



Recharging the planet. Recycling your batteries.™

June 25, 2013

Mr. Mark Moroukian, Chief
Product Stewardship and Waste Reduction Section, Division of Materials Management
New York State Department of Environmental Conservation
Bureau of Waste Reduction & Recycling, 9th Floor
625 Broadway
Albany, NY 12233-7253

Dear Mark,

Thank you for reviewing Call2Recycle's re-submitted "Rechargeable Battery Collection, Transportation and Recycling Plan". Per your most recent response letter, below please find the explanations or actions taken to address each of the issues outlined:

- **Change in "Number of Active Sites" from original submission:** During the Plan review process, our definition of what constitutes an "active" collection site changed. When our plan was submitted, an "active" collection site was defined as a site which had enrolled in our program. That was changed to a site that has enrolled within the last 12 months or one that has sent batteries in for recycling for the last 12 months. This caused the number of "active" collection sites to decrease from the original submission.
- **Retail Poster.** The poster that will be provided to retailers is appendix 2 and reflects the specific requirements of the statute.
- **Basel Action Network's "e-Steward" Certification:** Call2Recycle® manages its downstream vendors in accordance with the guidelines outlined for "e-Steward" certification, which are the most stringent in the industry. Additionally, these guidelines serve as our "floor" for compliance purposes. We verify all vendor activity with internal and 3rd party audits, as well as maintaining detailed documentation for compliant transportation and final disposition.
- **Validity of Numbers:** The numbers in Section 6 differ from our original plan submission to be in line with the most accurate data available.
- **Inconsistent Language between the Law and our Plan:** The third bullet of Section 8 has been edited to exclude batteries using the exact definition of the NY State law. Please find this change in the attached revised plan.
- **Annual Report Form:** Section 12 has been edited to reflect the completion and submission of the annual report form issued by the NY State DEC. Please find this change in the attached revised Plan.

Thank you for your attention in this matter and we look forward to receiving final approval of our Plan. If you have additional questions or require specific clarification on an issue, please contact Todd Ellis at (678) 218-1086.

Best Regards,

Carl E. Smith, LEED® AP
CEO & President

cc: Todd Ellis, Call2Recycle, Inc.
Vimal Minocha, NY Department of Environmental Conservation
George Kerchner, Executive Director, PRBA – The Rechargeable Battery Association



A Rechargeable Battery Collection and Recycling Plan for the State of New York

Submitted to New York State Department of Environmental Conservation (DEC)

By:

Call2Recycle Inc.*

May 2013

**RECHARGEABLE BATTERY RECYCLING CORPORATION OFFICIALLY CHANGED ITS NAME TO CALL2RECYCLE® INC. ON JANUARY 1, 2013.*

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PLEASE NOTE: THE PLAN AND APPENDIX CAN BE FOUND AT WWW.CALL2RECYCLE.ORG/NEWYORK.

RECHARGEABLE BATTERY PRODUCT STEWARDSHIP PLAN

1.0 EXECUTIVE SUMMARY

This plan has been developed by Call2Recycle® pursuant of Article 27 Title 18 of the Environmental Conservation Law (“Act”) of the state of New York (“New York”). A stewardship plan is required pursuant to section 2.a. of §27-1807, for rechargeable battery manufacturers to show responsibility for the life-cycle management of their products.

Call2Recycle® has entered into legal agreements with rechargeable battery manufacturers, manufacturers whose products contain rechargeable batteries, and certain distributors and retailers of products as may be appropriate. A list of these companies can be found in *Appendix 1*. Under this agreement, Call2Recycle®’s program is charged with collecting dry cell batteries under 25 pounds per the requirements of the Act.

This plan was developed by Call2Recycle® in collaboration with the participating battery and product manufacturing companies and is based on meeting the requirements of the Act, experience gained in other jurisdictions and a desire for harmonization with similar programs in other Canadian and U.S. jurisdictions.

The submitted plan is available for the general public and other interested stakeholders at www.call2recycle.org/newyork.

Main Program Elements

Based on this collective input, the program will be developed as follows:

1.1 Financing Mechanism

The Call2Recycle® program has been voluntarily supported by rechargeable battery and product manufacturers (whose products are powered by rechargeable batteries) in North America, including New York, for approximately seventeen years. A licensee fee is assessed for units and weights sold into North America. Call2Recycle Inc. was set up as a nonprofit to meet participating manufacturers’ obligations under state laws.

Under the New York law, participating manufacturers will bear the cost of collection, transportation and processing rechargeable batteries.

1.2 Convenient Collection Systems

Actual collection points and methods will be determined through assessment of such matters:

- Proximity to population
- Cost-effectiveness
- Environmental health and safety
- Ease of access
- Facilities available

Collection systems will be designed with user convenience and flexibility in mind.

All sites are provided specific instructions on how to store, package and properly ship used rechargeable batteries for recycling. Call2Recycle® monitors and records all incoming shipments

to ensure compliance with applicable state and federal regulations. Any abnormalities found are traced back to the specific site and are addressed with the collection site manager.

Major collection methods expected to be used include:

- Call2Recycle® offers battery recycling plans for retailers, municipalities, public agencies, and businesses completely free of charge.
- Call2Recycle® provides all collection containers and collateral materials, and pays all shipping, sorting and recycling costs, so there is no cost to the public or collection sites to participate.

1.3 Processing and Recycling

- The program will not ship any used batteries to a processor that has not been qualified by Call2Recycle®. Work to qualify potential processors by Call2Recycle® is ongoing to ensure competitive pricing and changes in capacity. Processors will be selected through a competitive process that will require compliance with applicable environmental, health and safety and transportation regulations including (but not limited to) the following:
 - Basel Action Network (BAN) qualification and ISO certification
 - Final destination receipt and disposal documentation/certification, downstream processing material management, residual material management and residual waste management.
- Retailers, businesses, municipalities, and public agencies will send the collected batteries and cell-phones to a recycling facility for processing. Call2Recycle® has developed a monitoring system that tracks and reports on the return of collection boxes to insure they meet proper safety and transport requirements under the law. A thermal recovery process will reclaim the metals (nickel, iron, cadmium, lead, and cobalt) from the batteries and prepare them for use in new products such as new batteries and stainless steel. No battery material will be disposed outside of North America.

1.4 Public Awareness and Education

The public awareness program will include all identified audiences with messages that, among other topics, will cover:

- The importance of battery collection and recycling
- Identification of materials covered by the program
- Where to take materials for collection
- Where to get additional information
- Disposition of recycled material

Call2Recycle® conducts a national public education campaign to generate awareness and enlist support of the Call2Recycle® program. Through public service announcements, national advertising, and tradeshow, Call2Recycle®'s message reaches a diverse audience.

