

# Battery Stewardship Program Plan for Yukon

## 2025 - 2030

**Submitted by:**

Jason Brown  
Director, Program and Project Management  
Call2Recycle Canada, Inc.  
2590 Granville Street, Suite 201  
Vancouver, BC V6H 3H1  
[jbrown@call2recycle.ca](mailto:jbrown@call2recycle.ca)  
[www.call2recycle.ca](http://www.call2recycle.ca)

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## Executive Summary

Call2Recycle Canada, Inc., (Call2Recycle) which administers the Recycle Your Batteries, Canada! 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.

For more than 20 years, Call2Recycle has been managing a voluntary consumer battery collection and recycling program in the Yukon. In January 2024, the Government of Yukon approved the Extended Producer Responsibility (EPR) regulation (the Regulation) for hazardous and special products including batteries. The program will focus on steady growth by raising awareness, and through the participation of our dedicated network of collection site operators encouraging their employees, customers, and communities to recycle their batteries.

Call2Recycle has employed a strategic and coordinated national marketing campaign intended to reach consumers who do not recycle their batteries at end of life, or who stockpile large quantities of used batteries without recycling them. Using an integrated marketing approach that employs seasonal awareness campaigns, advertising, social media, retailer engagement, contests, local battery drives and key partnerships, Call2Recycle will encourage battery consumers of all ages to act responsibly by recycling their used batteries.

Continuous improvement is fundamental to the future success of the Call2Recycle program. As such, the program is committed to ongoing research and development to enhance our collection and recycling infrastructure. Performance measures and targets herein will be achieved through raising public awareness, increasing accessibility, leveraging partnerships with producers and collection organizations, transparent operational management, and continued collaboration with the Territory toward our shared goals. Each year, a report will be provided to the Government of Yukon to review activities and performance.

Call2Recycle will continue to investigate and utilize new technologies and go-to-market strategies to advance battery collections and recycling in the Yukon.

## 1. Introduction

Call2Recycle Canada, Inc., which administers the Recycle Your Batteries, Canada! program, is a Canadian not-for-profit battery stewardship organization. For more than 20 years, Call2Recycle has been managing a voluntary consumer battery collection and recycling program in the Yukon. In the territory of Yukon, the *Extended Producer Responsibility (EPR) regulation* sets out requirements obligating producers/stewards of designated materials to participate in a stewardship program. This plan for consumer dry-cell batteries weighing up to and including 5 kilograms is being submitted by Call2Recycle Canada, Inc. In keeping with the request of the Government of Yukon, Call2Recycle Canada, Inc. has developed this five-year battery recycling plan and is submitting it for consideration for the years inclusive of 2025 through 2030.

## 2. Call2Recycle Overview

This Call2Recycle program was established to fulfill the product stewardship obligations for brand holders, importers, and retailers of products, battery manufacturers, and manufacturers whose products contain batteries.

Since 1997, Call2Recycle has operated a battery collection and recycling program across North America, and today works on behalf of battery and product manufacturers, distributors, and retailers. Call2Recycle collects and recycles dry-cell batteries from local governments, businesses, and consumers. Call2Recycle Canada is governed by a Canadian Board of Directors. Since inception, Call2Recycle has diverted more than 46 million kilograms of batteries from the solid waste stream and established over 12,000 collection sites across Canada.

Our network of public and private collection sites, sorters, and processors ensures optimal efficiency, cost-effectiveness, and continued growth along with promoting ease and practicality of the Call2Recycle program. Call2Recycle's national reach minimizes confusion among consumers and reduces administrative red tape and redundancies for larger collection site operators.

To be effective contributors to the circular economy, Call2Recycle routinely adopts best practices gleaned from national and international research to increase collections. Promoting environmental sustainability across the country, Call2Recycle is the first program of its kind to receive the Responsible Recycling Practices Standard (R2) certification.

### 3. Program Details

#### 3.1 Applicable Products

**Batteries included:**

- Rechargeable and primary (single-use) battery chemistries;
- Batteries, regardless of if the battery is supplied as a stand-alone product or embedded in a product<sup>1</sup>;
- Dry-cell batteries, weighing up to and including 5 kilograms each;
- Batteries generated by both consumers and by private businesses or other organizations; and,
- Damaged, defective, and orphaned batteries.

**Battery chemistries included** (See Appendix A: Glossary for detailed definitions):

- |   |                                    |
|---|------------------------------------|
| • Alkaline/Carbon Zinc (AA, AAA, 9V etc.) | • Nickel Zinc (Ni-Zn)              |
| • Lithium Ion (Li-Ion) <sup>2</sup>       | • Silver Oxide                     |
| • Lithium Primary                         | • Small Sealed Lead Acid (SSLA/Pb) |
| • Nickel Cadmium (Ni-Cd)                  | • Zinc Air                         |
| • Nickel Metal Hydride (Ni-MH)            |                                    |

**Batteries sold in or with a product including (but not limited to):**

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

**Excluded Products**

This stewardship plan does not include management of:

- Automotive batteries
- 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 an obligated entity that is not a registered member of the Call2Recycle program. Call2Recycle makes concerted efforts to register all obligated entities with the program to eliminate free rider activity. However, it should be noted that both orphaned and free rider batteries are accepted by our program and are diverted from landfill.

<sup>1</sup> Except when batteries are non-removable (not easily removeable by a consumer).

<sup>2</sup> Including Portable Power Banks.

