

# Battery Stewardship Renewal Plan for Manitoba

2023-2028

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## Executive Summary

Call2Recycle Canada, Inc., (Call2Recycle) which administers the battery program (the program), is a Canadian-owned not-for-profit product stewardship organization. The stewardship program has been operating in Canada since 1997 collecting and recycling primary and rechargeable batteries nationally. Call2Recycle has operated Manitoba's provincially-approved extended producer responsibility (EPR) program for stand-alone replacement batteries used in household electronic and electrical products and weighing up to five kilograms since 2011.

Between 2011 and 2022, the program has collected more than 1,000,000 Kg of batteries in the province and diverted them from the waste stream. The program has experienced steady growth as a result of many awareness raising events, media and advertising efforts, and participation by our dedicated network of collection site operators encouraging their employees, customers, and communities to recycle their batteries.

Pursuant to the requirements of the Manitoba Household Hazardous Material and Prescribed Material Stewardship Regulation, this Product Stewardship Plan is being submitted for review and approval for Call2Recycle to continue as the battery stewardship program for the Province.

This plan covers the five-year period from 2023 through 2028. It provides an outline of current program operations and our plans to further grow the program in Manitoba.

During the course of this plan, the following is proposed:

- Increase consumer awareness of battery recycling from 77% to 82%
- Increase incidence/frequency of battery recycling from 54% to 62%
- Increase accessibility to recycling from the current 90% to 95%
- Reach a recovery rate of 32% by 2028

The recovery rate will be calculated based on the weight sold into the market in the reporting calendar year divided by the weight sold into the market, which will be calculated based on a three (3) year rolling average from the three (3) preceding calendar years.

Continuous improvement is a core principle of the program. As such, we are committed to ongoing investment in research and development to enhance our collection and recycling infrastructure. Performance measures and targets herein will be achieved through enhancing public awareness initiatives, increasing accessibility, leveraging partnerships with producers and collection organizations, transparent operational management, and continuing collaboration with the Province toward our shared goals. Every year a report will be provided to Manitoba Environment and Climate to review activities and performance.

Call2Recycle has proven its ability to meet the requirements of a stewardship program for Manitoba Environment and Climate over the past years. We are focused on overcoming any challenges present in the marketplace, and we continue to investigate and utilize new technologies and go-to-market strategies. We look forward to continued collaboration with Manitoba Environment and Climate and the residents of the province to increase battery collections and recycling.

## 1. Plan Submission

In keeping with the requirements of the Household Hazardous Material and Prescribed Material Stewardship Regulation (the “Regulation”) issued under The Waste Reduction and Prevention Act and the Guideline for stewardship programs issued in Manitoba, Call2Recycle Canada, Inc. has developed this battery recycling plan renewal and is submitting it for approval to Manitoba Environment and Climate.

## 2. Call2Recycle Overview

Call2Recycle Canada, Inc., which administers the battery program (the program), is a Canadian-owned not-for-profit product stewardship organization. The program was established to fulfill the product stewardship obligations for retailers and distributors of products, battery manufacturers, and manufacturers whose products contain batteries.

Since 1997, Call2Recycle has operated a robust battery collection and recycling program across North America, and today works on behalf of battery and product manufacturers and retailers. The program collects and recycles dry-cell batteries weighing less than five (5) kilograms from local governments, businesses, and consumers at no cost to them. Call2Recycle Canada is governed by a Canadian Board of Directors.

Its network of public and private collection facilities, sorters, and processors ensures optimal efficiency, cost-effectiveness, and continued growth along with promoting the ease and practicality of the program. The program’s national reach minimizes confusion among consumers and reduces administrative red tape and redundancies for larger collection site operators.

In order to be effective contributors to the cause of conservation and recovery, the program routinely adopts best practices gleaned from its own research and from associate organizations both in Canada and internationally to increase collections. Promoting environmental sustainability across the country, the program meets Basel Action Network (BAN) e-Steward qualification standards, and is the first program of its kind to receive the Responsible Recycling Practices Standard (R2) certification. As a result, Call2Recycle is the preferred choice for product stewards and stakeholders including retailers, governments, stewardship organizations, associations, and NGOs.

In 2011, the Manitoba Government approved Call2Recycle as the agency to meet producer obligations for household batteries. In 2018, the Manitoba Government approved Call2Recycle’s five-year renewal plan, until 2023. As required by the government we are submitting this renewal plan for review and approval. This Product Stewardship Plan proposes to continue to build on the past success of the program in Manitoba.

### 3. Collection System and Consumer Access

The program operates a simple and highly efficient program. The primary focus is to recycle consumer batteries wherein batteries collected through the program are diverted from landfill. The program is offered at no cost to consumers dropping off their batteries at collection sites and for those signing up as collection site partners.

The program collects batteries weighing up to five (5) kilograms from collection sites located across the province for consumer convenience. Batteries are shipped to sorting partners and separated by chemistry, then sent to processing partners where their component parts are extracted for reuse in such products as new batteries, stainless steel alloy, and roadbed aggregate additives.

#### Applicable Products

The program manages a recycling program for batteries which includes:

- Rechargeable and primary (single-use) battery chemistries
- Batteries, regardless of whether the battery is supplied as a stand-alone product or embedded in a product<sup>1</sup>
- Batteries generated by both consumers and those generated by private businesses and other organizations

The program accepts dry-cell batteries weighing less than five (5) kilograms each.

Below is a list of the battery chemistries we accept:

- Nickel Cadmium (Ni-Cd)
- Nickel Metal Hydride (Ni-MH)
- Lithium Ion (Li-Ion)
- Nickel Zinc (Ni-Zn)
- Small Sealed Lead Acid
- Portable Power Banks
- Lithium Primary
- Alkaline/Carbon Zinc (AA, AAA, 9V etc.)
- Zinc Air
- Silver Oxide

Batteries sold in or with a product including:

- Garden tools
- Construction/renovation tools
- Smoke and CO alarms
- Portable flashlights and spotlights
- E-toys
- E-bikes, E-Skateboards, E-Scooters, and Hoverboards

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<sup>1</sup> Excluding products covered under an existing stewardship plan.

Some products containing easily removable batteries are selected for inclusion based on the likelihood that their batteries will end up in the program's recycling stream due to frequency of battery replacement associated with usage. The program's goal is to ensure that applicable batteries are safely managed at end-of-life while also minimizing the potential for cross-subsidization between products and categories. Applicable products may include garden tools, construction and renovation tools, smoke and carbon monoxide alarms, portable flashlights and spotlights, electronic toys, and e-mobility (electric bicycles, electric scooters, and electric skateboards). Any fee placed on these categories is intended to manage the batteries and not for the device itself. Product categories are reviewed annually due to the constantly changing marketplace, particularly with new devices with embedded batteries.

(See Appendix A: Glossary for detailed definitions.)

## Excluded Products

This stewardship plan does not include the management of:

- Motive batteries <sup>2</sup>
- Wet cell batteries
- Batteries weighing more than 5 kg

## Orphaned/Free Rider Batteries

"Orphaned batteries" refers to batteries produced by a manufacturer that either no longer exists or no longer produces batteries. "Free rider" refers to a battery manufacturer that is not a registered steward of Call2Recycle. It should be noted that both "orphaned" and "free rider" batteries are accepted by the program, and all batteries are diverted from landfill. The program makes concerted efforts to register all battery manufacturers with the program to eliminate "free rider" activity to ensure fairness in the market and compliance with the Regulations. This ongoing process involves identifying potential "free riders" followed by a series of recruitment actions including contacting the organization through letters and follow-up phone calls. This formal undertaking is continued until the "free rider" signs on to the program or provides information that it has its own battery recycling program in the Province. In the case that the organization either refuses to comply or is unresponsive to our efforts and we have exhausted all avenues, the program seeks assistance from Manitoba Environment and Climate to bring these Stewards into compliance.

