







Vermont Department of Environmental Conservation

Waste Management & Prevention Division, Solid Waste Program
One National Life Drive, Davis 1
Montpelier, VT 05620-3520

WTrecycles.com

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Carin Stuart
Steward Relations Manager / Call2Recycle®
Call2Recycle, Inc.
1000 Parkwood Cir Ste. 200
Atlanta, GA 30339
CStuart@call2recycle.org
Sent via email

RE: 2023 Annual Report Review and 2024 Proposed Collection Rate and Outreach Plan

Dear Carin,

Thank you to you and Matt for the meeting on February 12th to discuss the upcoming plan for outreach and the proposed collection rate for 2024 and for the submittal of the 2023 Annual Report. We appreciate meeting with Call2Recycle quarterly on collection rates, outreach metrics and general program updates as well as Call2Recycle's continued daily coordination and accessibility with VT collection sites.

The 2023 Annual Report addressed all requirements of statute for what must be included, however, the Solid Waste Program (Program) is concerned that Call2Recycle did not meet this year's collection rate performance goal of 25%. A 22% collection rate for 2023 fails to show an incremental year-to-year increase in the collection rate goal over the term of the VT Primary Battery Stewardship Program Plan (Plan) as was outlined in the January 21, 2021 Plan Approval letter. The Program is requesting Call2Recycle achieve the collection rate performance goal of 25% for calendar year 2024 and take the following additional steps to promote awareness of battery recycling in VT and to improve the collection rate past 25% over the remainder of the Plan term.

- Continue using social media campaigns using reels and other short messaging so consumers know where to recycle their batteries.
- Continue EPR Television Ads
- Continue Front Porch Forum Ads including both individual battery specific ads and shared ads with other EPR programs.
- Conduct in person visits to grocery stores, pharmacy, hardware and other retailers to promote use of shelf talkers, window clings and other retail displays and raise awareness about where to recycle batteries in VT.
 Allow retail collection sites that are interested to sign up as a collection site.
- Increase existing collection site engagement around best practices and battery safety when conducting in person visits to VT.
- Coordinate with the solid waste management entity (SWME) school outreach group to promote National Geographic Curriculum and raise student awareness about where their family can recycle batteries in VT.
- Continue to message updated versions of the Avoid the Spark VT specific materials to all transfer stations, material recovery facilities (MRFs) and the one operating Landfill in VT.

- Offer all curbside haulers and transfer stations in VT outreach materials that they can distribute to their
 customers about how and where to recycle batteries. Outreach material should be compact and print worthy
 and illustrate simple messaging so hauler can easily distribute as an insert with billing or hand to customer. This
 would be consistent with what the IPSOS survey noted that consumers look to their trash hauler for information
 on how to recycle batteries.
- Coordinate with SWMEs on contacts for medical centers, technical and career centers, colleges, long term care healthcare facilities and other larger generators of batteries in their region in order to enlist them as program participants.
- Establish relationships with hazardous waste contractors servicing SWME household hazardous waste (HHW) programs and businesses in VT in order to encourage their participation in the program.

We appreciate Call2Recycle's efforts to continue to divert more batteries from the waste stream. If you have any questions, please feel free to contact me at (802) 522-5926 or mia.roethlein@vermont.gov.

Sincerely,

Mia Roethlein Solid Waste Program

VT Department of Environmental Conservation

cc: Josh Kelly, Materials Mgmt. Section Chief, Solid Waste Program; Matt Stephens, Call2Recycle