at collection facilities, facilities will be provided with a list of accepted brands. In both instances, customers will be referred to EPRA for brands that are not within the scope of this program plan.

5. Stakeholder Consultation

5.1 Consultation Undertaken Prior to EPR Plan Resubmission

This EPR plan and notice of consultation was posted to Call2Recycle's website (call2recycle.ca/british-columbia/) on March 1, 2022, and established a 45-day consultation period ending on April 15, 2022.

Call2Recycle held three (3) consultation sessions via webinar. The first session was by invitation to members of the BC Product Stewardship Council (BCPSC) and was held on March 22 (at 11 a.m. PST). Registration was not required. The second (March 29 at 11 a.m. PST) and third sessions (April 5 at 11a.m. PST) were open to all stakeholders with registration required. The comment period closed on April 15, 2022.

The consultation process engaged a cross-section of program stakeholders, including producers/industry, collection facilities, processors, members, government (local and federal), associations, and other EPR programs. Indigenous communities that participate in Call2Recycle's battery program and Indigenous communities that subscribe to the CWMA or RCBC newsletters

were invited to consult. All consultation materials were available on Call2Recycle's website at call2recycle.ca/british-columbia/. The webinar's content mirrored the layout and contents provided in this EPR plan document.

Notice of the consultation and webinars was distributed through the following channels, which targeted key stakeholders and producers:

- Notification to registered Call2Recycle battery program collection facilities in B.C.
- Notification to B.C. producer-members.
- Notification via Call2Recycle newsletter to subscribers.
- Notice of consultation distributed via Recycling Council of B.C. (RCBC).
- Notice of consultation distributed via Coast Waste Management Association.
- Notice of consultation distributed to all members of the B.C. Product Stewardship Council.
- Individual email notification to other identified key stakeholders.

During the one-hour consultation webinar, approximately 30 minutes was allotted for the presentation and 30 minutes was allotted for questions and comments. The stewardship plan and consultation materials clearly provided sufficient detail to enable those affected by the plan and program operations to determine the implications to their interest, including, when applicable, a summary of the program's potential impacts, both positive and negative, on affected stakeholders.

The process for reviewing submissions and responding to stakeholders was transparent. All comments and responses have been incorporated into the plan contents and are also published and made available in this plan in Appendix D.

5.2 Ongoing Stakeholder Consultation

Throughout the plan period, Call2Recycle commits to continue to engage with stakeholders, including meetings with other stakeholder groups upon request to capture feedback and address concerns if possible. 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, in-person meetings with stakeholders at conferences and events, and in-person visits 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. 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 e-bike landing page of the website. This encourages stakeholders to share their feedback at any time.

6. Collection System and Consumer Accessibility

Call2Recycle commits to an extensive network where consumers and businesses can either 1) initiate a request for direct pick-up at their residence or place of business, or 2) drop off e-transport products for recycling at designated collection facilities, which can include independent bicycle

retailers, municipalities, and depots, at no additional cost (as per section (5)I(iii) of the regulation).

The direct pick-up service is an integral part of the program for the duration of the plan period and provides an unparalleled level of service, providing full accessibility by going directly to the consumer to pick-up the product. Given the relative newness of this product type, there has been limited demand for recycling of this product as well as the number of products available to collect. The strategy for this plan period is to maintain the direct pick-up service as the primary avenue for collection and to add permanent collection facilities where warranted based on emerging demand and units available for collection. Units available for collection and demand will inform the expansion of the collection network, with the establishment of up to 75 collection sites.

When implementing permanent collection facilities, Call2Recycle will leverage its existing relationships with collectors under the battery plan and explore new opportunities to provide convenience to consumers. Once established, collection facilities will receive safety training and specialized kits for damaged, defective, and recalled batteries. The compensation methodology will be finalized prior to the establishment of contracted collection facilities (see section 8.2).

Below are other considerations when adding collection facilities, over the duration of the program plan:

- **Accessibility** – To ensure an optimal number of collection facilities available based on geography, population density, and ease of access.
- **Convenience** – Facilitate ease of drop-off for consumers in urban areas and, ultimately, as products become more prevalent, in rural and remote communities by providing collection services at non-traditional drop-off locations, or recycling/round-up events.
- **Cost-effectiveness** – Effectively 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.

6.1 Collection System

Call2Recycle Canada's network of collection facilities across the province will provide consumers with convenient access to drop-off locations in high-density population areas for their used e-transport products. The program uses a qualification process for collection facilities to maximize returns.

Call2Recycle tracks product collections from direct pick-up and collection facilities by product type (see Appendix C for more details on this process). Using this collection shipment information, Call2Recycle regularly reviews the collection results of all regional districts to identify under-served areas of the province and underperforming collection facilities. In under-served areas of the province, Call2Recycle staff pursue additional opportunities to collect. In the case of underperforming collection facilities, Call2Recycle staff outreaches to these facilities

to encourage increased participation.

Call2Recycle commits to dispatch service providers to fulfill all collection requests for qualifying e-transport products. A request for direct pick-up service can be initiated in two ways: via a form on the website or by calling Call2Recycle's customer service line. In both cases, several qualifying questions will be posed to ensure that the products are covered under the program and to capture the details of the actual pick-up plan. Products will be picked up within 10 business days of a scheduled pick-up. A consumer who initiates a direct pick-up request will receive an acknowledgement along with a confirmation of the planned pick-up time 24 hours before the scheduled time.

Product Pathways Not Directly Managed by the EPR Program

There will be some instances when e-bikes may not flow through Call2Recycle's program. Other EPR programs may manage e-transport products. Some products may not be returned for recycling in their entirety at end-of-life. When the commodity value for certain materials is high, they may be stripped from the product.

To understand if the product is being disposed of incorrectly and ending up in landfill, Call2Recycle participates annually in a waste composition audit facilitated through the SABC. While e-transport products found in the waste stream cannot be solely attributed to Call2Recycle's program since other EPR agencies may also manage them, it will ensure that this information will inform its efforts to capture these products in the future. Call2Recycle will report on the results of the SABC-facilitated waste audit in the annual report to the director.

6.2 Consumer Accessibility

Call2Recycle commits to free and reasonable access to collection to program products. Call2Recycle will engage with and encourage residents to request a pick-up of their e-transport products by the direct pick-up service or drop off their products. The direct pick-up service is the primary and most effective means to provide collection for the program, due to its ability to effectively match collection needs as they arise. With the direct pick-up service, the program can initiate the program with a high standard of accessibility across the province.

Over the duration of the program plan, Call2Recycle will evaluate areas of elevated demand for collection, based on units available for collection of its direct pick-up service. Over time, it expects to have up to approximately 75 collection sites, based on emerging collection data. Considerations will also be based on geography, Indigenous communities' needs, population density, and ease of access. The program will work to increase collection options in under-served or remote areas of the province by seeking opportunities to enroll permanent collection facilities for e-transport products. All collection facilities will be listed on Call2Recycle's [website](#) locator. Call2Recycle commits to engaging with the BCPSC to address any gaps in service opportunities.

6.3 Collection Targets and Recovery Rates

The regulation sets out a 75 percent (%) recovery rate. A recovery rate compares the quantity of products collected in the province to the quantity of products sold in the province in the same year. This measure of program success is difficult to apply to durable goods including e-transport products.

E-transport products have only recently increased in popularity with the move toward more environmentally friendly modes of transportation, the number of products sold in the province significantly surpasses the number of products available for recycling. These products are durable with lifespans measured in decades.

The program tracks the quantity of products sold in the province in units, and the amount collected and recycled is tracked in weight. Each manufacturer makes their products to their own specification, and there is no industry standard weight for the e-transport products making a conversion from units into weight or the inverse difficult. Additionally, users of e-transport products, especially e-bikes, often keep and reuse components for use on the next device. For example, it is common for seats, dropper posts, handlebars, tires, and rims to carry over to the next e-bike. When the product is not returned for recycling in its original state, the weight of the product at end-of-life may be different from when it was originally sold. Finally, when returned, some products are in a broken state, which renders them impossible to identify. All of this combines to make the conversion between units and weight inaccurate and impractical to do with a reasonable degree of accuracy.

Due to the long lifespan of the product category, it is expected that collection of e-transport products in the initial years of program operation will be low. Units available to collect will increase in subsequent years as products near the end of their useful life. While Call2Recycle maintains that the above factors make a recovery rate impractical, Call2Recycle will commit to completing a study on the feasibility of recovery rates for e-transport products by June 1, 2027 (year 3 of the approved program plan). The results of the study will be shared with the ministry. If the findings do not support the feasibility of a recovery rate, Call2Recycle will propose an alternate measure or target to assess plan performance upon the completion of the study. This alternate measure will be reported annually starting in 2028 (year 4 of the approved plan).

