

February 29, 2024

Mia Roethlein Environmental Analyst Vermont Department of Environmental Conservation 1 National Life Drive, Montpelier, VT 05620

RE: Call2Recycle 2024 Proposed Improvement Actions to Increase Battery Collections for Vermont Primary Battery Program

In 2023, Call2Reycle's proposed goal for collection rate was 25% or approximately 149,000 pounds. The program achieved 22% or 117,501 pounds. Due to the lower collection numbers, Call2Recycle is addressing in this cover letter the actions we will be taking in 2024 to increase the collection rate and total pounds collected in 2024.

Timing of Battery Shipments at End of Year

A loss of approximately 17,500 pounds in 2023 as compared to 2022 was from one solid waste site. About 15,000 pounds were shipped from that site in 2023 however they are waiting to be sorted as of 1/1/2024 so we cannot include those in our 2023 numbers. In other words, about 15,000 pounds have been shifted to 2024 numbers. This issue with battery shipments not being recorded in the same year will be addressed in 2024 so that the majority of collections in a given year can be allocated to that same year to avoid the moving between years for improved accuracy.

Increases in Mix of Collection Sites

The accessibility rate in the state of Vermont is at an all-time high (98% of residents live within 10 miles of a collection site). However, given recent IPSOS survey findings and reviewing our list of public and private collection sites, Call2Recycle will pursue a new mix of sites that includes private sites that generate a high volume of single use batteries, such as universities, medical centers and long-term care facilities and we will reach out once again to grocery stores to add at least one major grocer as a public site (per consumer feedback they prefer recycling at grocers in IPSOS). Lastly, we are working with the state's largest waste hauler to add more of their sites to collect batteries.

Education & Outreach Focus

Call2Recycle is changing our ad agency to oversee the education & outreach campaign in the state. We feel it is time to rethink and refresh the approach to educating consumers to increase the incidence of recycling batteries. Additionally, we will work with the state's largest hauler to investigate running a campaign with this company as IPSOS findings revealed that many consumers prefer to hear about recycling from their waste haulers. Lastly, we will also partner with the solid waste districts to ensure their education and outreach driven by their 5 year district plans include specific focus on battery recycling education especially in regions where we have seen lower incidence rates.





Call2Recycle is committed to ensuring primary battery collections in the state of Vermont are successful. We will employ all of these tactics to ensure the 2024 program and future years are successful in increasing battery collections in the state.

Sincerely,

Carin Stuart

Steward Relations Manager

Call2Recycle, Inc.

2023

VERMONT PRIMARY BATTERY STEWARDSHIP ANNUAL REPORT

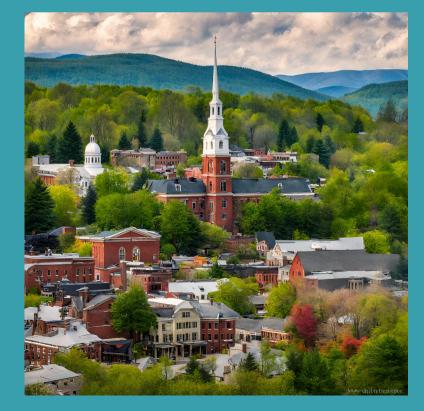
REPORTING PERIOD: JANUARY - DECEMBER 2023

SUBMITTED: FEBRUARY 29, 2024

PREPARED FOR:

VERMONT AGENCY OF NATURAL RESOURCES DEPARTMENT OF ENVIRONMENTAL CONSERVATION WASTE MANAGEMENT AND PREVENTION DIVISION DAVIS BUILDING - 1ST FLOOR ONE NATIONAL LIFE DRIVE MONTPELIER, VT 05620-3704

PREPARED BY:
CALL2RECYCLE, INC.
1000 PARKWOOD CIRCLE,
SUITE 200
ATLANTA, GA 30339
678.419.9999 |
WWW.CALL2RECYCLE.ORG



Call2Recycle, Inc.
Changing habits. Inspiring action.

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2023 Program Highlights

In 2023, Call2Recycle is in the third year of the next five-year term as the stewardship organization for the Vermont Primary Battery Stewardship Program. 2022 was the first full year in which prepandemic activity resumed for businesses and consumers in the United States. In 2022, collections were the highest collection numbers for the program both in terms of pounds collected (149,884 lbs.) and collection rate (25%). In 2023, the program experienced a drop in both total pounds collected (117,501) and in the collection rate (22%). More than half of the drop in collections was due to lower volume at a single collection site and this was due to shipments late in December which are received at our sorting facility in 2024. In terms of awareness and incidence, more Vermonters are aware they can recycle primary batteries (61% up 4 points from 2022), but incidence has declined (down 8% from 2022). This drop coincides with consumers, mostly women, storing batteries for a more convenient time to drop off for recycling. Additionally, convenience has been cited as a reason to store their batteries where Vermonters prefer a drop off location near work or at the grocery store.

Education & Outreach

In 2023 there was a focused effort to reach the 35-54-year-old demographic to increase awareness and incidence for recycling batteries. Call2Recycle worked with the marketing communications firm, HMC (based in Richmond, VT) to refine Vermont specific creative assets and determine the best mix of non-traditional and traditional media. Messaging continued to use three pillars -community, environment, and safety - anchored by imagery reflecting Vermont's natural landscape. The multi-platform social media campaign created 6.6M impressions, more than twice the amount in 2022. There was a corresponding 4-point increase in consumer awareness in Vermont. Due to Google analytics changing their algorithm for web tracking and analysis mid-2023, we cannot compare web visits between 2022 and 2023.

EPR Partnerships

To bolster recycling for multiple materials in Vermont, Call2Recycle collaborated with the other Vermont Extended Producer Responsibility (EPR) programs, including paints, electronics, light bulbs, and thermostats, to create public information television segments and outreach materials.

Plan Renewal

On January 21, 2021, Vermont Agency of Natural Resources approved Call2Recycle's new five-year plan for the Vermont Primary Battery Stewardship Program.

At Home Mailer

In October, Call2Recycle launched an At-Home mailer collection pilot in Vermont. At the end of the year, 95 pounds of primary batteries were returned over the 12-month trial period. 163 mailers were ordered with 29 mailers returned or a return rate of 17.7% at the close of the trial. The cost per pound to collect was \$136.58/lbs. which is not feasible to expand this at-home mailer trial to additional locations in the state.

