

February 17, 2026

Call2Recycle BC Extended Producer Responsibility Program Plan for Batteries

BCPlan@Call2Recycle.ca

Feedback on the Draft Plan

Dear Mr. Zenobio,

Thank you for the opportunity to comment on the draft plan. Zero Waste BC is a non-profit association dedicated to driving systemic change towards Zero Waste in BC. Zero Waste is the conservation of all resources by means of responsible production, consumption, reuse, and recovery of products, packaging, and materials without burning and with no discharges to land, water, or air that threaten the environment or human health. Our current resource consumption systems of linear take-make-waste not only create waste but also generate a huge amount of greenhouse gases which constitute some of the discharges that threaten the environment and human health. EPR programs can play a key role in changing these consumption systems. For more information on Zero Waste, please see the Zero Waste Hierarchy.¹

We are pleased that BC has regulated these products and that this EPR program is now renewing its plan and expanding to include vapes and e-cigarettes. We submit these comments in hope that the program will show leadership in the realm of EPR to move it beyond mere recycling to actually changing the nature of the products and how the service is delivered, as envisioned in the Canadian Council of Ministers of Environment Canada-wide Action Plan for EPR.

Please see our comments by section below:

Section 3. Appointment of an Extended Producer Responsibility Agency

A Board with industry representatives from across Canada is an efficient system for many aspects of governance but the program lacks a mechanism that is BC-specific looking at both the level of service offered in BC and the achievement of environmental outcomes. We recommend the creation of a committee with a wide range of stakeholders including reuse and repair organizations, recyclers, local governments of varying sizes and locations, First Nations communities and environmental NGOs. This committee should be empowered to effect change for the BC program. There should be a commitment to engage with the BC Product Stewardship Council (BCPSC) and the Indigenous Zero Waste Technical Advisory Group (IZWTAG). We support the Ministry's expectation in the previous Plan Approval letter that the program make extensive efforts towards informing Indigenous communities (including IZWTAG)

¹ Zero Waste Hierarchy: <https://zerowastecanada.ca/zero-waste-hierarchy/>.

of the program and impacts. There should be meaningful changes based on the feedback of the committee, BCPSC and IZW TAG.

The communications with producers is a sound start but should be increased and expanded to actively work to drive design change and ensure the correct contacts within the producer companies are reached (i.e. those that can change design, marketing and packaging rather than solely government relations or accounting departments).

The plan is also clear on what is communicated to existing members, but is not sufficient in terms of how the program is ensuring that all battery producers are part of the program (or another program).

Section 4. Products Covered under the EPR Plan

The list of accepted products is suitable. Given that other programs also collect batteries (though note Telus may now be under the EPRA program), the plan should outline how the programs will work together to ensure fairness for stewards, for communities and in handling orphan products. The requirement for a more explicit list of initiatives was set out in the [2024 plan approval letter](#) as well as reporting annually on progress, and completion, of collaboration initiatives with other programs that overlap with this program and we support this.

We appreciate that orphaned and free rider batteries are accepted but efforts should be made to quantify this and identify the free riders.

Section 5. Stakeholder Consultation

We recommend that the webinars are recorded and made available during the consultation period for those who were not able to attend even with the multiple different time slots. We also suggest that the notification for the webinars be sent out sooner (as of January 13th, no webinars were noted on the website for the BC program) in order to maximize participation.

We also appreciate the intention to conduct surveys every two years of the program participants (unclear how this is defined -producers or also consumers and collectors? we recommend all of them) and to the commitment to engage with BCPSC annually, the Retail Council as well as other groups upon request. However, it is unclear if these actions which were part of the last plan as well have ever taken place as there is not record or results of these meetings shown on the [BC webpage](#). We request that the results of survey and other engagement are made transparent by showing the survey results and meeting minutes for actions taken each year.

Section 6 Collection System and Consumer Accessibility

6.1 Collection System

The key factor that will improve Call2Recycle's effectiveness is that collection sites need to be adequately compensated, particularly for local government or non-profit locations, otherwise the program is being subsidized by taxpayers and other EPR programs. This is especially

important as there has been an increase in fires caused by batteries resulting in some collection locations providing additional oversight of the battery collection which takes additional staff time. For convenience - the program also needs to ensure that compensation considers the need to be open an adequate number of hours to be seen as a viable collection site and the payment needs to be enough to ensure these collection sites are viable and do not need to be subsidized by local governments nor the collection sites themselves. For accessibility (or consumer access), there needs to be a collection location in every community and also each First Nation community that would like one. Association to batteries is one aspect but link to recycling should also be added. Cost-effectiveness is not a key to where service should be offered but instead what kind of service (curbside, depot, pick up or fully paid mailback) is provided. Where no sites exist and if Call2Recycle cannot contract with one, the program should deliver the service themselves (either by setting up a depot or providing the no-fee pick up service).

The plan notes that “Call2Recycle is committed to picking up full collection receptacles across the province within five (5) business days of a scheduled pick-up”. It is unclear what this means but we support that Call2Recycle will pick up a full collection container within 5 business days of the request.

