

October 18, 2024

Honorable Andrea Khanjin
Ministry of Environment, Conservation and Parks
5th Floor, 777 Bay Street
Toronto, Ontario M7A 2J3

Re: Call2Recycle's Response to Proposed Amendments to the Batteries Regulation in Ontario

Dear Minister Khanjin,

On behalf of Call2Recycle and our Ontario members/producers who represent approximately 95% of the province's battery industry, I am pleased to submit comments on proposed amendments to the Batteries Regulation (O. Reg. 30/20), under the Resource Recovery and Circular Economy Act, 2016.

In terms of our history and operations, Call2Recycle was founded as a nonprofit in 1997 and is Canada's leading battery recycling organization across seven regulated provinces. For the past 27 years, we have recycled over 50 million kilograms of batteries. On behalf of more than 400 members across Canada, we run an efficient program that safely diverts batteries from landfills through an extensive collection network, across a wide range of batteries including household, e-mobility, Electric Vehicles (EVs), and shortly vape devices.

We recognize the draft amendments intend to increase flexibility, reduce administrative burden, and simplify compliance requirements for battery producers. While there are some positives within the proposed amendments that are currently under consultation, unfortunately, they will not solve the core issues that currently exist within Ontario's battery recycling system.

The Ministry has an opportunity to fix the core issues with the Batteries Regulation. In this submission, we provide an overview of proposed regulatory amendments that will strengthen the regulations and bring them in line with other leading jurisdictions. If these changes are not made, we believe the following issues will continue to persist:

1. **Continued industry disruptions:** for all stakeholders including producers, PROs, processors, the Regulator (RPRA), and the Ministry, as a result of operating under Regulations that do not reflect market realities and are overly burdensome. The regulations and enforcement of them are causing disruptions that are becoming more problematic, prevalent, and public as evidenced by recent media attention. These disruptions can be resolved by making the recommended changes to the Batteries Regulation, which will provide the industry with more clarity and requirements that are outcomes-based.
2. **Increased costs to consumers:** if the core issues detailed in our submission are not addressed, the recycling cost to Ontario consumers will continue to rise, and we expect this increase could be between 42% and 50% in the short term, with additional increases required in the long term. This is particularly concerning given the current affordability challenges that Ontarians are facing. Producers are spending a considerable amount of time and resources (in a small materials category) to navigate the complexities of the Batteries Regulation, which impacts the costs of batteries on the shelves. This is not a good outcome for Ontarians who rely on batteries for many of their needs and not something producers or PROs want to see happen.

3. **Ontario's regulations are an outlier when compared to other provinces and globally:** Ontario's system is one of the most expensive in the world and among the most complicated. Allowing the private sector to do what it does best requires us to have realistic targets, a system that is consistent with other leading jurisdictions (in Canada and globally), and one that allows for innovation. Ontario's battery recycling regulations are an outlier compared to other jurisdictions in Canada and internationally, and without further amendments to the regulations, costs will significantly rise and burden Ontario consumers. As a result of complex compliance requirements and rising costs, producers may be compelled to exit the province due to inefficient regulations. This is something we have already started to see and does not align with this government's goal of strengthening Ontario's economy.

It is our objective to strengthen the regulations so that Ontarians are not paying more than is necessary to recycle their batteries, help the province meet its recycling objectives, and provide a regulatory system that is clear and simpler to navigate for producers. To that end, we highly recommend that the Ministry considers the following changes to the Batteries Regulation:

