

Collector Training  
Webinar for  
SB1215 Covered  
Battery-Embedded  
Products Regulations  
Implementation

January 21, 2026



# Agenda

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**SB 1215 Statutory and Regulatory Overview  
Questions and Answers**

**Updated Collector Forms for Payment Claims  
Questions and Answers**

**Future Trainings and Outreach  
Questions and Answers**

# LEGISLATION



# Senate Bill (SB) 1215

## Covered Battery-Embedded Products (CBEPs)

- Legislation was passed in 2022 expanding the Covered Electronic Waste (CEW) Recycling Program to include CBEPs
- CalRecycle conducted rulemaking to implement SB 1215:
  - Established a covered battery-embedded waste recycling fee
  - Developed regulations to implement SB 1215 and modernize the program
- Implementation Timeline:
  - January 1, 2026: consumers begin paying the recycling fee for CBEPs
  - January 1, 2026: collectors can begin recovering CBEP CEW to be eligible for payments (*collection cannot start before*)
  - April 1, 2026: recyclers can begin submitting payment claims for CBEP CEW collected on or after January 1, 2026

# SB 1215 Definitions Related to CBEPs

- A **“Covered Electronic Waste”** means a **covered electronic device that is discarded.**
- **“Covered electronic device”** means either of the following two categories:
  - (A) ...a **video display device** containing a screen greater than four inches, measured diagonally, that is identified in the regulations adopted by DTSC.
    - **Video display devices comprise two categories: CRT and non-CRT**
  - (B) **Any covered battery-embedded product**, as defined in subdivision (f).
- **“Covered battery-embedded product”** is a product containing a battery from which the battery is not designed to be easily removed from the product by the user of the product with no more than commonly used household tools.”

# List of Covered Video Display Devices (These are not CBEPs even if they have an embedded battery.)



1. Cathode ray tube containing devices (CRT devices)
2. Cathode ray tubes (CRTs)
3. Computer monitors containing CRTs
4. Laptop computers with liquid crystal display (LCD)
5. LCD containing desktop monitors
6. Televisions containing CRTs
7. Televisions containing LCD screens
8. Plasma televisions
9. Portable DVD players with LCD screens
10. OLED-containing televisions;
11. OLED-containing laptop computers;
12. OLED-containing tablets;
13. OLED-containing desktop monitors;
14. LCD-containing tablets; and
15. LCD-containing smart displays

# Devices Excluded from the Definition of CBEP

- Certain medical devices used or prescribed in healthcare settings
- Video display devices that are covered electronic devices  
*(Can't claim a VDD as a CBEP or the same device twice, as a VDD and CBEP)*
- Energy storage systems
- Electronic nicotine delivery systems, which include electronic cannabis vaping devices



# Devices Excluded from the Definition of CBEP (continued)

## Motor Vehicle Exclusion

- **A motor vehicle is not a covered battery-embedded product.**
- “Motor vehicle” does not include any of the following:
  - (i) A motorized scooter.
  - (ii) A motorized skateboard.
  - (iii) A motorized hoverboard.

# COVERED BATTERY EMBEDDED PRODUCTS REGULATIONS



# SB 1215 Regulations: Definitions Related to CBEPs

The regulations clarified the SB 1215 statutory definition of a “covered battery-embedded product” by further defining the following:

- “Commonly used household tools” or “common household tools”
- “Designed to be easily removed from a product by the user of the product, with no more than commonly used household tools”

**"Common household tools" means tools that most people have at home.**

**These are considered common household tools:**

- Flathead, crosshead, and Phillips screwdrivers
- Paper clips
- Coins
- Hex keys (also called Allen wrenches)

**These are not considered common household tools:**

- Tools like hammers, mallets, scissors, pliers, knives, ratchets, saws, or chisels
- Special screwdrivers that:
  - Can't be bought by the general public
  - Are only made for one brand or company
  - Are protected by a U.S. patent
- Tools that are only given to:
  - People who buy a certain product
  - Employees or contractors of a company
  - People with a special license or certificate
- Tools that need batteries, electricity, or fuel to work
- Tools that need heat, chemicals, or a lot of force to remove a battery from a product

## What “Easily Removed by the User” Means

A battery is “easily removed by the user” if it can be taken out of a product by the person using it, using only common household tools (like a screwdriver), and without needing special skills or training.

### Examples of Batteries That Are Easily Removed:

- Marketed for removal.
- Instructions or warranty allow it
- No tools needed so the battery can be pulled out by hand.

If the product has a key, app, or lock to stop theft or tampering—but not to stop the user from removing the battery—then it still counts as easily removable.

## What Does Not Count as Easily Removed?

If the battery is glued in or attached in a way that needs special tools or a trained technician to remove it, it does not count as easily removable.

### Special Cases

Even if a battery seems removable, it **does not** count as easily removable if either:

1. The tool required to remove the battery is not a common household tool and using a common tool would void (cancel) the product’s warranty.  
**or**
2. The product has a label, manual, or notice that tells users not to remove the battery, even if they could do it with common tools.

# Manufacturer CBEP Decision Tree

## Manufacturer Notice Guidance

**Note:** CalRecycle will not be making any determinations regarding whether a specific product is a “covered battery-embedded product” (CBEP) that is subject to SB 1215. Consult with your own legal counsel regarding how statutory requirements apply to your business and products.