Product Pathways Not Directly Managed by the EPR program

Rather than committing to 4 campaigns annually, a better metric is that Call2Recycle will increase campaign intensity until 95% of BC residents know the safe and proper recycling method for batteries, as measured through the annual awareness studies (though the survey questions should be standardized and vetted by Ministry staff to ensure accurate results). We recommend that Call2Recycle should support all waste composition studies that local governments are conducting (whether through SABC or not). Study and audit results should be made public each year on the program website.

6.2 Consumer Accessibility

We are pleased that the program does not use the SABC accessibility standard but feel that 95% of British Columbians residing within 15 km of a collection facility may not be the right target. Programs should provide service in all municipalities and if no service provider can be contracted, the program itself should set up the collection depot or provide a mailback system at no cost to the person sending it. The program should work with the BC Product Stewardship Council and the Indigenous Zero Waste Technical Advisory Group to determine the underserved communities.² The target for coverage should be that 100% of the total population has access to curbside collection, a collection depot, or a free mailback service. Collection events should only ever be a one-time stop gap measure to provide service in an unserved community (where the program should be offering service by the following year) or in addition to existing service as part of awareness raising for multiple product streams. Collection events should not be used to calculate consumer accessibility -only permanent public options should be used for these

² Product Care’s work with IZW TAG is commendable and should continue and expand.

calculations. There should be a list of collection events and their purpose provided each year to help flag gaps in service. Due to the issue of active and inactive sites, the program should conduct a secret shopper initiative to understand the experience of a consumer trying to recycle their batteries and improve the quality of the experience as well as check for incorrect information.

6.3 Collection Targets and Recovery Rates

A good program needs sound data. This is even more important when there is more than one program collecting similar product types. The program should track collection of products by unit (which negates the weight issue) and compensate the collectors for this. In this way, the programs will have a more accurate sense of its collection rate. The collectors should also note the brand so that it can be determined if the competing programs are fairly sharing the costs. Producer reporting should also include weights of the models sold and lifespans so that future data analysis can use that to assess capture rate. Surveys can help to better assess consumer behaviour in use of rechargeables, purchase habits, and hoarding habits. Collaboration with other existing and upcoming programs is essential to fully understand the degree to which batteries are captured.

The 75% target should be the minimum with steady increases after that, especially for a program that has been in existence for as long as this one. The program should move to recovery rate based on units instead of weights.

We fully support the curbside collection of batteries as a separate stream but there must be full compensation to collectors for these costs (i.e. no subsidies required from local governments or haulers).

6.4 Performance Targets and Reporting Commitments

As noted, the target should be for 100% of communities in BC having access to curbside collection, a collection site or free mailback service.

The Recovery Rate of 75% should be the goal for 2029 and then it should escalate 5% a year until it reaches 95%.

Another measure that may be useful is the convenience of accessing depots. The 2018 BC survey noted that 50% of residents found recycling household batteries very convenient and another 35% found it somewhat convenient.³ A target to raise this number as well as an annual survey to measure it would be useful. The survey also noted that up to 41% of respondents may throw household batteries in the garbage, the third highest after Styrofoam and lighting products. When asked why these household batteries may have been thrown in the garbage,

³ BC Ministry of Environment and Climate Change Strategy (2018). Consumer Awareness Survey of Extended Producer Responsibility Programs in BC. Accessed at https://www2.gov.bc.ca/assets/gov/environment/waste-management/recycling/recycle/rel-res/consumer_awareness_survey_of_epr_2017.pdf.

25% did not know the item was recyclable, 29% did not know where to take it and a significant 15% said there was nowhere to take it or no way to get it there. This shows some key areas that this program plan should work to excel at and that this program needs to go beyond what has happened to date for household batteries.

Reporting commitments

As noted a transition to also recording collection by units and transparency around survey and waste audit data is recommended.

The programs should encourage the use of reusable batteries as part of the Reuse portion of its plan.

Another measure for programs is where the depots are located. Programs usually note Regional district and municipality but the program should also provide a list of First Nation communities with permanent depots so it is clear which ones have or do not have service.

Section 7 Consumer Awareness

We appreciate the communications strategies included in the plan but given that the program will be relying on the same methods as it has used to communicate about recycling batteries, the low awareness for a product that has had an EPR program for years is concerning. Only 86% of the BC residents (2024 Annual Report) were aware of the program and only 44% recycled all their batteries (7% decline since 2020). The goal should be to get 95% (not 88%) of the population aware of the program by 2030 (and later 100%). The behaviour target should be much higher to achieve the necessary collection rates. To do otherwise is to continue to externalize costs to the public and the environment. The program could also pursue disposal bans with local governments to ensure consumers do the right thing but also that they are aware that throwing these products away is not appropriate.

The use of the annual survey is good. Testing audiences should be done after new campaigns to determine if they were effective or if they should be adjusted. If the program does not meet the high bar for awareness, then the budgets should be adjusted to address the key barriers to better performance. We recommend that Call2Recycle commits to reporting on how data and results from studies will be and are used to inform efforts to improve consumer awareness and recovery rates.