1.5 Accountability and Transparency

Call2Recycle® is a non-profit, public service organization dedicated to rechargeable battery and cell-phone recycling in the US and Canada. Call2Recycle®'s financial statements are audited by an independent CPA firm annually to ensure that fees collected have been applied to recycling and public education program costs in the US and Canada.

Call2Recycle® long has employed, and as part of the plan in New York will continue to employ, several different audit procedures to assure compliance with required laws and regulations and general efficiency, including:

- Compliance with all local, State and federal regulatory agencies
- Independent 3rd party verification of program accomplishments
- Periodic environmental audits of its recycling facilities
- Certificates of recycling to program participants requiring documentation
- Basel Action Network (BAN) qualification for all processors of batteries

2.0 PROGRAM PRINCIPLES

As approved, this stewardship program will:

- Provide a level playing field and, in the longer term, provide the necessary research and development process to explore and define how environmentally responsible producers might be rewarded in the market-place
- Achieve a high level of compliance and minimize the potential for free-riding product manufacturers
- Ensure the program is delivered with the lowest possible cost while achieving maximum environmental efficiency
- Ensure materials are processed and recycled in a responsible manner that safeguards the environment and worker health & safety as well as preventing illegal export to developing countries
- Establish a dispute resolution process to resolve issues between parties involved in battery collection, sorting and recycling under this program
- Ensure the program reflects a shared responsibility model with appropriate roles for the State government, local government, consumers, industry, and other stakeholders while manufacturers finance the program, all other stake holders have a roll to encourage consumers to recycle their rechargeable batteries
- Ensure the program provides adequate coverage to all areas of the state
- Strive for continuous improvement in environmental and economic performance
- Ensure that the rechargeable batteries are stored at collection locations and transported in compliance with applicable health and safety and federal and state transport regulations

3.0 ORGANIZATION STRUCTURE AND MANAGEMENT

Call2Recycle, Inc. is a not-for-profit corporation organized under Delaware law. It has operated the Call2Recycle® program in North America, including New York, since 1994. The Call2Recycle® program collects used rechargeable batteries and used cell phones.

Call2Recycle® operates under the direction of a Board of Directors and includes representatives of rechargeable battery manufacturers, rechargeable product manufacturers, and selected outside members based on expertise and experience.

3.1 Management and Administration

Call2Recycle® is responsible for the management and administration of the program. This includes, but is not limited to, the following tasks:

- Collection and disbursement of fees through a process which ensures confidentiality of data.
- Management of program communications
- An interface for the public and with parties contracted under the program.
- Preparing and distributing an annual report
- Defining and meeting the performance management targets for the program, including the plan for continuous improvement
- Overall day-to-day management of the program, including liaison with other stakeholders and New York government
- Ensuring compliance with all applicable federal, state and municipal requirements
- Management of contracts with the collection, sorting, processing and recycling service provider(s) and the audit functions
- Setting and adhering to operating budgets

4.0 PUBLIC EDUCATION AND AWARENESS

Call2Recycle® has an extensive public education program designed to both encourage all New Yorkers to recycle their used batteries and inform them how they can participate in the recycling program. This will provide the foundation for the promotion, education and awareness activities of the Call2Recycle® program in New York.

Leading up to the law effectiveness day in December 2011, Call2Recycle® invested approximately \$100,000 for New York outreach and promotion activities which resulted in collections of 278,000 pounds.

Batteries are commonly used at home, work and play. Building on our existing program's dynamics, the following target groups will be considered part of the public education and awareness strategy:

- Collection sites (public, such as retailers and municipalities and private, such as businesses).
- Consumers (NY State residents)
- Media (industry- and consumer-focused)

Based on Call2Recycle's program experience, the following are its proposed strategies and tactics for educating New York residents, supporting existing and new customers, and increasing total rechargeable battery collections:

At the core of the Call2Recycle® public education program is the focus on information accessibility. This is accomplished through both electronic services and staff availability.

Website

Call2Recycle® has an extensive website at www.call2recycle.org. The website provides program information for retailers, municipalities, stakeholders, businesses, consumers and media. The most viewed portion of the website is the collection site locator, where consumers can access information about the nearest drop-off location in their area. Collection locations are listed based on proximity and their level of participation in the program, identified as “preferred sites”. For anyone looking to “recycle on the go”, Call2Recycle® also has a mobile site that provides quick access to a drop-off location and updated news about the program and is easy and accessible for all mobile devices.

Program participants (both existing and potential) as well as consumers can access information about the program and also download support materials such as web banners, NY state specific signage, and other communication support materials from Call2Recycle’s website. Upon final approval of the Call2Recycle program by the state, the website will be expanded to provide extensive information on specific requirements and accessibility requirements by the state.

Toll-Free Help Line

Call2Recycle® reaches consumers through its toll-free help line, 877-2-RECYCLE, that provides automated options for finding the nearest battery drop-off location or connecting directly to a Customer Service Associate for specific inquiries.

Customer Support & Service

For years, Call2Recycle® has maintained and increased the involvement of program participants, and this effort will continue. Support initiatives involve direct phone calls, emails, and updates on collection results, all designed to inform and remind existing collection sites of their vital roles. In-store/organization signage is, and will continue to be, provided with collection box shipments. Upon approval of the Call2Recycle® program plan, this signage will be updated to reflect the requirements of the Act and acknowledge New York’s leadership role in this initiative.

Accessibility Measure

Call2Recycle® will create an accessibility measure of its collection sites, which is a critical dimension in maximizing collection. Through this measure, Call2Recycle® can identify underserved areas and populations. In this regard, while Call2Recycle®’s current collection locations serve as an effective foundation for this program, Call2Recycle® may strategically identify areas to focus site growth.

Since its inception, Call2Recycle® has dedicated significant resources to increase and encourage battery recycling awareness and motivate consumers to take action. Call2Recycle’s program growth proves that consumers can be inspired to do the right thing and voluntarily recycle their batteries when educated. The following are some efforts that Call2Recycle uses to help educate consumers about battery recycling.

Advertising

Call2Recycle® purchases advertising space in select online and print outlets, such as *Waste & Recycling News*, *Earth911.com*, *Environmental Leader*, and this will continue upon approval of the Call2Recycle® New York State expanded program.

Call2Recycle has already supplemented its online and print advertising with the distribution and airing of a television ads across New York State. The 30-second spots were launched to correspond with the New York State Rechargeable Battery Law effectiveness date, December 2011. The spots could be seen on cable networks, including MSNBC, HLN, NY1, NEWS12, TBS, CNN, and History Channel, across all nine DMA markets in New York State, including Metro NY City/Long Island, Albany, Syracuse, Buffalo, Rochester, Binghamton, Watertown, Utica, and Elmira. With over 5 million household impressions, New Yorkers heard the message that the disposal of rechargeable batteries as solid waste is prohibited after December 5, 2011 and they could comply by bringing their used rechargeable batteries to retail outlets.