## Collection System

Since 2011, the program has laid the foundation for a robust battery collection and recycling program serving Manitoba residents and businesses. In total, more than 1,000,000 kilograms of batteries have been collected and diverted from the Manitoba waste stream. The program will continue to engage with and encourage residents to drop-off their batteries at one of the many collection sites.

Collection facilities use one of two collection methods: the bulk or box program. The bulk

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<sup>2</sup> Managed under the Canadian Battery Association (CBA) program.

program caters to facilities that generate large quantities of batteries for recycling (230 kg minimum per shipment). The box program is designed for facilities that do not generate large quantities of batteries in a short period of time or do not have the space to collect bulk quantities. These facilities receive collection boxes free of charge. The box kits include promotional material, plastic bags for battery terminal protection, and pre-paid shipping labels. Each box holds up to 25 kilograms of batteries. The program covers the cost of shipping for both the bulk and box programs.

Any retailer, business, institution, or government entity which meets our collection site requirements can participate as a drop-off location that is open to consumers (public site) or collect batteries used internally (private site). Collection facilities are strategically located where they are most likely to be used by consumers. Below are other considerations when adding collection sites.

- **Accessibility** – To ensure an optimal number of collection sites available based on geography, population density, and ease of access.
- **Convenience** – Facilitate ease of drop-off for consumers not only in urban areas, but rural and remote communities by providing collection services at non-traditional drop-off locations, holding recycling/round-up events, or through curbside battery collection.
- **Cost-effectiveness** – It is necessary to manage the program’s cost-to-serve for continued growth and success.
- **Environmental health and safety** – The program will work with companies that want to enroll to promote environmental health and safety through battery recycling.
- **Association to batteries** – The likelihood that consumers will correlate batteries with the location (e.g. an electronics store or recycling depot).

Collection locations that are available to Manitoba residents are listed on the program’s online locator tool. Residents can search by postal code or city and province to find a battery collection location on the program’s website. In addition, they can utilize the ‘Recycle on the Way’ feature that allows them to provide a start and end address and then shows drop-off locations that are en route to their destination.

Evidence from collection programs around the world shows that simply increasing the total number of collection sites doesn’t necessarily increase battery collections -- it must be done strategically and carefully.

For the duration of this plan, the program will take proactive measures to increase the number of collection sites across the province specifically targeting municipalities, retailers, businesses, and government agencies. We will also work to ensure that residents in urban, rural, and remote areas (including First Nations communities) are served with a variety of battery recycling options that range from permanent drop-off facilities, seasonal and event recycling. (For strategies see section 6. Consumer Awareness.)

Over the past years, the program has signed up various businesses as private collection sites. As part of this renewal plan, efforts will continue to enroll large-volume generators of spent batteries. Businesses also have the option to use Municipal and Eco-Depots that are open to the public. Depots are accessible by anyone, including large-volume generators unless the specific depot has chosen otherwise.

## Northern, Remote, and First Nations Communities

Northern, remote and First Nations communities pose specific challenges to collecting not only batteries for recycling, but all stewarded materials. These communities include geographic areas not serviced by Canada Post, only accessible by plane or ice roads in winter, and low population density spread out over a large area. Some of the issues in servicing these communities include land transport accessibility, cost of service, infrastructure and willingness of the locals to participate.

The program will continue its collaboration with a variety of remote communities including First Nations, municipal offices and provincial government. Call2Recycle has joined forces with other Producer Responsible Organizations (PROs) in order to more effectively service remote communities by pooling resources, sharing costs, and promoting and educating on recycling.

In partnership with other PROs in Manitoba, recycling services are provided to participating First Nations communities accessible by seasonal ice roads. The project focuses on ensuring communities have the required materials to collect, store, and safely transport stewarded materials and on the removal of designated stewardship material from selected communities.

In the coming years, the program will continue to work with organizations such as Indigenous Services Canada to participate in Environmental Awareness sessions with First Nations communities. The program will deliver educational material to create awareness for our program among the First Nations chiefs and their communities.

## Consumer Accessibility

The program has serviced the province of Manitoba for more than 20 years with its collection and recycling program. At the time of this plan development, 90% of the Manitoba population has a drop-off location within 15 kilometers of their home. While coverage in many urban areas exceeds the 15 kilometers' accessibility standard, improvements will be made to increase the number of collection facilities and/or collection methods in non-urban communities as well as First Nations communities.

By the end of 2028, the program intends that 95% of the population will be within 15 kilometers of a public collection site. (See section 10. Performance Measurement and Targets)

The following chart and map depict the current collection network.

### Manitoba Network Summary

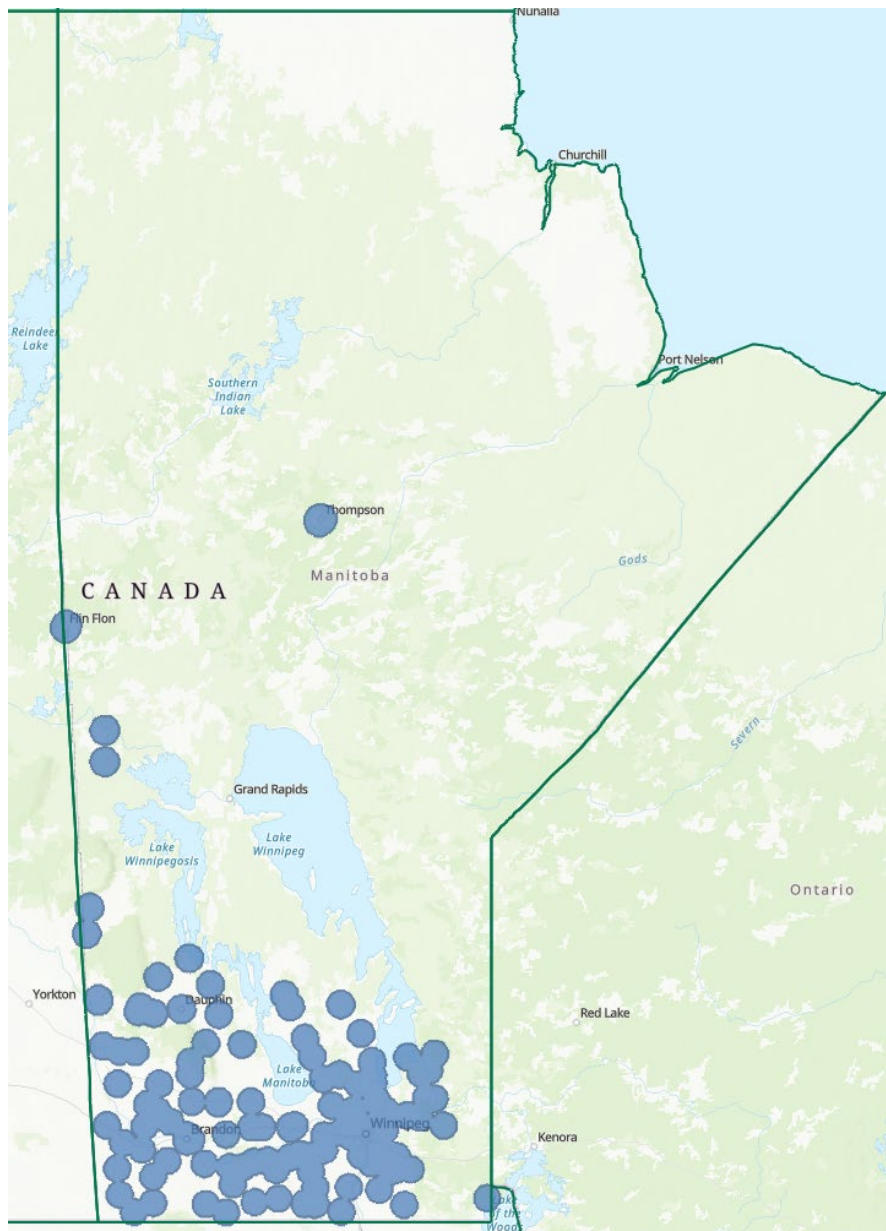
Total Active Sites	Active Public Sites	Active Private Sites	Accessibility
755	352	403	90%



To continually improve the convenience of its collection network within Manitoba, the program will evaluate the Manitoba network on a semi-annual basis and actively solicit participation when and where needed.