Also note that many EPR programs do not have, or do not have easily accessible, materials in languages other than English that address different users of their program. Any residents who do not speak English are not able to easily participate in the programs. Based on the 2016 Census, 15% of BC Households speak a non-Official language at home, so would need EPR materials and information to be translated into a different language to be aware of a program (let alone participate). This is especially important for the more consumer/resident focused programs such as this one.

Reporting commitments should be to publish any reports on the behaviour and perspectives of consumers.

Section 8 Management of Program Costs

8.1 Program Funding and Reserves

The program should plan to develop differential fees based on certain criteria such as lifespan, use of easy to recycle materials, ease of replacing barriers, ease of repair, etc. to drive product design change as intended by the Canadian Council of Ministers of Environment. There could be a waived or discounted fee for rechargeable batteries to encourage reuse over single use. The fees should also be set at a high level to ensure the program has good data on collection rates, provides a comprehensive collection network, rapidly increases awareness and fulfills the mandate for redesign, reduction (longer lifespans), and reuse.

Fees should not be based on actual costs to collect and manage but what would be needed to meet all targets including its 95% recovery target. In this way, the program would have funds to rapidly scale up actions if the recovery target is not met. To only base costs on what is collected continues to reward the program and its producers for underperforming.

8.2 Collector Compensation

The commitment to compensate collectors is a major step forward, however it is important that the 250 kg threshold is not a barrier to collection in smaller communities. It is also important to note that activity-based costing misses the fact that depots need to have sufficient opening hours in order for it to be seen as convenient by consumers. Being open for these hours represents a cost to the collector. It is also essential that the program pay its fair share of all of the costs the collector may have including capital, staff training, and insurance costs so we are pleased to see some of these costs start to be factored in (table page 17).

Question: what is meant by or included in “Employer Costs Building” in table on page 17?

We appreciate the ongoing commitment to review this and to participate in the province-wide study. The studies should be made public once they are completed.

Section 9 Management of Environmental Impacts

Per the 2024 Approval Letter, Call2Recycle was obligated to conduct a study of end-fates of products not directly managed by the program with a Terms of Reference due in January 2025. We did not see this mentioned in the plan. Call2Recycle should summarize the results in this plan or commit to reporting in the upcoming annual report how this end-fate study will inform management of environmental impacts and improvement of recovery rates.

9.1 Pollution Prevention Hierarchy

The objective of the program should be two-fold - one is to provide an effective collection and recycling program. The other is “as a means to provide clear signals to producers that Canadians want improved environmental performance of products and better product design with reduced use of toxic materials, enhanced recyclability, increased use of recycled materials, reduced life-cycle energy and materials consumption and reduced greenhouse gas emissions.”⁴ It is unclear that the program is trying to take any active role in working towards the second CCME objective. We appreciate the efforts made to reduce the environmental footprint of the direct program operations but feel this misses the bigger aim of EPR. As noted above, we feel the program should have a key role in redesign, reduction and reuse as well as recycling. With its close ties to producers, the program should be well positioned to support products that have lower environmental footprints thorough differential or eco-modulated fees.

The program notes that primary batteries are used when rechargeables may not be suitable but offers no research to support this claim. The program should conduct a study into this and then actively work to support consumers switching to rechargeables where possible (with a target set for this after the study is completed). In addition, can there be research conducted to support longer lifespans for primary batteries so they are less resource intense? There could be a fee structure to support their use over shorter-lived batteries.

9.2 Downstream Process and Program Certification and Permits

We appreciate Call2Recycle’s plan to certify and audit downstream collectors to ensure responsible recycling. To improve transparency in reporting, Call2Recycle should provide the names of downstream collectors and processors.

The targets by battery type provides useful information but there should be transparency in the annual reports to provide full details of where materials flow and what gets recycled, downcycled or disposed (burned or landfilled) as well as where the challenges arise for recycling more of the material. Use of materials for energy should not be accepted as responsible handling.

9.3 Safety

The move to safer forms of containers is appreciated given the increase in fires.

9.4 Performance Monitoring and Reporting Commitments

See 9.2 above.

In addition, the program should report on the GHG impact of the program.

Section 10 Dispute Resolution

The equity of this system needs to be restored. Depots have very little clout. Service providers cannot take a PRO to arbitration. It’s too expensive and takes too long. They risk going bankrupt

⁴ Canadian Council of Ministers of the Environment (2009). Canada-wide Action Plan for Extended Producer Responsibility. https://ccme.ca/en/res/cap-epr_e.pdf

or losing market access. The monopsonies (PROs) are 'too big to fail'. Many contracts can be cancelled if a depot files a dispute because there is a reputation clause. Some PROs use their monopsony power to silence its service providers with a threat of ending market access. Programs should make their contracts public and there should be no clauses that restrict a depot's ability to dispute an issue. There is a model for dispute with power imbalances for First Nations model and this model should be adapted
<https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/environmental-assessments/environmental-assessment-process/guidance-materials/indigenous-nation-guidance/dispute-resolution>.

Conclusion

The program plan should provide significant advances needed to reach the potential of EPR programs as envisioned in the CCME plan. We hope that this information is helpful in crafting the renewed plan.

Sincerely,
Sue Maxwell
On behalf of Zero Waste BC