6.4 Collection Systems, Consumer Accessibility Performance Targets and Reporting Commitments

Performance Targets:

- Accessibility is based on picking up an e-transport product within 10 business days of a scheduled pick-up request.
- 100% of direct pick-up requests fulfilled

Reporting Commitments:

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

- The total weight of e-transport products collected during the reporting year

including the total weight of products collected via direct pick-up or at a collection facility (if applicable).

- Number of active collection facilities in the province and in each regional district by type (if applicable).
- Weight collected in the province in each regional district including collections by weight per capita and changes in weight collected from the previous report.
- Location of collection facilities (if applicable).
- Changes in the number of collection facilities from the previous report (if applicable).
- Total units of e-transport products sold by participating obligated producers by type into B.C. during a calendar year.
- Dates, locations, and results of collections events (if applicable)
- Result of the SABC facilitated waste composition audit with respect to e-transport products including batteries.

All information in this section is consistent with the requirements for the assurance of 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 e-transport recycling and where and how to safely do so as per section 5(1)(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 e-transport recycling. Its efforts include both traditional and digital strategies, including:

- Call2Recycle website
- Google AdWords
- Social media
- Customer service call centre
- Point-of-sale signage and handouts available to all retailers (available on call2recycle.ca/bc-etransport/)
- Sponsorships and collaborations
- Traditional Advertising
- Media relations outreach

To gauge its effectiveness to positively move the ‘recycling’ needle, Call2Recycle conducts a provincial annual consumer awareness survey¹. An e-transport awareness survey was conducted in 2023 to establish an awareness baseline for e-bikes. Survey results are used to develop promotion and education campaigns to inform residents of the appropriate way to dispose of and recycle e-transport at the end of life. If producers appoint Call2Recycle to manage other categories of e-Transport products, they will also be incorporated into the awareness survey.

The survey helps Call2Recycle quantify levels and trends in consumer awareness (e.g., level of awareness that e-transport products can be recycled) and behaviours and the effectiveness of its outreach campaigns to increase recycling incidences among target audiences. Call2Recycle commits to reporting the results of its annual consumer awareness study to measure its success in increasing consumer awareness. With a baseline of 63 percent consumer awareness, Call2Recycle will increase awareness by five percentage points every year for five years.²The program will also disclose the question’s wording to measure awareness in the annual report. As part of the consumer awareness survey, Call2Recycle will also measure the percentage of British Columbians who recycled e-transport products each year (incidence). These numbers will be included in each annual report. Call2Recycle’s e-transport survey is separate from Call2Recycle’s batteries survey to ensure that each targets the appropriate groups and to avoid confusion between the two programs.

To help raise awareness, drive participation, and maximize collections with B.C. residents, Call2Recycle will offer collection facility participants opportunities to participate in various education and promotion campaigns. On a parallel track, Call2Recycle will implement a proactive outreach program targeting opinion leaders, stakeholders, and media outlets. This will be complemented by integrated, multi- channel promotions through traditional and digital media and sponsorships and partnerships to reach the defined target audiences and further diversion goals efficiently. In addition, Call2Recycle commits to promoting the importance of safe e-bike recycling and education on how to schedule a pick-up.

Objectives for consumer awareness campaigns are as follows:

- 1) Educate and Motivate:** Inform B.C. residents:
 - a. E-Transport products can and should be recycled.
 - b. Why it is important to recycle– e-transport products.
 - c. How and where to safely recycle e-transport products.
 - d. Share the environmental and economic benefits of battery recycling.

¹Call2Recycle contracts with reputable market research companies to conduct consumer awareness studies.

² Call2Recycle also participates in the SABC consumer awareness survey; however, for the purpose of the annual report to the Director, the results from Call2Recycle’s initiated study will be used.

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

7.2 Target Audiences

Target Audiences will include:

B.C. Residents	Collection Network	Stakeholders
<ul style="list-style-type: none"> Users of e-transport products 	<ul style="list-style-type: none"> Collection facilities – includes independent bike retailers and others that are participating in collecting, handling and sending e-transport products for recycling Direct pick-up 	<ul style="list-style-type: none"> Key Influencers (Local Government, Industry and Trade Associations, Indigenous Communities, and Non-Governmental Organizations) Call2Recycle Members/Obligated Producers Collectors Media, Experts, Influencers

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

- Annual public awareness and education campaigns (e.g., Earth Week and Canadian EnvironmentWeek).
- Promotion through independent retail bike shops.
- Promotion through industry publications
- Google AdWords.
- Targeted awareness programs.
- Promotional events
- Program material available at point of sale³.
- Engaging with school-aged children to provide education about the importance of recycling.
- Ongoing communication with collection facilities (in-person, over the phone, and in writing).
- Newsletters to collectors and members.

Call2Recycle works with other programs to increase awareness and encourage recycling

³ Point of sale materials are available to all members. It is at the discretion of the member whether to supply them to consumers. Material includes information on fees and accepted products.

behaviour. Initiatives include SABC, which is a group of stewardship agencies who seek synergies whenever possible. Call2Recycle also commits to engaging in projects, such as the First Nations Recycling Initiative (FNRI), that work with Indigenous communities to raise recycling awareness and foster the collection of EPR products. Call2Recycle commits to include information on the FNRI's activities as they relate to Call2Recycle in the annual report.

7.3 Overcoming Barriers to Recycling

Call2Recycle recognizes that there are opportunities to increase general recycling behaviour amongst consumers. To encourage consumers to recycle, Call2Recycle will focus on education regarding why, how, and where to recycle. To gain more clarity and certainty regarding the effectiveness and impact of consumer key messages, Call2Recycle initiated a messaging and creative testing project in August 2019, which will expand in 2022 to include e-transport products. British Columbians will be surveyed via Google Survey. Following the survey, Call2Recycle will host focus groups with British Columbians to determine public preference for supporting messages or headlines that relate back to the leading message. Participants will also be asked to identify the most preferred and impactful supporting creative to illustrate and deliver the associated message.

In addition, through market research, the program will refine segments of the population that are most likely to use e-transport products and have the greatest need to recycle them at end-of-life. To encourage consumers to recycle, promotion and education outreach will be geared to target demographics. This approach will be balanced with overall awareness-building promotion and education initiatives across the province. Call2Recycle will investigate alternative methods to collect e-transport products to increase convenience and participation.

7.4 Performance Monitoring and Reporting Commitments

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

Performance Targets:

- With a baseline of 63 percent consumer awareness, Call2Recycle will increase awareness by five percentage points every year for five years.

Reporting commitments:

- The question asked to measure awareness in the annual consumer awareness study.
- The percentage of British Columbians who recycled e-transport products as reported in the annual consumer awareness study.
- The number and type of marketing and awareness activities executed within the calendar year.
- Information about the FNRI's activities as they relate to Call2Recycle in the annual report.

8. Management of Program Costs

8.1 Program Funding and Reserves

Call2Recycle's funding mechanism is based on a "fee per unit sold" model referred to as Environmental Handling Fees (EHFs). The fees are set through a budgeting process and then reviewed and approved by the Call2Recycle Canada, Inc. Board of Directors.

EHFs will be calculated based on the actual cost to collect and responsibly manage e-transport products at end-of-life in British Columbia. EHFs will be 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. It will be solely the decision of the individual member whether to charge the EHF as a visible line item on the receipts at the time of sale or to internalize the EHF into the cost of the product.

The organization will maintain a reserve fund, where Call2Recycle Canada's Board of Directors determines reserve amounts. This fund will ensure the stability of the program and the organization's ability to deliver on any future financial obligations that may arise, including wind-down costs if necessary.

8.2 Collector Compensation

In accordance with section (5)(1)(c)(i) of the regulation, the plan must adequately provide for the producer paying the costs of collecting and managing products within the product category covered by the plan. Call2Recycle commits to pay for the costs associated with the collection and management of products under this EPR plan. This includes products that were previously or are currently sold, distributed, or offered for sale in B.C. The funding mechanism to pay for these costs will be through EHFs.

Service providers for the direct pick-up service are selected through a competitive request for proposal (RFP) process. Once established, permanent collection facilities will be compensated based on a third-party verified costing methodology utilizing inputs including contribution margins collected through survey data and site visits/interviews. Qualifying locations who enter into an agreement with Call2Recycle will receive compensation.

