



VIRTUAL LUNCH AND LEARN SERIES: THE ROLE OF PRODUCER RESPONSIBILITY ORGANIZATIONS (PROS) IN EPR

JANUARY 10, 2024

PRO QUESTIONS AND ANSWERS:

When does the collection system that producers are responsible for paying officially begin?

- Collection begins April 1, 2025, for HSP and for PPP Phase 1.

The regulation states October 31st, 2027, for producer material management requirements, what does that mean?

- The material management target, for producer compliance purposes, is set for October 2027. This means that when producers submit their annual reports in 2028 for the preceding year, they must demonstrate their fulfillment of the material management target as of October 31, 2027.

Do the PROs (Producer Responsibility Organization) have community information available to them?

When can we expect to be contacted to negotiate a contract?

- Yes, community information has been shared by ARMA (Alberta Recycling Management Authority) with registered PROs.
- Call2Recycle: We are reaching out to all communities, but if you are ready to review and discuss, please contact us directly, and we would be happy to engage. You can reach out to me at: jchung@call2recycle.ca
- Circular Materials: (we are a registered PRO (Producer Responsibility Organization) for paper and packaging). We are reaching out to communities that have registered through the ARMA portal now. If you have not heard from us, please reach out to us at: ABoperations@circularmaterials.ca
- Product Care: Once a community has registered with ARMA, the Product Care team will reach out to the community.

How often do you foresee collections, especially in remote rural areas? Do you plan to have "set" collection times for those that register with you?

- Call2Recycle: Speaking specifically of batteries, our model includes a pre-paid collection box that is picked up by Purolator. As the boxes become full, you can arrange for pickup, and a new box will be shipped out. Our new innovative "Smart Container" units will operate on a model of scheduled pickups based on the fill status of the container. Each unit will have sensors that tell us its fill level and we will arrange for pickup accordingly. If you would like to discuss this further, please contact: jchung@call2recycle.ca

- Circular Materials: We are meeting with all registered communities to understand current collection times and operations and will follow the guidelines as set out in the Alberta Extended Producer Responsibility (EPR) Regulation. As the province transitions to EPR, we are committed to ensuring a seamless transition for communities and residents.
- Product Care: The regulation sets out the requirements for a common collection system for HSP but does not mandate “set collection times.” Product Care believes that the communities know what hours of service best suit their residents’ needs and would be willing to work with those hours, subject to ARMA bylaws, if applicable.

What education for glass collection do you have? With several types, glass can be tricky to collect (This question is specific to the PPP PRO).

- Circular Materials: Following the meeting with our operations team, our marketing and communications team will also be reaching out to schedule a meeting to learn about each community’s promotion and education initiatives. The purpose of these meetings is to learn about resident communications, opportunities, and challenges. As the materials list and collection details are being developed, we will engage collaboratively to develop a robust communications plan that is targeted to all residents in Alberta and will ensure that glass collection is identified as a key item. Our goal is to support a seamless transition to EPR for communities and residents.

With a collection of these products with existing depots, who covers the transportation costs, especially for remote rural locations?

- Call2Recycle: Call2Recycle will cover all the material and transportation costs. More specifically, we cover the cost of collection boxes, and pickup and shipping of collected materials including drums (usually via Purolator) to our downstream processing facilities. Communities will NOT have to incur any costs for collection.
- Circular Materials: We are reviewing the data submitted through ARMA and are meeting with registered communities across Alberta to identify and verify current collection program details including depot and transportation costs. We will then continue to meet with all stakeholders to review financial program costs. We will provide more details as we move into more contractual meetings starting in April/May.
- Product Care: Product Care intends to work with the communities’ existing HHW service providers and the community for the coordination of service and will be responsible for the transportation costs associated with the transportation of collected obligated HSP products.

For the Community that continues to want to provide services, do the PROs negotiate directly with communities who are interested, or will they need to respond to an RFQ?