The program will also continue testing new methods for collecting batteries from Manitoba residents to enhance access.

### Manitoba Collection Network Map



## 4. Transportation and Sorting

The program will continue to utilize a variety of service providers including those for transportation and sorting. (See Appendix B: Physical Flow Chart) In order to optimize participation, improve efficiency, and meet or exceed collection targets the program is committed to an open, transparent, and fair process in selecting service providers.

The program operates in accordance with intra- and inter-provincial shipping and transportation standards established by Transport Canada, Environment Canada, and any other applicable provincial environment and transportation ministry approvals. Shipments transported internationally are manifested/shipped according to Environment Canada, Transport Canada, US Environmental Protection Agency, and the US Department of Transportation.

Currently, there are no sorters operating in Manitoba. Therefore, batteries collected through the program in the province are sorted and consolidated in Ontario. While sorting batteries is currently done manually, new technologies are emerging and the program remains at the forefront of investigating and utilizing these resources.

Once batteries are sorted according to chemistry, their weights are recorded, and they are prepared for shipping to the appropriate recycling processor based on their chemistry.

## 5. Processing of Products

The program is committed to meeting the highest global standards for safe and effective battery processing. It seeks to maximize the amount of material that is captured from processing to direct it to secondary uses. Through the program, the battery's constituent parts are reclaimed and diverted from the waste stream.

Different battery chemistries require different reclamation methods; therefore, the program seeks partnerships with various processors to ensure optimal performance. It seeks local processing partners wherever possible to reduce its transportation footprint. All of the program's processing facilities use the latest and proven-effective thermal, mechanical, or chemical processes to recover materials such as nickel, iron, lead, cadmium, and cobalt.

Service partners are and will continue to be qualified by the program under its rigorous selection practices. Processors are selected through a fair and transparent system that requires compliance with applicable environmental, health and safety, and transportation regulations. Processors will also be expected to have industry-recognized certification(s) and audit processes in place.

## Some selection practice examples are noted below:

- Written policies outlining corporate commitment to environmental management and continuous improvement.
- Complete tracking and documentation of materials in and out of facilities.
- Final destination receipt and disposal documentation/certification, downstream processing material management, residual material management, and residual waste management.

In an added effort to ensure the highest standards, the program itself also undergoes inspections to maintain industry-recognized certifications, like those listed below:

- Responsible Recycling (R2): This certifies that the program's management practices are comprehensive; covering environmental, health and safety, and data security practices.
- International Standardization Organization (ISO) 14001: This certifies the program's Environmental Management Standards for the management of the collection, and the distribution to downstream processors, for the recycling of batteries.
- Occupational Health and Safety Advisory Services (OHSAS) 18001: This certifies Call2Recycle's Occupational Health and Safety Management System for the management of the collection, and the distribution to downstream processors, for the recycling of batteries.

The landscape is monitored regularly to keep abreast of the activities, regulations, and new capabilities within processing facilities both locally (unfortunately at this time there are no processors in Manitoba) and nationally. The program regularly reviews processors to ensure that they can demonstrate an ability to adapt to the program's growth and volume increases in recyclable materials.

## 6. Consumer Awareness - Education and Outreach

### Strategic Approach

Consumer awareness is critical to the success of any extended producer responsibility (EPR) program, and as such, the program deploys a multi-pronged promotions and education approach to increase the level of awareness and incidences of battery recycling. Its efforts include both traditional and digital strategies, including:

- The program's website
- Google AdWords
- Social media
- Customer service call centre
- Point-of-sale signage and handouts available to all retailers (available on the program's website)
- The program's website safety portal
- Sponsorships and collaborations with like-minded associations
- Traditional Advertising

- Media relations outreach
- Events and drives

To gauge its effectiveness to positively move the ‘recycling needle’, the program conducts a provincial annual consumer awareness study<sup>8</sup>. The study helps the program quantify levels and trends in consumer awareness (i.e., level of awareness that batteries can be recycled) and behaviours and the effectiveness of its outreach campaigns to increase battery recycling incidence among target audiences. The program will report on the results of its annual consumer awareness study in support of its goal to maintain an awareness level of 78 percent (%) or higher<sup>9</sup>. The program will also disclose the wording of the question posed to measure awareness in the annual report. As part of the consumer awareness survey, the percentage of Manitobans who recycled batteries each year (incidence) is measured. These numbers will be included in each annual report.

To help raise awareness, drive participation, and maximize collections with Manitoba residents, the program will offer opportunities to collection network participants to take part in various education and promotion campaigns. On a parallel track, the program 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, as well as sponsorships and partnerships to efficiently reach the defined target audiences and further battery diversion goals and education initiatives.

Objectives for consumer awareness campaigns are as follow:

While Call2Recycle operates a national battery program across Canada, it also appreciates the unique characteristics of individual provinces, its residents, and available communication channels. Knowing who to reach and how to reach them is critical to the success of any outreach and education plan. To that end, in addition harmonizing educational and promotional materials with other jurisdictions where appropriate, engagement in specific research to understand the nuances of the Manitoba market will continue. (See Appendix C for Highlights of 2021 Ipsos Reid Research Summary and Learnings.)

To ensure a successful education and awareness campaign, the communications budget will support a range of new and recurring outreach and education efforts. We will monitor consumer behaviours, attitudes, and actions, and will evaluate programs against key metrics, including collection targets and collection network accessibility. Based on continued learnings and outcomes, strategies and plans will be adjusted accordingly.

## Objectives

1. **Educate and Motivate:** Inform MB residents:
  - a. Batteries can and should be recycled
  - b. Why it’s important to recycle batteries
  - c. How and where to safely recycle batteries

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

## Target Audiences

Target Audiences will include:

MB Residents	Collection Network	Stakeholders
<ul style="list-style-type: none"> <li>• Consumers</li> <li>• Businesses</li> </ul>	<ul style="list-style-type: none"> <li>• Public Sites (collects directly from residents): Municipalities / Local government, Retailers, Communities</li> <li>• Private Sites (internal collections): Solid Waste Facilities, Businesses</li> </ul>	<ul style="list-style-type: none"> <li>• Key Influencers (Local Government, Industry and Trade Associations, and Non-Governmental Organizations)</li> <li>• Program Members/Obligated Producers</li> <li>• Collectors</li> <li>• Media, Experts, Influencers</li> </ul>

The program’s collection network - whether a public or private site - receive ongoing training and support. Education is provided on how to participate as a collection site. Other materials are designed to educate staff, and show how to promote collections to the public. A variety of communication vehicles are used to increase consumer awareness on battery recycling at the point of sale including posters, rack cards, bookmarks, promotional items, brochures, signage, newsletters, email blasts, etc available on the program’s website.

To further promote recycling of batteries, the program requests that collection boxes are placed in an area that is clear and visible. However, the decision on where to place collection receptacles lies with the individual sites.

Below is an overview of the marketing plan in chart form.