1. **Recycling Efficiency Rate (RER) and Resources Recovered:** this requirement should be fully removed for **producers** by amending section 16 (1) of the Batteries Regulation. As an alternative, delink the RER from the management requirement, by moving towards a collection target system. **Please see Appendix A for details.**
2. **Single-use and rechargeable batteries should be combined into one collection target:** Ontario is one of the only provinces in Canada, and one of the only jurisdictions globally that splits collection/management target/requirement into single-use and rechargeable categories. Streamlining this area of the regulation will provide more flexibility for producers while enabling a greater ability to reach collection/management targets/requirements. **Please see Appendix B for details.**
3. **Collection/management targets/requirements need to be readjusted:** While we appreciate that the Ministry has extended 2024's collection/management target/requirement of 45% to 2029, performance data from other more mature jurisdictions validates our experience with the timeframe required for fulsome consumer adoption of battery recycling practices. As such, collection/management targets/requirements need to be adjusted. **Please see Appendix C for details.**
4. **The effective date of the regulation changes should be from the 2023 performance year and onwards:** We have been proactively advocating for these changes to the battery recycling regulations in Ontario since 2023. We hope that through this consultation period, the Ministry will consider the above three proposed amendments and put them into effect retroactively for the 2023 performance year and onwards. Given the good-faith efforts of producers to call out concerns with the regulations and provide input on how they may be improved, we ask that flexibility be granted when it comes to enforcement action. With the regulations still being refined with the input of industry and other stakeholders, we believe that producers should not be unfairly penalized.
5. **Record-keeping requirements for large transactions should remain in place:** Given that there is a current market gap in total collected volume versus collection/management targets, it is recommended that no amendment be made to the record-keeping requirement. If the record-keeping requirement is amended

as per the published plan language document, we believe that it may incentivize out-of-province volume entering Ontario.

6. **Proposed changes in other resource categories that warrant the attention of the battery program:** Should MECP expand Electrical and Electronic Equipment (EEE) product categories, it is strongly recommended that MECP place both the Original Equipment Manufacturer (OEM) and replacement/aftermarket batteries (if applicable) under the Batteries category. **Please see Appendix D for details.**

I would like to take this opportunity to thank you again for considering Call2Recycle's feedback on the proposed amendments to the regulations. By increasing efficiencies within the regulations, producers can increase efforts aimed at public participation in battery returns with simplified consumer calls to action, and thereby focus on environmental outcomes while keeping costs down for consumers.

Sincerely,



Michael Partab
Chief Financial Officer

cc:

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ONTARIO RECYCLING EFFICIENCY RATE (RER) AND RESOURCES RECOVERED SUMMARY

Recommendations

- The intention of removing the RER requirement for processors is to reduce the burden for processors and increase the number of processors PROs can work with. However, keeping the RER requirement for producers will ultimately further negatively impact producers and PROs that will lead to escalating costs to Ontario consumers.
- Alternatively, de-link RER/resources recovered from the calculation of management/collection requirements but still require reporting.
- [British Columbia](#) takes this approach requiring producers/PROs to report on collection targets and RER separately.
- See British Columbia annual report [here](#), page 7 for Recycling Efficiency Rate reporting.
- If RER was removed for producers towards management requirements (along with the other 2 recommended changes), there is an opportunity to:
 - Continue to have visibility to RER %s by battery chemistry (following the BC model) and oversight on resources recovered.
 - Prevent less red tape, allowing producers, PROs and other stakeholders to focus and reinvest in (i) public education and (ii) battery safety which is a significant issue for consumers, municipalities and waste service workers/facilities.
 - Prevent unnecessary increasing cost burden to Ontario consumers amongst record inflation.
 - Creating better conditions for businesses, bringing regulations in line with other leading jurisdictions and;
 - Higher likelihood of industry achieving targets which is good for all with better environmental outcomes.

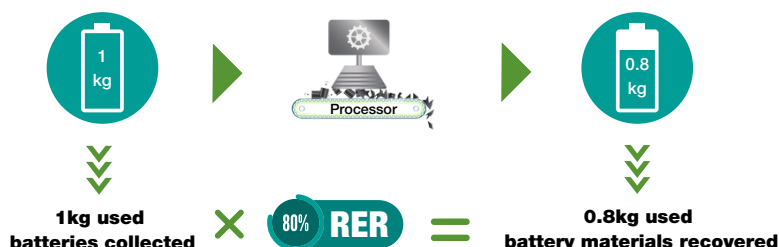
What is Recycling Efficiency Rate (RER) and its link to Resources Recovered?

- Recycling Efficiency Rate, or RER, is a measure of the percentage of battery materials that are recovered from the recycling process.
- It is [calculated](#) by comparing the weight of materials recovered relative to the original weight of those batteries.
- The formula for RER is required in order to calculate resources recovered.

If this is removed from processors, producers cannot compute this for reporting purposes and as Dillon states, [during RPRA's public consultation](#), on page 16, "RER verification represents a high cost and resource burden...".

- There is no generally accepted alternative methodology in the battery material management category to calculate resources recovered outside of the RER.