Tradeshows

Visibility at targeted tradeshows is an additional component of Call2Recycle's outreach campaign. In 2012, Call2Recycle® exhibited at *Federation of New York Solid Waste Associations Solid Waste & Recycling Conference*, *Retail Industry Leaders Association's Environmental Sustainability & Compliance Conference*, *Corporate Recycling & Waste Conference (CRWC)*, and numerous other international, national, and regional shows. Call2Recycle plans to continue this type of outreach. At these shows, Call2Recycle® answers inquiries and provides handout materials to support awareness and drive program participation.

Cooperative Opportunities

In addition to the specifics listed in this section, Call2Recycle® works with government agencies to communicate and support our collection program. Building on 19-years of New York experience, these recognized examples of comprehensive marketing campaigns, involving both grassroots and consumer-oriented efforts, will be the foundation to increase participation and overall collections. Call2Recycle® looks forward to working with the Department of Environmental Conservation to further develop these materials and take advantage of joint communication opportunities.

The specific communication outreach objectives and strategies by target group will continue to be as follows:

Collection Sites

Objectives

- To support existing Call2Recycle® collection sites and reinforce their roles and responsibilities within the program
- To support new collection sites and their role in battery recycling

Strategies

- Detailed instructions are provided in each collection kit advising of overall Call2Recycle® program and the steps involved in collecting and shipping Call2Recycle® containers for recycling

- Specific section on websites: www.call2recycle.org (under “Program Info”) developed for collection site training and program information
- Toll-free customer support and service information line (1-877-723-1297) to access support staff for inquiries and supply requirements/replenishment
- Series of correspondence and phone calls to existing collection sites to inform and remind them of their program participation and responsibilities
- “How the Program Works” video development for participants explaining program dynamics and outreach requirements
- Distribution of posters (see Appendix 2) in collection containers for use in-store/at work to promote recycling program and participation details.
- Presence at trade shows via presentation as well as exhibits to announce expansion and encourage added participation
- Advertising in select trade publications (retail, business, public agencies) to build awareness and participation
- Dedicated sections on www.call2recycle.org for program information and training as well as availability of pre-developed communications materials that can be customized for individual needs
- Ongoing phone calls and emails to check-in with collection sites to maintain program participation
- Call2Recycle® has had an e-newsletter since 2009 that communicates monthly to over 11,000 subscribers
- Monthly alerts to participants that have shown a decline in participation or inactivity to prompt some type of action – shipping their box in, ordering additional supplies, requesting educational materials, etc.
- Promotional tools to help encourage their involvement and the availability of battery recycling at their site

Consumers

Objectives

- To inform and encourage battery and battery-powered users to recycle their used rechargeable batteries

Strategies

- Use of www.call2recycle.org including a zip code-driven locator to inform of nearby collection drop-off locations
- Availability of a toll-free 1-877-2-RECYCLE to inform of participating drop-off locations (community and retail)
- Articles and press releases advising of program initiatives and events as well as the “for more information” vehicles: www.call2recycle.org and 1-877-2-RECYCLE
- In addition to traditional advertising and events, social media continues to be a “hot spot” for Call2Recycle® with regular Facebook (since 2009) and Twitter. Surveys, contests, and general recycling and environmental articles make social media one of the fastest growing channels for Call2Recycle®, and utilizing these pages allows Call2Recycle® to respond immediately to specific questions, concerns and suggestions from all channels.

- Release of television ads across the state of New York was done in December 2011. New Yorkers saw the message via cable news channels, including MSNBC, CNN, HLN, History Channel, NY1, etc...

Media

Objectives

- To raise awareness of the dynamics of our collection and recycling program for used batteries and cell phones

Strategies

- Press Releases advising of initiatives and recycling successes
- Distribution of contributed articles for community newspapers
- Dedicated media newsroom on www.call2recycle.org (under “Media Center”) featuring background information, photos and other relevant support materials to assist in media coverage
- Development of newsworthy location-specific and state events/ announcements

5.0 COLLECTION, PROCESSING AND RECYCLING

Retailers, businesses, communities and public agencies send the collected batteries and cell phones to a recycling facility for processing. A thermal recovery process reclaims the metals (nickel, iron, cadmium, lead, and cobalt) from the batteries and prepares them for use in new products such as new batteries and stainless steel.

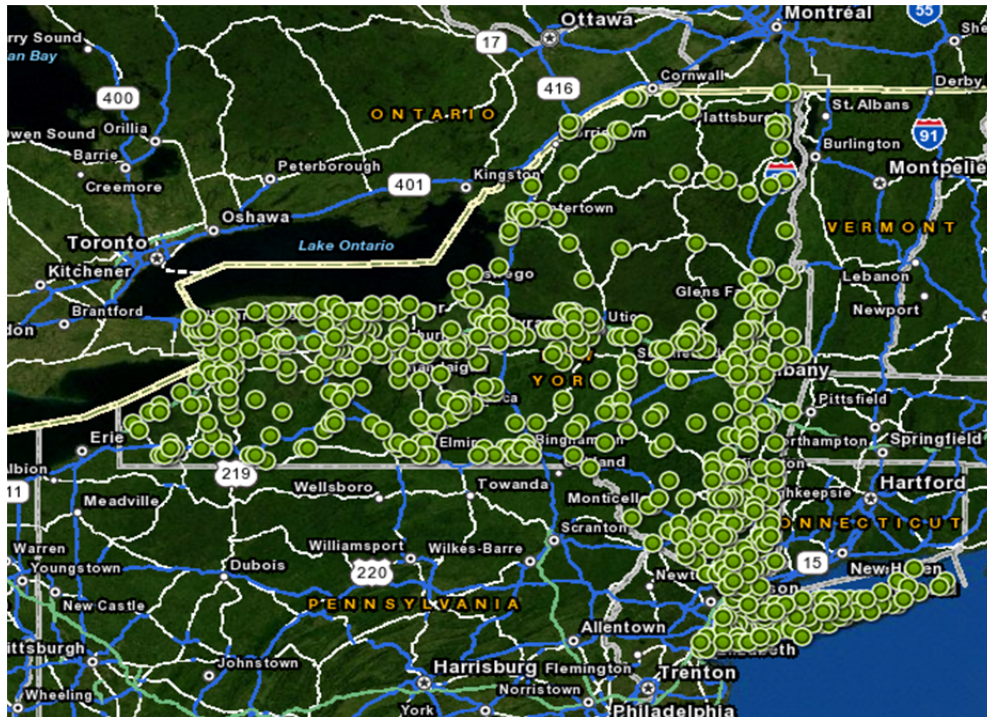
5.1 Collection

The Call2Recycle® New York Plan will build upon and expand Call2Recycle®’s existing approximately 2,100 active collection locations. These and future sites implement and will implement one or more of the following approaches, all of which impose no charges to the collection site participant or used battery generators:

- *Retail Recycling Plan:* This program, a principal focus of the Call2Recycle® education program, aims at reaching consumers through retailers who sell batteries and battery-powered products. Participating retailers who serve New York include The Home Depot, Lowes, Radio Shack, Best Buy, Sears and Kmart. However, in addition to these national retail chains the Call2Recycle® program is available to independent retail stores and regional retail chains. The full listing of New York retail sites that have signed up with the Call2Recycle® program can be found at www.call2recycle.org.
- *Community & Public Agency Recycling Plan:* The Community and Public Agency Recycling Plan are targeted to municipalities, communities, public agencies (such as hospitals, police and fire departments), institutions and government agencies. Included among the many collection initiatives for communities and public agencies are curbside collection, special waste collection events and household recycling center collection.
- *Business Recycling Plan:* The Business Recycling Plan helps structure and manages the collection of qualified non-household batteries in the workplace, including bar code readers, laptop

computers, two-way radios, cordless power tools, portable printers and PDAs. Approximately 200 businesses in New York are currently participating in the Call2Recycle® program.

New York Collection Sites (As of May 2013)



The Call2Recycle® New York Plan will expand this existing collection base using both Call2Recycle®'s existing resources and the additional contacts that will arise via broad based communications. Participating as a collection location is purely voluntary for all non-retail companies and organizations.

The growth of New York's e-waste collection program also should contribute to increased battery collection locations by Call2Recycle® in the state. Call2Recycle® has well established working partnership with e-waste recyclers across the state, from which it already accepts rechargeable batteries through the Call2Recycle® program. This relationship will be further intensified to ensure that all batteries collected through e-waste initiatives are channeled in the Call2Recycle® program for recycling. Any e-waste depots or other battery collection and recycling processors who are not Call2Recycle® participants / partners will be asked to provide their collection data for inclusion in Call2Recycle®'s annual report of overall battery collection results in New York.

To become a collection site, interested program participants are provided instructions and required to complete a sign-up application form. Upon completion of the application, each new participant is then assigned a unique identification number. These numbers, like those assigned to existing participants (“sites”), allow tracking of all materials assigned and returned by the site. The site will then receive collection boxes (including plastic bags in which to place the individual battery to ensure safe storage and shipping as well as the “site I.D.” marked on the box along with a pre-

paid/pre-addressed return label), posters and safety/handling instructions to begin their collection initiative.

The collection containers, made of corrugated cardboard with 92% post-consumer / 8% pre-consumer recycled content, are currently and will continue to be available in two sizes: one capable of holding approximately 20 pounds of batteries (primarily used for collection at retail) and the other capable of holding approximately 66 pounds (primarily used with higher quantity generators such as municipalities and business). These materials, along with transportation and recycling services, are and will be provided free-of-charge.

Larger quantity generators also have and will continue to have the option to utilize their own shipping containers, utilizing pre-approved labeling and adhering to the same preparation requirements (i.e. use of plastic bags to contain each collected battery) as per the Call2Recycle® collection containers. Bulk containers are preferred by Call2Recycle® as a more cost-effective means of collection, sorting and transportation.

Adherence to transportation and safety guidelines for battery collection is an ongoing priority within the Call2Recycle® program. All personnel handling Call2Recycle® collection containers must be instructed to read the preparation and shipping instructions for proper battery collection as well as watch Call2Recycle®'s safety training video. This video can be viewed online at <http://www.call2recycle.org/webinar-and-video.php?s=&c=1&d=79&e=106&f=&g=&a=24&w=2>.

When a used battery or cell phone is turned in for recycling, each is to be placed and sealed in an individual plastic bag provided by Call2Recycle®. Bags are used to comply with Federal transport laws in US which require that certain types of primary and rechargeable batteries be insulated from possible electrical short circuit during transport (excerpts from regulations of relevance include: *the cells are separated to prevent short circuits; These dangerous goods may be handled, offered for transport or transported under this shipping name if the dangerous goods are (a) protected from short circuits. . . .*) If bags are not available, Call2Recycle® also allows the use of non-conductive electrical tape to cover the battery terminals.

Once the collection container is filled and adherence to the “one battery/cell phone – one bag” preparation standard is confirmed, the assigned person responsible for the Call2Recycle® program at the collection site must write his/her address on the shipping label and securely seal the box when full. He or she must then call UPS, Call2Recycle®'s shipping service, or just include in his/her outgoing UPS pick-up services. The pre-paid, pre-addressed container is then scanned by UPS and, as of the time of this submittal, delivered to INMETCO (Ellwood City, PA) where the content of the containers are sorted according to battery chemistry, weights recorded and readied for shipping to the designated-according-to-chemistry recycling processor. INMETCO is assigned the management of shipping documentation and any manifesting of shipments to the final recycling destination. This destination may change depending on the outcome of identifying and selecting a processor and sorting capability.

The current Call2Recycle® program operates, and will operate, in accordance with intra- and interstate shipping and transportation approvals provided by Transport US, the Department of Environmental Conservation and all other state environment and transportation approvals. All

shipments that are transported internationally are manifested in compliance with the Basel Convention and ISO standards.

5.2 Processing and Recycling

The constituents of all of the used batteries and cellular phones collected through the program and Call2Recycle® New York Plan are and will be reclaimed. However, different battery chemistries and phones require different reclamation methods. Call2Recycle® will continue to use several service providers.

Unsorted used batteries collected under the Call2Recycle® program are sent, as of the time of this submittal, to INMETCO in Ellwood City, Pennsylvania for sorting. INMETCO has been providing sorting services for Call2Recycle® since 1994 and has an exemplary record. From INMETCO, sorted materials will be sent to licensed and well-operated commercial reclamation facilities in US, the Canada. Nickel-containing batteries will remain at INMETCO's facility; lead-containing batteries will be sent to Newalta Nova Pb in Ville Ste-Catherine, Quebec, Canada; and, Lithium Ion batteries will be sent to Xstrata in Sudbury, Ontario, Canada.

All of these facilities use thermal recovery processes to reclaim materials. Recovered metal materials include: nickel, iron, lead, cadmium and cobalt. These metals are either returned to rechargeable battery manufacturers or used to make other products such as stainless steel. Some processes also recover plastic and other constituents.