The methodology for determining compensation was presented for feedback during stakeholder consultation webinars for this EPR plan. Feedback from all stakeholders, including collection facilities, was incorporated into both the contents of the plan, and Appendix D. Multiple key inputs are included in the costing methodology when calculating compensation for contracted collectors to accept and manage Call2Recycle program materials, including:

- Labour and handling time.
- Equipment costs to manage the product.
- Space and storage requirements.

- Average cost per square foot (including overhead) to manage Call2Recycle’s program material.
- Changes in product specifications over time, including weight, size, and material composition.
- Administration required to manage the product and complete required paperwork.
- Comparable rates for similar collection services.

Call2Recycle engaged MNP, a Canadian national accounting, tax, and business firm, in January 2022 to review collectors’ cost compensation. The compensation study’s objective is to develop fair compensation for collectors’ efforts in collecting and handling program material. MNP’s approach uses data collection (survey data collected from collection facility respondents), and time and cost analysis to develop an activity-based costing model to calculate collector cost, attribute costs to the program, and assess the per-unit costs incurred relative to compensation levels. The compensation model is calculated to determine both the gross and contribution margins related to Call2Recycle compensation.

The initial program compensation methodology is based on prospective collection facility survey data, as well as comparable rates for similar services from both within this and other jurisdictions. Call2Recycle commits to initiate an additional compensation study 18 months following the approval date of this program plan, to ensure that all key variables are tracked, validated, and incorporated into compensation rates. This compensation study will include additional collector surveys, site visits, and collector staff interviews/phone calls.

The additional compensation study will allow for greater accumulation of operational program data, and further improve the model accuracy of all costing data. Key operational program data collected will include average weight per product, average weight per shipment, collection facility costs, and time requirements. Call2Recycle commits to integrating the outcome of the study into program compensation for participating collection facilities. Following the establishment of a baseline, Call2Recycle commits to reviewing compensation rates if additional e-transport products are added to the plan and every two (2) years to address any substantive material changes in the market, including variables such as inflation, operation costs, and market trends within the e-transport category. Compensation reviews will be conducted using the established methodology as well as through data collection via surveys, site visits, and interviews/phone calls with compensated collectors.

The program covers all collection costs. This includes the direct pick-up service—direct pick-up from any fixed location in the province—critical for the program to maintain high accessibility, particularly in provincial areas where collection facilities may not be possible due to low population density.

As detailed in Section 5.2, Call2Recycle commits to continue to engage with stakeholders and encourage stakeholders to provide program feedback on an ongoing basis.

8.3 Financial Reporting

Call2Recycle will comply with all annual reporting requirements as stipulated by the regulation.

The organization's finances, including financial statements specific to the B.C. e-transport program, will be audited annually by an independent third-party auditor in accordance with generally accepted accounting principles and industry practices. The results will be made public and provided to stakeholders through the provincial and corporate annual reports.

8.4 Performance Monitoring and Reporting Commitments

Call2Recycle remains committed to operating a transparent program. Independently audited financial statements will be produced annually and will detail revenues and expenditures for associated EHF's collected from the sales of e-transport products in British Columbia during the calendar year. The audited financial statements will also be available in the annual report to the director and the corporate annual report which is shared with stewards and publicly available on the Call2Recycle website.

9. Management of Environmental Impacts

The Call2Recycle program manages e-transport products once they reach the end of their useful life. The direct pick-up service was determined to be the optimal collection method for this program due to its operational efficiency. The direct pick-up service streamlines the transportation process by minimizing the number of intermediary steps between the consumer and the processor. Call2Recycle must abide by the pollution prevention hierarchy (PPH) as required by the Recycling Regulation, Part 2, Section 5(3), whereby EPR programs must manage products at the highest level possible

Reduce: The province encourages people to adopt active and more environmentally friendly modes of transportation, including transportation using e-bikes and other e-transport products. Advocating for the reduction in e-transport is inconsistent with the province's CleanBC goals.

Redesign: Through direct communications and newsletter correspondence, Call2Recycle will encourage producers to design products with reusability or recyclability as a consideration.

Reuse: To encourage reuse, Call2Recycle will maintain a list of BC organizations that accept e-transport products for donation or resale. The list will be available on the Call2Recycle website. In addition, marketing materials will include messaging that users should consider selling or donating their e-transport products before recycling them.

Recycling: Recycling is the most certain way of safely ensuring that e-transport products are properly handled at end-of-life. The Call2Recycle program will efficiently and cost-effectively recycle e-transport products, and no products collected through the program that can be recycled will go to landfill. The reclaimed materials from the e-transport products collected can be used in various products.

For additional details, please see appendix E.

9.1 Downstream Process, Program Certifications and Permits

Call2Recycle will maintain a diverse group of approved downstream vendors or third-party logistic providers used for the transportation, dismantling, and processing of e-transport products (See Appendices B&C for more details). All contracted service providers will be vetted according to ISO 9001 and will be subject to an annual auditing process.

The program specifies material flow for all downstream vendors through to end-of-life. A robust information system tracks focus material as it moves through the prescribed downstream vendor network. These safeguards help affirm our commitment to the proper downstream management of e-transport products collected.

During the second quarter of 2024, Call2Recycle the program will have accepted products covered under this plan included under the following certifications: ⁴

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

Some highlights of Call2Recycle’s program are presented below:

- As program manager, Call2Recycle specifies the program material flow for all 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.

These safeguards help affirm Call2Recycle’s commitment to proper downstream management of collections, including not exporting to developing countries or sending materials to local landfills.

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 conducting annual due diligence reviews of processors to ensure they can demonstrate an ability to adapt to Call2Recycle’s program growth and increases in recyclable materials.

To address the requirement for third-party assurance on reporting on product end-fates, Call2Recycle will include a chart in each annual report disclosing the management of collected products through to final disposition using a mass balance of the total weight of all material types/components received. The chart will include the processing method and the PPH management level.

⁴ At the time of submission e-bikes and other e-transport products are not covered under the Responsible Recycling (R2) Standard.

Call2Recycle maintains that RER targets for batteries as components are not necessarily a suitable measure of a program performance. These targets are contingent on individual processors and can shift with changes or advancements in their technology. However, for this program plan, and as required by the ministry, Call2Recycle commits to reporting annually on the RER target performance of batteries managed under this plan, including but not limited to:

Battery Chemistry	RER Target
Lithium Ion	70%-95%

The RER will be reviewed in accordance with the requirements of the third-party assurance of non-financial information and disclosed in the annual report. The program will continue to explore more meaningful measures to replace the RER targets and will notify the ministry of any developments.

9.2 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 product collection and recycling process. When the lithium-ion batteries used in these products reach end-of-life, they may still retain a residual charge that presents a safety risk if not handled properly. Call2Recycle continually improves its safety policies and best practices to ensure that products with batteries are safely collected, transported and recycled. It continues to invest in innovative solutions that help mitigate risks.

9.3 Performance Monitoring and Reporting Commitments

In the annual report to the director, Call2Recycle will report by product type as per the requirements of the non-financial assurance. This includes program-specific definitions and program-applicable criteria, including the RER disclosure for all batteries collected with lithium-ion batteries having an RER performance target of 70-95%.

10. Dispute Resolution

Eligible collection facilities must enter into an agreement for cost reimbursement associated with collections. The agreement outlines the dispute resolution process. For collection facilities that do not have a formal agreement with Call2Recycle, the same approach will be followed. 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 reach 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, including transporters, processors, and sorters.