10 V.S.A. § 7585. ANNUAL REPORT; PLAN AUDIT - Annual report. On or before March 1, 2018, and annually thereafter, a producer or a primary battery stewardship organization shall submit a report to the Secretary that contains the following:

(1) the weight of primary batteries collected by the producer or the primary battery stewardship organization in the prior calendar year;

In 2023, Call2Recycle, Inc. collected 117,501 pounds of primary batteries Vermont. This was a decrease of 21.6% over the total amount of primary batteries collected in 2022. Below please find the 2022 & 2023 primary battery recycling data.

| Primary Battery Recycling Collection (Lbs) | | | | | | | |
|---|---------|---------|-------------------|----------|--|--|--|
| Material Type | 2022 | 2023 | Change in Lbs. | % Change | | | |
| Alkaline (Including Carbon Zinc & Silver Oxide) | 146,655 | 114,602 | (32,053) | (22.0%) | | | |
| Lithium | 3,222 | 2,899 | (323) | (10.0%) | | | |
| Mercury | 7 | 0 | (7) | (100%) | | | |
| Total | 149,884 | 117,501 | (32,383) | (21.6%) | | | |

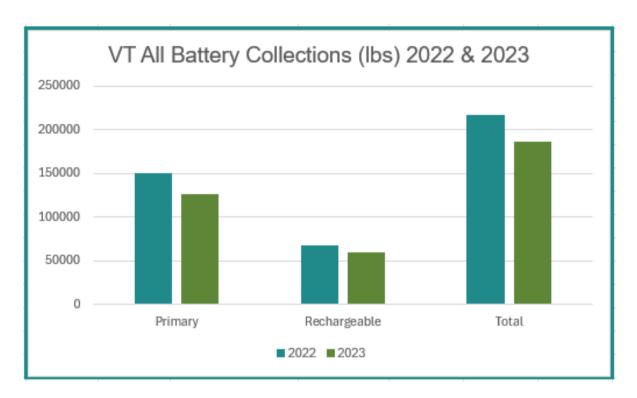
(2) the estimated percentage, by weight, of rechargeable batteries collected by the producer or the primary battery stewardship organization in the prior calendar year.

In 2023, Call2Recycle, Inc. collected 59,467 pounds of rechargeable batteries in Vermont, which is a decrease of 7.7% of the total amount of rechargeable batteries as compared to 2022. Below please find the rechargeable battery recycling data for both 2022 & 2023.

| Rechargeable Battery Recycling Collection (Lbs) | | | | | | | | |
|---|--------|--------|-------------------|----------|--|--|--|--|
| Material Type | 2022 | 2023 | Change in Lbs. | % Change | | | | |
| Small Sealed Lead Acid (SSLA/Pb) | 22,200 | 22,510 | 310 | 1.4% | | | | |
| Nickel Cadmium (Ni-Cd) | 17,197 | 14,646 | (2,551) | (14.8) | | | | |
| Lithium Ion (Li-Ion) | 19,480 | 16,958 | (2,522) | (12.9) | | | | |
| Nickel Metal-Hydride (Ni-MH) | 5,551 | 5,353 | (198) | (3.6%) | | | | |
| Totals | 64,428 | 59,467 | (7,864) | (7.7%) | | | | |

In 2023, Call2Recycle, Inc. collected 176,968 pounds of primary and rechargeable batteries (combines in Vermont, a 17.4% decrease from 2022. Below please find the combined battery recycling data for both 2022 & 2023.

| Combined Battery Recycling Collection (Lbs) | | | | | | | | |
|---|---------|---------|-------------------|----------|--|--|--|--|
| Material Type | 2022 | 2023 | Change in Lbs. | % Change | | | | |
| Primary | 149,884 | 117,501 | (32,383) | (21.6%) | | | | |
| Rechargeable | 64,428 | 59,467 | (4,961) | (7.7%) | | | | |
| Total | 214,312 | 176,968 | (37,344) | (17.4%) | | | | |



(3) The percentage of primary batteries collected in the prior calendar year that are from producers who are not participating in any approved stewardship plan, based on periodic sorting of primary batteries by the reporting producers;

Throughout the year, Call2Recycle, Inc. conducted periodic audits of batteries collected from Vermont collection sites. The audits captured brand name, chemistry, and weight sorted. Below please find the results of the audits combined with the percentage of batteries from non-participating producers:

| Vermont Battery Audit ¹ | Number of Brands | Weight Sorted (Lbs.) | % of Overall Weight |
|---------------------------------------|---------------------|-------------------------|------------------------|
| Participating Brands | 23 | 4,169 | 86% |
| Non-Participating Brands ² | 310 | 685 | 13% |
| Exempted Brands ³ | 3 | 5 | 1% |

1 Each category is mutually exclusive.

² Brands received through the Call2Recycle program that are not participating in an approved program.

³ Exempt brands were granted exemption status from the Agency as defined under the law.

Measuring the percent of primary battery brands collected from non-participating producers can be complex and misleading because once a battery is collected for recycling, Call2Recycle must fund the proper recycling of that battery even though that battery may be exempt from the law. Examples of exempt batteries are ones sold in products, batteries sold specifically for hearing aids, or batteries sold directly to the business or industrial sector.

In addition, once a battery is collected for recycling, it is impossible to know if that battery, sold by a participating steward is covered under the law – as it may be sold in a product or directly to the business sector – therefore, the 13% shown above can be misleading.

(4) the collection rate achieved in the prior calendar year under the primary battery stewardship plan, including a report of the estimate total sales data by weight for primary batteries sold in the State for the previous three calendar years;

Fifteen (15) obligated stewards selling covered primary batteries into the State of Vermont participated in Call2Recycle, Inc.'s approved primary battery stewardship plan. This is down by 2 stewards in 2022. Below details the estimated total weight of covered primary batteries as defined under the law, sold by producers participating in Call2Recycle, Inc.'s plan, total weight collected of all primary batteries (participating, non-participating and exempt) and the 2023 achieved collection rate for producers participating in Call2Recycle, Inc's plan:

| Primary Battery Collection Rate | | | | | |
|--|---------|--|--|--|--|
| Total Weight of Covered Battereis Sold into VT by Producers Participating in Call2Recycle, Inc. (3 Year Average) | 544,570 | | | | |
| Total Weight of All Primary Batteires Collected | 117,501 | | | | |
| Collection Rate Proposed for 2023 in Call2Recycle's Plan | 25% | | | | |
| Call2Recycle, Inc. Collection Rate Achieved in 2023 on behalf of Participating Producers | 22% | | | | |

(5) the locations for all collection points set up by the primary battery producers covered by the primary battery stewardship plan and contact information for each location;