### 3.2 Collection System

Call2Recycle operates a simple and highly efficient program. Our primary focus is to reduce the amount of batteries that go to landfill. The program is offered to consumers dropping off their batteries at our collection sites and for those signed up as collection site partners. The program is available to all residents of the Yukon including the industrial, commercial, and institutional sectors.

Call2Recycle currently collects from sites located across the Territory. Batteries are shipped and sorted by chemistry, then sent to processing partners where their component parts are extracted for reuse in products such as new batteries, stainless steel alloy, and roadbed aggregate additives.

Call2Recycle's collection partners, known as collection sites, use one of two collection methods: the bulk program or the box program. Collection sites add the collected batteries to an accepted collection receptacle, and terminal protect based on provided guidelines when required. The bulk program caters to sites that generate large quantities of batteries for recycling (250 kg minimum per shipment). The box program is designed for sites 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 sites receive collection boxes at no cost, including bulk box quantities where applicable. The collection box kits include promotional material, plastic bags for battery terminal protection, and pre-paid shipping labels. Plastic bags are also recycled. Each box holds up to 30 kilograms of batteries. Call2Recycle covers the cost of shipping for both the bulk and box programs.

Any retailer, business, institution, or government entity that meets our collection site requirements (listed on our website in the 'become a collection partner' section) can participate as a drop-off location that is open to consumers (public site) or collect batteries used internally (private site). Collection sites are strategically located where they are most likely to be used by consumers. Call2Recycle is also committed to collaborating with other producer appointed EPR agencies, where practical and collection methods align, in order to provide consumer convenience and cost efficiencies. 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, and through recycling/round-up events.
- **Cost-effectiveness** – It is necessary to manage the program's cost-to-serve for continued growth and success.
- **Environmental health and safety** – Call2Recycle will work with companies and other interested entities that want to enroll to promote environmental health and safety through battery recycling, whether as a public or private collection site. This includes those wanting to contribute to the environmental benefits of keeping batteries out of landfills.
- **Association to batteries** – The likelihood that consumers will correlate batteries with the location (e.g. an electronics store or recycling depots).

Public collection locations that are available to Yukon residents are listed on the Recycle Your Batteries, Canada! website. Residents can search by postal code or city and province/territory to find a battery collection location. The locator tool can be found on our website located at [www.recycleyourbatteries.ca](http://www.recycleyourbatteries.ca).

For the duration of the stewardship plan, Call2Recycle will take proactive measures to ensure that battery collection accessibility and convenience in the territory is increased. Residents across the Yukon will be served with a variety of battery recycling options that range from permanent drop-off sites as well as seasonal and event-based recycling. (For strategies see section 4 Communication: Consumer Awareness and Education.)

### 3.3 Consumer Accessibility

Call2Recycle has serviced the Territory of the Yukon for over 20 years with its voluntary collection and recycling program. While coverage in many areas may exceed the 15 kilometers accessibility standard, improvements will be made in the regulated program to increase the number of collection sites and/or collection methods in non-urban communities.

Call2Recycle intends to maintain an accessibility rating wherein over 78% of the population will be within 15 kilometers of a public collection site over the course of the plan period (See section 8 Performance Indicators and Reporting Commitments). Whitehorse, Dawson, and Watson Lake will be included among the serviced communities. Call2Recycle will also report on the accessibility in the territory with the goal of increasing the percentage of population with access to a battery drop-off location or a battery collection event. Accessibility will be improved to meet or exceed targets (see section 8), by establishing collection sites and events in areas with gaps in coverage. Call2Recycle will participate in collection events in communities upon discussion and based on demand, as well as in conjunction with other PROs where practical.

### 3.4 Transportation, Sorting, and Processing

Call2Recycle will continue to use a variety of service providers including those for transportation and sorting. To optimize participation, improve efficiency, and meet or exceed collection targets, Call2Recycle is committed to an open, transparent, and fair process in selecting service providers.

Call2Recycle operates in accordance with intra- and inter-provincial shipping and transportation standards established by Transport Canada, Environment Canada, and any other applicable provincial/territorial environment and transportation approvals. International shipments are manifested/shipped according to Environment Canada and Transport Canada.

Currently there are no sorters operating in the Yukon, therefore, batteries collected through the program in the territory are sorted and consolidated in British Columbia. 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 chemical composition.

Call2Recycle is committed to meeting the highest global standards for safe and effective battery processing. Through the Call2Recycle program, the batteries' constituent parts are reclaimed and diverted from the waste stream. Different battery chemistries require different reclamation methods; therefore, Call2Recycle seeks partnerships with various processors to ensure optimal performance. When possible, Call2Recycle uses local processing partners to help reduce its transportation footprint. All Call2Recycle'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.

### 3.5 Management of Environmental Impacts

The territory abides by the waste management hierarchy in descending order of preference. Call2Recycle encourages producers to manufacture batteries that have high efficiency, are energy-dense, and have a longer lifespan. This reduces the number of units introduced into the market. Additionally, Call2Recycle encourages battery producers to design batteries in a manner that improves reusability and recyclability.

Around 80 percent of the batteries managed by Call2Recycle program are primary batteries, otherwise known as single use. Primary batteries are not reusable or able to be reconditioned or refurbished. Once dropped off for recycling these batteries have typically exhausted their useful life. Primary batteries are often used when it is inappropriate or cost prohibitive to use rechargeable batteries and are often used in times of emergency when recharging batteries may not be possible or practical. The best option along the waste management hierarchy for single-use batteries is recycling, which allows usable materials to be reclaimed during processing and used for other purposes.