6.0 PERFORMANCE MEASURES

In the past five years, Call2Recycle® has collected over 1,120,000 pounds of batteries in New York, with 242,061 collected in 2012.

Here is a summary of New York battery collections of the Call2Recycle® program (pounds) in the last five full years:

	2012	2011	2010	2009	2008
Ni-Cd	89,661	8,752	104,830	111,645	103,158
Ni-Mh	29,330	37,107	32,769	19,547	15,995
Li-Ion	48,794	9,263	39,898	31,371	13,384
SSLA	4,276	99,128	54,163	35,499	42,306
Total	242,061	274,250	231,660	198,062	174,843

Call2Recycle[®] measures its performance both on the amount it collects and the amount reclaimed from each battery that can be used in secondary products. The program abides by the European Union Battery Directive (see below) on “Recycling Efficiency” in both how to calculate these rates and also what benchmarks for recovery are appropriate based on battery chemistry.

Call2Recycle[®] Recycling* Rates

Battery Chemistry	Recovery Rates
Primary Alkaline	50%
Small Sealed Lead Acid (SSLA/Pb)	65%
Nickel Cadmium	75%
Other Rechargeables	50%

* “**Recycling**” rate in this context refers to the weight of each battery reclaimed for use in a secondary product. This is sometimes referred to as “**recovery rate**” or, in the EU, the “**Recycling Efficiency**”.

Calculating the amount of batteries collected as a percentage of the batteries sold is often highly problematic for two reasons. First, batteries are often sold through a complex sales chain, from manufacturer to battery-powered product manufacturer to wholesaler to distributor to retailer. Most battery stewards can only estimate sales into New York. Second, depending on the chemistry of the battery, as many as 95% of batteries are sold in or with a product, further complicating tracking, disposal and recycling.

Below represents the forecast prepared by an outside, independent consultant (Frost Sullivan) of sales (by weight) of rechargeable batteries sold into the USA, and allocated to New York by population percentage.

Batteries Sold/Collected	Base Year *	2011	2012	2013	2014	2015
Rechargeable Batteries Sold Into New York**	7,800,000	7,900,000	8,000,000	8,133,000	8,231,000	8,330,000
Total Collected (lbs.)	231,662	274,250	242,061	325,320	370,395	416,500
Collection Rate Targets	3%	3.5%	3%	4%	4.5%	5%
Grams per Capita	5	6	6	8	9	10

* Assumes that program years, including based year, runs from January 1 – December 31.

** “**Batteries Sold into New York**” represents estimates based on study performed by an outside, independent consultant is based on total USA battery sales allocated by state population.

The above numbers include batteries that are in electronic products covered by New York law to fulfill state regulatory requirements. As more stewardship organizations are designated to handle product that contain and / or use batteries, Call2Recycle[®] is prepared and committed to working with them to the safe, effective and efficient end-of-life disposal of these batteries.

Call2Recycle[®] will reassess plan design and targets compared with actual sales after two years of program operation to ensure that targets are realistic and program design is sufficiently robust.

6.1 CONTINUOUS IMPROVEMENT

Call2Recycle®, in conjunction with The New York State Department of Environmental Conservation, will analyze numerous metrics to determine more effective methods of increasing participation in the Call2Recycle® program. Call2Recycle® measures the amount of designated waste recycled by weight. Call2Recycle® collects weight data on a monthly basis and compares the amount collected with previous months and years. Call2Recycle® then calculates a New York diversion rate. All these practices will be continued as part of the Call2Recycle® New York Plan.

Call2Recycle® also employs sophisticated tracking and reporting software that allows for the preparation of various reports pertinent to the Call2Recycle® New York Plan and reporting requirements.

Call2Recycle® will continue to directly communicate with individual collection sites regarding their activities by tracking monthly totals of rechargeable batteries and cellular phones collected, Call2Recycle® can use targeted outreach efforts to increase collections and participation rates at individual collection sites or areas.

Call2Recycle® will submit any sign of changes or updates to its plan within 30 days of the change. The list of participating manufacturers will be updated no less frequently than every calendar quarter.

Historically, Call2Recycle®'s strategic planning has been grounded on facts obtained through consumer awareness surveys. These marketing plans were developed partly by segmenting consumers with similar recycling characteristics to better disseminate Call2Recycle®'s message. For instance, in a recent analysis, consumer segments included heavy use recyclers, light use but dedicated, hoarders, reforming heavy users, abashed trashers, unabashed trashers, those who didn't care and those with no occasion to recycle. This analysis helped Call2Recycle® create more effective promotional materials and thus increase participation among consumers. Analogous efforts will continue in support of the ongoing success of the Call2Recycle® New York Plan.

The reporting capabilities allow Call2Recycle® to generate reports with unique and detailed data such as:

- By City, Region, postal code, and overall State
- By individual site
- By day/month/year or any other required time period
- Retail store or chain
- By collection channel
- By weight and containers received
- By battery type (chemistry)
- Comparative analysis including participation rates

Call2Recycle® also expects to report on collection information on a per capita basis. The annual report will also track the program's performance, particularly in regards to materials reclaimed from end-of-life battery disposal, compared with the pollution prevention hierarchy.

Furthermore, in keeping with the continuous improvement mandate established from the beginning of the Call2Recycle® program's implementation, Call2Recycle® staff will monitor results on a monthly, quarterly and annual basis. In addition to quantitative performance indicators such as site participation

and collected tonnage, this will allow success to be measured according to website visits, media impressions and targeted surveys.

Finally, Call2Recycle® has long required vendors to meet rigorous qualification standards for collection and processing of batteries. These will continue to be used as part of the Call2Recycle® New York Plan.

Continuous improvement is fundamental to the current and future success of Call2Recycle®. As such, ongoing investment in research and development to enhance our collection and recycling infrastructure has been essential.

To ensure continued leadership in learning and program effectiveness, Call2Recycle® participates in an extensive number of initiatives to coordinate and develop best practices with analogous battery and cell phone organizations operating around the world, such as RECHARGE in Europe and PRBA in the U.S. In addition, Call2Recycle® supports and cooperates in research and development programs seeking better mechanisms to recycle rechargeable and primary batteries. Most recently, through the American Recovery and Reinvestment Act of 2009 (the “Stimulus Act”), Call2Recycle® has been included in two applications that have been filed with the U.S. Department of Energy to improve the recycling of lithium ion and primary batteries.

Industry-wide investments are further supplemented by individual R&D initiatives spearheaded by our battery stewards, all of whom also support the Call2Recycle® New York Plan and collection/recycling network. In addition to processing and efficiency improvements, Call2Recycle® annually invests to improve marketing outreach and communication programs to maximize collections.