- Call2Recycle: We do not require an RFQ process and are more than happy to negotiate directly with each community.
- Circular Materials: We are meeting with each community to review options that have been set out in the Alberta EPR Regulation. For communities interested in continuing to provide services,



starting in April/May, we will schedule a meeting to review next steps and initiate contract discussions.

- Product Care: Product Care intends to discuss and work with each community individually, as not all communities operate their HHW programs the same way or are in the same stage of setting up or providing HSP services.

What is included in the verification plans that PROs need to submit? Do they need to have contracts with communities in place by Apr 1, 2024, for service beginning in Apr 2025?

- Verification plans requirements are outlined in Section 12 and 11 of the bylaws for PPP and HSP.

How are you going to cooperate with other PPP PROs on the market? How will PROs work together?

- Call2Recycle: As in other provinces, where collection events and/or activities can be conducted together, we will continue to work with other PROs. Many locations will have multiple collection tools for all regulated product categories.
- Circular Materials: Any collaboration with other PROs would be stipulated in an agreement with these other organizations. In our only other experience in a multi-PRO-environment, Circular Materials has been the system administrator as well as the PRO and responsible for making all arrangements with collectors on behalf of the common collection system.
- Product Care: Where synergies exist and it is practical to do so, Product Care will try to collaborate with PPP PROs or other PROs to co-locate collection services. Due to the hazardous nature of Hazardous and Special Products, the collection of Hazardous and Special Products has additional regulatory constraints that PPP may not have, that may limit the ability for co-location of collection services.

If a community has an existing service provider with an agreement in place beyond April 1, 2025, how will that be handled?

- Call2Recycle: We are willing to explore working with any service provider to continue existing programs for the collection of batteries. This can be discussed as needed with each community.
- Circular Materials: We will engage directly with the community to understand the contractual obligations during our discovery meetings to determine next steps. We are committed to working collaboratively and minimizing disruption during transition, which may include bridge agreements where applicable.
- Product Care: Product Care has been in discussions with current HHW services providers about the Product Care HSP program. Product Care intends to work with the communities and their contracted service providers through the transition period with the goal of minimizing disruption to the current system, subject to agreement by the community and their service provider.

We are a municipality, how much space would we need in our recycling depot to set up to start accepting HSP?

- Call2Recycle: For batteries, you should ideally have one pallet space available to allow for 3-4 drums.
- Product Care: There are several variables and factors that impact the amount of space a collection site may need for the collection of HSP. These details will be discussed with communities individually after they have completed their background information form.

Are the weights in the size restrictions the weight of the product collected or the original capacity of the container?

- Call2Recycle: These refer to weights of the collected product (batteries).
- Product Care: For HSP, the size restriction is based on the original container capacity.

One question that communities often get asked by those who are recycling these products is "where do they go or end up"?

- Call2Recycle: What happens to batteries after being collected for recycling depends entirely on their chemistry. Here is a simple “Life of a Recycled Battery” flowchart for here, but we are happy to provide greater details.
 - Batteries are collected from pickup points.
 - They are sent to a sorter who goes through the loads to separate by chemistry – Alkaline vs. Lithium vs. Nickel-Cadmium (NiCad) vs. Nickel Metal Hydride... and, unfortunately, any garbage that often finds its way into a collection bin.
 - Once sorted, the batteries get sent to different downstream processing facilities. Lithium, NiCad, Nickel Metal Hydride would go to a processor that can handle this (for AB it will likely go to Trail, BC). Alkaline (your everyday household battery) would go to a different processor that can handle this chemistry (for AB it will be Delta, BC).
 - Once it arrives at its respective processor, they will be shredded and then via different technology, will have the material separated and a dark powdery “black mass” is created which includes all the chemicals that were in the battery.
 - This black mass can be reused for the production of new batteries.
 - Non-minerals from this separation process go to the production of other products, including mixing with asphalt, for example, and plastics going to yet other products that require plastics.
 - Through this process up to 95% of a battery can be recycled.
 - Note: for rechargeable batteries, precious minerals like lithium, cobalt, and manganese are particularly important commodities.
- Product Care: For HSP products, the collected HSP will go to a hazardous waste management company for treatment, processing, or disposal. The management options will depend on the hazard class of the material and available options. Some materials may be sent to a downstream hazardous waste management company for future treatment/processing/disposal.