Illustration of RER and Resources Recovered Calculations



What is the current situation in the proposed 45-day consultation changes to the Ontario *Batteries Regulation*?

- RER and resources recovery requirements is removed for processors (ref. Section 16 (3) of the Batteries Regulation), but not for Producers, as section 16 (1) of the batteries regulation was not explicitly removed.
- Ontario is an outlier in the way it calculates its Management Target.
- The targets of every provincial program in Canada are based on the total weight of material collected.
- This is also the case for the 27 member countries in the European Union (EU).
- Ontario is the only jurisdiction that does not count 1 kg of collected batteries as 1 kg towards the management/collection target.
- In other words, approx. 20%-30% of the weight of batteries collected cannot be counted towards the achievement of collection/management targets.

What is the impact of keeping RER towards the Management Target in Ontario regulations?

Summary:

- Removing the RER or at minimum, de-linking RER/resources recovered from the calculation of management targets would still enable the Regulator and MECP to ensure materials continue to be efficiently managed and ensure a high yield of resource recovery.
- British Columbia takes this approach requiring RER reporting by battery chemistry but is not tied to the calculation of targets. BC's model allows producers to meet targets and allows the government to monitor the efficiency of resources recovered.
- Furthermore, the Regulator, industry experts and processors have been undergoing [consultations](#) since March 2023 to effectively calculate and administer RER reporting. The consultation has been paused and the Regulator has even moved to [suspend](#) RER reporting requirements for processors.
- As such, by now proposing to shift the RER burden to producers (and hence resources recovered), the Ministry will be further exacerbating the burden and complexity for producers that the industry is already faced with for RER reporting. The expectation for producers to add time, resources and costs to determine this will ultimately increase costs to Ontario consumers and divert focus and investment away from initiatives to increase awareness, drive collection rates and enhance safety.

Impact to Industry:

- The inclusion of RER for producers significantly increases the total aggregate collection requirements, without any added environmental benefits and makes a theoretical 100% target a mathematical impossibility.
- The inclusion of RER artificially deflates performance outcomes and in so doing, skews Ontario's performance and adds related burdensome processes, relative to other jurisdictions across the globe.
- Furthermore, if the RER requirement is removed for processors only, and not producers, then this also creates a paradoxical situation in which producers may be technically unable to report RER and resources recovered, as producers are dependent on processors for this information.

- As stated in the [RPRA Public Consultation on RER Calculation](#) (slide 16), "RER verification represents a high cost and resource burden....". Should this burden be placed on producers, the administrative burden and resource burden associated costs would continue to rise and negatively impact Ontario consumers.

Impact to Ontario consumers:

- Ontario is already one of the most expensive battery collection systems in the world and across Canada.
- If the RER is not removed for producers (along with the other 2 recommended changes), then the estimated aggregate administrative penalties for the battery program over 2023-2028 could be between \$40MM to \$45MM (failure to achieve single-use targets). This would increase the recycling cost to Ontario consumers by 42% to 50% in the short term, with potential further increases in the future.
- The expectation for producers to add time, resources and costs to determine this will ultimately increase costs to Ontario consumers and divert focus and investment away from increasing awareness, collections and enhancing safety.

