

### Summary

- Call2Recycle's Ontario consumer battery collection and recycling program serves producers obligated by the Resource Recovery and Circular Economy Act Regulation 30/20 Batteries, enforced by the Resource Productivity and Recovery Authority (RPRA).
- Batteries collected in the Ontario program must be covered by the regulation to:
  - Achieve producer management requirements with compliant collected materials
  - Ensure fairness for EHF remitting producers in the allocation of program funds
  - Maintain producer confidence in the Call2Recycle program and brand
- Batteries covered by the regulation include the following:
  - Primary and rechargeable household stand-alone (not sold in or with devices) batteries weighing 5 kg or less\* including:
    - a) Button cells, power chargers and small sealed lead acid batteries
    - b) On-line and IC&I/Commercial Sales
    - c) Any replacement batteries that fit b. above for products such as eMobility / toys / power or garden tools / electronics etc.

\*Note: Producers may use the actual weights of their batteries or weight conversion factors as supplied by RPRA in their Registry Procedure – Verification and Audit document (link below) [https://rpra.ca/wp-content/uploads/Registry-Procedure-Verification-and-Audit-Batteries\\_Final.pdf](https://rpra.ca/wp-content/uploads/Registry-Procedure-Verification-and-Audit-Batteries_Final.pdf)

  - Batteries supplied in Ontario
  - Batteries supplied by producers above the minimum supply threshold
  - Batteries that are sold separately (not with or in products)

### Procedures

- Call2Recycle will ensure compliance of batteries collected via the following:
  - Collector contract terms detailing the requirements for compliant shipments
  - Audits described in the collector contracts (see audit checklist Appendix 1 on page 3)
    - The intention of the audit is to achieve confirmation of compliance in partnership with collectors. To ensure continued funding for program operations, Call2Recycle's Ontario program collectors must cooperate in these necessary audits and assist in the rejection of non-program materials.
    - Collectors will be ranked by risk (volume collected & nature of business)
    - Highest risk collectors will be audited every year

- Reminder letters
  - Collectors will be sent compliance reminder letters semi-annually (Appendix 2)
- Letters of attestation
  - Loads received by Call2Recycle sorters greater than 30,000 lbs. or 13,6000 kg must be accompanied by the following letter/e-mail of attestation with the following (or equivalent) language:  
  
“I \_\_\_\_\_, having the authority to represent \_\_\_\_\_, confirm that the shipment of (date) with Call2Recycle BOL # \_\_\_\_\_ meets eligibility requirements in Call2Recycle’s Ontario program. The batteries from this shipment were originally supplied in Ontario and to the best of my knowledge, the batteries in this shipment were supplied as stand-alone batteries, not sold with or in other products.”

## Policies

- Audits are mandatory for participation in Call2Recycle’s Ontario program. Collectors who refuse to grant audits will be dismissed from the program.
- Shipments of greater than 30,000 lbs. or 13,600 kg without letters of attestation will be rejected and are not be eligible for compensation in the program.
- Should non-conforming batteries be shipped as a result of what appears to be an honest mistake, Call2Recycle will work with that collector to ensure procedures are established to prevent further non-conforming shipments.
- Collectors who consistently ship non-conforming loads will be dismissed from the program.
- If at any point it is determined that Call2Recycle has provided financial compensation for non-conforming batteries, Call2Recycle will pursue a return of those funds.

## APPENDIX 1

### Call2Recycle Ontario Program – Service Provider Audit Checklist

Date:

Call2Recycle Auditor: \_\_\_\_\_

Company Name: \_\_\_\_\_

RPRA Registration Number: \_\_\_\_\_

#	Requirement	Initial	Comments
1	RPRA registration (hauler, processor or refurbisher) remains in good standing for primary batteries		
2	RPRA registration (hauler, processor or refurbisher) remains in good standing for rechargeable batteries		
3	Records of all collections available up to 60 months where applicable		
4	All records are complete - all collections volume is accounted for		
6	All collection sites receive service at no charge to the of the consumer		
7	List of all collection sites in Ontario provided		