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

11. Performance Monitoring and Reporting Commitments

PERFORMANCE METRIC	TARGET OR REPORTING COMMITMENT	SUBJECT TO AUDIT/ ^{3rd} PARTY VERIFICATION
COLLECTION SYSTEM AND ACCESSIBILITY		
Fulfillment of 100% of qualifying direct pick-up service pick-up requests.	Target	Yes
Pick-up of a qualifying e-transport product within 10 business days of a scheduled pick-up request (direct pick-up service).	Target	No
The total weight of e-transport products collected during the reporting year including the total weight of products collected via direct pick-up or at a collection facility (if applicable)	Reporting Commitment	Yes
Number of active collection facilities in the province and in each regional district by type (if applicable).	Reporting Commitment	Yes
Number of collection facilities in each regional district (if applicable).	Reporting Commitment	Yes
Total weight collected in each regional district including collections percapita and changes in weight from the previous report.	Reporting Commitment	Yes
Location of collection facilities (if applicable).	Reporting Commitment	Yes
Changes in the number of collection facilities from previous report (if applicable).	Reporting Commitment	Yes
Total units of e-transport products sold into British Columbia by participating obligated producers by type during a calendar year.	Reporting Commitment	Yes
Result of the SABC facilitated waste composition audit with respect to e-transport products including batteries.	Reporting Commitment	No
Dates, location, and results of collection events (if applicable).	Reporting Commitment	No
Result of the SABC facilitated waste composition audit with respect to e-transport products including batteries.	Reporting Commitment	No
CONSUMER AWARENESS		
With a baseline of 63 percent, Call2Recycle will increase awareness by five percentage points every year for five years.	Target	No
The question asked to measure awareness in the annual consumer awareness study.	Reporting Commitment	No
The percentage of British Columbians who recycled e-transport products as reported in the annual consumer awareness study.	Reporting Commitment	No

PERFORMANCE METRIC	TARGET OR REPORTING COMMITMENT	SUBJECT TO AUDIT/3 rd PARTY VERIFICATION
CONSUMER AWARENESS cont.		
Information about the FNRI's activities as they relate to Call2Recycle in the annual report.	Reporting Commitment	No
MANAGEMENT OF PROGRAM COSTS		
Audited Financial Statements. Detail revenues and expenditures for fees collected from the sales of e-transport products in the calendar year in British Columbia.	Reporting Commitment	Yes
MANAGEMENT OF ENVIRONMENTAL IMPACTS (END FATE)		
RER disclosures for all batteries collected with lithium-ion batteries having an RER performance target of 70-95%.	Reporting Commitment	Yes
Management of product end-fates.	Reporting Commitment	Yes
AGENCY GOVERNANCE		
Any changes in Call2Recycle's governance or structure from one year to the next.	Reporting Commitment	No
The number and type of promotion and education activities within the calendar year.	Reporting Commitment	No

Appendix A: Board of Directors as of June 2024

Joe Borsellino - Chateau Manis Electronics Inc.

David Collie (Chairperson) - Independent

Annalise Czerny – Independent

Peter Daley - Dollarama Inc.

Tammy Giroux – Independent

Mauro Godino – Panasonic Canada, Inc.

Raman Johal – London Drugs **Ltd.**

James McPhedran – Independent

Alan Moyer – Independent

Paul Nielsen - Live to Play Sports

Alma Obeid – Canadian Tire Corporation

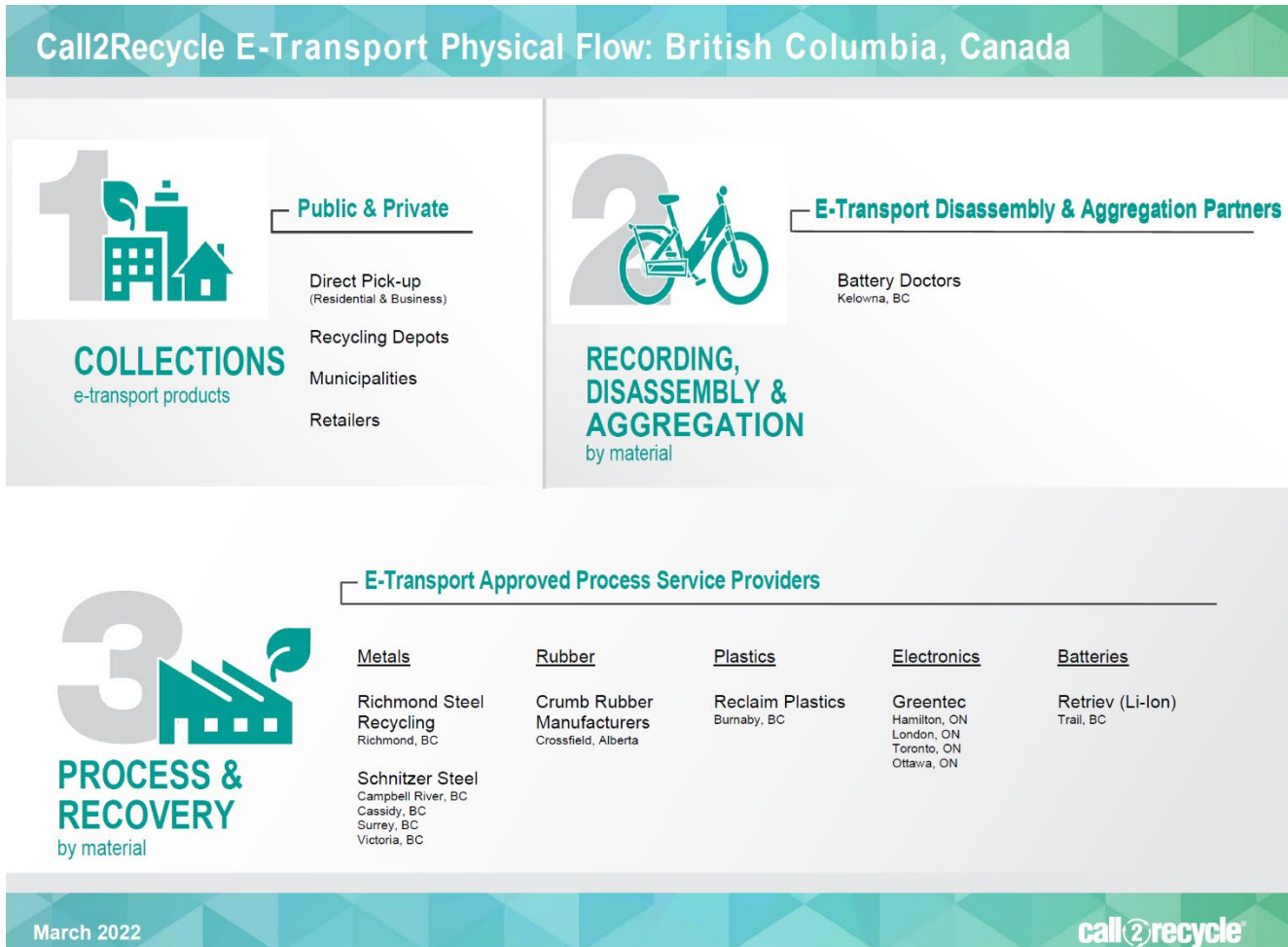
Kevin Rejent -Energizer Holdings, Inc.

Tim Reuss – Canadian Automotive Dealers Association

Harriet Velazquez - Independent

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

Appendix B: E-Transport Physical Flow Map (As of November 2023)



Appendix C: Downstream Service Providers (updated November 2023)

While not subject to review and approval by the Ministry, the following summary identifies and discusses the downstream service providers that Call2Recycle program may use for e-transport products at launch.

The transporter/pick-up service provider supporting the direct pick-up service and collection facilities will be **Battery Doctors**, a subsidiary of parent company **Matichuk Holdings Ltd.** ([Kelowna Recycling | Kelowna, B.C.](#)). Battery Doctors is a recycling leader in B.C. and operates as part of a full-service recycling centre (Kelowna Recycling), offering both drop-off and pick-up services for various recyclable products. Battery Doctors is currently a transportation service provider for Call2Recycle's household battery recycling program, servicing bulk collection sites in the Kelowna area with plans to expand into the Lower Mainland in 2022.

Disassembly of the e-transport products will be handled by:

Matichuk Holdings Ltd. (see above) may also disassemble the e-transport products. Disassembling products at the consolidation point of the transporter offers considerable efficiencies. Matichuk Holdings Ltd. will send the parts to the recycle streams provided below upon disassembly. By recycling bicycles, it takes bikes out of the waste stream, offer affordable bikes for sale, and encourage cycling as a sustainable, healthy transportation choice.

After disassembling the e-transport products, Matichuk Holdings Ltd. will handle, store and ship batteries using Call2Recycle's approved and patented containers. Transportation of batteries will be governed by Call2Recycle's existing permits (see section 8.1) to ensure safety. Matichuk Holdings Ltd. have been properly trained to handle this responsibility.