Rechargeable batteries constitute the remaining 20 percent of the collected batteries under the program, with the majority being lithium-based batteries. Call2Recycle currently does not endorse the practice of battery refurbishment due to safety concerns and the lack of universal standards and guidelines. Instead, Call2Recycle maintains its emphasis on recycling batteries in a safe and environmentally friendly manner. Call2Recycle is committed to thought leadership on the viability of repurposing rechargeable batteries in a safe and compliant manner and is committed to exploring partnerships opportunities with organizations including but not limited to fire departments, to better understand safety considerations and the viability of the battery reuse and reconditioning market.

Call2Recycle'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. Each processor is continually monitored to ensure competitive pricing and the ability to adapt to volume increases. Call2Recycle also commits to annual reviews of processors to ensure they can demonstrate an ability to adapt to Call2Recycle's program growth and volume increases in recyclable materials.

## 4. Communication: Consumer Awareness and Education

### 4.1 Strategic 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 awareness and battery recycling. Call2Recycle will employ a targeted education and program awareness building campaign. Primarily focusing on Yukon residents, collection network participants (retailers, businesses, and municipalities) will be enlisted to help raise awareness, drive participation, and maximize collections. On a parallel track, Call2Recycle will implement a proactive program to reach key opinion leaders, stakeholders, and media outlets. This will be complemented by an integrated, multi-channel approach through traditional, non-traditional, and digital media, as well as sponsorships and partnerships to efficiently reach the defined target audiences and further battery diversion goals.

While Call2Recycle operates a national program across Canada, it also appreciates the unique characteristics of individual provinces/territories, 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, Call2Recycle will seek to further understand the nuances of the Yukon market. Call2Recycle will augment its national marketing with local/regional marketing, unique to the Yukon territory, including local sponsorships & partnerships, collection site events, thought leadership, and PR activities including press releases and special events.

The program will be evaluated against key metrics, including annual collection results as well as accessibility to the collection network. Based on continued learnings and outcomes, strategies and plans will be adjusted accordingly. These performance metrics (See section 8 Performance Indicators and Reporting Commitments) will be reported in the program's annual report. There is also a dedicated email address at [YukonPlan@call2recycle.ca](mailto:YukonPlan@call2recycle.ca) for stakeholder feedback, which is also promoted on our website.

### 4.2 Objectives

- 1) Educate:** Inform Yukon residents that a free collection and recycling solution exists for consumer batteries and what types of batteries can be recycled.
- 2) Motivate:** Inspire the audience to recognize the role they play — raising awareness of the importance of battery recycling.
- 3) Move to action:** Demonstrate the accessibility of battery drop-off sites, and provide a range of opportunities to find collection locations via online and through partnerships.

## 4.3 Target Audiences

### A. Yukon Residents:

- Local Government
- Consumers (including municipalities)
- Businesses
- First Nations

### B. Collection Network:

- Public Site (collects directly from residents): Municipalities, Communities, Retailers, Solid Waste Facilities, First Nations
- Private Site (internal collections): Businesses, Government

### C. Stakeholders:

- Key Influencers [Local Government, First Nations, Industry/Trade Associations, and Non-government organizations (NGOs)]
- Call2Recycle Members/Obligated Parties
- Media, Experts, Influencers

## 5. Stakeholder Engagement

### 5.1 Stakeholder Feedback

This EPR plan and notice of consultation was posted to Call2Recycle's website on May 17<sup>th</sup>, 2024, with a consultation period ending on July 22<sup>nd</sup>, 2024.

The consultation process engaged a cross-section of program stakeholders, including producers/industry, collection facilities, processors, members, government (First Nation, territorial, and municipal), and associations. Feedback throughout the consultation period was provided via webinar feedback and the dedicated email address at [YukonPlan@call2recycle.ca](mailto:YukonPlan@call2recycle.ca).

A one-hour and fifteen minute consultation webinar was also held, with sufficient advance notice to program stakeholders; 30 minutes was allotted for the presentation and 45 minutes allotted for questions and comments. The stewardship plan and consultation materials 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, to affected stakeholders. Feedback provided during the consultation process is included in a consolidated table, in Appendix C, and is incorporated into the final program plan where applicable.

## 5.2 Advisory Committee

The Regulation requires that interests of Yukon must be represented by way of an advisory committee. In order to provide a platform for all Yukon interests to be addressed, Call2Recycle will establish and chair a local advisory committee with Yukon representation.

The advisory committee will consist of 5-7 advisory committee member seats, with the majority being Yukon residents. Advisory committee participants will be selected by Call2Recycle and will ensure that the interests of program stakeholders are represented, including the following stakeholder groups:

- Yukon Government
- Local Government
- First Nations
- Producers
- Retailers

The advisory committee will be held at a minimum of twice per calendar year, and will serve as a mechanism and a meaningful forum to foster dialogue for stakeholders to provide feedback regarding the program. The committee may also advise on program goals, program development, and opportunities for continuous improvement. Recommendations emerging from the committee will be non-binding but will be used to inform program enhancements.

## 5.3 Ongoing Stakeholder Consultation

Throughout the plan period, Call2Recycle commits to continue to engage with stakeholders. Call2Recycle 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, and in-person meetings with stakeholders at conferences and events. Dedicated to continuous engagement with stakeholders, Call2Recycle also welcomes ongoing input from all involved parties. The designated feedback email address, [YukonPlan@call2recycle.ca](mailto:YukonPlan@call2recycle.ca) is displayed on the Call2Recycle website, which encourages stakeholders to share their feedback at any time.