Call2Recycle, Inc. provides an easy, responsible, and no-cost solution for consumer battery drop-off at retailers, municipalities, and solid waste management facilities. Below please find the list of these sites and contact information for each site:

| Account Name | Address | County | Main Phone |
|--|--|--------------------------|------------------------|
| A.B.L.E. Waste | 512 E. Woodstock Rd, Woodstock, VT, 05091 | Windsor | 802672356 |
| A.B.L.E. Waste Fast Trash | Bridgewater Town Garage, Bridgewater Corners, VT, | Windsor | 802674447 |
| Addison County Solid Waste Management District | 05035 1223 Route 7 South, Middlebury, VT, 05753-8800 | Addison | 802388233 |
| Alburgh Transfer Station | 10 Dump Road, Alburgh, VT, 05440 | Grand Isle | 802796607 |
| Aubuchon Hardware | 50 Shelburne Shopping Park, Shelburne, VT, 05482-7488 | Chittenden | 802985334 |
| Aubuchon Hardware | 40 Main St, Montpelier, VT, 05602 | Washington | 802223170 |
| Battenkill Bicycles | 99 Bonnet Street, Manchester Center, VT, 05255 | Bennington | 802362273 |
| Bennington Transfer Station | 111 South St. Suite 203, Bennington, VT, 05201 | Bennington | 802447873 |
| Benson Transfer Station | 503 Glenn Rd, Benson, VT, 05743-9477 | Rutland | 802342570 |
| Bibens Ace Hardware | 1127 North Ave, Burlington, VT, 05408 | Chittenden | 802881005 |
| Bibens Ace Hardware | 15 Essex Way, Essex, VT, 05452 | Chittenden | 802870812 |
| Bibens Ace Hardware | 1961 Williston Rd, South Burlington, VT, 05403 | Chittenden | 802866096 |
| Bibens Home Center Inc. | 362 River Rd, North Springfield, VT, 05150 | Windsor | 802886228 |
| Bicycle Express - Waterbury VT | 23 Commercial Dr, Waterbury, VT, 05676 | Washington | 802882828 |
| Bisbee's Hardware | 109 Mad River Green, Waitsfield, VT, 05673-7297 | Washington | 802496363 |
| Bridgewater Town Garage | 65 School House Road, Bridgewater, VT, 05034 | Windsor | 802672537 |
| Broughton True Value Hardware | 3437 VT Route 22A, Bridport, VT, 05734-4416 | Addison | 802758247 |
| Brown and Roberts Ace Hardware | 182 Main St, Brattleboro, VT, 05301-2892 | Windham | 802257456 |
| Cambridge Transfer Sation | Route 104, Cambridge, VT, 05444 | Lamoille | 802891405 |
| Casella Coventry Landfill/CWM Transportation, Inc. | 21 Landfill Ln, Newport, VT, 05855-4504 | Orleans | 802334830 |
| Casella Waste Earthwise Transfer | 6911 Main St, Waitsfield, VT, 05673-6023 408 E Montpelier Rd, Montpelier, VT, 05602-8255 | Washington | 802496639 802224012 |
| Casella Waste Management Depot | | Washington | |
| Cavendish Transfer Station-Town Offices Chittenden Transfer Station | 37 High St, Cavendish, VT, 05142-4430 | Windsor Rutland | 802226729 |
| | 300 Holden Rd, Chittenden, VT, 05737-9800 | | 802342570 802888317 |
| Country Home Center | 85 Center Rd, Morrisville, VT, 05661-8585 | Lamoille Orleans | |
| Craftsbury Transfer Station | 40 Creek Rd, Craftsbury, VT, 05826-9528 | Chittenden | 802496639 |
| CSWD Burlington Drop-Off Center | 339 Pine St, Burlington, VT, 05401-4739 | | 802872810 |
| CSWD Environmental Depot | 1011 Airport Parkway, South Burlington, VT, 05403 | Chittenden Chittenden | 802865466 802872810 |
| CSWD Essex Drop-Off Center | 218 Colchester Rd, Essex Junction, VT, 05452-2405 | Chittenden | 802872810 |
| CSWD Hinesburg Drop-Off Center | 907 Beecher Hill Rd, Hinesburg, VT, 05461-9135 | Chittenden | |
| CSWD Milton Drop-Off Center | 36 Landfill Rd, Milton, VT, 05468-3886 | Chittenden | 802872810 |
| CSWD South Burlington Drop-Off Center CSWD Williston Drop-Off Center | 87 Landfill Rd, South Burlington, VT, 05403-5702 | | 802872810 |
| CVSWMD - ARCC | 1492 Redmond Rd, Williston, VT, 05495-7701 | Chittenden | 802872810 |
| Damon Hall | 540 N Main St, Barre, VT, 05641-2504 1 Quechee Road, Hartland, VT, 05048 | Washington Windsor | 802476190 |
| Dover Transfer Station | | Windham | 802436244 |
| | 11 Landfill Road, West Dover, VT, 05356 | Chittenden | 802780798 802864919 |
| arl's Cyclery Z Way Rental Center | 2069 williston rd, south burlington, VT, 05403 115 County St, Bennington, VT, 05201-1809 | | 802442839 |
| Fair Haven Transfer Stn | 175 Fair Haven Ave, Fair Haven, VT, 05743 | Bennington Rutland | 802265829 |
| Fairlee Transfer Station | Dump Road off U.S. Rte 5 South, Fairlee, VT, 05045 | | 8023333436 |
| Green Mountain Bikes | 105 N. Main St., Rochester, VT, 05767 | Orange Windsor | 802767446 |
| Green's Ace Hardware | 10 Railroad St, Enosburg Falls, VT, 05767 | Windsor Franklin | 802933750 |
| Hartford Recycling Center | 2590 N Hartland Rd, White River Junction, VT, 05001- | Windsor | 802295574 |
| Hartland Town Offices | 9819 1 Quechee Road, Hartland, VT, 05048 | Windsor | 802295574 |
| nterstate All Battery Center of Rutland | 71 River St, Rutland, VT, 05701-3935 | Rutland | |
| J & H Do It Best | 20 The Sq, Bellows Falls, VT, 05101-1335 | Windham | 802786907 802463414 |
| lerihill Ace Hardware | 249 VT Route 15, Jericho, VT, 05465-9641 | Chittenden | 802899127 |
| Johnson Hardware and Rental | 1442 VT Route 15, 3ericho, VT, 03403-9041 | Lamoille | 802635728 |
| ohnson Transfer Station | 941 Wilson Rd, Johnson, VT, 05656-9304 | Lamoille | 802053726 |
| Cenyons Hardware and Farm Supply | 93 N Main St, Northfield, VT, 05663-6742 | Washington | 80248596 |
| arrabee's Building Supply | 1410 US-2, West Danville, VT, 05873 | Caledonia | 802684362 |
| 3 | | Windham | |
| Londonderry Hardware | 5700 VT Route 100, Londonderry, VT, 05148-9537 189 Hanneford Dr, South Burlington, VT, 05403-6956 | | 802824392 |