Audience	Strategies	Campaigns/Tactics
<b>A. Manitoba Residents &amp; Businesses</b>		
<b>Consumers</b>	Seasonal Campaigns: National & Local	National: National Battery Day, Earth Day, Circular Economy Month Local: Manitoba Moose partnership, Earth Rangers, Summer Collection initiatives
<b>Businesses</b>	Key Industry-focused Campaigns	Campaigns targeted at Healthcare, Hospitality, Education, Travel, Solid Waste Facilities
<b>B. Collection Network</b>		
<b>Municipalities/Communities</b>	Campaigns for organizations who collect directly from residents at public and private places	Depots: National Municipal Depot Campaign Collection site Newsletter

<b>Retailers</b>		Retail Campaigns Retailers Newsletter
<b>C. Stakeholders</b>		
<b>Key Influencers</b>	Partnerships with Local Government, Industry and Trade Associations, Non-Governmental Organizations	Association Partnerships: AMM, MARR NGO Partnerships: Manitoba Eco-Network Environmental Partnerships: Pride Manitoba
<b>Stewards</b>	Activities focused on supporters and contributors to the program	Stewards Newsletter
<b>Thought Leaders</b>	Programs targeting media, journalists, subject matter experts, key decision makers	National and Local Media campaign Focused events and conferences

## 7. Funding Structure

The program’s funding mechanism is based on a "fee per unit sold" model referred to as Environmental Handling Fees or EHF. The fees are set through a budgeting process and then reviewed and approved by the program’s board of directors. Based on the number of units of batteries sold into MB, members report quantities at pre-set periods using an online system.

EHF’s are calculated based on the actual cost to collect and responsibly manage batteries at end-of-life in MB and used to fund the program (including but not limited to promotion and education, collection, transportation, processing, and administration). The program will ensure accurate member remittances through a system that includes periodic audits to verify compliance and completeness of reporting of EHF’s. Each producer-member determines whether to charge the EHF as a visible line item on the receipts or to internalize the EHF into the cost of the product.

The organization maintains a reserve fund determined and reviewed by the board of directors. This fund ensures the stability of the current program and the organization's ability to deliver on any future financial obligations that may arise including wind-down costs if necessary.

The program complies with all annual reporting requirements as stipulated by Manitoba Environment and Climate as per the Regulation. Consolidated finances are audited annually by an independent third-party auditor, and the results are made public and provided to stakeholders.

A report specific to the province is provided to Manitoba Environment and Climate annually. As stipulated in the Regulation, the report provides an account of activities in the Province as relates to the waste management of batteries, including but not limited to consumer outreach and education, and collection performance. Once approved the report is posted on the Manitoba page.

## 8. Management of Environmental Impacts

The Province abides by the pollution prevention hierarchy—reduce, reuse, and recycle—however, this hierarchy can be more difficult to apply to batteries than to other materials and products. The program is not in a position to promote a reduction in the use of batteries, and reconditioning batteries for reuse can pose an unacceptable safety risk to consumers. Therefore, the program does not support reconditioning batteries unless certain strict conditions pertaining to the reconditioning organization, the safety testing, and the proper labeling of reconditioned batteries are met.

Recycling is the most viable means of keeping battery waste from entering landfills. The program efficiently and cost-effectively recycles household batteries of all types, and batteries collected through the program are diverted from landfill. The reclaimed materials from the batteries we collect can be used in various products, such as new batteries, cookware, appliances, and hardware.

The program’s transportation and battery processing partners have passed a rigorous selection process to ensure that they comply with applicable environmental, health and safety, and transportation regulations. We continually monitor each processor to ensure competitive pricing and an ability to adapt to increases in volume. The following charts show an example of recycling efficiency rates (recovery rates) for the processors used by the program and how the various materials are managed.

**Recycling Efficiency Rates**

Battery Type	Rechargeable Battery Chemistry				Primary Chemistry	
	NI-CD	LI-ION	NI-MH	SSLA	ALKALINE	LITHIUM
<b>% Material Recovered*</b>						
To Metals	52%	63-78%	77%	66-79%	18-27%	35%
To co-product, aggregate	0%	30%	0%	0%	1-72%	0%
To Cadmium	21%	0%	0%	0%	0%	0%
To Secondary Recovery	0%	0	5%	2-4%	0-57%	21%
Plastic Recovery or Reductant	0%	0-44%	10%	5-8%	0-5%	0%
<b>Total Recovery</b>	<b>73%</b>	<b>78-93%</b>	<b>77%</b>	<b>76-89%</b>	<b>80-95%</b>	<b>56%</b>

\* Recovery rates are provided by processors and are subject to change.

All collected batteries are sent to program-approved sorters and processors. (See Appendix B: Physical Flow chart.) Each of these facilities uses thermal, mechanical, or chemical recovery processes to reclaim materials such as nickel, iron, lead, zinc, manganese, cadmium, and cobalt, and prepare them for use in new products such as new batteries, stainless steel alloy, and roadbed aggregate additives. Some processes also recover plastic and other constituents.

## Environmental Transparency and Accountability

The program maintains a commitment to third-party audit of material end-fates, and downstream processes in accordance with R2 certification requirements, in order to ensure transparency and accountability to the government and to the public.

## 9. Dispute Resolution

Call2Recycle has established written agreements with its Stewards (Membership and Proxy Agreements – available on the program’s website) and service providers (sortation and processing partners). Disputes with either of these groups follow a similar process to ensure that there is a fair and equitable resolution.

For collection sites that enter into an agreement for cost reimbursement associated with the collection of batteries in bulk quantities, a contract is in place which outlines the dispute resolution process. For collection sites that do not have a formal agreement with the program, the same approach will be followed. As a first step, once the issue has been raised in writing, representatives from the program and the other party will attempt to resolve the issue within 30 days or a mutually agreed-upon timeframe. If the parties cannot come to a resolution within the given timeframe, the two parties will jointly select a third party to arbitrate and settle the dispute with his/her decision. The dispute resolution procedure also applies to members and vendors, including transporters, processors, and sorters.

The program 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.

## 10. Performance Measurement and Targets

It is important to measure the success of a program and organization in order to improve its performance and ensure accountability. In its program plan renewal in 2018, the program provided the Manitoba Government with specific collection and recycling targets and thereafter with an annual report on performance. With this plan renewal, the program performance measures remain consistent. The projected new targets are based on the learnings and growth within the province over the years. In reviewing performance, both quantitative and qualitative measures are taken into consideration to allow for a full evaluation of the battery stewardship program in Manitoba, while also harmonizing performance measurements and calculations with other jurisdictions where possible.



## Accessibility

In 2021, 90% of Manitobans resided within 15 kilometers of a battery drop-off site. By 2028, the program will ensure that accessibility will reach 95%. Accessibility and convenience are critical in driving recycling behaviour.

As previously written, the program will continue to focus on alleviating the challenges of recycling in remote and First Nations communities with a goal of increasing their accessibility to battery recycling. The program partners with other Producer Responsibility Organizations in Manitoba to provide recycling services to First Nations communities accessible by seasonal ice roads. The project focuses on ensuring communities have the required materials to collect, store, and safely transport stewarded materials and on the removal of designated stewardship material from selected communities.

A chart with the annual accessibility targets is provided below.

2023	2024	2025	2026	2027	2028
90%	91%	92%	93%	94%	95%

## Battery Sales and Recovery Rate

Calculating the total weight of batteries available to collect in Manitoba can be challenging for a variety of reasons including:

- 1) Weight of certain battery chemistries sold into the market declines year over year - Heavier battery chemistries, such as nickel cadmium, are being replaced by lighter lithium-ion batteries. This will have implications on the overall battery weight sold into the market.
- 2) Life of a battery - Battery life is increasing which reduces the need to replace batteries as frequently.
- 3) Type of battery - Products that currently require primary batteries will likely be replaced by those that run on rechargeable batteries – both embedded and easily removable.
- 4) Purchase habits: Batteries are generally purchased in large or multiple quantities and have a multi-year shelf life and are often sold in “club” packs. There is generally not an immediate 1:1 relationship between battery purchase and usage.
- 5) Hoarding issues: Consumers may keep spent batteries for a long time before they recycle them. Since consumer-type batteries are typically small, they can easily be stored at home, thus consumers have no immediate urge to recycle them.