Matichuk Holdings Ltd. will send disassembled e-transport material into five recycling streams: metals, rubber, plastics, electronics/wiring, and batteries. The downstream vendors recycling the materials are:

- **Metals** will be handled by:
 - **Richmond Steel Recycling** ([A Leader in Scrap Metal Recycling | Richmond Steel Recycling](#)) is a leading scrap metal recycler located in the heart of British Columbia. It is committed to the principles of environmental sustainability and works to protect our planet by recycling a wide range of scrap metals. Over four decades of experience in the recycling industry, it maintains top-notch safety standards in addition to providing world-class service. The metal it recovers is used in making new steel-based products.
 - **Schnitzer Steel** ([Schnitzer Steel](#)) is a global leader in the metals recycling industry. Founded in 1906, it collects, processes and recycles raw scrap metal (ferrous and nonferrous) and provides processed scrap metal to mills and foundries around the world. Its steel manufacturing facility transforms recycled scrap metal into quality finished steel products such as reinforcing bar (rebar), wire rod, coiled bar, merchant bar and other specialty products. The metal it recovers is used in making new steel-based products.
- **Rubber** parts will be sent to **Crumb Rubber Manufacturers** ([CRM Rubber Manufacturers | CRM](#))

[Rubber](#)). Established in 1998 and with 5 manufacturing plants in the United States and Canada, CRM® is North America's largest ambient and cryogenic crumb rubber manufacturer. It provides customers with leading edge technology and specializes in crumb rubber for rubberized asphalt, sports fields and track infill and rubber-molded products. With over 20 years in business, it has established a reputation for excellence and routinely sourced crumb rubber to the largest asphalt contractors and synthetic turf product companies in North America. The rubber it recovers under this program will be used in rubber-based sports fields, tracks and other surfaces.

- **Plastics** will be sent to **Reclaim Plastics** ([Burnaby Plastic Recycling- Reclaim Plastics](#)). Based in Burnaby, B.C., Reclaim Plastics handles a range of plastics, primarily from the automotive industry. Under this program, the plastics are separated by type. After processing, the plastics can be used in a wide-range of plastic products from new electronics, to carpet, to containers. None will be used for fuel.
- **Electronics and wiring** will be managed by **Greentec** ([Greentec](#)). Greentec is a certified electronics recycling company. It helps businesses and organizations securely dispose of electronic devices in a compliant and cost-effective manner. It is committed to a circular economy by supporting clients with secure and sustainable electronics recycling solutions. Greentec is currently an approved downstream vendor of Call2Recycle. Greentec is R2 certified.
- Lithium-ion **batteries** will be shipped to **Retriev** in Trail, B.C. ([Retriev Technologies | Battery Recycling and Management](#)). For over 25 years, Retriev has built its reputation as a global leader in battery recycling and management. It has a well-respected record of accomplishment in research and development, excellent client services, and the highest level of environmental compliance that demonstrates its unwavering commitment to the best recycling practices. Retriev primarily extracts cobalt and nickel from the batteries it receives. The cobalt is used as an input into new lithium ion batteries; the nickel is sold into the steel industry.

Appendix D: Consultation Comments, Response and Types

Consultation Webinar 1 – March 22, 2022:

Please note that based on consultation feedback, eMobility is now referred to as E-Transport and the spelling of specific products has been adjusted. The responses below are in their original form.

Question	Call2Recycle Response	Type
<p>Question from a Regional District: The name "eMobility" immediately brings to mind products to assist people with mobility issues, like electric scooters for seniors. This will be confusing for people. Why are those battery-powered mobility products excluded from this program?</p>	Thank you. The name has been changed to "E-Transport."	Name
<p>Question from a Regional District: I would like to second Sarah's comment, the name is not going to help communicating with the public and will only cause confusion.</p>	Thank you. The name has been change to "E-Transport."	Name
<p>Question from a Regional District: How are the actual bikes recycled? Is there any reuse happening if the bike is in good condition or is the bike just put into metal recycling?</p>	5 components for recycling eBike: Metals, plastics, rubbers, batteries, electrical components. Depending on the condition of the bike, these products have some riders/users that will keep certain components like their favorite handlebar, and favorite seat. It will all depend on the condition; this product category is new; Call2Recycle will be learning a lot about it in the coming months and years. There is a good system in place in terms of the 5 recycling streams; we will work closely with our service providers to understand more of that.	Downstream
<p>Question from a Regional District: Will there be any reuse/refurbishment taking place in this program?</p>	On the topic of reuse, Call2Recycle will be able to reuse seats, handlebars, and posts; items will be taken at the collection depot and sent for reuse specifically on other bikes as bikes get rebuilt. There are a couple of components that must be recycled due to proprietary technology and liability. Those include batteries, the drive motor and electronics. Trying to reuse this becomes a safety issue. Therefore, those three items must be recycled, whereas other things like tires, seat posts, and handlebars can be reused.	Reuse
<p>Question from Anonymous:</p>	The issue is that whole units will not always	Reporting

<p>If you are picking these units up individually, why can't you report on collections by unit?</p>	<p>be available for recycling and retailers don't always sell whole units. For instance, when someone might want to keep their seat, Call2Recycle would be getting the bike back without a seat. There is not a clear way to verify what sold into the market in units and what's taken off the market in units.</p>	
<p>Question from a Regional District: Collection and pickup of eMobility items is currently in operation or is there a later start date?</p>	<p>As of Feb 28, 2022, a direct pick up service has been available anywhere in British Columbia.</p>	<p>Pick-Up</p>
<p>Question from Anonymous: While we appreciate you trying to develop a cost that is representative of the handling and level of effort, are you asking depots to sign on as a collector without first knowing what they will be paid to participate?</p>	<p>The MNP cost study, which has begun, Call2Recycle has every intent to work with the depots and other key stakeholders to understand time in motion studies, what is required to properly compensate depots, and others.</p> <p>Asking depots to sign on as a collector without first knowing what they will be paid to participate? No, and that is one reason why the concierge service was started because nobody would want to be in the collections business without knowing what the cost and benefits were.</p>	<p>Compensation</p>
<p>Question from a Regional District: The plan only mentions a 50% awareness level, not the 25% increasing 5% per year to 50% by 2027. Which is it going to be?</p>	<p>Understood. This will be clarified that in the re-submittal on May 16th. Instead of starting at 25%, Call2Recycle will establish a baseline of awareness in its 2022 survey and commit to increasing awareness by 5 percentage points each year over the next 5 years.</p>	<p>Awareness</p>
<p>Question from a Regional District: There is robust demand for these products right now, and as IKEA has caught on, reselling your own used products can be profitable as well as good for the environment. Assuming the product could be repaired and resold, will you prohibit your dismantlers from reselling, and require them to dismantle and recycle products that could be kept in circulation? How is this moving up the hierarchy?</p>	<p>Call2Recycle is working with Our Community Bikes in Vancouver, which is a non-profit that rebuilds bikes in the community. It will be one of the facilities that disassemble the bikes, and the components that are reusable will go on to bikes that they can be provided back into the community. The components that are nonreusable will end up going for recycling. Yes, Call2Recycle will follow the more traditional hierarchy of reuse before recycling.</p>	<p>Reuse</p>

<p>Question from a Regional District: Will there be an annual reported value for reuse material from the program?</p>	<p>Regarding the downstream management, as Call2Recycle does with the battery program, Call2Recycle will report any of the recycling components through those 5 streams, previously mentioned through the annual report. It will not assess the value of what has been reused.</p>	<p>Reuse</p>
<p>Question from a Regional District: The program has proposed a sound rationale for the challenges of using a 'traditional' recovery rate/capture rate for performance. Perhaps the program could investigate demonstrating that program materials aren't ended up elsewhere (e.g., in the garbage or illegally dumped). This could be through unaccounted-for product studies or waste composition studies (above and beyond the 1 per year conducted by SABC). This is consistent with comments provided to the light and alarm programs.</p>	<p>As products are disassembled, Call2Recycle will be counting what goes for recycling, what goes for reuse, and having data for each. What's not going to be possible is measuring how many riders keep components for reuse themselves. But of what we get, there might be an opportunity to count what gets reused.</p> <p>Call2Recycle may also separately research what ends up in landfill. Call2Recycle will continue to work with SABC to assess what is put into landfill.</p>	<p>Reporting</p>
<p>Question from a Regional District: These items are really all based on battery life. If the battery is easy to replace, it will be sold/passed on until the actual unit reaches end of life. Looking at how easy it is to buy new batteries and replace them in the different units will give a good idea of how fast you might expect these to come in. Most ebikes are pretty easy for battery change out.</p>	<p>While batteries are key to prolonging the life of these products, batteries should generally not be interchanged. Batteries must be consistent with the charging unit. Therefore, consumers should go back to the place of purchase and get the exact same battery from the same manufacturer. It is totally doable, generally, through the brand from which you bought it. The manufacturers that Call2Recycle works with indicate that over the life of an ebike, which is about 15 years, there will be about 3 different batteries used with that ebike. The battery constitutes the highest level of a safety risk. The eBike industry wants the Call2Recycle® program to manage this in this way.</p>	<p>Repair</p>
<p>Question from a Regional District: If these items end up at the landfill in the scrap metal piles will Call2Recycle provide pickup service or is it only a residential service?</p>	<p>If a business calls for a pick-up, Call2Recycle will absolutely service that business. Call2Recycle picks up the full unit.</p>	<p>Pick-Up</p>
<p>Question from a Regional District: Do you believe that these new products that you are proposing to accept are currently already</p>	<p>Currently, the majority of the eBike industry wants Call2Recycle to handle this program, as indicated through letters of intent. That's why</p>	<p>Program Coordination</p>