## 6. Management of Program Costs and Obligated Parties

### 6.1 Obligated Parties

Call2Recycle provides producers written notification of their obligation. Once a producer confirms that they are obligated and appoints Call2Recycle as their designated EPR agency for batteries, the producer must enter into a formal membership agreement with Call2Recycle Canada, Inc., acknowledging that Call2Recycle will manage their obligations under the Regulation.

Call2Recycle will actively pursue obligated parties to participate under the approved program plan and will actively seek to enroll free-riders. Call2Recycle will provide an annual list of compliant stewards in the annual report, or upon request, and will provide a list to the Department of Environment of potentially non-compliant organizations as needed.

## 6.2 Program Funding

The Program is funded by Environmental Handling Fees (EHF), the fee per unit supplied on applicable products that are sold into a regulated province/territory. The EHF is applicable to all supplied batteries in the designated province/territory. There is no cross-subsidization between provinces/territories. The EHF reflects the cost of:

- Collection, transportation, sorting and processing
- Communication and public awareness initiatives
- Program administration
- Audits
- Research and development to increase collections and accessibility

The organization maintains a reserve fund, whose amount is determined by Call2Recycle Canada, Inc.'s Board of Directors. This fund ensures the stability of the current program and any future financial obligations that may arise. Program members are the obligated parties for batteries in the territory and members must remit EHF's to the program. Call2Recycle does not dictate how a producer (retailer, distributors, or others) applies the EHF. A producer may or may not choose to impose the fee onto its consumers - either via charging at point of purchase or building the EHF into the costs of the product. EHF funding will remain in the Program for the purpose of operating the Program. Call2Recycle maintains separate financial records, based on jurisdiction of program. Yukon specific audited financial statements will include EHF revenue and operational costs in Yukon, and will be provided based on the schedule set out in section 8 of this plan.

## 6.3 Collector Compensation

Call2Recycle commits to collecting and paying for the costs associated with managing batteries covered under Call2Recycle's EPR plan. Call2Recycle offers compensation based on comparable rates for similar services from both within this and other jurisdictions. Call2Recycle will review compensation rates every at a minimum of 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 battery category. Review methodology includes collection site interviews and survey data to help inform substantive material changes in the market.

Call2Recycle will provide compensation to public-facing collection facilities collecting batteries in bulk quantities. A bulk quantity is defined as a shipment of more than 250 kilograms of batteries (approximately the weight of one full drum) contained in drums or Call2Recycle-provided containers (e.g., Call2Recycle boxes) consolidated on a pallet. Qualifying collection facilities must enter into an agreement with Call2Recycle to receive compensation. Call2Recycle evaluates existing compensation rates against identified costs using site interviews and survey data to determine fair compensation. The total cost per kilogram is calculated as follows:

$$\frac{(\sum \text{Direct Labour Costs} + \text{Overhead Cost})}{\text{Reported Volume}}$$

## 7. Audits

### 7.1 Facility Audits and Other Certifications

Service partners are and will continue to be qualified by Call2Recycle 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:

- Under the Responsible Recycling (R2) standard, processors are certified every three (3) years, but must go through annual surveillance audits to maintain the certification.
- 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 Call2Recycle program itself also undergoes inspections to maintain industry-recognized certifications, including those listed in Appendix B.

Call2Recycle regularly monitors the landscape to keep abreast of the activities, regulations, and new capabilities within processing facilities both locally and nationally, if available. We also commit to regularly reviewing processors to ensure that they can demonstrate an ability to adapt to Call2Recycle's program growth and volume increases in recyclable materials.

### 7.2 Audits of Members/Obligated Entities

In accordance with the Yukon *Extended Producer Responsibility Regulation's* determination of obligated producers, Call2Recycle audits and inspects the records of its members with respect to products sold in Yukon to verify the accuracy of the remittances of EHF's by the Member to Call2Recycle.

### 7.3 Audit of Financial Information

Call2Recycle will comply with reporting requirements as stipulated by the Government of Yukon. Its consolidated finances will be audited by an independent third-party auditor, and the results will be made public and provided to stakeholders. The audit covers all the organization's operations nation-wide. In accordance with the regulatory requirement, every three years Call2Recycle will provide the audited financial statement for program operations, beginning with the second annual report.

## 8. Performance Indicators and Reporting Commitments

Call2Recycle will meet with the Department of Environment to review the program and discuss performance, and an annual report on the reporting commitments below will be submitted. The report will be publicly available via posting on Call2Recycle’s website. A report specific to the territory will be provided to the Government of Yukon. The report will provide an account of activities in the Territory as it relates to the waste management of batteries, including all reporting requirements, performance, and commitments (limited to consumer outreach and education, and collection performance).