To address these issues, beginning in 2024, the recovery rate will be calculated based on the weight collected in the reporting calendar year divided by the weight sold into the market based on a three (3) year rolling average from the three (3) preceding calendar years. For example, in

2024 the recovery rate will be calculated by taking the weight collected that year (2024) divided by the average weight sold into the market in 2021, 2022, and 2023 (the preceding three years), and expressed as a percentage. This method of calculating recovery rate provides a more accurate reflection of the lifespan of batteries. Changing the calculation of the denominator for the recovery rate (weight sold into the market) impacts the volume required to be collected in a given year in order to achieve the recovery rate target.

Changing market conditions add to the difficulty of estimating actual sales into market, the program will strive to achieve the targets as set out below. The targets also take into account Manitoba specificities such as population density, urban/rural and remote location challenges.

The plan goal is to attain a 32% recovery rate of batteries that are sold into the Manitoba market by the end of year five (2028). The program will annually assess performance against targets using pre-defined metrics and may adjust strategies if necessary. Any performance deficiencies will be outlined in a remediation plan, including corrective and strategic actions. The chart below indicates the stepped approach to reach 32% by 2028.

### Recovery Targets

	2023	2024	2025	2026	2027	2028
<b>Collection Targets (as a % of sales)</b>	22%	24%	26%	28%	30%	32%

### Implementation Timeline

As outlined in the Education and Outreach section, seasonal and other promotions and events will be ongoing through the renewal plan years. The number of initiatives will vary over the years all focusing on accessibility, awareness and action. We will regularly meet with other provincial PROs to identify opportunities for partnerships that promote stewardship programs.

<b>Major initiatives to increase Accessibility, Awareness and Action 2023 - 2028</b>
Traditional (TV, outdoor) and digital (web, YouTube, social, display) advertising campaigns Student education through schools via Earth Rangers partnership
Collection Methods – increasing convenience for consumer drop-off
Increasing Collections - from northern, remote and First Nations communities

For an overview of all targets included throughout this plan, see Appendix E for the Summary of Performance Measures chart.

For an overview of stewardship plan requirements and location in this plan, see Appendix F for the Stewardship Plan Reference chart.

## 11. Stakeholder Consultation

Prior to being submitted to Manitoba Environment and Climate, the program presented its plan for consultations from stakeholders and the general public using the following methods:

- 1) The plan was posted on the program's website on January 4<sup>th</sup>, 2023.
- 2) Information about the consultations was posted on [call2recycle.ca/mbconsultations/](https://call2recycle.ca/mbconsultations/)
- 3) A webinar was held on January 20<sup>th</sup>, 2023.
- 4) Communications and inquiries regarding the renewal plan were carried out through email at [mbplan@call2recycle.ca](mailto:mbplan@call2recycle.ca).
- 5) Frequently asked questions and answers relating to the renewal plan and consultations were posted on our website and can be found in Appendix G.

The organizations that were consulted during the Manitoba Program Plan review and evaluation process included municipalities, recycling collectors, First Nations and northern communities, processors, waste management industry representatives, and producers. Consultation feedback was sought out through newsletters, website and email feedback, and through a dedicated webinar. During the consultation phase some questions about the program were asked (see Appendix G) but no concerns about the program were raised.

The program is committed to ongoing stakeholder engagement. A direct feedback email address has been established at [Manitoba@call2recycle.ca](mailto:Manitoba@call2recycle.ca), and posted to the website, encouraging stakeholders to reach out with any feedback. Point-of-sale materials are also available on the program's website.

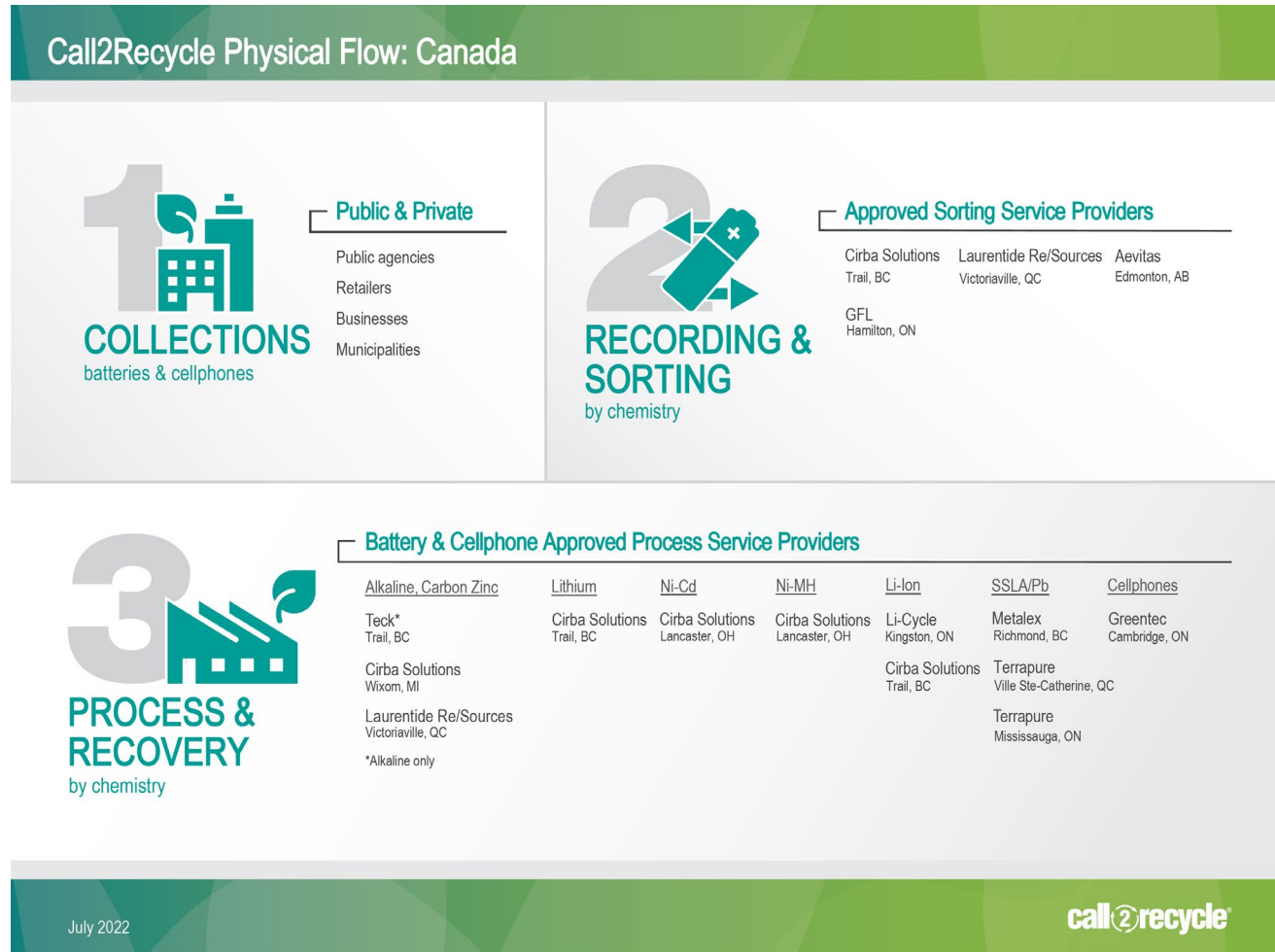
## 12. Appendices

### Appendix A: Glossary

The following is a glossary of key terms and definitions in this plan.