<p>included for collection in any approved program plan in BC? For example EPRA?</p>	<p>Call2Recycle developed this plan.</p>	
<p>Question from a Regional District: Are some of the batteries being rebuilt and resold as refurbished batteries or are they just being disassembled for their components to be remanufactured?</p>	<p>Due to safety issues, the battery should not be disassembled by the collection site. At some point in the future, where there's enough of a battery volume in the marketplace that can sustain a repurposing of these batteries, they may be assessed for reuse. .</p> <p>There are too many unknowns to be able to safely refurbish an eBike battery. In the near term, all those batteries will be recycled.</p>	<p>Disassembly</p>
<p>Question from a Regional District: I have 2 ebikes and have replaced both batteries. You can easily upgrade/change batteries if you buy direct from China as well as the computer component.</p>	<p>Thank you for your comment; please be very careful. Randomly changing batteries is a safety risk.</p>	<p>Batteries</p>

Consultation Webinar 2 – March 29, 2022:

Question	Call2Recycle Response	Type
<p>Question from a Regional District: These products can have a large footprint, and bike retailers (one of the targeted depot sites) tend to be small, especially in smaller communities. Increased foot traffic isn't an incentive for a retailer to join.</p>	<p>The independent bike retailer is a key piece of the collection process. They have sold the bike into market, serviced it, and likely sold batteries for it. So, they will be interested in acquiring and reusing some of the components.</p> <p>When someone turns in an eBike, there can be a high likelihood that another won't be purchased unless some sort of transaction takes place.</p> <p>Call2Recycle believes that manufacturer and dealer networks want retailers to be a part of this.</p>	<p>Collection Sites</p>
<p>Question from a Regional District: Will Call2Recycle partner with CESA or EPRA for collection? That would help us reduce the collection footprint at a municipal site, as these collection containers will probably fill up slowly due to this technology not being as widely distributed and its long life span.</p>	<p>Since both programs will collect eBikes, there will be a need for cooperation. However, our programs represent separate obligated producers. Over time, Call2Recycle expects to work closely with EPRA but initially, there likely will not be much volume to require it.</p> <p>The Call2Recycle program will not require boxes at collection sites; it will use a carrier that can pick up the device in their truck. It will go to a disassembler in Vancouver which will then separate materials (e.g., metals, rubber, etc) can be sent down their proper stream with some parts being reused.</p>	<p>Program Coordination</p>
<p>Question from a Regional District: 1) How is the program in operation NOW, if the plan has not been approved by MOE yet. 2) If MNP is assessing the compensation, can we expect the \$15 EHF to increase? 3) If a Depot collects for EPRA and Call2Recycle, will the Depot only register with one steward? 4) If all products are accepted regardless of producer, is Call2Recycle working with EPRA?</p>	<p>1) Call2Recycle wanted to ensure the obligated producers had a functioning plan in place and that all areas of the Province were being served even though few products will be picked-up in the short-term. The Ministry was aware that we initiated this prior to its review and approval.</p> <p>2) Call2Recycle will work with MNP as well as the stakeholder group to ensure all angles for the cost study are considered. The \$15 EHF fee is for 2023.</p>	<p>Plan Approval</p> <p>Compensation</p>

	<p>It will be reviewed by the Call2Recycle Board annually and is subject to its approval. Depending on volume and costs, EHF's could be subject to change on an annual basis.</p> <p>3) Call2Recycle will not dictate what collection sites are registered with which program. Sites are free to choose. Registration with both is a choice that Call2Recycle would encourage.</p> <p>4) Call2Recycle is not currently working directly with EPRA, but if a given location has two streams through EPRA/Call2Recycle, Call2Recycle will work with EPRA and that facility to make sure it is managed properly. The intention is to have the collection footprint grow to manage the obligations of members.</p>	<p>Program Coordination</p>
<p>Question from a Regional District: Will you be including the questions from your webinar Q&A in your MOE reports?</p>	<p>Questions from all 3 consultations will be included in the revised plan submitted to the Ministry on May 16th.</p>	<p>Plan Submittal</p>
<p>Question from a Regional District: I am skeptical on retailers joining, as they won't even join the bike tires recycling through TSBC. Please reconsider this.</p>	<p>Already, Call2Recycle has 1300 bike retailers across North America working participating in collecting batteries from eBikes, beginning on January 1st, 2021. That sets a good precedent for a strong relationship between the manufacturers and their dealer networks. If necessary, Call2Recycle will adapt with more pick-up from residences and depots. But if bike retailers do embrace this, it will provide a greater footprint in the province.</p>	<p>Collection System</p>

<p>Question from a Regional District: How is Call2Recycle guaranteeing the reuse of components? Have the producers committed to that?</p>	<p>Call2Recycle is committed, whenever possible, to follow the waste hierarchy, reusing before recycling. Any component that is usable will be reused within a certain set of conditions, mostly concerning safety. Call2Recycle will work with Our Community Bikes, a shop in BC, that will disassemble bikes and reuse as much as possible. Certain batteries, electronic components and drive motors have unique designs that must be used together; it is a safety risk to mix and match. Those must therefore be recycled. Likewise, frames must be recycled because they can crack if they've been abused. Call2Recycle cannot allow an untested frame to be used in another bike. Items that can be reused include the seat, seat post, stem, handlebars, pedals, rims, and tires. This will be at the discretion of Our Community Bikes based on their inspection and appropriate items will be put back into the market on other bikes.</p>	<p>Collection System</p>
<p>Question from a Regional District: What is Call2Recycle doing to support Right to Repair through this new program?</p>	<p>Call2Recycle does not take positions on political issues. Call2Recycle focuses on optimizing reuse of products and materials within safety considerations.</p>	<p>Repair</p>
<p>Question from a Regional District: As this is a new program, what are you doing in Year 1&2 to promote this program above and beyond the normal EPR promotion (not very much)?</p>	<p>As with the battery program, Call2Recycle will focus on adapting, learning, driving results, and evolving strategy to generate as much public education and awareness as possible. Call2Recycle will consider publications and other media that are unique to users of eMobility products. Call2Recycle will also use research and awareness studies to locate opportunities throughout the province.</p>	<p>Awareness</p>

<p>Question from a Regional District: What is the current collection performance for batteries? I thought it was less than 50%, if this is the case, do you feel that this program will be more successful?</p>	<p>For BC, the recovery rate for the current Call2Recycle program is in the high 30 percent. The Call2Recycle battery program exceeded its targets this year.</p> <p>eMobility is a new and very different product category. Calculating a recovery rate is very difficult and different from batteries. It's not clear what the best metric will be for this new category.</p> <p>Batteries are embedded in everything, so they can be hard to identify and to separate. This makes them difficult to pick out and put into a collection stream. One knows when one has an eBike or a scooter. They take up much more space so they are harder to ignore. In collection programs, items like that receive more attention and tend to be easier to collect. This leads to higher collection rates than items like batteries.</p>	<p>Collection Target</p>
<p>Question from a Regional District: Will you be reporting out on GHGs from all the direct pickups? Or are you doing something to reduce the GHGs associated with all the individual pickups?</p>	<p>While it can be done, it has not been in the Call2Recycle plan. Call2Recycle regards direct pick up as a short-term, stopgap measure; the current lack of fixed collection facilities will be resolved over time which would lessen the impact on GHGs. In some cases, such as areas of the province that are more remote or rural, direct pick up is the only viable option.</p>	<p>Reporting</p>

Consultation Webinar 3 – April 5, 2022:

Question	Call2Recycle Response	Type
<p>Question from a Regional District: Will this program apply to shared eMobility operators?</p>	<p>Yes, Call2Recycle is currently reaching out to additional potential members; including rideshare members.</p>	<p>Program Plan</p>
<p>Question from a Regional District: Will this program be expanded to other battery types, Automotive Hybrid batteries?</p>	<p>No, the existing Call2Recycle program covers consumer batteries less than 5kg and replacement batteries for eMobility products. This new program plan will cover the full eMobility product where there are 4 product types: eBikes, eScooters, Hoverboards, and eSkateboards. This plan does not cover hybrid car batteries or EV batteries.</p>	<p>Accepted Products</p>
<p>Question from a Regional District: This would also apply to new types of mobility units as they are developed.</p>	<p>Call2Recycle may consider new product types in the future, but for the time being, in the plan submission, the plan is focused on the 4 product types.</p>	<p>Accepted Products</p>
<p>Question from a Regional District: Could the email contact be posted in the chat, please?</p>	<p>bcplan@call2recycle.ca</p>	<p>Other</p>