Our community currently has higher than regulated service frequency, what will happen when I switch?

- Call2Recycle: We can work with your existing service provider, if available, or work with our own. We do not operate our own network of fleet pickups and will contract out.
- Circular Materials: We are meeting with all registered communities to understand current collection times and operations and will follow the guidelines as set out in the Alberta Extended Producer Responsibility (EPR) Regulation. As the province transitions to EPR, we are committed to ensuring a seamless transition for communities and residents. This may include retaining the current collection service frequency or adjusting to meet the guidelines. Any changes will be followed by a targeted promotion and education plan that educates residents to minimize confusion and disruption.
- Product Care: We do not intend to reduce the service level unless the community chooses to do so.

Our municipality wants a higher level of service than what is regulated, is that possible?

- Call2Recycle: We can support communities by working with your existing service provider or coordinating with our contracted service providers.
- Circular Materials: We are meeting with all registered communities to understand current collection service schedules and program operations. As we engage with stakeholders, we will build a full understanding of current program costs. Once complete, we will evaluate if a higher level of service than what is required by the regulation can be considered.
- Product Care: Our initial focus will be to get the collection system set up and to ensure compliance with the regulatory requirements, following which we would be happy to have discussions with communities that wish to increase service levels in their community.

How will you ensure residents know what is expected of them?

- Call2Recycle: We spend millions of dollars each year on public education and awareness campaigns. In communities across the country that we already partner with we provide regular communications, support local events through sponsorship that allows us the opportunity to message, and via any platform that is available to the community. We will continue to invest in marketing communications.
- Circular Materials: Our marketing and communications team will be reaching out to communities to learn about each community's promotion and education initiatives. The purpose of these meetings is to learn about resident communications, opportunities, and challenges. Our communications team will then build out a strategic communications plan to educate residents to ensure minimal disruption and a seamless transition to EPR. Details on these plans will be shared and coordinated with communities well before implementation.
- Product Care: We will engage in a rigorous public education and outreach component as part of the program. Many communities already have a public education program for HHW and Product Care will seek collaboration with communities on public education and outreach.

Will you contract with registered communities as your collection provider?



- Call2Recycle: We would very much appreciate the opportunity to work with each one of you as collection partners.
- Circular Materials: We will engage directly with the community to understand the contractual obligations during our discovery meetings to determine next steps. We are committed to working collaboratively and minimizing disruption during transition. This could result in a contract with the community, or with the service provider directly.
- Product Care: We will be partnering and contracting with registered communities to provide collection services.

Will you use a community's existing depots?

- Call2Recycle: We would use existing depots and augment them with additional collection points, where possible.
- Circular Materials: In our discovery meetings with registered communities, we will identify and verify current collection program details including depot locations and operations. Once we understand each community's operations, we will be in a better position to determine whether there is an opportunity to work with existing depot locations.
- Product Care: We intend to partner with registered communities to utilize the existing collection network.

What happens to a community's existing contracts with service providers?

- Call2Recycle: We can explore working with your existing service provider or help coordinate with others. Ideally contract renewals would occur after aligning with Call2Recycle. This will be up to each community's contracts and how you would like to proceed.
- Circular Materials: We will engage directly with the community to understand the contractual obligations during our discovery meetings to determine next steps. We are committed to working collaboratively and minimizing disruption during transition. This may include Circular Materials entering into a contractual agreement with the community (and the community maintaining its agreement with service providers) or Circular Materials contracting with the service providers directly.
- Product Care: This will depend on several variables such as the terms within the contract, what changes, if any, the community wants to make, whether your service provider is amendable to modifications and what arrangement the community has with Product Care. This will require a discussion with all three parties together (the communities, contracted service providers, Product Care).

What does a community do if they have a contract with a service provider that expires before April 1, 2025?