PERFORMANCE METRIC	REPORTING/PERFORMANCE COMMITMENT										
<b>Collection</b>	<ul style="list-style-type: none"> <li>• Number of collection sites</li> <li>• Total weight of batteries collected (single-use and rechargeable categories)</li> <li>• Batteries collected per capita</li> <li>• Target of year-over-year collection volume increases (2023 volume of 3,749 Kg as initial benchmark)</li> <li>• Recovery rates will be reported in the annual reports for 2029 and 2030</li> </ul>										
<b>Accessibility</b>	<ul style="list-style-type: none"> <li>• Percentage of population within 15 kilometers of a Call2Recycle public facing collection site or Call2Recycle partner (accessibility rate)</li> <li>• Target of 78% accessibility rate by the end of the plan period, with the following targets per year: <table border="1" data-bbox="699 1205 1356 1314"> <thead> <tr> <th>2026</th> <th>2027</th> <th>2028</th> <th>2029</th> <th>2030</th> </tr> </thead> <tbody> <tr> <td>74%</td> <td>75%</td> <td>76%</td> <td>77%</td> <td>78%</td> </tr> </tbody> </table> </li> </ul>	2026	2027	2028	2029	2030	74%	75%	76%	77%	78%
2026	2027	2028	2029	2030							
74%	75%	76%	77%	78%							
<b>Financial</b>	<ul style="list-style-type: none"> <li>• Every three years, beginning with the second annual report, an Audited Financial Statement for the Yukon will be provided</li> </ul>										
<b>Stewards</b>	<ul style="list-style-type: none"> <li>• List of all Yukon members of Call2Recycle (following program launch, will be available on the Call2Recycle website and within Annual Reports)</li> </ul>										

## 9. Dispute Resolution

The dispute resolution procedure applies to members and vendors, including transporters, processors, collectors, and sorters. In the event of an issue, 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 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.

Call2Recycle will operate in good faith with its partners and will try to resolve a dispute without arbitration. Arbitration will follow the applicable laws in the Yukon, and only be used if both parties cannot come to a reasonable solution.

## 10. Program Start Date

As specified in the regulation, the launch date of the regulated program will be the later of April 1, 2025, or 6 months after approval of the stewardship plan. Consumer facing advertising regarding the launch will be conducted in the month prior to the official regulated start date.

Call2Recycle has been servicing the Territory of the Yukon for over 20 years with its existing voluntary collection and recycling program. Call2Recycle will continue to use a variety of service providers including those for transportation and sorting. To optimize participation, improve efficiency, and meet or exceed collection targets, Call2Recycle is committed to continuing an open, transparent, and fair process in selecting service providers.

While coverage in many areas may exceed the 15 kilometers accessibility standard, efforts will be made to increase the number of collection sites and/or collection methods in communities. Upon approval of the program plan, all program stakeholders will be informed of the approval, and Call2Recycle will engage in additional integration discussions with interested Yukon municipal governments and First Nations governments, which do not currently collect through the existing program.

### Pre-Launch Timeline

Task	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6
Collection Site Receptacles Provided						
Collection Site Training						
EHFs approved by board of directors						
90-day notice of EHF to Producers						
Consumer Facing Advertising re: Program Introduction						
Program Launch Start Date						

## 11. Appendices

### Appendix A: Glossary

The following is a glossary of key terms and definitions related to the products covered 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 no more than 5 kilograms each.
Carbon Zinc	A type of primary battery.
Damaged or Defective Batteries	Batteries that are not intact or are physically damaged.
Environmental Handling Fee (EHF)	A fee per unit sold that is representative of the cost to collect, handle, transport, and responsibly recycle batteries at the end-of-life.
Extended Producer Responsibility (EPR)	An environmental policy wherein the producer is responsible for the reduction of environmental impacts across the life cycle of the product.
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 used to supply electrical power to electronic devices external to the device.
Primary Battery	A battery that cannot be recharged by the consumer, commonly known as AA, AAA, 9V, D-cell, and button cell batteries. Primary batteries are also known as single-use batteries.
Private Collection Site	A location that actively collects batteries, not open to the public for battery drop-off.
Processing	Manual, mechanical, thermal, or chemical alteration of batteries for the purpose of recycling.
Processor	An entity that engages in end-of-life management of batteries for the purpose of recycling.
Public Collection Site	Drop-off locations that are open to the public, even for a minimum amount of time, for collection of batteries. Includes public-facing collection events.
Rechargeable Battery	A type of battery that is capable of being charged again multiple times after its power has been discharged.
Responsible Recycling Standard or R2	The R2 standard outlines responsible recycling practices for the recycling of electronics globally. The requirements are comprehensive and cover environmental, health and safety, and data security practices. This standard is provided through an accredited third-party to ensure Call2Recycle 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.
Small Sealed Lead Acid	A type of rechargeable battery.
Wet Cell Batteries	A battery containing liquid electrolyte such as sulfuric acid, a dangerous corrosive liquid.
Zinc-air	A type of primary battery.

## Appendix B: Certifications

In an added effort to ensure the highest standards, the Call2Recycle program itself also undergoes inspections to maintain industry-recognized certifications, including those listed below:

- Responsible Recycling (R2) R2V3: This certifies that Call2Recycle's management practices are comprehensive; covering environmental, health and safety, and data security practices.
- International Standardization Organization (ISO) 14001: This certifies Call2Recycle'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.
- Quality Management System (QMS) ISO 9001: This certifies Call2Recycle's Quality Management System that ensures a common-sense approach to the management of the organization to consistently satisfy customers and other stakeholders.