To do this, we have implemented and will continue to implement a number of initiatives to sharpen our message:

6.1.1 Collection Infrastructure

Through research and development, Call2Recycle® periodically assesses the program offerings, including collection boxes, plastic bags, shipping guidelines, and informational materials. When the Call2Recycle® New York Plan is launched, research and development will remain an important element, including the investigation of a collection box redesign to improve safety and transportation requirements.

6.1.2 Brand Awareness

To better understand driving forces behind consumers’ “green” practices and attitudes, and to determine consumer recycling habits in general, Call2Recycle® has been tracking consumers’ attitudes and practices for the past three years. The information gained from these surveys is distributed to media outlets and participants, and gives Call2Recycle® an opportunity to further spread the word about battery recycling.

Additionally, program awareness will be tracked among key audiences, including Retail Partners, Collection Site Managers, Key Opinion Leaders, and Green Business Executives. A brand awareness study performed among US audiences, will explore the current awareness and perception of the Call2Recycle® program, the importance of recycling, environmentalism and sustainability and how it impacts their organization, the relative importance of battery recycling within their activities (including awareness of the difference between rechargeable and regular batteries), and attitudes and motivation for environmental activities (including revenue opportunities). The brand awareness

study will provide a reliable and actionable baseline measure and tracking measurement for Call2Recycle®'s branding efforts. This study was conducted in 2010 and will be conducted again in 2011; however, the study may be expanded upon acceptance of the proposed Call2Recycle® New York Plan.

6.1.3 Program Efficiencies

On behalf of Call2Recycle®, the Product Stewardship Institute (PSI) has developed a set of metrics for assessing the performance of programs that collect and recycle primary and rechargeable batteries that policy makers, program participants, and other stakeholders can use to evaluate and strengthen battery collection initiatives. Through this study, Call2Recycle® gained even further insight into performance-based metrics that will help supplement measures of the number of batteries collected, or a collection rate that is based on the number of batteries available for collection.

Additionally, Call2Recycle® commissioned a research study to gain information on the market shares of key companies in the portable rechargeable battery market in the U.S. and US. Included in this study is also an estimate on the number of batteries sold separately versus those sold in products.

6.1.4 Processing

Pursuing the automation of sorting process for collected batteries will significantly improve the efficiencies of the battery recycling infrastructure. This initiative in addition to other continuous improvement opportunities will form the foundation of ongoing R&D initiatives for Call2Recycle®.

Call2Recycle® commits to continuous research and development efforts over the next several years. Some of the important areas of inquiry will include: logistics infrastructure necessary to handle an increasing breadth of product and materials; consumer behavior towards disposing electronics with batteries compared with just batteries; and, life cycle assessment of battery recycling. Results of this investment will be annually reported to the New York Department of Environmental Conservation and available to the public.

The battery industry believes in continuous improvement in broader life cycle management of its products, examples of which will be highlighted in the Call2Recycle®'s annual report.

7.0 PROGRAM SCHEDULE – MILESTONE DATES

- Consultation with the Department of Environmental Conservation on the content and process for reviewing the plan: February 1, 2011
- Final submission of the stewardship plan to the Department of Environmental Conservation: March 7, 2011
- Proposed program launch: July 1, 2013

8.0 PROGRAM INCLUDED AT STARTUP

The program will commence with the list of products required by the regulation:

- Batteries eligible for collection and recycling are those weighing less than 25 lbs./11.34 kg each of the following chemistries:
 - **Nickel Cadmium (Ni-Cd)**
 - **Nickel Metal Hydride (Ni-MH)**
 - **Lithium Ion (Li-Ion)**
 - **Nickel Zinc (Ni-Zn)**
 - **Small Sealed Lead (SSLA/Pb)**
- Rechargeable batteries power cordless power tools, cellular and cordless phones, laptop computers, camcorders, two-way radios and digital cameras. All types of cell phones are accepted - any size, make, model, digital or analog, with or without battery or charger.
 - The program does not recycle household cordless phones, mobile-installed or bag phones, two-way radios, or pagers.
- Call2Recycle® **DOES NOT ACCEPT** the following types of batteries:
 - Batteries weighing **more than** 25 lbs. each
 - Batteries used as the principal electric power source for a vehicle, such as, but not limited to, an automobile, boat, truck, tractor, golf cart or wheelchair
 - Batteries used for storage of electricity generated by an alternative power source, such as solar or wind-driven generators.
 - Batteries used for memory backup that is an integral component of an electronic device.

9.0 FUNDING

As of the submission of this plan, more than 175 rechargeable battery manufacturers and marketers finance the Call2Recycle® program. These companies support Call2Recycle® by licensing from Call2Recycle® the right to place a trademarked *Battery Recycling Seal* ("Seal") on their Ni-Cd, Ni-MH, Li-ion, Ni-Zn and SSLA/Pb batteries and/or battery-powered products sold in the United States and US. Fees are based on the total number of licensed battery cells sold into North America, without distinction on the nation, state or state in which the sales occur, and cover the total cost of the Call2Recycle® North American rechargeable battery program. Those Call2Recycle® licensees selling products in New York would be considered stewards. No additional fees will be assessed against those licensees to support the Call2Recycle® New York Plan described here.

A complete listing of the companies funding Call2Recycle®'s efforts can be found in *Appendix 1*.

10.0 RESPONSIBILITIES AND OBLIGATIONS

This plan is based on a shared responsibility model where all parties have roles to play.

10.1 Processing and Recycling Contractors

The current Call2Recycle® program operates and Call2Recycle® New York Plan will operate, in accordance with intra- and inter-state shipping and transportation approvals provided by USDOT, New York and all other state environment and transportation approvals. The Call2Recycle® program operates under a special permit (see Appendix 3) that sets forth all of the safety and transportation

requirements for the program under federal regulations. All shipments that are transported internationally are manifested in compliance with the Basel Convention and ISO certifications.

10.2 State Government

The state government is expected, through its enforcement authority, to ensure that regulations allow for adequate fines and penalties to be levied against those individuals not in compliance with the regulation or the approved program. The state government is expected to enforce program compliance in a timely and effective manner. The state government is also expected to implement policies to ensure that government procurement officials only procure batteries from program compliant corporations.

10.3 Local Government

Local government may wish to act as collection sites for designated material with appropriate reimbursement for services provided. Nothing in this plan is intended to dictate whether a local government participates as a collection site.

10.4 Consumer or End User

Consumers will be responsible delivering designated batteries to collection points.

11.0 RECYCLED MARKET DEVELOPMENT

In contrast to some other materials collected through recycling efforts, markets are well developed for the metals and other materials reclaimed from used batteries. Ready insight into these markets can be obtained at the website www.metalprices.com/FreeSite.