- Call2Recycle: We can explore working with your existing service provider or help coordinate with others. Ideally contract renewals would occur after aligning with Call2Recycle. This will be up to each community's contracts and how you would like to proceed.

- Circular Materials: We will engage directly with the community to understand the contractual obligations during our discovery meetings to determine next steps. We recommend communities in this situation contact Circular Materials to set up a discovery meeting as soon as possible. We are committed to working collaboratively and minimizing disruption during transition and may discuss extensions or bridge agreements where applicable.
- Product Care: We recommend the community connect with Product Care to have discussions prior to issuing an RFP or signing a new service agreement.

A community uses our depots for other material collection (tires, electronics, paint, used oil), how will that work operationally?

- Call2Recycle: Depending on your existing service provider, the approach can be flexible. This collection setup can continue, and we can either pick up directly or get the batteries downstream after they are picked up. We can also put together new programs where the synergy of the products collected can work (i.e., Electronics and batteries usually align, but tires would not). We can review these details with each community specifically.
- Circular Materials: In our discovery meetings with registered communities, we will identify and verify current collection program details including depot locations and operations. Once we have a detailed understanding of each community's operations, we will be in a better position to determine potential opportunities to work with existing depot locations.
- Product Care: Our focus is on the collection of HSP and not on the other materials that a community may or may not collect. If there are synergies with HSP and the other products, Product Care is willing to have discussions on opportunities for collaboration with the other programs.

ARMA QUESTIONS AND ANSWERS:

Do municipalities sign up, or does the Community's service provider sign up?

- Communities are required to register; however, communities can delegate their authority to a third party. Once the community has registered or the third party has written and formal approval to act on behalf of a community, PROs will engage with them through the contact information received from ARMA to determine the next steps.

How many Blue Box PROs are being considered in Alberta? There is currently one (1) PRO for each waste stream. Will there be more? Do you expect there will be other competing PROs beyond these three here today that could be stepping forward anytime soon?

- A PRO that can meet the Regulatory requirements to operate in Alberta will be able to apply to register. It is an open market, and the Regulation does not place a limit on the number of PROs that can do business in Alberta. Registered PROs are listed on ARMA's website at <https://www.albertarecycling.ca/pros/>.



When will the lists of specific accepted materials be circulated to registered communities? Is bear spray included in this program?

- ARMA is currently working on the HSP Material Guidelines document. Once this is released, it will clarify many specific product questions. Please continue to visit ARMA's website for information updates.

If a larger municipality has registered by Dec 31st, do the smaller municipalities (towns within) need to register as well, or can they be included under our registration? We currently operate as one with the larger municipality being the managing partner.

- If the smaller communities are not noted within the registration form, please contact ARMA with the details. We can still consider the smaller communities within if that is the intent.

Will mattresses/lighting/batteries 5kg and over (such as EV batteries and automotive batteries) be added to EPR in Alberta and have PROs?

- Mattresses, lighting, EV batteries and automotive batteries are not material streams currently under the scope of the EPR Regulation. Any material stream additions to the EPR Regulation would be the purview of the Ministry of Environment and Protected Areas.

Are certified compostable materials exempt from fees? In the regulation, there is a mention of "downcycling" and that no more than 15% of material management requirements can be achieved through downcycling which has a definition that includes composting. What does this mean?

- Materials that meet the designated materials definition are subject to requirements as set out in the EPR framework, including producers' obligations for reporting, collecting, and managing that material and the related costs. There are no exceptions for compostable materials (e.g., take-out container made from compostable paper still falls under the paper category of PPP).
- The material management requirements in the regulation set out targets that producers need to meet for different designated material streams. Downcycling, under which composting is defined in the regulatory definition, is an acceptable method of managing materials, but there is a cap of up to 15% to encourage the use of other recycling options.

Do products need to be in original containers?

- For HSP materials, the regulation references the federal Consumer Chemicals and Containers Regulation hazard symbols on the container label, as the criteria for defining obligated HSP products. By default, containers of HSP must be in their original container.