Term	Definition
Alkaline /Carbon Zinc	A type of primary battery (e.g. AA or AAA, C, D, 9V, and button batteries).
Batteries	Dry-cell rechargeable and primary batteries weighing less than 5 kilograms each.
Batteries sold in or with a product	A device sold with an easily removable battery/batteries that is not covered under an existing stewardship program and includes, e-toys, smoke and co alarms, garden tool, construction/renovation tools, flashlights and spotlights.
Lithium Ion (Li-Ion)	A type of rechargeable battery.
Lithium Primary	A type of primary battery.
Nickel Cadmium (Ni-Cd)	A type of rechargeable battery.
Nickel Metal Hydride (Ni-MH)	A type of rechargeable battery.
Portable Power	A lithium-based, stand-alone rechargeable battery.
Primary Battery	A battery that cannot be recharged by the consumer commonly known as AA, AAA, 9V, D-cell, and button cell batteries.
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 according to the nature of materials, markets and processing methods.
Responsible Recycling Standard or R2	The R2 standard outlines responsible recycling practices for the recycling of electronics globally. The requirements contained are comprehensive, covering environmental, health and safety, and data security practices. This standard is provided through an accredited third-party to ensure the program practices are conducted in an environmentally responsible manner, protective of the health and safety of workers and the public, and that the data on media devices is secure until destroyed.
Zinc-air	A type of primary battery. These batteries can typically be found in small devices such as hearing aids.

## Appendix B: Physical Flow Chart\*



\*Flow charts are updated from time to time and can be found on the program's website.

## Appendix C: Highlights from Ipsos Reid Research - 2021

- 76% of residents of Manitoba say that at least some kinds of household batteries can be recycled while one in five (20%) say they don't know and 5% say no, they can't be recycled.
- Men (79%) are more likely than women (73%) to believe that household batteries can be recycled. Women (23%) are more likely than men (16%) to not know if household batteries can be recycled.
- There is not much variation in responses by age, however, residents 55+ are slightly more likely than 18-34 year olds and 35-54 year olds to believe batteries can be recycled.
- Looking at all batteries, nearly four in ten (40%) are recycled. A majority (56%) of Manitobans say they recycle none of their batteries, while 15% recycle all of them. Roughly two in three (23%) batteries are thrown out – in fact, roughly one in ten (13%) residents throw all of their batteries in the garbage, no matter what kind of battery.
- Most frequently, Manitoba residents have recycled their household batteries at a recycling depot or centre (72%), at a retailer (29%), and at work (9%).
- No matter the gender, most Manitobans recycle at a recycling depot or centre, at a retailer, and at work. Men appear to be more likely to recycle at these locations.
- 62% of Manitobans are saving their batteries for a future recycling trip, and 27% just do not know what to do with their used batteries.

## Appendix D: Manitoba Battery Stewards

As at December 31, 2022 (Updated list can be found at [www.call2recycle.ca/list-of-stewards/](http://www.call2recycle.ca/list-of-stewards/))

<p>3M Canada Acer America Corporation Acklands Grainger Canada Inc. ACS Distributing ADI Global Amazon Canada / Amazon.com.ca, Inc. Amplifon Apple Canada Inc. Battery Canada Bay6 Computer Services BDI, a division of Bell Mobility Inc. Bed Bath and Beyond Canada L.P. BellMTS, a division of Bell Canada Best Buy Canada Ltd. Bike Co LLC BISSELL Canada Corporation Bose Corporation Cabela's Canada Computers Inc. / Ordinateurs Canada Canadian Energy and Power Corporation Canadian Tire Corporation, Ltd. Canadian Tire Petroleum Canon Canada Inc. Cardinal Health Canada Inc. Cell Mechanics Inc. Century Optronic Inc. Cervelo Cycles Inc. Château Manis Electronics Inc. Circle K Stores (Previously Mac's Convenience) Connect Hearing Canada Core-Mark International Inc. Costco Wholesale Canada Ltd Cycles Devinci Cycles Lambert D'Amour Bicycle &amp; Sports Inc. Dell Canada Inc. Dollar Tree Stores Canada Inc.</p>	<p>Dollarama L.P. Dynabook Canada Inc Dyson Canada Limited East Penn Canada (Power Battery Sales Ltd.) ECHO Power Equipment (Canada) Edma Marketing Ltd. EECOL Electric ULC Enns Brothers Ltd. Epic Cycles Inc. EUCAN Distribution Inc. Fastenal Canada, Ltd. Federated Co-Operatives Limited FERMETCO INC. FGL Sports Ltd. FuturPlus (Division of Cathelle Inc.) Gazelle USA, LLC Gescan (Sonepar Canada) Giant Bicycle Canada Inc Giant Tiger Stores Limited Google Canada Corporation Grand &amp; Toy Ltd. Grin Technologies Groupe BBH Inc. Guillevin International Cie Hawthorne Canada Limited HearingLife Canada Ltd. Henry's Enterprises Inc. Hilti Canada Corporation Hitfar Concepts Ltd. Home Hardware Stores Limited HRS Global Hudson's Bay Company Husqvarna AB IKEA Supply AG ILINK Industries Ltd Imperial Dade Canada Inc. Indigo Books and Music Inc. Interstate Batteries Inc.</p>
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*Ivan Hupalo -2448131 Manitoba Ltd.*  
*John Deere Canada ULC*  
*KMS Tools and Equipment Ltd.*  
*Kranked Bikes*  
*Lee Valley Tools Ltd*  
*Lego Brand Retail, Inc.*  
*Lem-Rich Foods Ltd.*  
*Lenovo Canada Inc.*  
*Loblaws Inc.*  
*London Drugs Limited*  
*Louis Garneau Sports Inc.*  
*Lowe's Canada ULC*  
*LTP Sports Group Inc.*  
*Magnacharge Battery Corporation*  
*Makita Canada Inc.*  
*Marin Bikes Canada*  
*Mark's / L'Équipeur*  
*Mastermind LP*  
*MB Battery Distributors Inc.*  
*McKesson Canada*  
*McMunn and Yates*  
*Mica Sport Canada Inc.*  
*Michaels Stores Inc.*  
*Microsoft Corporation*  
*Motorola Solutions Canada*  
*Mountain Equipment Company Ltd.*  
*MSA Safety Sales, LLC*  
*Nedco West Division*  
*Newell Brands Canada*  
*Nikon Canada Inc.*  
*Northern Building Supply*  
*Northern Specialities Ltd.*  
*Novexco Inc.*  
*Onlybatteries.com*  
*On the Edge Canada Inc.*  
*Orgill Inc.*  
*Orka Division Rexel Canada Electrical Inc.*  
*Outdoor Gear Canada*  
*Part Source*  
*Peavey Industries Limited*  
*Pedego Canada (Voltage Bikes Ltd.*  
*Photo Central Inc.*  
*Prairie Battery Ltd.*  
*Praxis Works*