### Appendix C: Stakeholder Consultation Feedback

Question	Call2Recycle Response	Type
The plan outlines that it will take commercial business batteries – does this mean that you will take all batteries outlined in the list from all sources across Yukon even though the regulation does not stipulate that?	Call2Recycle will accept all designated batteries up to and including 5Kg.	<b>Accepted Products</b>
Do you plan to offer bins and signage at our solid waste facilities and municipal solid waste facilities and then do your own collection at those sites?	We provide collection boxes, best practice guides, and signage to solid waste facilities and municipal solid waste facilities which wish to enroll as collection sites. Note that it is not a requirement to become a collection site, and additional collection opportunities will be expanded through retail locations and collection events where practical as well.	<b>Collection Sites</b>
How do you plan to meet the 15km reach for 75% of Yukoners? What communities does this include and will these communities allow you to reach the 75%? If you reach 75% in Whitehorse do you plan to provide service in all communities anyway?	Call2Recycle will be continuing to discuss with communities which wish to collect with us. We will strive to provide collections where practical and serviceable. We have also increased the accessibility target to 78%; it is benchmark to meet, but not a limit.	<b>Accessibility</b>
Because batteries in this program are not able to be refurbished – what happens to them specifically? Where does the recycle part come in?	Batteries are collected through our collection sites and transported to a Call2Recycle sorting facility, where they are sorted by chemistry, and then sent to a processor which can process the batteries and recover materials for use in future products.	<b>Recycling</b>
What type of agreement do you foresee making with YG and Municipal solid waste facilities?	Call2Recycle will be happy to discuss expanding collections where the current voluntary program does not provide collection, and where gaps in coverage exist. Following discussion, and upon agreement to become a collection site, Call2Recycle provides collection boxes, best practice guides, and training materials.	<b>Collection Sites</b>
Is the plan period 5 years therefore it will take you 5 years to gain the 75%?	Call2Recycle strives to reach the accessibility target within the program plan period, and based on consultation feedback has also increased the target to 78% of the population to be within 15km of a collection site. While the accessibility target is a benchmark to meet, it is not a limit.	<b>Accessibility</b>
Can you explain a bit better about how an obligated entity exists and is managed?	The obligated entity/steward corresponds to the definition of determination of steward, specifically 6 (1)(b) in the Yukon Extended Producer	<b>Stewards</b>

	Responsibility Regulation . As of the date of the program plan submission, Stewards are allowed to join a PRO which manages a program. When stewards join a PRO, they become a member, and report/remit EHF's on the sale of obligated batteries to the program through our online portal to cover the costs of operating the program.	
Will C2R be dealing with lead acid batteries under 5kg and integrating batteries over 5Kg at another stage?	Call2Recycle will be accepting all regulated batteries, including small sealed lead acid (SSLA), up to and including those weighing 5Kg. We currently do not have plans to manage batteries over 5Kg, as they are outside the scope of the regulation.	<b>Accepted Products</b>
Will C2R accept objects with an embedded battery, such as toys, tools and vapes, or just the battery itself?	Call2Recycle accepts easily removeable batteries from these devices only.	<b>Accepted Products</b>
Freeriders (p.6) Who are the current freeriders in other jurisdictions and how successful are governments in helping C2R manage them?	The freeriders in jurisdictions are in large part dependent on the definition of producer/steward obligation in the associated regulation. Call2Recycle will refer non-compliant entities to the Department of Environment for follow-up if the entities are nonresponsive.	<b>Stewards</b>
What are Call2Recycle's specific collection site requirements?	The current collection site requirements regarding minimum terminal protection, storage, and shipping can be found on the Call2Recycle website, both for box shipping and bulk shipping. Collection site requirements are subject to change as best practices may change over the duration of the program plan.	<b>Collection Sites</b>
Consumer accessibility (p.7) Over 75% of Yukon residents live in Whitehorse so the initial target can be met without providing access to all other Yukon communities. We feel this should be increased to 100% from year 1.	According to recent population statistic estimates, ~70% of Yukon residents reside in the City of Whitehorse. Sustainable collection network growth is a focus as we launch our regulated program in Yukon. Call2Recycle has increased the targeted accessibility rate to 78% based on feedback during the consultation process. While the accessibility target is a benchmark to meet, it is not a limit.	<b>Accessibility</b>
Who are C2R's processing partners and what is their reporting mechanism?	Call2Recycle has a wide array of processing partners across our programs nationally, and is continuously expanding in scope. Our processing partners provide confirmation of volumes processed through certificates of recycling.	<b>Material Management</b>
We think there needs to be a stronger commitment to the waste management hierarchy stated up front. The disclaimer that	Thank you for your feedback in regard to the waste management hierarchy.	<b>Waste Management Hierarchy</b>

<p>this is hard to achieve for batteries does not lend a great deal of faith in Call2Recycle’s approach. It is akin to saying “don’t set the bar high for us”. We suggest alternate wording such as “we recognize that the battery recycling industry is struggling to keep up with the demands of EPR and not all battery products are currently treated in the manner that we hope to achieve due to supply and demand (and whatever else is holding us back). We have set ambitious goals for ourselves and are supporting growth and improvement in the processing and remanufacturing of batteries in the following ways (xy&amp;z) and will be measuring our own success as per section 8 (see suggested addition to section 8 below).”</p>		
<p>We asked another PRO if they lobby their producers to make better products and they stated that they would be out of a job instantly. How is C2R “encouraging” its producers to make better batteries and what do you see as your service providers’ role in lobbying?</p>	<p>Call2Recycle does this through our touch points and correspondences with producers (including newsletters). We also facilitate connections between interested battery processors and battery manufacturers, promoting the reuse of reclaimed materials from recycled batteries to produce new ones.</p>	<p><b>Product</b></p>
<p>Does reducing #s of batteries produced offset the environmental impacts of increasing energy-density?</p>	<p>Batteries are used in a wide array of use cases, including for health and safety. Our main objective is to divert what producers sell at end-of-life and try to achieve the best possible environmental outcomes on their behalf.</p>	<p><b>Product</b></p>
<p>Why is it hard to determine if battery refurbishers are testing to UL 1642 standards?</p>	<p>Call2Recycle does not currently support these activities due to safety concerns and necessary further exploration of potential. Similarly, there are no official guidelines regarding the refurbishment of other rechargeable batteries. Call2Recycle is committed to thought leadership on the viability of repurposing rechargeable batteries in a safe and compliant manner and is committed to exploring partnership opportunities with organizations such as fire departments to better understand the viability of the battery reuse and reconditioning market.</p>	<p><b>Waste Management Hierarchy</b></p>
<p>What will be involved in the annual review of partners?</p>	<p>Regular reviews are conducted for service providers, and the process is dependent on the type of service they provide. Processors are included in annual reviews, and in regard to</p>	<p><b>Service Providers</b></p>