| .owe's | · • • • • • • • • • • • • • • • • • • • | Chittenden | 802318905 |
| OWE'S | 10 Susie Wilson Rd, Essex Junction, VT, 05452-2807 | Chittenden | 802662913 |
| udlow Transfer Station udlow Transfer Station-Town Offices | 336 Route 100 S, Ludlow, VT, 05149-9510 | Windsor | 802228284 |
| Aanchester Town Clerk Office | 37 Depot St, Ludlow, VT, 05149-1300 | Windsor Bennington | 80222828 |
| | 40 Jeff Williams Way, Manchester Center, VT, 05255 | _ | 802362133 |
| Menard's Family True Value | 780 Brooklyn St, Morrisville, VT, 05661 | Lamoille Butland | 00224255 |
| Aiddletown Springs Transfer Station | 8 Fire House Ln, Middletown Springs, VT, 05757 | Rutland | 80234257 |
| Milton Ace Hardware | 5 Southerberry Dr, Milton, VT, 05468-4537 | Chittenden | 80289341 |
| Aorrisville Transfer Station | 832 Cochran Road, Morrisville, VT, 05661 | Lamoille | 80225395 |
| IEKWMD - Ryegate Recycling Ctr | 269 School St, East Ryegate, VT, 05042 | Caledonia | 802626353 |
| NEKWMD - Waterford Recycling | Duck Pond Rd, Lower Waterford, VT, 05819 | Caledonia | 802626353 |
| NEKWMD - Westfield Recycling | 757 VT Route 100, Westfield, VT, 05874-9666 | Orleans | 802626353 |
| NEKWMD - Westmore Recycling NEKWMD - Wheelock Recycling | 6988 VT Route 5A, Westmore, VT, 05860 Route 122, Lyndonville, VT, 05851-6000 | Orleans Caledonia | 802626353 802626353 |
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| 161 Route 58 E, Irasburg, VT, 05845-9666 End of Town Highway 14, Saint Johnsbury, VT, 05819- 8590 621 Railroad St, Island Pond, VT, 05846-9626 153 Sawmill Rd, Lower Cabot, VT, 110 Brook Rd, Concord, VT, 05824 | Orleans Caledonia Essex Washington | 80262635 80262635 80262635 80262635 |
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| 440 December Deed Depuille VT 05020 | Essex Caledonia | 80262635 |
| 448 Peacham Road, Danville, VT, 05828 | Orleans | 80262635 |
| 3427 US Route 5, Derby, VT, 05829 | | 80262635 |
| 3427 US Route 5, Derby, VT, 05829 | Orleans | 80262635 |
| 1600 Dry Pond Rd, Glover, VT, 5839 | Orleans | 80262635 |
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| 105 Court St, Middlebury, VT, 05753-1475 4659 Route 113, Thetford Center, VT, 05075 | Addison Orange | 8027852 |
| | Town Hwy 8, Greensboro, VT, 05841 3157 Valley Rd, Holland, VT, 05830 1375 Cross Rd, North Troy, VT, 05859-9818 Transfer Station Rd, Lunenburg, VT, 05906 285 Hatton Hts, Morgan, VT, 05853-9601 285 Hatton Hts, Morgan, VT, 05853-9601 1358 Newark St, West Burke, VT, 05871-9733 Rt105, The Old Town Garage, Newport Town, VT, 05857 249 VT Route 114 S, Norton, VT, 05907 Town Highway #2, E Peacham, VT, 188 N Main St Ste 4, Barre, VT, 05641-4370 830 Union St, Newport, VT, 05855-5523 10 The Green, Woodstock, VT, 05091 224 Church St, Lyndonville, VT, 05851-9616 158 Morse Dr., Fairfax, VT, 05454 24 New Boston Road, Norwich, VT, 05055 380 Main St Route 108, Bakersfield, VT, 05441-9998 86 Mountain Rd, Montgomery Center, VT, 05471-3130 362 W Shore Rd, North Hero, VT, 05486-4514 83 Rewes Dr, Saint Albans, VT, 05478-2000 975 Lower Plain, Bradford, VT, 05602 37 Church St, Burlington, VT, 05602 37 Church St, Burlington, VT, 05602 37 Church St, Burlington, VT, 05603 3639 US Route 5, Spartanburg, VT, 05829-9490 511 center street, Pownal, VT, 05261 511 Center St, Pownal, VT, 05261 511 Center St, Pownal, VT, 05261 512 Center St, Hyde Park, VT, 05655-9267 47 Bridge St, South Bare, VT, 05495 590 E Main St, Hyde Park, VT, 05477-7748 9 Gregory Dr, South Burlington, VT, 05403-6061 14 Gleason Rd, Rutland, VT, 05477-7748 9 Gregory Dr, South Burlington, VT, 05403-6061 14 Gleason Rd, Rutland, VT, 05701-9001 218 Northwood Park Rd, Rutland, VT, 05736 69 VT-132, Sharon, VT, 05065 529 Jasper Mine Rd, Colchester, VT, 05403-5724 300 S Main St, Rutland, VT, 05701-9001 218 Northwood Park Rd, Rutland, VT, 05736 69 VT-132, Sharon, VT, 05401 515 N End Rd, Tinmouth, VT, 05701-9001 218 Northwood Park Rd, Rutland, VT, 05701-901 218 Northwood Park Rd, Rutland, VT, 05701-901 218 Northwood Park Rd, Rutland, VT, 05701-901 218 Orthwood Park Rd, Rutland, VT, 05701-901 218 Orthwood Park Rd, Rutland, VT, 05701-901 218 Orthwood Park Rd, Rutland, VT, 05701-905 159 VT Rte 132, South Burlington, VT, 05403-5724 300 S Main St, Rutland, VT, 05701-905 159 VT Rte 132, South | 3157 Valley Rd, Holland, VT, 05830 1375 Cross Rd, North Troy, VT, 05859-9818 Transfer Station Rd, Lunenburg, VT, 05906 285 Hatton Hts, Morgan, VT, 05853-9601 Orleans 1358 Newark St, West Burke, VT, 05871-9733 Rt 105, The Old Town Garage, Newport Town, VT, 05857 249 VT Route 114 S, Norton, VT, 05907 Town Highway #2, E Peacham, VT 188 N Main St Ste 4, Barre, VT, 05641-4370 330 Union St, Newport, VT, 05855-5523 Orleans 10 The Green, Woodstock, VT, 05091 224 Church St, Lyndonville, VT, 05851-9616 158 Morse Dr, Fairfax, VT, 05454 24 New Boston Road, Norwich, VT, 05055 330 Main St Route 108, Bakersfield, VT, 05441-9998 86 Mountain Rd, Montgomery Center, VT, 05471-3130 362 W Shore Rd, North Hero, VT, 05033 39 Main Street, Montpeller, VT, 05632 39 Main Street, Montpeller, VT, 05633 39 Main Street, Montpeller, VT, 05602 37 Church St, Burligton, VT, 05602 37 Church St, Burligton, VT, 056401 426 Plains Rd, Pittsford, VT, 056491 2518 Pomfret Road, North Pomfret, VT, 05033 30 Main St, Burligton, VT, 056401 426 Plains Rd, Pittsford, VT, 056491 511 Center St, Pownal, VT, 05261 511 Center St, Pownal, VT, 05261 512 Aspost St, Manchester Center, VT, 05495 294 Retail Way, Williston, VT, 05495 309 US Route S, Spartanburg, VT, 05495 309 US Route, Spartanburg, VT, 05 |