*Prime Deals International Ltd.*  
*Princess Auto Ltd.*  
*Proflash Techonologies Inc.*  
*Riese & Muller*  
*Robert Bosch Inc. (Canada)*  
*Rocky Mountain, Div. of Industries RAD Inc.*  
*RONA Inc.*  
*S.P.Richards Co. Canada, Inc.*  
*Santa Cruz Bicycle*  
*Save on Food Limited Partnership*  
*Scotts Canada Ltd.*  
*SharkNinja Operating LLC*  
*Shimano Canada LTD*  
*Shopper+Inc.*  
*Shoppers Drug Mart Inc.*  
*Snap-On Tools of Canada Ltd*  
*Sobeys Capital Inc.*  
*Sonos Inc.*  
*Specialized Bicycle Components Canada*  
*Standard Products Inc.*  
*Staples Canada Inc.*  
*Staples Professional, Inc.*  
*Steelcase Canada Ltd*  
*Stihl Limited*  
*Super Thrifty Drug Stores*  
*Supreme Basics*  
*T-Zone Health*  
*Telus Communications Company*  
*Tenaquip Limited*  
*The \$1. Store Plus*  
*The Battery Man*  
*The Bicycle Group (TBG) Kona Canada*  
*The Home Depot of Canada, Inc.*  
*The North West Company*  
*The Source (Bell) Electronics Inc.*  
*The Stevens Medical Company Limited*  
*Tip Top Electronics Supply Ltd.*  
*ToolTown Inc.*  
*Toys R Us Canada, Ltd.*  
*Trek Bicycle Canada ULC*  
*UAP Inc.*  
*Uline Canada Corporation*  
*Veritas Technologies LLC*



<p><i>Velec inc.</i> <i>Vulpine Networks</i> <i>Wallace and Carey Inc.</i> <i>Walmart Canada</i> <i>Wesco Distribution Canada</i> <i>Westburne Midwest Division</i> <i>Wisdom Electronics Inc.</i> <i>Wurth Canada Ltd.</i></p>	
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## Appendix E: Summary of Performance Measures

Measures	Annual Targets and Goals						
	2023	2024	2025	2026	2027	2028	
Accessibility - % of population within 15 km of collection site	90%	91%	92%	93%	94%	95%	
Collections Targets - batteries to be collected expressed as a percentage of what is sold into the MB market	22%	24%	26%	28%	30%	32%	
Consumer Awareness	Conduct two (2) Omnibus Surveys per year. One to inform on awareness and one to inform on incidence						
Battery Recycling Awareness*	77%	78%	79%	80%	81%	82%	
Battery Recycling Incidence**	54%	55%	56%	58%	60%	62%	

\*Battery Recycling Awareness: # or % of residents aware that household batteries can be recycled in Manitoba.

\*\*Battery Recycling Incidence: # or % of residents who have recycled their batteries in Manitoba.

## Appendix F: Stewardship Plan Reference

Required in Plan		Location
<b>A.</b>	<b>Stewardship Plan</b>	
1	The establishment and administration of a waste reduction and prevention program for household hazardous material and prescribed material	Throughout Plan
2	The appropriate management of household hazardous material and prescribed material according to guidelines established by the minister	Throughout Plan
3	A province-wide, convenient collection system for waste material without user fees at the point of collection	Section 3
4	A system for the payment of expenses incurred in the collection, transportation, storage, processing and disposal of waste material in connection with the waste reduction and prevention program	Section 7
5	The orderly collection of revenue from program subscribers in balance with expenses for the program	Section 7
6	The establishment and administration of education activities for the program	Section 6
7	The establishment and administration of point-of-sale information for the program	Section 3
8	On-going consultations with those who may be affected by the program, including members of the public, in accordance with any consultation guidelines the minister may establish	Section 11
9.	The Plan may also deal with research and development, training and education activities, as well as activities related to waste reduction or pollution prevention. The minister may provide additional program guidance to program operators.	Section 6
<b>B.</b>	<b>Program Plan Evaluation</b>	
	Proposed Plan shall demonstrate how:	
1	The cost of managing designated waste materials is borne by the stewards and users of the designated material rather than by the taxpayer	Section 7
2	The management of these materials is economically and environmentally sustainable	Section 8
3	Product stewards determined how these materials are managed and how the affected industry and potential program partners will bear these costs	Section 7 & 8

Required in Plan		Location
4	The methodology by which fees, if any, will be set and collected under an approved program plan	Section 7
5	A comprehensive public awareness and education program will be developed and implemented in consultation with the department	Section 6
6	The operator will provide a province-wide collection system that ensures convenient and consistent public access in all regions of Manitoba	Section 3
7	The stewardship program in Manitoba is harmonized, where practical and feasible, with those of other provinces	Section 2
8	Funds raised for the management of a material or product relate to the costs of managing that designated material or product	Section 7
9	The transparency of program operations will be provided through the development of industry proposals, program plans, and annual reports, to be made available to all stakeholders	Throughout Plan and <a href="http://call2recycle.ca/manitoba">call2recycle.ca/manitoba</a>
10	The operator undertook appropriate consultations on program plan proposals prior to submission of those proposals to government	Section 11
11	The operator will resolve stakeholder disputes	Section 9
12	The operator will conform to regulatory requirements to ensure a level playing field among stewards responsible for a designated waste stream	Section 1, 7 & 8
13	The operator will measure, monitor and report on program performance, including meeting designated material recovery rate targets	Section 9
14	The operator will adhere to guideline provisions for pollution prevention and best management practices (Section I).	Section 8
<b>C. Public Consultation Process for Household Hazardous Material and Prescribed material</b>		
1	<p>Stewards shall:</p> <ul style="list-style-type: none"> <li>a. Ensure that stewardship program decisions and activities include processes or measures for informing those affected by decisions and actions in a timely manner</li> <li>b. Provide meaningful opportunity for public consultation and due process, including the timely release of pertinent information</li> <li>c. Ensure that local governments and citizen groups are consulted</li> <li>d. Employ collaborative decision-making and consensus-building processes, where appropriate</li> </ul>	Section 1, 8 & 11

Required in Plan		Location
2	Stewards shall seek input during the development and amendment of the program plan, annual reporting, and review of operations from: <ul style="list-style-type: none"> <li>a. Government</li> <li>b. Service delivery agencies</li> <li>c. Relevant external agencies</li> <li>d. The public.</li> </ul>	Section 11
3	Prior to submitting its program plan to the minister, the applicant is required to consult with affected stakeholders and the public. To do this, stewards shall: <ul style="list-style-type: none"> <li>a. At the outset of any program plan consultation, identify:               <ul style="list-style-type: none"> <li>i. who they expect to consult with;</li> <li>ii. the purpose of the consultation; and</li> <li>iii. how they will conduct the consultation.</li> </ul> </li> <li>b. Seek input from those who               <ul style="list-style-type: none"> <li>i. Have a mandate or responsibility in a related program area</li> <li>ii. Are expected to implement the proposal</li> <li>iii. Are expected to bear the cost of implementing the proposal</li> <li>iv. May be impacted by the proposed plan</li> </ul> </li> </ul>	Section 1, 8 & 11
4	In a program plan proposal, stewards shall identify to the minister: <ul style="list-style-type: none"> <li>a. Who has been consulted in the process of developing and evaluating the plan and/or proposal options</li> <li>b. Any objections and concerns raised by those who were consulted</li> <li>c. Endorsement of proposed responsibilities by program partners.</li> </ul>	Section 11
<b>D. Design of an Adequate Collection System</b>		
1	The program plan shall adequately provide for collecting and managing waste household hazardous material and prescribed material	Section 3, 4 & 5