SINGLE-USE AND RECHARGEABLE REPORTING CATEGORIES SUMMARY

Recommendations

- Feedback received takes the position that other stakeholders that represent large market share opposes the combination of categories. Call2Recycle represents ~95%+ market share of battery producers in Ontario and highly recommends combining single-use and rechargeable reporting categories into one collection/management requirement.
- There is precedent, pages 22 and 23 of the Plain Language Description of Proposed Regulatory Amendments, MECP proposes to remove reporting requirements for replacement parts from ITT/AV equipment.
- Part of MECP's rationale for this proposal is to "reduce administrative burden for producers of replacement parts for ITT/AV equipment".
- The same should be applied to the batteries category for the following reasons:
 - In aggregate, single-use batteries account for ~80% of sales into the market and total collection volume with the rechargeable category representing ~20% of sales into the market and total collection volume. Feedback received takes the position that should the categories be combined, producers and PROs may be able to "over collect" in the rechargeable category to meet management requirements. The reality is, given the 80/20 split and the other safeguards outlined below, this would not be possible.
 - Furthermore, Ontario (and Quebec) is the only province or territory in Canada that separates reporting for single-use and rechargeable categories. Feedback received takes the position that continuing to report separately is easy (i.e., data from sorters and processors report as such), however this is not the case in business operations and execution. Harmonization to other provinces is highly recommended including reporting requirements. Lack of harmonization and any small difference in reporting creates unnecessary complexity and added time and resources that could be invested into public education, safety and collecting more batteries.
 - Over-indexing on SSLA batteries would not be possible with large, heavy SSLA car batteries since this category exceeds the 5 kg weight threshold and falls outside of the scope of the Batteries regulation.
 - Safeguards are in place to ensure over-indexing does not take place given collection audits are required every 3 years.
 - Across Canada, SSLA (under 5 kg) accounts for a modest ~7% of total collection volume (reference year 2022).
 - Streamlining this area of the regulation would provide more flexibility for producers to allow for more investment in public education and safety, while enabling a greater ability to reach management/collection targets.
 - Accelerate the timeframe for the achievement of a 50% collection target by 4 years (2026 vs. 2030), with the removal of RER and combination of single-use and rechargeable categories into one collection/management requirement (see table on page 2).

What is the current situation in the proposed 45-day consultation changes to the Ontario *Batteries Regulation*?

- The recommendation to combine single-use and rechargeable batteries into one collection/management reporting requirement was not included in the proposed changes.
- Ontario is one of the only provinces in Canada, and one of the only jurisdictions globally that splits collection/management targets into single-use and rechargeable categories.
- For information, rechargeable battery chemistries include batteries under 5 kilograms of (i) lithium-ion (ii) small sealed-lead-acid (SSLA) (iii) nickel metal hydride (iv) nickel cadmium and (v) nickel zinc.
- The reality is that there are more lithium-ion and SSLA-powered devices being sold into the marketplace that pose the greatest safety risk to people and property.
- Over the last 27 years, rechargeable batteries have accounted for ~20% of the 50 million kgs of batteries collected and recycled through Call2Recycle, and SSLA under 5 kgs in particular only ~7% of total collection volume.
- In other words, SSLA plays a relatively minor role in the volume available for collection (based on sales-into-the-market).
- Additionally, the Batteries regulation explicitly safeguards against the collection of large format SSLA batteries weighing more than 5 kgs (example car batteries), as per Section 1 (b).
- Finally, when consumers return used batteries to collection sites, they do not delineate between single-use and rechargeable chemistries.

What is the impact of continuing to separate single-use and rechargeable battery categories for collection/management requirements?

- Ontario's regulation will continue to be an outlier. The reporting separation of single-use and rechargeable categories is another example of added, unnecessary complexity that leads to additional costs to the system and consumers with no greater environmental outcomes.
- The added costs and complexity of keeping these categories separated impede the ability to accelerate collections in both categories, and hinder valuable time and resources to invest in long-term public education and safety efforts that would make Ontario a leader in this regard.

Collections - Actual and Forecast

Summary: 50% achievement 4 years earlier in year 2026 (vs. 2030) with the removal/de-linking of RER and single-use and rechargeable categories combined.

Details	2022 Actual	2023 Actual	2024 Forecast	2025 Forecast	2026 Forecast
Current Regulatory Targets	40%	40%	45%	50%	50%
Realistic Collection Rate Achievable	23%	31%	37%	41%	47%
Recommended Collection Targets	40%	30%	40%	40%	50%
Recommendation	Period Closed	Target to be adjusted	Target to be adjusted	Target to be adjusted	No adjustment

*Note: All calculations assume a) RER removal from management requirements and b) combination of primary and rechargeable battery categories.

COLLECTION/MANAGEMENT TARGET ADJUSTMENT SUMMARY

Recommendations

- It is recommended that collections/management requirements be adjusted to allow for sustainable growth as per our forecast (see table on page 2).
- If the Ministry must choose between a) combining primary and rechargeable categories OR b) adjusting management targets, it is **strongly recommended to choose the combination of primary and rechargeable categories along with removing RER (or de-linking from the calculation of management requirements).** Both changes are highly recommended.
- Implementing this change would substantially benefit the system, create better conditions for businesses in Ontario, improve environmental outcomes and protect against escalating costs for Ontario consumers.
- As an alternative to adjusting targets, the Ministry and RPRA should avoid penalization (non-compliance orders and penalties) of producers for 2023 and 2024 given the longstanding, required changes needed of the existing regulations. There is an urgent need for industry, producers and PROs to divert resources and significantly invest in public education of battery recycling and safety awareness given the frequency and high-profile safety incidents at risk to people and property¹, positioning Ontario as a leader in battery safety.