| Account Name | Address | County | Main Phone |
|---|--|------------|------------|
| Tinmouth Town Transfer Station | 537 Route 140, Tinmouth, VT, 05773 | Rutland | 8023425701 |
| Town of Burke | 212 School St, West Burke, VT, 05871-9009 | Caledonia | 8026269622 |
| Town of Cavendish | 354 Route 131, Cavendish, VT, 05142 | Windsor | 8022267743 |
| Town of Hartland | Town Offices (Damon Hall), Hartland, VT, 05048 | Windsor | 8026749235 |
| Town of Newbury | 4982 Main St N, Newbury, VT, 05051-9802 | Orange | 8028669008 |
| Town of Pomfret | Town Offices, North Pomfret, VT, 05053 | Windsor | 8026744474 |
| Town of Sharon | Town Offices, Sharon, VT, 05065 | Windsor | 8026744474 |
| Town of Springfield | 100 Recycle Road, Springfield, VT, 05156-2140 | Windsor | 8028855827 |
| Town of Wardsboro | 77 Dump Rd, Wardsboro, VT, 05355-6707 | Windham | 8028966542 |
| Vermont Bicycle Shop | 105 N Main St., Barre, VT, 05641 | Chittenden | 8026228222 |
| Vermont Bike & Brew | 242 Academy Rd, Thetford, VT, 05074 | Orange | 8022742277 |
| Vershire Recycling Center | 6894 VT Route 113, Vershire, VT, 05079-9604 | Orange | 8026852227 |
| Vershire Town Office | 6897 VT Route 113, Vershire, VT, 05079 | Orange | 8026852227 |
| Waterbury True Value Hardware | 838 Waterbury Stowe Rd, Waterbury, VT, 05676- | Washington | 8022448905 |
| Weathersfield Recycling Center | 9730 5024 Route 106, Perkinsville, VT, 05151 | Windsor | 8022635651 |
| West Fairlee Town Offices | 870 Rte. 113, West Fairlee, VT, 05083 | Orange | 8023339696 |
| Weston Town Office | 12 Lawrence Hill Rd., Weston, VT, 05161-0098 | Windsor | 8028246645 |
| Whitingham Transfer Station | 4189 VT Route 100, Whitingham, VT, 05361 | Windham | 8023687876 |
| Windham Solid Waste Management District | 327 Old Ferry Rd, Brattleboro, VT, 05301-9175 | Windham | 8022570272 |
| Windsor Municipal Building | 29 Union St, Windsor, VT, 05089-1503 | Windsor | 8026746786 |
| Woodstock Ace Hardware | 452 Woodstock Rd, Woodstock, VT, 05091-9759 | Windsor | 8024573291 |
| Worcester Transfer Station | 43 Calais Rd, Worcester, VT, 05682 | Washington | 8022539503 |

(6) examples and description of educational materials used to increase collections;

In 2023, Call2Recycle, Inc. employed an integrated, multi-channel approach to educate stakeholders, maintain awareness of battery recycling in Vermont, and encourage Vermonters to act and recycle their used batteries. Below is an outline of 2023 program activities:



Figure 1

Program Resource Guide

In 2022, Call2Recycle developed and distributed a new digital Program Resource Guide (Figure 1) to help collection sites navigate and enhance their participation in the program. The all-inclusive guide offers a program overview, safe battery handling, preparation, and packaging instructions, and educational materials, among other information. In 2023, Call2Recycle began a campaign to remind collection sites of the materials that can be used to promote battery collections around key battery recycling dates and during special events.

Point of Sale Material

Call2Recycle offered collection sites with point-of-sale material (Figure 2): a shelf talker for placement near the battery display and a cling for affixing to a counter or window to identify their location as a battery drop-off location. Both items are available via online order form.





Figure 2

At Home Mailer

In fall of 2022, Call2Recycle launched an "at-home" mailer pilot program where Call2Recycle mailed postcards to residents in Bennington and Londonderry counties to inform residents of this new program and instructions on how to order an at home mailer collection kit. During a one-year period, 163 at home mailers were mailed out to residents in Vermont. From November 2022 to November 2023, 29 mailers (or 17.7%) were returned to Call2Recycle with single-use batteries inside. A total of 94.3 pounds of single-use batteries were collected which equated to \$136.58 per pound collection for this pilot program. As a result, this specific program is overly costly to continue testing in the state of Vermont.



Collaborative EPR Outreach

In 2023, Call2Recycle renewed outreach efforts in partnership with other legislated Vermont Extended Producer Responsibility (EPR) programs: electronics, paint, fluorescent light bulbs, and mercury thermostats. A mix of outlets were utilized to disseminate information about these materials requiring "Special Recycling," including 15-second and 30-second television commercials on WCAX TV, digital ads on Front Porch Forum, OTT – Statewide Spanish, and brochure distribution (Figure 3), which is available in multiple languages.



Figure 3

Paid Digital

Call2Recycle again partnered with local Marketing Communications agency, HMC, to create a statewide digital campaign (Figure 4) with a concentration on engaging Vermonters aged 35-54. The campaign included paid search and a mix of feed and stories on Facebook, Instagram, Snapchat and X (Formally Twitter). The creative used was an extension of the 2022 Vermont imagery concept which we call the "Re-Re: campaign; however, updated to reflect the natural environment found in Vermont with a direct "call to action" to Respect, Restore and Reflect" both the environment and safety concerns with the disposal of lithium-ion batteries. Using images of the Vermont landscape to showcase the natural beauty of Vermont, the refresh reinforced the safety message to keep batteries out of the blue bins and garbage to protect Vermont while emphasizing the 'how and where' for battery recycling, directly driving the audience to the drop-off locator.