Required in Plan		Location
2	The collection system shall be designed to provide for reasonable and free consumer access to collection facilities and recycling services. The following service expectations are intended as a guide for program operators: <ol style="list-style-type: none"> <li>a. Rural density: In rural areas, a radius of approximately 50 km is appropriate spacing for facilities.</li> <li>b. Urban density: In urban areas, facilities should be approximately 15 minutes travelling distance from any point.</li> <li>c. Remote and northern areas: In remote and northern areas, other standards may be proposed. Initiatives such as special collection events may be appropriate</li> </ol>	Section 3 & 6
3	The collection system design should consider and prioritize the degree of risk presented by the product	Section 3, 4, 5 & 8
4	Consultation with local governments, municipal corporations, community councils, and First Nations should occur to determine the most effective collection systems for the communities	Section 3, 6 & 11
5	Stewards may partner with existing collection systems established by other stewards or another program plan for other designated materials	Section 3, 4, 6 & 8
6	Consumers shall not be charged a user fee at the point of collection	Section 2, 3, 6 & 7
<b>E. Achieving Designated Material Performance Targets</b>		
1	In consultation with the program operator and other stakeholders, the minister will confirm minimum performance targets for designated material	Section 10
2	Stewards are expected to commit to continuous improvement in program performance.	Throughout Plan
3	The minister may establish other performance requirements in consultation with the program operator and other stakeholders	Section 10 and TBD
<b>F. Establishing Appropriate Performance Measures</b>		
1	A steward may recommend program performance measures in the program plan submitted for approval. The measures must be able to show both what is recovered, and what is not	Section 10
2	The minister may specify one or more performance measures or targets as part of the program plan approval process	Section 10 and TBD

Required in Plan		Location
3	The following are examples of acceptable performance measures: <ol style="list-style-type: none"> <li>Sales and recovery data</li> <li>Municipal waste composition study results</li> <li>Periodic surveys of public awareness of the program and use of the collection system</li> <li>The amount of waste material collected by service providers;</li> <li>Number of collection points</li> <li>Proportion of product to be managed, according to the principles of pollution prevention and 4Rs hierarchy</li> </ol>	Section 10
<b>G. Dispute Resolution Procedure</b>		
1	A program plan shall adequately provide for a dispute resolution process, which allows for fair, transparent, and unbiased independent processes where all views are known when stakeholder or public interests may be affected.	Section 9
<b>H. Annual Report</b>		
	Section 16 (1) of the Household Hazardous Material and Prescribed Material Stewardship Regulation requires the operator of an approved program plan to submit an annual report within 90 days after the end of each calendar year. In addition to Section 16 (2) of the regulation, which provides the minimum requirements for an annual report, operators shall: <ol style="list-style-type: none"> <li>Post a copy of the report on the program website</li> <li>Document the performance in adherence to the program plan; and</li> <li>Specify what the stewards will do to reduce or eliminate any gap between actual and projected performance</li> </ol>	Section 6, 7, 10 & <a href="http://call2recycle.ca/manitoba">call2recycle.ca/manitoba</a>
<b>I Pollution Prevention and Best management Practices for Household Hazardous Material and Prescribed Material</b>		
1	For household hazardous material and prescribed material, Manitoba promotes the principles of pollution prevention and the 4Rs of reduce, reuse, recycle, and recover. This means: <ol style="list-style-type: none"> <li>Safely using the product for its originally intended purpose</li> <li>Reuse of the products where it is safe to do so</li> <li>Recycling waste household hazardous material and prescribed material</li> <li>Disposing waste household hazardous material and prescribed material safely</li> </ol>	Section 5 & 8
2	Manitoba prohibits the improper storage, illegal dumping, or landfilling, of waste household hazardous material and prescribed material.	Throughout Plan

Required in Plan		Location
3	<p>Stewardship program operators shall:</p> <ul style="list-style-type: none"> <li>a. Where environmentally and economically sustainable, promote local processing, manufacture and use of products from waste material as an alternative to exporting recovered material to another jurisdiction</li> <li>b. Operate in a manner supportive of national and international agreements</li> </ul>	Throughout Plan



## Appendix G: Stakeholder Consultation FAQs

### 1) Why is Call2Recycle submitting a renewal plan for Manitoba?

Every stewardship program must submit a renewal plan every five (5) years as a requirement of the Household Hazardous Material and Prescribed Material Stewardship Regulation issued under The Waste Reduction and Prevention Act and the draft Guideline for stewardship programs issued in Manitoba.

### 2) Who is the renewal plan being submitted to?

The renewal plan is being submitted to the Ministry of Environment and Climate.

### 3) What type of batteries are accepted by the Call2Recycle program?

The Call2Recycle program accepts dry-cell batteries weighing less than five (5) kilograms each. Below is a list of the battery chemistries we accept:

- Nickel Cadmium (Ni-Cd)
- Nickel Metal Hydride (Ni-MH)
- Lithium Ion (Li-Ion)
- Nickel Zinc (Ni-Zn)
- Small Sealed Lead Acid
- Portable Power Banks
- Lithium Primary
- Alkaline/Carbon Zinc (AA, AAA, 9V, etc.)
- Zinc Air
- Silver Oxide

Batteries sold in or with a product including:

- Garden tools
- Construction/renovation tools
- Smoke and CO alarms
- Portable flashlights and spotlights
- e-bikes, e-Skateboards, e-Scooters
- e-toys

### 4) Where can I view the renewal plan?

The draft renewal plan has been posted in the Manitoba section of the Call2Recycle website. Comments may be submitted to [mbplan@call2recycle.ca](mailto:mbplan@call2recycle.ca). The deadline for submissions is 17:00 EDT on January 27, 2023.

### 5) When and where are the consultations being held?

A webinar consultation will be held on Friday, January 20, 2023 at 1:00 p.m. EDT. This will be an opportunity to learn more about the Call2Recycle plan, and to make comments or ask questions.

### 6) What are the major differences between the last plan and the current renewal plan?

This renewal plan was designed to build on our successes and learnings in Manitoba, with the goal of increasing our collections within the province.

In addition to establishing new performance targets, Call2Recycle has enhanced the focus of the program with more specific strategies and tactics to reach our goals. The priority of the plan is to increase accessibility and move consumers to action. For example, we will:

- Work more closely with municipalities
- Expand on our methods of collection (drives/round-up events/etc), and

- Increase our focus on rural and remote communities

**7) Will Call2Recycle increase accessibility for the public?**

Yes; 90% of the Manitoban population currently has a drop off location within 15 kilometers of their home. We intend to increase accessibility to 95% by the end of 2028. Call2Recycle will also continue exploring new methods for collecting batteries from Manitoba residents.

**8) Are there modifications to the renewal plan that will impact service providers, collection sites, and/or Stewards of the Call2Recycle program?**

There are no changes in terms of the core of the program; however, Call2Recycle will seek to have even more collaboration with our various stakeholders. We will provide additional support to our collection network and municipalities, and leverage partnerships both locally and nationally.

**9) Does Call2Recycle cover shipping for collection sites?**

Yes, Call2Recycle covers the shipping for all its collection sites. For facilities that do not generate large quantities of batteries we offer a box program that includes a pre-paid shipping label.

**10) What happens to metals from recycled batteries?**

When batteries are recycled at our processors, metals are then recovered and used in new products such as silverware, pots and pans, and new batteries.

**11) What are the main challenges Call2Recycle experiences in running its program in Manitoba?**

A main challenge in running a recycling program in Manitoba is a low population density; there are a few “urban” zones, with the rest of the population spread out in rural and remote locations (i.e. no road access).

**12) How do you plan on working with rural and remote communities to increase recycling?**

The following are some of the tactics that we will employ:

- Providing increased access to collection services
- Educating the public on the battery recycling options for their communities
- Work with First Nations - presentations, workshops, and providing educational materials
- Continue to work with the other Manitoba PROs to provide winter road collection services

**13) How can I become a collection partner?**

The collection program is only available to organizations. If you are an individual interested in recycling batteries, please drop them off at a site nearest you (available on the program website). For organizations, we have a convenient enrollment form located on our website.

**14) Does Call2Recycle work in other provinces?**

Yes. In addition to Manitoba, Call2Recycle provides consumer battery collection programs for the provinces of British Columbia, Saskatchewan, Ontario, Quebec, PEI, and New Brunswick. Call2Recycle also runs a voluntary national battery recycling program with collection sites throughout Canada.