What is the current situation in the proposed 45-day consultation changes to the Ontario *Batteries Regulation*?

- As opposed to adjusting targets, the Ministry extended 2024's collection/management target (45%) to 2029, before increasing targets to 50% from 2030 onwards.
- While the 5% effective reduction is appreciated, producers cannot collectively achieve a 45% collection/management target until approx. 2026.
- As communicated, if the Ministry had to choose between a) combining primary and rechargeable categories OR b) adjusting management targets, it is strongly recommended to choose the combination of primary and rechargeable categories along with removing RER (or de-linking from the calculation of management requirements). Both changes are highly recommended. This would substantially benefit the system, improve environmental outcomes and minimize escalating costs for Ontario consumers.

What is the impact of no further target reductions/holds or electing to amend the targets vs. combining single-use and rechargeable battery categories for collection/management requirements?

- This is a pivotal and significant change needed to allow producers to achieve management targets or at minimum, choose to combine single-use and rechargeable categories along with removing RER (or de-linking from the calculation of management requirements) and leave proposed targets as is.

¹ [Lockdown lifted for residents near Port of Montreal after lithium battery fire | CBC News](#)

- There is precedent, page 19 of the Plain Language Description of Proposed Regulatory Amendments, MECP proposes to reduce the collection/performance targets for the Tires program by -20% (from 85% down to 65% for 2025-2029).
- It would seem that the Ministry is open to amending targets for other categories and this should apply to Batteries in the spirit of fairness and a level playing field.
- In doing so, this would avoid significant, aggregate administrative penalties for the battery program over 2023-2028 estimated to be between \$40MM to \$45MM (failure to achieve single-use targets).
- If no further changes were made, this would:
 - Further hamper the development of the Ontario battery recycling ecosystem.
 - Further increase the recycling cost to Ontario consumers by 42% to 50% in the short term, with potential further increases in the future.
 - Result in no added, positive environmental outcomes.

Collections - Actual and Forecast

if Resources Recovered is de-linked from Collection Targets and combination of single-use and rechargeable categories (recommended)

Details	2022 Actual	2023 Actual	2024 Forecast	2025 Forecast	2026 Forecast
Current Regulatory Targets	40%	40%	45%	50%	50%
Realistic Collection Rate Achievable	23%	31%	37%	41%	47%
Recommended Collection Targets	40%	30%	40%	40%	50%
Recommendation	Period Closed	Target to be adjusted	Target to be adjusted	Target to be adjusted	No adjustment

*Note: All calculations assume a) RER removal from management requirements and b) combination of primary and rechargeable battery categories.

Collections - Actual and Forecast

if Resources Recovered is NOT de-linked from Collection Targets and NO combination of single-use and rechargeable categories (NOT recommended)

Table 1.0: Single-Use

Details (Single-Use)	2022 Actual	2023 Actual	2024 Forecast	2025 Forecast	2026 Forecast
Current Regulatory Targets	40%	40%	45%	50%	50%
Realistic Diversion Rate Achievable	11%	21%	27%	31%	36%
Recommended Diversion Targets	40%	20%	25%	30%	35%
Recommendation	Period Closed	Target to be adjusted	Target to be adjusted	Target to be adjusted	Target to be adjusted

Table 2.0: Rechargeable

Details (Rechargeable)	2022 Actual	2023 Actual	2024 Forecast	2025 Forecast	2026 Forecast
Current Diversion Regulatory Targets	40%	40%	45%	50%	50%
Realistic Diversion Rate Achievable	54%	49%	51%	50%	52%
Recommended Diversion Targets	40%	40%	45%	50%	50%
Recommendation	Period Closed	No adjustment	No adjustment	No adjustment	No adjustment

*Note: All calculations assume no changes to the proposed regulations (RER remains in place for producers towards management requirements and separate single-use and rechargeable categories).