The diligence of Call2Recycle® and its' recycling suppliers to ensure that the maximum reuse potential of recovered metal is a cornerstone of the credibility of the Call2Recycle® program.

12.0 ANNUAL REPORT

Call2Recycle® will provide an annual report to the New York government as stated in statute. The annual report will also be available on the program website as a PDF file. Call2Recycle® will complete and submit an annual report using the form issued by the New York State Department of Environmental Conservation. In addition, the report will also include, but not be limited to, the following:

- A summary of the educational materials and educational strategies used for Call2Recycle®
- The location and changes in the number of collection sites
- A description of how the recovered products were managed in accordance with the pollution prevention hierarchy
- An estimate of the total amount of designated products sold into the state by producers that have designated Call2Recycle® and the total amount collected Independently audited combined financial statements of Call2Recycle® and performance results specific to New York
- A comparison of the approved plan performance for the year with the performance requirements and targets in the regulation and the approved plan. The plan performance measures will include batteries collected by chemistry, collection per capita within the state. Also critical to this annual report will be a discussion of performance relative to the pollution prevention hierarchy.
- A summary of the research and development efforts conducted during the last year and results that they have yielded.

APPENDICES

APPENDIX 1: CALL2RECYCLE® LICENSEES (OBLIGATED STEWARDS)

As of March 31, 2013

3M COMPANY - OH&ES DIVISION	DOUGLAS QUICKUT
ACCESS BATTERY & POWER SYSTEMS	DR. BATTERY
ACER SERVICES CORP	DURACELL a Division of P & G
ADVANCED BATTERY SYSTEMS, INC.	DURACELL CANADA INC.
ADVANCED ELECTRONICS ENERGY LIMITED	EASTMAN KODAK COMPANY
AGILENT TECHNOLOGIES	ECHOLON, INC.
AIR STRUCTURES INTERNATIONAL, UK	ELECTROLUX HOME CARE PRODUCTS
ALEXANDER TECHNOLOGIES EUROPE, LTD	ENERCO GROUP, INC.
ALLIED INTERNATIONAL/ALLIED TOOLS	ENERGY SALES, INC.
ALLTRADE TOOLS LLC	ENERSYS DELAWARE INC.
AMBIENT CORP.	EPSON AMERICA, INC.
AMERICAN LAWNMOWER COMPANY	ESI CASES & ACCESSORIES
AMERICAN TOPPOWER INC.	ETICA BATTERY INC.
AMPERGEN	EVEREADY BATTERY COMPANY, INC. (ENERGIZER)
ANTON/BAUER INC.	EXACT BATTERY
APPLE, INC.	EXCELL BATTERY COMPANY
APPLIED POWER INC.	FDK AMERICA, INC.
ARROW FASTENER CO., LLC	FEDCO ELECTRONICS
AVED GENERATIONS ELECTRONICS	FEIN POWER TOOLS, INC
AVEX ELECTRONICS CORPORATION	FESTOOL
BATTERY SPECIALTIES	FINISH THOMPSON INC.
BISSELL HOMECARE, INC.	FLYING DRAGON DEVELOPMENT LTD.
BLACK & DECKER CORPORATION	FREIGHT SECURITY NET
BLOUNT, INC.	FRESHBATTERY.COM
BMR GROUP INC.	FRONTROW
BOREN ELECTRONICS CO., LTD.	FUJIFILM HOLDINGS AMERICA CORP.
BOSE CORPORATION	FUNAI CORPORATION
BRAUN, A DIVISION OF P&G	GARMIN INTERNATIONAL, INC.
BROTHER INTERNATIONAL CORPORATION	GENERAL DYNAMICS ITRONIX
BYD BATTERY (USA) CO.	GERBING'S HEATED CLOTHING
CANADIAN SATELLITE RADIO	GIANT TIGER STORES LIMITED
CANADIAN TIRE	GILLETTE, A DIVISION OF P&G
CANON U.S.A., INC.	GLOBAL TECHNOLOGY SYSTEMS, INC.
CAR-GO BATTERY CO.	GOLD PEAK INDUSTRIES
CASIO AMERICA, INC.	GOLDEN CEL BATTERY CO. LTD.
CELL-CON INC.	GREATBATCH, LTD.
CENTURY OPTRONIC, INC.	GREEN SMOKE, INC.
CHERVON NORTH AMERICA/MASTERCRAFT	GREENRON ENERGY LIMITED
MAXIMUM	GS BATTERY (USA) INC.
CISCO SYSTEMS, INC.	HENAN HUANYU POWER SOURCE CO., LTD.
COLEMAN COMPANY, INC	HEWLETT-PACKARD COMPANY
COLUMBIA SPORTSWEAR COMPANY, INC	HILTI (CANADA) CORPORATION
CONAIR CORPORATION	HILTI, INC.
COVIDIEN	HITACHI - KOKI U.S.A. LTD.
DANTONA INDUSTRIES	HITACHI-KOKI CANADA CO.
DELL INC.	HOBBICO - HOBBY CORPORATION OF AMERICA
DIGI-KEY CORPORATION	HONG KONG HIGHPOWER TECHNOLOGY CO., LTD
DONGGUAN GOLDEN CEL BATTERY CO.	

HOOVER COMPANY (TTI FLOOR CARE NORTH AMERICA)
 HOT-SHOT PRODUCTS CO., INC.
 HOUSE OF BATTERIES
 HTC CORPORATION
 ICOM AMERICA, INC.
 IDX SYSTEM TECHNOLOGY
 ILLINOIS TOOL WORKS
 INDUSTRIAL BATTERY SERVICE, INC.
 INDUSTRIAL SCIENTIFIC CORPORATION
 INSPIRED ENERGY, LLC
 INTEC INDUSTRIES CO. LTD.
 INVOX HARDWARE LIMITED
 IOTTIE
 ITECH "INTELLEAGENT TECHNOLOGIES"
 ITO CO., LTD.
 JEAN COUTU GROUP INC.
 JIANGSU HIGHSTAR BATTERY MANUFACTURING CO., LTD
 JLG INDUSTRIES, INC.
 JVC AMERICAS CORP.
 KENSINGTON COMPUTER PRODUCTS GROUP, A DIVISION OF ACCO BRANDS USA LLC
 KENWOOD AMERICAS CORPORATION
 KING OF FANS
 L'MAGE HOME PRODUCTS INC.
 LEICA CAMERA, INC.
 LENMAR BATTERY SOLUTIONS
 LENOVO (UNITED STATES) INC.
 LEXEL BATTERY (SHENZHEN) CO., LTD.
 LG ELECTRONICS, INC.
 LOBLAW INC
 MAG INSTRUMENT, INC.
 MAKITA CANADA INC.
 MAKITA U.S.A., INC.
 MAX CO., LTD.
 MAXELL CORPORATION OF AMERICA
 MCNAIR TECHNOLOGY CO., LTD.
 MEASUREMENT LTD., INC.
 MEDTRONIC PHYSIO-CONTROL CORP.
 MERITool LLC
 MILWAUKEE ELECTRIC TOOL CORPORATION
 MOTOROLA, INC.
 NEC CASIO HITACHI MOBILE
 NEPTUNE TECHNOLOGY GROUP, INC.
 NIKON CANADA INC.
 NOKIA
 NORELCO CONSUMER PRODUCTS CO.
 NORMARK INNOVATIONS
 NOVATEL WIRELESS
 NYLUBE PRODUCTS COMPANY, LLC
 OKI DATA AMERICAS, INC.
 OLYMPUS AMERICA, INC.