Feedback received from BCPlan@call2recycle.ca – March 1st - April 15th , 2022:

Question	Call2Recycle Response	Type
<p>Question from a Regional District: Will Call2Recycle work with the other stewardship agencies to take over collection of all the products, so collection is homogenized under one plan?</p>	<p>Since multiple programs will collect eBikes, there will be a need for cooperation; however, our programs represent separate obligated producers. Over time, Call2Recycle expects to work closely, but initially, there likely will not be much volume to require it.</p> <p>Additionally, the Call2Recycle® program will not require that boxes are used at collection sites; it will use a carrier that can pick up the device in its truck. It will go to a disassembler in Vancouver which will then separate materials (metals, rubber, etc) that can be sent down their proper stream, with some parts being reused.</p>	<p>Program Cooperation</p>
<p>Question from a Regional District: In addition, Call2Recycle should expand on what they are doing to encourage bike shops to collect all emobility program products, and not just ebikes. Squamish is a town with many bike shops, and all of them, especially over spring and summer months, are already very pushed for space with their inventory and other bikes for repair. Will Call2Recycle assist these shops in locating additional storage space?</p>	<p>Call2Recycle will be encouraging the collection of all 4 of the program product categories (eBikes, eScooters, eSkateboards, and hoverboards). All program products will be covered through awareness and education efforts. Call2Recycle currently does not have plans to help collection sites locate additional storage space, and will be focusing on partnering with locations with existing physical space for collection.</p>	<p>Accepted Products</p>
<p>Question from a Regional District: How will the reuse and repair portion of the program be reported?</p>	<p>As products are disassembled, Call2Recycle will be counting what goes for recycling, what goes for reuse, and reporting by each category. What's not going to be possible is measuring how many riders keep components for reuse themselves.</p>	<p>Reuse Reporting</p>
<p>Question from a Regional District: How will Call2Recycle be supporting Our Community Bikes, as they have significant space and capacity restrictions?</p>	<p>Call2Recycle and Our Community Bikes will work this out between the two organizations.</p>	<p>Downstream Vendors</p>
<p>Question from a Regional District: How can the reuse component be extended to other program products, beyond eBikes?</p>	<ol style="list-style-type: none"> 1) Hoverboards are a single unit with limited reusable parts. 2) eSkateboards may have the wheels and board reused. 3) eScooters fall into two categories. The entry level eScooters are all one unit with limited ability to reuse parts. The high end road 	<p>Reuse</p>

	scooters for commuting do have parts that are reusable. The program will establish reuse of select components at time volume allows it to happen. This may be done in conjunction with a ride share operator.	
Question from a Regional District: How can Call2Recycle support other bike-recycling programs, such as Recycle Bicycle, in Squamish?	Recycling pedal bicycles is not part of the program at this time.	Covered Products
Question from a Regional District: 100% of residents should have access to the depot, and if it is not realistic to have a depot within 15km of residents, there should be a mail back program available at no cost.	Call2Recycle is providing a concierge/pick-up service, which will be available regardless of location.	Accessibility
Question from a Regional District: The goal of achieving a 50% awareness is too low and should be set to 100% of users of eMobility products. Products information and advertisement should be done in languages other than English. To achieve an understanding and adoption of the program by all residents, both technical and marketing material should be available in multiple languages. Any surveys on engagement and awareness should also target residents in different languages. As this is a new program, please elaborate on plans for the first 2 years to promote the program beyond the normal EPR promotion streams to get a groundswell of awareness among consumers.	As a new category, it's unrealistic to expect 100% awareness of this effort. Combined with its awareness study, Call2Recycle will continuously look to adjust and improve its awareness strategy across the province. To start, the focus will be on: <ul style="list-style-type: none"> a. Industry publications (ie. The Loam Wolf, Pinkbike, etc.) b. Google AdWords/SEO c. Social Media d. Local print and radio advertising e. Point-of-sale material at collection facilities f. Media relations outreach 	Awareness
Question from a Regional District: How will Call2Recycle be reporting on the GHG impacts of the pick-up program? More details on how transportation emissions will be reduced should be included in the plan, especially as this is a key component to the collection system.	It has not been in the Call2Recycle plan because it regards direct pick up as a short-term, stopgap measure. The current lack of fixed collection facilities will be resolved over time which would lessen the impact on GHGs. In some cases, such as areas of the province that are more remote or rural, direct pick up is the only viable option.	Reporting
Question from a Regional District: It has been mentioned that Call2Recycle will take all orphan and free rider eMobility products. What are the repercussions and/or steps taken by Call2Recycle if producers do not recycle their own products and do not choose Call2Recycle to be their stewardship agency? By doing so they put the cost of recycling their products on Call2Recycle consumers who paid	While Call2Recycle will accept both orphaned and free-rider products, Call2Recycle makes concerted efforts to register all obligated entities under the regulation to eliminate free-rider activity. This includes ongoing market assessments, collection data and working with the Ministry to report free-rider activity.	Producer Responsibility

for their own product recycling and not the free riders on the program.		
Question from a Regional District: eMobility products will be covered under the plan up to a top speed of 45km/hour. What is the reasoning behind setting 45km/hour as the top speed when the Recycling Regulation doesn't set a speed limit on eMobility products? Are consumers aware of this requirement?	45km/hr is tied to the classification of ebikes #1, #2, and #3. Higher than 45km/hour and it is considered a moped or motorcycle and requires a drivers permit, becoming a different class of vehicle. In order to provide greater clarity in the accepted/excluded product list, it now specifically excludes products which fall in this higher speed category.	Covered Products
Question from a Regional District: When talking about the Concierge Service and pick up times, the plan references 2-4 business days for densely populated urban areas and 10 business days for remote regions of the province. Densely populated urban areas and remote regions of the province should be defined in the plan. Will the 10-business day pick up time for remote regions of the province be for all remote regions no matter the location, or will there be restrictions?	The 2-4 business day target mostly applies to the Greater Vancouver area. The 10-business day pick-up time is available for all other regions, regardless of the location.	Pick-Up Service
Question from a Regional District: How does Call2Recycle guarantee 100% of total weight available for collection in BC during each calendar year will be recycled? Will the weights of orphaned and free rider eMobility products be counted separately in the annual reports?	The annual report will include reporting on weight and units available and that were requested to be collected.	Reporting
Question from a Regional District: As this is a new program, how will the reserve fund be accumulated to ensure environmental handling fees (EHF) are equally distributed among consumers of program products? Will all reserve funds be accumulated through the first year collecting EHF's or will it be spread out over multiple years?	Call2Recycle has a strict reserve fund policy governed by its Board of Directors. The reserve fund policy reflects best practices for non-profit-organizations and follows a number of governing policies. As is Call2Recycle's policy, EHF's are assessed and reviewed annually, and are subject of approval by the Board of Directors.	Fees
Question from a Regional District: If consumer awareness levels fall below the 50%, what are the measures to be implemented to ensure this does not happen again? Further, the Ministry of Environment and Climate Change Strategy demands EPR plans show continuous improvement. By setting a single target to achieve, consumer awareness can be allowed to stagnate. The consumer awareness	The consumer awareness target will be based on a baseline established in 2022. The target will increase by 5 percentage points every year thereafter. Call2Recycle will continuously look to adjust and improve awareness strategy across the province.	Awareness