Figure 4

Outreach Metrics

Call2Recycle implemented continuous outreach and promotional activities to ensure battery recycling remains top-of-mind for consumers and stakeholders across Vermont. Specifically, Call2Recycle implemented activities that were measurable to assess progress for this five-year term of the program. These activities included the following:

Social Media Websites and Campaigns

The social media websites included Facebook/Instagram, X (formerly Twitter), YouTube, Front Porch Forum, and Google. Call2Recycle engaged in both organic and paid social campaigns. In total, over 6.6M impressions were attained in a broad campaign to refresh the Vermont Primary Battery Stewardship Program brand. See impressions, posts, and click-through rates (CTR).

EPR Partnerships

Call2Recycle partnered with the other Vermont EPR programs on television and Front Porch Forum campaigns from January through November. This resulted in 1,228,000 impressions that educated consumers on how to recycle batteries.

Dedicated Vermont Landing Page and Locator

Call2Recycle maintains a Vermont-specific landing page at www.call2recycle.org/vermont, which includes promotional and educational materials, as well as access to its online locator. The locator encourages users to enter their zip code for the nearest Call2Recycle drop-off locations. The online drop-off locator was used 20,821 times in 2023. The visits to the Call2Recycle dedicated Vermont page were 9,386. Comparisons to 2022 visits are not provided as Google analytics changed their algorithm for web tracking and analysis mid-2023 therefore we cannot compare web visits between 2022 and 2023.

| Vermont 2023 Outreach Metrics | | | | | | | |
|-------------------------------|------------------|--------------|------------|--|--|--|--|
| Social Media Websites | Fans & Followers | Posts/Tweets | Engagement | | | | |
| Facebook | 330 | 67 | 6% | | | | |
| X (formerly Twitter) | 176 | 71 | 1.08% | | | | |
| | | | | | | | |
| Social Campaigns | Impressions | Clicks | CTR | | | | |
| Paid Google Search | 8,282 | 1,685 | 20.35% | | | | |
| Paid Facebook/Instgram | 3,705,740 | 5,259 | 0.14% | | | | |
| Paid YouTube | 461,959 | 174 | 0.04% | | | | |
| Total | 4,175,981 | 7,118 | | | | | |
| | | | | | | | |
| Website Vsiits | 2021 | 2022 | 2023* | | | | |
| Vermont Landing Page | 4,827 | 15,809 | 9,386 | | | | |
| Call2Recycle Locator | 30,311 | 28,799 | 20,821 | | | | |

^{*2023} website metrics cannot be directly compared with previous years as Google Analytics released the new GA4 web tracking replacing the previous standard, Universal Analytics, drastically changing results.

Consumer Survey to Measure Effectiveness:

In the Fall of 2015, Call2Recycle, Inc. conducted its first survey in Vermont to benchmark consumer awareness of single-use battery recycling. The survey has been repeated each Fall to measure the effectiveness of Call2Recycle's education and outreach initiatives to gauge awareness (% aware that single-use batteries can be recycled) and incidence (% who have actually recycled their single-use batteries). Below please find the results of two high-level measures from the surveys for the last seven years:

| High-Level Consumer Survey Results | Fall 2017 | Fall 2018 | Fall 2019 | Fall 2020 | Fall 2021 | Fall 2022 | Fall 2023 |
|--|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
| Awareness % of Vermonters that know single-use batteries can be recycled | 57% | 56% | 61% | 59% | 57% | 57% | 61% |
| Incidence % of Vermonters that have recycled single-use batteries in past 12 months | 40% | 41% | 49% | 44% | 50% | 49% | 41% |

In 2023, we saw an increase in the percent of Vermonters who know single-use batteries can be recycled (61%) but a decrease in Vermonters who recycled their single-use batteries in the past 12 months (41% to 49%).

(7) the manner in which the collected primary batteries were managed

Used batteries were collected for recycling through an established network of sites throughout Vermont. Once collected and packaged for shipment, these batteries were shipped directly to its contracted sorter, Cirba Solutions (formerly, Battery Solutions Recovery, LLC).

Shipments of used batteries are recorded by site, sorted by chemistry, consolidated into truckload shipments, and sent to Call2Recycle's qualified processing network. Below please find the physical flow (Figure 6) representing the robust network of downstream vendors who meet Call2Recycle's service standards and are approved to accept each type of battery chemistry collected by Call2Recycle for proper recycling.

Call2Recycle Physical Flow: United States



Public & Private

Public agencies Retailers Businesses Municipalities



Sorting Partners

Cirba Solutions Mesa, AZ Wixom, MI

Inmetco Ellwood City, PA Wistron GreenTech McKinney, TX



Approved Downstream Vendors

Li-lon

Interco Madison, IL

Li-Cycle Rochester, NY

Recycling Coordinators, Inc. Akron, OH

Redwood Materials Carson City, NV

Retriev Lancaster, OH

SungEel Hitech Co. Incheon, South Korea

Umicore Hoboken, Belgium Ni-Cd, Ni-MH, Ni-Zn

Evergreen Battery Recycling (Ni-Cd only) Youngstown, OH

Inmetco (Ni-MH and Ni-Zn only) Ellwood City, PA

Interco (Ni-MH only) Madison, IL

Kobar Republic of Korea

NRCC Osaka Japan

Recycling Coordinators, Inc. (Ni-MH and Ni-Zn only) Akron, OH

Redwood Materials (Ni-MH only) Carson City, NV

Retriev (Ni-Cd only) Lancaster, OH

SNAM (Ni-Cd only) Viviez, France SSLA/Pb Dry Cell

Gopher Resource Eagan, MN

RSR-Quemetco, Inc. Indianapolis, IN

(Alkaline only) Wixom, MI

Inmetco (Alkaline) Ellwood City, PA

RMC (Alkaline only)
Port Colborne, ON, Canada

Alkaline, Carbon Zinc,

Cirba SolutionsRecovery

Lithium Primary

Redwood Materials (Lithium Primary only) Carson City, NV

Retriev (Lithium Primary only) Trail, BC Cellphones

The Wireless Alliance Boulder, CO

cal ②recycle®

Version 022023

(8) any material changes to the primary battery stewardship plan approved by the Secretary pursuant to section 7586 of this title; and

Call2Recycle made no material changes to the primary battery stewardship plan in 2023.