ONLIVE, INC.
 OOMA, INC.
 OPTEX, INC.
 ORAL-B, A DIVISION OF P&G
 PALLADIUM ENERGY
 PANASONIC CORPORATION OF NORTH AMERICA
 PANTECH CO. LTD.
 PASLODE
 PERSONAL COMMUNICATION DEVICES, LLC (PCD)
 PHILIPS CONSUMER ELECTRONICS
 PHOTO CONTROL CORPORATION
 PHYSIO-CONTROL CORPORATION
 PORTACELL USA LLC
 POSITEC TOOL CORPORATION
 POWER PRODUCTS
 POWERGENIX
 PRO TEAM THE VACUUM COMPANY
 PROCTER & GAMBLE
 PROFESSIONAL TOOL PRODUCTS, LLC
 PROGRESSIVE TECHNOLOGIES, INC.
 PROMARK ELECTRONICS
 QUANTUM INSTRUMENTS INC.
 QUICKIE MANUFACTURING CORPORATION
 RADIOSHACK
 RAYOVAC CORPORATION, A DIVISION OF SPECTRUM BRANDS
 REALFLEET CO., LTD.
 REMINGTON, DIVISION OF SPECTRUM BRANDS, INC.
 RESEARCH IN MOTION LIMITED
 RESISTACAP, INC.
 RIDGE TOOL COMPANY (RIDGID)
 RKI INSTRUMENTS
 ROBERT BOSCH TOOL CORPORATION
 RRC POWER SOLUTIONS INC
 RYOBI NORTH AMERICA, INC.
 SAFT AMERICA INC.
 SAMSUNG
 SANYO ENERGY (U.S.A.) CORPORATION
 SATO AMERICA INC
 SEIKO INSTRUMENTS USA, INC.
 SENSIDYNE/GILIAN
 SHARP ELECTRONICS CORP
 SHENZHEN BOFUNENG BATTERY CO., LTD.
 SHENZHEN LTT ELECTRONICE CO., LTD.
 SHOPPERS DRUGMART INC.
 SIGMA CORPORATION
 SIRIUS XM RADIO INC.
 SNAP-ON INCORPORATED
 SONY ELECTRONICS INC
 SONY OF CANADA LTD
 SOUTHWICK TECHNOLOGIES
 SPECTRUM BRANDS, INC.
 SRAM LLC

STAR MICRONICS CO., LTD.
STIHL INCORPORATED
STIHL LIMITED
STRYKER
SUNBEAM PRODUCTS
SWISSVOICE
TECHNICAL POWER SYSTEMS, INC.
TECHTRONIC INDUSTRIES CO., LTD.
TECHTRONIC INDUSTRIES GMBH
TERRALUX
TEST RITE PRODUCTS CORP.
TEXAS INSTRUMENTS EDUCATION TECHNOLOGY
THE FURUKAWA BATTERY CO., LTD.
THE SOURCE
TNR TECHNICAL INC. / THE BATTERY STORE
TOSHIBA AMERICA, INC.
TRAXXAS
TREK BICYCLE CORPORATION
TTEK ASSEMBLIES INC.

ULTRALIFE CORPORATION
UNIDEN AMERICA CORPORATION
UNISYS
UNIVERSAL POWER GROUP
VARTA BATTERIES INC.
VENOM POWER
VERNIER SOFTWARE & TECHNOLOGY
VTECH COMMUNICATIONS LTD.
WACOM TECHNOLOGY CORP.
WAHL CLIPPER CORP.
WALMART CANADA CORPORATION
WINTONIC BATTERY & MAGNET CO. LTD.
WOHLER USA, INC.
XPLORE TECHNOLOGIES CORP.
YIYANG CORUN BATTERY CO., LTD.
YUASA BATTERY INC.

APPENDIX 2: POSTER FOR NEW YORK STATE FOR USE WITH RETAILERS

Ask for details
at this location.

call2recycle.org

You can
RECYCLE your
rechargeable **BATTERIES**
and **CELL PHONES**
here!

Recharging the planet. Recycling your batteries.™

call2recycle®

**It is illegal to dispose
of rechargeable
batteries in the state
of New York as solid
waste. We accept
used rechargeable
batteries for return
to the manufacturer.**

APPENDIX 3: US DOT SPECIAL PERMITS

December 7, 2012



U.S. Department
of Transportation

Pipeline and Hazardous
Materials Safety Administration

East Building, PHH-30
1200 New Jersey Avenue, Southeast
Washington, D.C. 20590

DOT-SP 14849
(THIRD REVISION)

EXPIRATION DATE: December 31, 2015

(FOR RENEWAL, SEE 49 CFR § 107.109)

1. GRANTEE: Call2Recycle, Inc. (Former Grantee: Rechargeable Battery Recycling Corporation)
Atlanta, GA
2. PURPOSE AND LIMITATIONS:
 - a. This special permit authorizes the manufacture, marking, sale and use of non-DOT specification fiberboard boxes for the transportation in commerce of certain batteries without shipping papers, marking of the proper shipping name and identification number or labeling, when transported for recycling or disposal. This special permit provides no relief from the Hazardous Materials Regulations (HMR) other than as specifically stated herein. The most recent revision supersedes all previous revisions.
 - b. The safety analyses performed in development of this special permit only considered the hazards and risks associated with transportation in commerce. The safety analyses did not consider the hazards and risks associated with consumer use, use as a component of a transport vehicle or other device, or other uses not associated with transportation in commerce.
3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.
4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR Subparts C, D and E of Part 172 in that shipping papers, marking and labeling are not required for batteries already excepted by § 172.102(c) special Provisions 130, 188 and 189;

For full documents in regards to US DOT regulations, please refer to [Call2Recycle DOT Special Permits](#).