	capacity, ensures that there is sufficient ability to adapt to potential program growth and volume.	
We keep track of how many hours we pay staff to sort, tape and package batteries per unit and per kg for C2R and are happy to share that and our wage data to help inform a fair price for collection services.	Call2Recycle reviews compensation rates every two years, and collection site interviews and survey data help inform substantive material changes in the market, including variables such as inflation, operation costs, and market trends.	<b>Compensation</b>
We have tried several methods to encourage the public to sort, in order to reduce the effort required of our staff, but none of them have had a significant impact. How are efforts working in other jurisdictions?	Public education and awareness is an important aspect to help encourage and habituate recycling behaviour, and reinforcing ideal habits can take extended periods of time. Call2Recycle, for example, encourages consumer terminal protection in many of our campaigns in this effort. It should be noted that sorting by chemistry is not a program requirement for collection sites.	<b>Public Education</b>
Who will sort all of the batteries collected at transfer stations managed by YG and municipalities?	Batteries collected in the Yukon will be transported to sorting facilities, and these comingled batteries will then be sorted by chemistry, and then shipped based on chemistry to the appropriate processing partners.	<b>Service Providers</b>
What happens to your sealable plastic bags used for terminal protection?	The sealable plastic bags are also recycled.	<b>Material Management</b>
The most important outcome and the point of the regulation is that material collected is reused or recycled. The draft plan measures weight collected and accessibility of collection but not amount processed, amount of residual material landfilled by the processors or amount successfully recycled. We think these should be required metrics for an outcomes based regulation.	Thank you for your feedback. Call2Recycle complies with requirements as set out in the regulation. All obligated batteries as outlined in our accepted battery list (section 3.1) collected in the program are sent to respective processors after being sorted by chemistry.	<b>Material Management</b>
In your July 9th webinar you talked about how much material you have diverted from landfill. Is this statistic obtained at the point of collection, a point in processing after residual material that is landfilled or incinerated, or at some other point in the process?	The diversion from landfill statistic is based on volume of material collected, by weight, confirmed by our sorting partners.	<b>Reporting</b>
Will C2R fund the dispute resolution process if it is needed?	The dispute resolution process will be conducted in accordance with the applicable laws in the jurisdiction.	<b>Service Providers</b>
Will template contracts for collection and processing be available as part of the plan?	Call2Recycle will provide contracts upon discussion with collection and processing partners which meet the requirements of the program, including any applicable due diligence process. Processing partners, for example, require compliance with applicable environmental, health	<b>Contracts</b>

	and safety, and transportation regulations. Bulk collection sites, for example, can receive bulk collection agreements, if they ship quantities of more than 250 kilograms of batteries.	
Call2Recycle reports on revenues from investment income every year. What is C2R invested in?	Investments are made on behalf of program members, and are designed to maintain and grow the reserves to ensure continuity of program operations.	<b>Reporting</b>
Are Environmental Handling Fees allowed to be shown on the receipt at time of purchase?	This is not specified in the regulation, and will be at the discretion of the Steward.	<b>Fee Visibility</b>
How can I become a collection partner?	Call2Recycle is happy to have direct conversations and guide you in the process. You can also apply through our website at <a href="http://www.call2recycle.ca">www.call2recycle.ca</a> , in the collection partner section.	<b>Collection Sites</b>
Are collectors compensated for the batteries that they collect?	Yes, we compensate bulk collectors, which ship more than 250Kg of batteries. Qualifying collection sites must enter into an agreement with Call2Recycle.	<b>Compensation</b>
How does the program select service providers such as transporters and processors?	Service providers are selected through a combination of RFPs, and a review of options based on service offerings and market availability.	<b>Service Providers</b>
Who will be on the Yukon advisory committee and how will committee members be selected?	The advisory committee will consist of 5-7 members. We will be selecting them from stakeholder groups including the department of environment, local government, First Nations, Stewards, Retailers, etc. We will be asking groups to nominate members.	<b>Advisory Committee</b>
Will the audited financial statements be specific to Yukon?	Yes, the program's financial statement will specifically outline EHF revenue and program costs in Yukon.	<b>Reporting</b>



Permit No: 100-01

## Extended Producer Responsibility Stewardship Plan Approval

Issued Pursuant to ss. 2 and 14 of the *Extended Producer Responsibility Regulation*, O.I.C. 2024/19

**Permittee:** Call2Recycle Canada Inc.  
**Mailing Address:** 2590 Granville Street, Suite 201, Vancouver, BC V6H 3H1  
**Authorized Representative:** Jason Brown  
**Phone/Fax:** (604) 283-6196 / (236) 996-9948  
**Email:** jbrown@call2recycle.ca

**Effective Date:** Date of Director's Signature  
**Plan Commencement Date:** **June 24, 2025**  
**Expiry Date:** June 24, 2030

This permit replaces permit #100-01 issued on December 24, 2024.