(9) the cost of implementation of the primary battery stewardship plan, including the costs of collection, recycling, education, and outreach.

Call2Recycle, Inc.'s annual audited financial statements are not finalized until early May each year. Below please find the unaudited financial statement specific to the primary battery stewardship program:

| Call2Recycle, Inc. (Vermont Primary Battery Program) Statement of Revenue & Expenses For the Year-Ended December 31, 2023 (Unaudited) | | | | | | | |
|---|----|------------|----|-------------|----|----------|--|
| | 20 |)23 budget | | 2023 actual | | Variance | |
| REVENUE | | | | | | | |
| Steward Fees | \$ | 453,128 | \$ | 400,696 | \$ | (52,432) | |
| TOTAL REVENUE | \$ | 453,128 | \$ | 400,696 | \$ | (52,432) | |
| EXPENSES | | | | | | | |
| Total Operations | \$ | 160,920 | \$ | 126,524 | \$ | (34,396) | |
| Salary & Benefits | \$ | 63,000 | \$ | 63,000 | \$ | - | |
| Education & Awareness | \$ | 100,000 | \$ | 95,000 | \$ | (5,000) | |
| Professional Fees | \$ | 24,775 | \$ | 24,775 | \$ | - | |
| Travel, Meals & Lodging | \$ | 5,000 | \$ | 900 | \$ | (4,100) | |
| Overhead | \$ | 13,720 | \$ | 13,720 | \$ | - | |
| Periodic Sorting | \$ | 10,000 | \$ | 15,000 | \$ | 5,000 | |
| ANR | \$ | 15,000 | \$ | 15,000 | \$ | - | |
| TOTAL EXPENSE | \$ | 392,415 | \$ | 353,919 | \$ | (38,496) | |
| Increase in net assests | | | | | | | |
| (operating) | \$ | 60,713 | \$ | 46,777 | \$ | (13,936) | |
| Collections | | | | | | | |
| Primary (lbs) | | 149,000 | | 117,152 | | -31,848 | |
| Total (lbs) | | 149,000 | | 117,152 | | -31,848 | |



Figure 5

The safe handling, transport, and disposal of used batteries, specifically lithium-based, continues to be a focus of Call2Recycle's collection efforts. To help ensure collection sites receive proper training on how to safely package used batteries for transportation, Call2Recycle, Inc. continued to require online safety training (Figure 5) for all participating collection sites, providing safety trainings via online video and guiz.

To further promote battery safety, Call2Recycle, Inc. staff participated in battery safety training sessions for Solid Waste Management Entities, as well as Household Hazardous Waste Coordinators' quarterly meetings hosted by the State. The focus of these activities was to reinforce the safe handling, packaging, and shipping of used batteries.

To help Vermonters prevent battery-related incidents, Call2Recycle created customized Vermont-specific Avoid the Spark, Be Battery Safety Smart campaign materials. Available at www.avoidthespark.com, Vermont collection sites and residents can now find battery safety guidelines, a disposal guide for specific types of batteries, and promotional materials including a video, social media posts, and logos. (Figure 6)

Avoid the Spark!



Figure 6



Figure 7

Damaged, Defective or Recalled Batteries

Damaged, defective and recalled (DDR) lithium-based batteries (Figure 7) require special handling per transportation regulations and cannot be placed in a typical Call2Recycle collection box. Therefore, Call2Recycle offers collection sites a fee-based compliant solution. In Vermont, Call2Recycle has provided special DDR containers to several sold waste entities to safely and compliantly ship these batteries for recycling.

Producers & Brands Covered by Call2Recycle, Inc.'s Approved Plan

In 2023, fifteen (15) obligated stewards, representing over 45 brands, financed Call2Recycle's primary battery collection and recycling program in Vermont. Below please find the list of obligated stewards and brands these stewards are "covering."

| Name | Brands | Address | Contact Information |
|--------------------------------------|--|----------------------------|---------------------|
| Ace Hardware Corporation | ACE | 2200 Kensington Court | Leigh Levinson |
| | | Oak Brook, IL 60523 | 866.290.5334 |
| Albertson's | Signature Care, Signature Select | 250 Parkcenter Blvd., | Angela Levin |
| | | Boise, ID 83706 | 510-514-2639 |
| Amazon.com | Amazon Basics | 410 Terry Avenue North | Heather Zakour |
| | | Seattle, WA 98109 | 206.266.1000 |
| Best Buy Co., Inc | Insignia | 7601 Penn Ave S | Tim Dunn |
| | | Minneapolis, MN 55423-3683 | 888.237.8289 |
| Delhaize America | Home 360; Smart Life | 2110 Executive Dr. | George Parmenter |
| | | Salisbury, NC 28147 | 800.442.6049 |
| Dollar General | DG Home | 100 Mission Ridge | Eric Voyles |
| | | Goodlettsville, TN 37072 | 615.855.4000 |
| Dorcy International | Diehard, Dorcy, Mastercell | 2700 Port Rd | Kathy Verhoeven |
| | | Columbus, OH 43217 | 614.497.5830 |
| | Duracell Activair, Duracell Coppertop, | 14 Research Dr | Steven Wicelinski |
| | | Luanne Lombardo | 800-551-2355 |
| | Duracell Coppertop Ultra Power, Duracell Mallory, | Bethel, CT 06801-1040 | |
| | Duracell Optimum, | | |
| Duracell US Operations | Duracell Power Pix, | | |
| | Duracell Prismatic, | | |
| | Duracell Procell, Duracell Quantum, Duracell Ultra, | | |
| | Duracell Ultra Advanced | | |
| Energizer Battery Manufacturing, Inc | Energizer | 25225 Detroit Rd | Kevin Rejent |
| | Eveready | Westlake, OH 44145 | 314-985-5200 |
| | Rayovac | | |
| HD Supply Holdings, Inc. | HD Supply | 3400 Cumberland Blvd SE | Armando Diaz |
| | | Atlanta, GA 30339-5940 | 770.852.9000 |
| Interstate Batteries Recycling, LLC | Interstate, Workaholic, PowerVolt, Power Patrol | 12770 Merit Drive | Tod Lyons |
| | | Dallas, TX 75251 | 888.772.3600 |
| Panasonic Corporation | Panasonic, Panasonic Pro, Panasonic Evolta | 2 Riverfront Plaza | Kazuhiro Suzuki |
| | | Ste 200 | 201.348.7000 |
| | | Newark, NJ 07102 | |
| Target Corporation | Up&Up | 33 S 6th St Ste CC-3625 | Catherine Wernecke |
| | | Minneapolis, MN 55402 | 800.440.0680 |
| Tractor Supply | JobSmart | 5401 Virginia Way | Pat Perry |
| | | Brentwood, TN 37027 | 615.440.4000 |
| True Value Company | True | 8600 W Bryn Mawr Ave | William Schwab |
| | | | |

Accessibility

To optimize battery and cellphone recycling across the country, Call2Recycle, Inc. developed a standard for measuring public recycling accessibility for these items. This accessibility rate measures the percent of a state's population that lives within a 10-mile radius of an available Call2Recycle, Inc. drop off location.