<p>target should be progressive with new targets each year.</p>		
<p>Question from a Regional District: How much of the \$15 EHF is going towards the reserve fund and as mentioned above, what is the time frame for the collection of the reserve fund?</p>	<p>EHFs are set annually through a budgeting process and then reviewed and approved by the Call2Recycle Canada, Inc. Board of Directors. The organization will maintain a reserve fund, where Call2Recycle Canada’s Board of Directors determines reserve amounts. As this is a new product category, EHF fees and reserves will be reviewed and assessed each year in accordance with the reserve fund policy.</p>	<p>Fees</p>
<p>Question from a Regional District: Consultation Undertaken Prior to EPR Plan Submission (Page 6): “The webinar’s content will mirror the layout and contents provided in this EPR plan renewal document.” Can the Plan provide further explanation of this statement? This appears to be an initial Plan for eMobility products and it is unclear which parts of the Plan involve renewal.</p>	<p>Thank you, the inclusion of the word ‘renewal’ was an error. This EPR plan is a new plan submission for eMobility products. This has been changed in the revised plan.</p>	<p>Plan Submittal</p>
<p>Question from a Regional District: “This includes the Concierge Service – direct pick-up from any fixed location in the province – critical for the program to maintain high accessibility, particularly in provincial areas where collection facilities may not be possible due to low population density.” Can the Plan provide further explanation of how the Concierge service will work? Will consumers need to attend to their devices until pick-up? Does the consumer need to prepare the device in any way? Does the device need to be boxed for transportation? Are there any other requirements in order to utilize the Concierge Service?</p>	<ol style="list-style-type: none"> 1. First, the eMobility product is sold in B.C. at which time EHF’s are remitted to C2R to administer the program. 2. The consumer or rider, enjoys the product 3. When ready, a request is placed for a direct pick up of the eMobility product to be collected and safely recycled. There is a direct pick up request form on the organization’s website for the user to initiate this return, at which time the pick-up process process begins. Upon submission of the form, a pick-up will be scheduled within 2-4 business days in densely populated areas and within 10 business days in remote regions of the province. Call2Recycle will call one day before the scheduled pick-up date to inform of a pick-up window. 4. The rider does not need to attend their device until pick up or prepare the device in any way. 5. Pick up then occurs at rider’s residence or as the collection footprint evolves, or at collection points throughout the province. The device does not need to be boxed for transportation. 6. Disassembly and aggregation of the product then takes place by Call2Recycle approved 	<p>Pick-Up Service</p>

	<p>service providers to then be sent downstream for processing and recycling.</p> <p>7. Finally, recycling occurs and reporting on program downstream management will document it.</p>	
<p>Question from a Regional District: “Greentec is currently an approved downstream vendor of Call2Recycle and handles the recycling/refurbishing of all the cellphones collected through the current program.” Can the Plan clarify this statement? The Call2Recycle program has already discontinued collection of mobile devices.</p>	<p>Call2Recycle does not actively promote the collection of mobile devices in BC but consumers do still bring mobile devices into our program in other parts of the country. As such, Call2Recycle has approved a vendor, Greentec, to manage this end-of-life responsibly.</p>	<p>Downstream Vendors</p>
<p>Question from a Regional District: Collection Systems, Consumer Accessibility Performance Targets and Reporting Commitments (Page 12): “Accessibility is based on picking up an eMobility product within 10 business days of submitting a pick-up request.” Can the Plan provide feedback from consumers that they understand this timeline to be reasonable?</p>	<p>Call2Recycle will include this in the annual consumer awareness study.</p>	<p>Awareness</p>
<p>Question from a Regional District: Having two programs in the province operated by separate Product Stewards adds confusion to where the products will be going. In the province there only needs to be one Product Steward responsible for these items.</p>	<p>Call2Recycle is committed to supporting its members to fulfill their obligations, and ensure there is comprehensive collection coverage throughout the Province.</p>	<p>Program Cooperation</p>
<p>Questions from a Regional District: Since the consumers have given the program products up for recycling, who has ownership of the products within the recycling network?</p>	<p>Ownership of the product is transferred to the collection sites / transporter once it is made available for reuse / recycling by the consumer. With that ownership comes all related liability unless otherwise covered under contact.</p>	<p>Downstream Vendors</p>
<p>Questions from a Regional District: Will all charging products and accessories to the eMobility products be included in this plan? They are not specifically included or excluded in this section.</p>	<p>All accessories sold with the program products are accepted under this EPR plan.</p>	<p>Covered Products</p>
<p>Question from a Regional District: “In the annual report to the Director, Call2Recycle will report on the following: Result of the SABC facilitated waste composition audit with respect to eMobility products.” Is this waste composition audit done annually? Who is responsible for the waste audit?</p>	<p>Call2Recycle annually participates in a waste composition audit facilitated through SABC and funded by a variety of stewardship organizations, including Call2Recycle.</p>	<p>Reporting</p>

<p>Question from a Non-profit Society: As noted, the target should be for 100% of communities in BC having access to a collection site or being served by the no-fee concierge service. The Recovery Rate of 100% of what is available for collection is ambitious but does not note how the amount captured by the other program will be considered in this measure. The program needs to develop a system for understanding what is put into the market place each year (by unit, weight and brand), what is captured each year (by unit, weight and brand), how much waste is prevented through repair/battery changeout/use for parts, how much is recycled, lifespans of products by type and brand, how these numbers compare with the other program and what would be a fair system to handle discrepancies.</p>	<p>We commit to collecting all pick-up requests for qualifying program products, and do not foresee any excluded areas in the province.</p> <p>Lifespans of products will vary greatly, with variances between brands, models, and material composition. Additionally, brands and models between programs will also have a wide array of variances, and will not be known until products are received at end-of-life, which may be measured in timespans of a decade or more.</p>	<p>Collection Target</p>
<p>Question from a Non-profit Society: The program should work with the BC Product Stewardship Council and the Indigenous Zero Waste Technical Advisory Group to determine the underserved communities.</p>	<p>Thank you for your suggestion. Call2Recycle commits to working with the BCPSC as well as programs that work with Indigenous communities to identify and address any gaps in service.</p>	<p>Collection Network</p>
<p>Question from a Non-profit Society: The Concierge service sounds like it will address issues in many smaller communities but the plan is not clear if there are any excluded areas of the province.</p>	<p>Currently we do not foresee any excluded areas of the province.</p>	<p>Pick-Up Service</p>
<p>Question from a Non-profit Society: The plan outlines five recycling streams but does not specify at what level of the hierarchy these fall - are the plastics all going to be recycled into new products or are some being used as fuel (and if so, how much)? Similar questions exist for the electronics and wiring. The plan needs to ensure the materials are handled as high on the hierarchy as possible (as per the Recycling Regulation) and where it is not possible, the program needs to work with the producers to improve this. This also needs to be very clear in the reporting.</p>	<p>The BC Ministry of Environment and Climate Change Strategy requires all programs to report on and verify product end-fates including components of products in each annual report. Call2Recycle commits to managing products and components at the highest level along the pollution prevention hierarchy whenever possible.</p>	<p>Pollution Prevention Hierarchy</p>

Appendix E: 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
<p><i>(a) reduce the environmental impact of producing the product by eliminating toxic components and increasing energy and resource efficiency;</i></p>	<p>The province encourages people to adopt active and more environmentally friendly modes of transportation, including transportation using e-bikes and other e-transport products. Advocating for the reduction in e-transport is inconsistent with the province's CleanBC goals.</p> <p>Call2Recycle encourages producers to manufacture these devices in an environmentally responsible way by eliminating the use of substances that cause harm to the environment and to use recycled materials where possible.</p>
<p><i>(b) redesign the product to improve reusability or recyclability;</i></p>	<p>Call2Recycle encourages its e-transport members to design products in a manner that improves reusability and recyclability.</p>
<p><i>(c) eliminate or reduce the generation of unused portions of a product that is consumable;</i></p>	<p>This level of the PPH does not apply to program materials managed by Call2Recycle, as e-transport products are not consumable.</p>
<p><i>(d) reuse the product;</i></p>	<p>To encourage reuse, Call2Recycle will maintain a list of BC organizations that accept e-transport products for donation or resale. The list will be available on the Call2Recycle website. In addition, marketing materials will include messaging that users should consider selling or donating their e-transport products before recycling them.</p>

<p><i>(e) recycle the product;</i></p>	<p>All the products that are received as part of the program have either reached the end of their useful life or have been deemed unworthy for reuse by the user.</p> <p>Recycling is the most certain way of safely ensuring that e-transport products are properly handled at end-of-life. The Call2Recycle program will efficiently and cost-effectively recycle e-transport products, and no products collected through the program that can be recycled will go to landfill. The reclaimed materials from the e-transport products collected can be used in various products.</p> <p>Once the product is collected as part of the program, the batteries are first removed from the unit and sent to an approved downstream for recycling. The remaining unit is mechanically shredded and its individual components (e.g. ferrous, aluminum, copper, rubber, plastic) are separated using its material properties. The metals generated including steel, aluminum, and copper are sent to secondary smelters to be refined into recycled metals. The rubber and plastic are reused for other purposes.</p>
<p><i>(f) recover material or energy from the product;</i></p>	<p>This level of the PPH does not apply as none of the components will have to be sent to waste to energy recovery.</p>
<p><i>(g) otherwise, dispose of the waste from the product in compliance with the Act.</i></p>	<p>In instances where Call2Recycle downstream processors have exhausted all the above options, any residual material will be disposed of in compliance with the act.</p>