**Scope of Authorization:** Call2Recycle Canada Inc. is authorized to:

- a) operate an extended producer responsibility stewardship program to collect and recover the designated materials described in Schedule 1, subcategory 13, on behalf of stewards, in accordance with its approved stewardship plan and the terms and conditions of this permit.

Dated this 23<sup>rd</sup> date of January, 2025

A handwritten signature in blue ink, appearing to read "Jennifer Dagg".

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Jennifer Dagg, Director, Environmental Protection and Assessment Branch  
Environment Yukon

## 1. DEFINITIONS

### 1.1. In this permit,

“Act” means the *Environment Act*, R.S.Y. 2002, c. 76, as amended or replaced from time to time;

“approved stewardship plan” means the plan that was submitted by the Permittee entitled “Battery Stewardship Program Plan for Yukon 2025 – 2030” prepared by “Call2Recycle Canada Inc.”

“associated personnel” means all employees, contractors, subcontractors and volunteers involved in the permitted activities;

“Branch” means the Environmental Protection and Assessment Branch of the Department of Environment;

“collection rate” means the weight of assigned designated materials collected divided by the weight of designated materials supplied to end users in Yukon, expressed as a percentage;

“collection target” means a metric in the approved stewardship plan to inform the performance of plan;

“Director” means the Director of the Branch;

“Manager” means the Manager of Standards and Approvals in the Branch;

“operator” in relation to a stewardship program, means (a) the steward that is operating the program, or (b) the producer responsibility organization that is operating the program on behalf of one or more stewards;

“producer responsibility organization” means a person who has entered into an agreement with a steward in accordance with subsection 8(3) of the Regulation;

“Regulation” means the *Extended Producer Responsibility Regulations*, O.I.C. 2024/19, as amended from time to time and as applicable;

“steward” means a person determined to be a steward in accordance with section 6 of the Regulation;

“stewardship program” means a program for the collection and recovery of assigned designated materials operated under an approved stewardship plan.

### 1.2. Any term not defined in this permit that is defined in the Act or the Regulation has the same meaning as in the Act or the Regulation.

## **2. APPROVED STEWARDSHIP PLAN**

- 2.1 The stewardship plan submitted by the Permittee is approved, subject to the terms and conditions included in this Permit.
- 2.2 The Permittee must operate its stewardship program in accordance with its approved stewardship plan and the terms and conditions of this Permit.

## **3. GENERAL**

- 3.1. Subject to this Permit, the Permittee is authorized to:
- a) Operated an extended producer responsibility program to collect and recover the designated materials described in Schedule 1, subcategory 13, on behalf of stewards, in accordance with its approved stewardship plan and the terms and conditions of this permit.
- 3.2. Nothing in this Permit limits the applicability of any other law or bylaw.
- 3.3. The Permittee shall start operations described in the approved stewardship plan no later than June 24, 2025.
- 3.4. The Permittee must provide, at a minimum:
- a) Collection services as described in the approved stewardship plan.
- 3.5. The Permittee must aim to meet a minimum accessibility target of 78% by the year 2030.
- 3.6. For the first 3 years of this permit, the Permittee shall aim to meet a targeted collection volume of 3,749 kg per year, increasing year over year.
- 3.7. The permittee shall submit a recovery rate for the year 2029 to the Branch in writing by July 1, 2030.
- 3.8. The Permittee must submit a proposed targeted collection rate for the 2030 calendar year to the Branch in writing no later than July 1, 2030.
- 3.9. The permittee shall ensure that all associated personnel:
- a) are aware of the terms and conditions of this permit;

- b) are aware of the approved stewardship plan; and
- c) receive the appropriate training for the purposes of carrying out the requirements of this Permit.

3.10. Where conflicts exist between this Permit and the approved stewardship plan, the terms of this Permit shall prevail.

3.11. A Permittee may request that this Permit be renewed and that the approval of the approved stewardship plan be renewed by submitting a request in writing to the Manager no later than 120 days before the expiry of this Permit. The request must comply with s. 15 of the Regulation.

#### **4. REPORTING AND RECORD KEEPING**

4.1. The Permittee must submit annual reports and audit reports as required in s. 17 of the Regulation.

4.2. If requested by the Director in writing, the Permittee must provide audited statements to the Director as outlined in s. 18 of the Regulation within 90 days of the request.

4.3. The Permittee must keep all records required as specified in s.20 of the Regulation and provide the records to the Manager upon request.

4.4. The Permittee must keep a list of all stewards represented under the plan, and provide the list to the Branch quarterly or at any time, immediately, upon the request of the Manager or Director.

4.5. Reports required under this Permit or the Regulation must be submitted in writing to the Director at [envprot@yukon.ca](mailto:envprot@yukon.ca)

#### **5. Specific Terms and Conditions**

5.1. The Permittee must operate in accordance with the approved stewardship plan with the following changes:

- a) Provide an updated list of stewards who will be represented by the Permittee to the Branch quarterly after the effective date (December 24, 2024).

- b) Provide the updated targeted collection rate to the Branch in writing by July 1, 2030, that will be applied to the calendar year of 2030. This may be provided in the 2029 Annual report.