PROPOSED CHANGES IN OTHER RESOURCE CATEGORIES THAT WARRANT THE ATTENTION OF THE BATTERY PROGRAM

Recommendations

- Should MECP expand Electrical and Electronic Equipment (EEE) product categories, it is strongly recommended that MECP place both the Original Equipment Manufacturer (OEM) and replacement/aftermarket batteries (if applicable) under the Batteries category.
- MECP should consider the following battery-powered devices to expand under the Batteries regulation:
 - E-Transport devices (e-Bikes, e-Scooters, e-Skateboards and Hoverboards);
 - E-Cigarettes or Vape devices;
 - Batteries sold with or in products (i.e., e-toys, portable flashlights, smoke alarms, power tools, etc.).
- The batteries contained in these product categories are the most complex, hazardous and pose the biggest safety and environmental risk to people and property.
- Call2Recycle has been actively working with most Producer Members in the above categories, providing a safe and convenient end-of-life solution.
- In doing so, we can position Call2Recycle and MECP as leaders in battery safety, harmonize Ontario recycling regulations with other provinces where possible, alongside other stakeholders we are actively working with who have a role to play on this issue.
- It is critical to recognize that what may work from one product category and their obligated producers may not be applicable to another product category. Programs and the products that they manage may differ, and regulations must be flexible to allow for variation.

What is the current situation in the proposed 45-day consultation changes to the Ontario Batteries Regulation?

- The Ministry is requesting feedback on expanding Electrical and Electronic Equipment (EEE) product categories, particularly with a focus on reducing fire hazards (Ref. MECP Proposal, consult on expanding categories of regulated EEE, item 5, page 26).
- The Ministry will collect initial information and feedback from stakeholders, and then there will be additional consultation opportunities.

What is the impact of adding product categories to the EEE category vs. the Batteries category?

- Certain product types are already covered by Call2Recycle in other Canadian provinces (regulated and voluntary basis) such as (i) e-Bikes, e-Scooters, e-Skateboards and Hoverboards and (ii) e-cigarettes or vape devices.
- **Of all the components in these product categories, the batteries have the greatest environmental impact. Most battery-powered devices use lithium-ion, nickel-cadmium, or nickel-metal hydride batteries—rechargeable chemistries that pose as the largest environmental and safety risks.**

- Call2Recycle is the leader in battery safety and with our expertise over the last 27 years across a wide range of battery categories – household, micromobility (e-bikes), and Electric Vehicles (EVs) – see below for a subset list of stakeholder groups Call2Recycle is already actively working with on a best-in-class safety and recycling solution (regulated or voluntary).

Who is Call2Recycle actively working with to lead in battery safety and management?

- **Global Battery Recycling Organizations**
 - [Bebat](#) (Belgium), [Stibat](#) (Netherlands), [Eucobat](#) (Europe), and Call2Recycle USA among others.
 - Call2Recycle Canada recently [joined EUCOBAT](#) as one of its first non-EU associated member.
- **Leading Safety Organizations**
 - [Canadian Association of Fire Chiefs](#) (CAFC), UL's [Fire Safety Research Institute](#) (FSRI), the [National Fire Protection Association](#) (NFPA) among others.
- **Government Stakeholders**
 - All other provincial Ministries of the Environment, Ontario Ministry of the Solicitor General (SOLGEN), over 300 municipalities across Canada, among others.
- **Industry Expertise**
 - Our Board of Directors mirrors the diverse battery ecosystem we operate in. With leaders from top organizations and associations—including Panasonic, Energizer, Live to Play Sports, General Motors Canada, Canadian Tire, and the Canadian Automobile Dealers Association—we are well-positioned to address the complexities of battery management across all sectors.
- **EV Sector**
 - Call2Recycle was selected by a consortium of auto manufacturers (16) to launch [EVBatteryRecovery.ca](#), the first service of its kind in North America. Over 20 auto manufacturers also selected Call2Recycle as their service provider to manage the safe transportation for remanufacturing, repurposing or recycling EV batteries.
 - Leveraging our established relationships with most leading EV auto manufacturers and key industry organizations ([Canadian Vehicle Manufacturers' Association](#), [Global Automakers Canada](#)), we contribute thought leadership through publications like [Guidance: EV Battery Safe Handling and Storage](#) and [Electric Vehicle Battery Management at End-of-Vehicle Life](#).
 - Auto Manufacturers (in alphabetical order):