For 2022, Call2Recycle maintained a 96% accessibility rate in Vermont. Please see the adjacent map (Figure 8) for specific details.

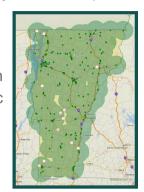
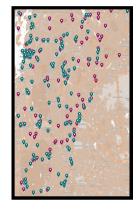


Figure 8



Call2Recycle maintains a mixture of private (not eligible to the public) and public sites in Vermont. Figure 9 shows this mixture of sites with purple sites public and teal sites private.

Figure 9

Customer Service Activity

Call2Recycle, Inc.'s customer service team handles hundreds of daily inquiries from collection sites and consumers weekly. In 2023, Call2Recycle's customer service team fielded the following inquiries and new site enrollments for Vermont:

| Vermont Activity | 2023 Totals | |
|---|-------------|--|
| Calls or Service Tickets (web-based, emails, etc.) from VT Collection Sites into Call2Recycle Customer Service | 309 | |
| New Collection Sites Added | 37 | |
| Rate of New Sites that Recycled Batteries in 2023 | 19% | |
| Call2Recycle Collection Boxes Sent to VT collection sites | 3,304 | |
| Call2Recycle Collection Boxes Returned from VT collection sites | 2,037 | |

Appendix – Vermont Consumer Survey (Fall 2023)

Full results available upon request.

Executive Summary: Vermont 2023

AWARENESS



Compared to last year, more Vermont residents believe that consumer household batteries can be recycled (72%, up 4 points).

Still, a quarter of Vermont's residents don't know whether household batteries can be recycled. There is, however, heightened awareness and certainty among residents regarding the recyclability of rechargeable batteries in 2023.

While there are no significant differences in awareness levels across age, there are marked differences when it comes to gender.

3 - © Ipsos

GENDER



This year, there are notable differences when it comes to gender and household battery recycling in Vermont.

Vermont men are more likely than women to believe that household batteries can be recycled, and women are more likely to be unsure, or think they can't be recycled at all – this is also the case when it comes to awareness of E-bike batteries.

This uncertainty and lack of awareness translates into recycling behaviours. Fewer Vermont women are recycling their household batteries, and more women are storing or throwing their batteries into the trash. Vermont women cite lack of knowledge and uncertainty as the main reasons for these behaviours.

RECYCLING BEHAVIOUR



Vermont residents are recycling similar quantities of household batteries compared to 2022. Last year, compared to the year before, fewer Vermont residents were storing fewer amounts of batteries, and more residents were throwing more batteries away. This year, we see the inverse, a more positive trend.

On average, the proportion of batteries being thrown away has decreased, down 9-points from last year. These batteries are likely accounted for in the 8-point increase in the proportion of batteries being stored by Vermont residents. This trend is mirrored by the decreased number of Vermont residents who are throwing away all their batteries, and the decrease in those who are storing none.

Executive Summary: Vermont 2023





Having positive attitudes towards recycling continues to be a trend for Vermonters this year. 9 in 10 agree recycling batteries preserves the environment, that there is an environmental benefit to recycling batteries, and that recycling is important.

Although Vermont residents are supportive of recycling in general, and battery recycling in particular, 8 in 10 Vermonters this year say sometimes it's just easier to throw something out than to recycle it (up 8-points).

Still, Vermonters are recycling similar amounts of batteries in 2023, and they are more likely this year to agree that consumer household battery recycling is convenient (57%). This is a good sign because we know that inconvenience and lack of awareness are often the top barriers to recycling household batteries.

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CONVENIENCE



Vermont residents who store batteries typically cite waiting for a more convenient time to recycle as their primary reason, and those who throw them away often do so for the sake of convenience. Of those who throw their batteries away, a quarter attribute their actions to the absence of a convenient recycling option in their community.

These insights tell us the importance of enhancing battery recycling processes in Vermont. Addressing barriers to convenience can positively influence Vermonter's battery recycling behaviours. In particular, Vermont residents would like recycling locations closer to their places of work or to have a pick-up service for their household batteries.

... continued

INFORMATION & PURCHASE



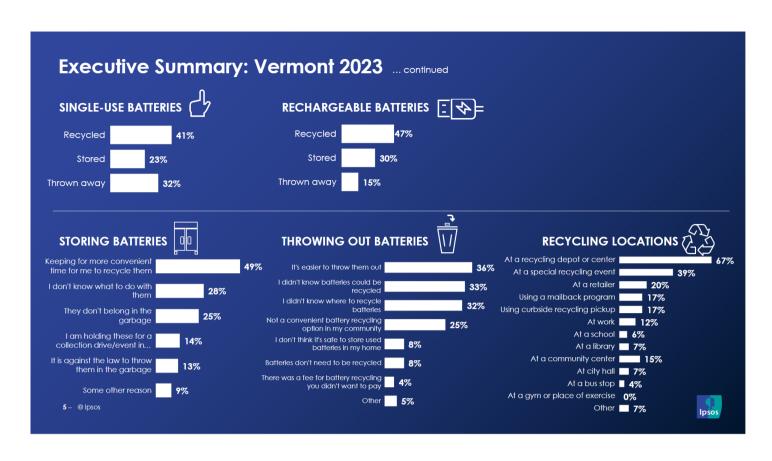
This year, Vermonters continue to get information about battery recycling from their local trash company or recycling center, online, or by searching for it themselves; they prefer these delivery mechanisms, along with local sources and information received by mail

Vermont women, and those aged 35+ are more likely to say they don't get battery recycling information at all.

Most Vermont residents don't remember where they bought their rechargeable batteries, but those who do listed online as number one. When it comes to single-use batteries, grocery stores are the top choice for Vermonters.



18 | 2023 | VERMONT PRIMARY BATTERY RECYCLING REPORT



Call 2 Recycle, Inc.

Changing habits. Inspiring action."



Call2Recycle, Inc.

1000 Parkwood Circle, Suite 200
Atlanta, GA 30339

678-419-9990 | call2recycle.org