1. BMW	2. Ford	3. General Motors	4. Honda	5. Hyundai
a. BMW b. Mini	a. Ford b. Lincoln	a. Buick b. Cadillac c. Chevrolet d. GMC	a. Acura b. Honda	a. Genesis b. Hyundai
6. Kia	7. Lion Electrique	8. Mazda	9. Mercedes-Benz	10. Mitsubishi
a. Kia	a. Lion	a. Mazda	a. Mercedes-Benz b. smart	a. Mitsubishi
11. Nissan	12. Stellantis	13. Subaru	14. Tesla	15. Toyota
a. Infiniti b. Nissan	a. Alfa Romeo b. Chrysler c. Didge d. Fiat	a. Subaru	a. Tesla	a. Lexus b. Toyota
16. Volkswagen	a. Audi b. Volkswagen	e. Jeep f. RAM		

- **E-cigarette/Vape Sector**

- Call2Recycle has been working diligently with RECYC-QUÉBEC, Santé Québec (Health), the Ministry, and e-cigarette producers to develop and launch a Recycle Your Vapes solution in the province of Quebec, effective January 1, 2025.
- Call2Recycle is working with three of the largest e-cigarette/vape producer members (representing ~40% market share) offering a solution in the province of Quebec (and potentially other provinces in the future) for e-cigarettes, safely diverting products containing batteries, plastics, and other materials from landfill.
- This industry-supported, dedicated program will launch on January 1, 2025 in the province of Quebec to solve an environmental issue and provide a safe, funded, and structured end-of-life solution.
- Call2Recycle Quebec Vape Members (in alphabetical order):
 - [British American Tobacco](#)
 - [Rothmans, Benson & Hedges Inc.](#)
 - [Japan Tobacco Inc.](#)

- **Batteries sold with or in products (i.e., e-toys, portable flashlights, smoke alarms, power tools, etc.)**

- Call2Recycle has been actively working with the majority of producer members in the above categories in most other Canadian provinces and territories.
- This includes major producer members such as Amazon, Apple, Belkin, Bose, Canon, Dell, Fastenal, Garmin, GoPro, Grainger, Hilti, Hypertec, IBM, Lego, Lenovo, Mattel, Milwaukee, Motorola, Newell, Snap-On, StandardPro, Stanley Black & Decker, Stihl, Sony, among many others.

- **E-Transport (e-Bikes, e-Scooters, e-Skateboards, Hoverboards)**

- E-Transport batteries are rechargeable lithium batteries that power electric bikes, scooters, skateboards, and hoverboards. When batteries are at the end of their useful life, they can and should be recycled responsibly.
- Call2Recycle has been actively administering a program for the last several years on behalf of obligated producers in provinces where end-of-life battery recycling is mandated under regulations.
- In provinces where regulations are not in place, Call2Recycle offers a program on behalf of producers who opt in voluntarily to ensure the products they place into the markets are collected and responsibly recycled.
- Call2Recycle not only has an established program across Canada that educates consumers and retailers on the safe handling of e-bike and e-scooter batteries, but we have also designed specialized receptacles to safely store and transport these batteries, including those that are damaged or defective.
- Most recently, in the province of British Columbia, the regulations were amended (2022) to require producers of e-transport products to establish a program to ensure such products are recycled responsibly, in their entirety, at the end of their useful life.
- On July 15, 2024, Call2Recycle Canada's BC Extended Producer Responsibility Plan for E-Transport Products was [approved](#) by the Ministry of Environment and Climate Change Strategy.
- E-Transport Members (in alphabetical order):

Bike Co LLC	Cycles Devinci
Cycles Lambert Inc./HLC	EuCan Distribution Inc
Gazelle USA, LLC	Giant Bicycle Canada Inc.
Kona Bicycle Company Inc.	Live to Play Sports Group Inc.
Marin Bikes Canada	Mica Sport Canada Inc.
Outdoor Gear Canada (OPUS)	Rocky Mountain Bikes, Div. of Industries RAD Inc. (Procycle)
Specialized Bicycle Components Canada	Trek Bicycle Canada ULC
Velec Inc.	Voltage Bikes Ltd (Pedego Canada)
Yeti Cycling LLC	