This decision tree is provided to help the manufacturer determine if their product is a CBEP.

**Question 1: Does your electronic device contain a battery?**



**Question 2: Is your device a covered video display device (VDD)?**



**Question 3: Is the battery-embedded product an excluded energy storage system, medical device, or electronic nicotine delivery system?**



**Question 4: Does the product contain a battery that is not designed to be easily removed by the user with no more than commonly used household tools? (PRC 42463(f)(1))**



**'Yes, It Is a CBEP' Examples**



# List of CBEPs Sold in California

CalRecycle compiled a list of products from notices sent to CalRecycle by manufacturers.

*Questions about specific product determinations should be directed to manufacturers.*

Both lists are linked to the right, but can also be found on our webpage:

[Manufacturer Notice Guidance - CalRecycle Home Page](#)

- The [PDF Table](#) document consolidates the data from the Manufacturer Notices into an easy-to-read chart
  - Categories of products
  - Manufacturer and brand names, and
  - Examples of products in each category.
- The [Notices Excel spreadsheet](#) is a sortable list of all noticed products from copies of the Manufacturer Notice.

# Example of Manufacturer PDF Table Notice

Category	Manufacturers Names	Brand Names	Examples of Devices
Appliances	LG, Samsung	LG Signature, Dacor	Air Conditioner, Laundry Washer/Dryer, Oven, Water Heater
Audio/Visual Professional Equipment	Canon, LG, Shure, Sony, Yamaha	Novathon	DJ Equipment, Production Equipment, Servers, Video Cameras
Audio/Visual Recording Devices	Atomi, Axon, Canon, DPI, Panasonic, Sony	ILIVE	Body/Dash Cam, Camcorder, Camera, Voice Recorder
Automotive Parts and Accessories	3M, Axon, Garmin, Interstate Batteries, StanleyBlack&Decker, T-Mobile	Dash Cam, GPS, MAC Tools	Tire Pressure Sensor, Diagnostic Tools, Portable Jump Starter
Aviation Parts and Accessories	Garmin		GPS Devices
Bicycle Parts and Accessories	Garmin, Shimano	Lazer	Connect Modules, Crank Set, Displays, GPS
Camping Equipment	Coghlan's Ltd.		Compass, Fan, Portable Shower, Torch lighter, Water Pump, Whistle
Charging Devices	Belkin, Garmin, Shure, Targus, Walmart	Hyper, Ozark Trail, PowerDrive	Charging Case, Power Banks
Computer and Peripherals	Acer, Apple, HP, Lenovo, Microsoft, Shure, TCL	Hyper X, Shure	Computer Tower, Hub, Keyboard, Microphone, Mouse, Stylus
Drawing and Writing Devices	DPI, Wacom	ILIVE	Drawing Tablets, Smart Notebook
E-Readers	Amazon	Kindle	E-readers
Exercise Equipment and Accessories	DPI, Garmin, Google	Fitbit, ILIVE	Fitness Equipment, Fitness Trackers (Ring, Bracelet)

# Example of Manufacturer Notices Excel Spreadsheet

Manufacturers Name	Brand Name	Model Number	Category
LG	LG	ARNH423K2A4.ANWALUS	Air Conditioner
LG	LG	ARNH423K3A4.ENWALUS	Air Conditioner
LG	LG	ARNH763K3A4.ENWALUS	Air Conditioner
LG	LG	ARNH963K2A4.ANWALUS	Air Conditioner
LG	LG	KNMFB071A.BWHBEUS	Air Conditioner
LG	LG	KNSAH091B.AT1GEHD	Air Conditioner
LG	LG	KNSAH121A.AT3GEHD	Air Conditioner
LG	LG	KNSAH121B.AT1GEHD	Air Conditioner
LG	LG	KNSAH181A.AT3GEHD	Air Conditioner
LG	LG	KNSAH241A.AT3GEHD	Air Conditioner
LG	LG	KNUFB091A.BWHBEUS	Air Conditioner
LG	LG	KNUFB121A.BWHBEUS	Air Conditioner
LG	LG	KNUFB181A.BWHBEUS	Air Conditioner
LG	LG	ZHBW055GA0.APILOT	Air Conditioner
Samsung	Samsung	AC009DNJDCG/AA	Air Conditioner
Samsung	Samsung	AC009DNJDCG/AA	Air Conditioner
Samsung	Samsung	AC012DNJDCG/AA	Air Conditioner
Samsung	Samsung	AC012DNJDCG/AA	Air Conditioner
Samsung	Samsung	AC015DNJDCG/AA	Air Conditioner
Samsung	Samsung	AC015DNJDCG/AA	Air Conditioner

# CEW Collector Requirements

SB 1215 Regulations have not fundamentally changed existing requirements for an approved collector.

- **CBEP is a type of CEW and not a separate category from CEW, existing CEW collection requirements apply to CBEPs.**
- Approved collectors must document CBEPs recovered.
- Designated Approved Collectors (DACs) and Local Governments approved collectors are exempt from:
  - Documenting the names and addresses of the California sources but are still required to provide other documentation related to circumstances of collection and if 5 or more units are collected from a nonresidential source, the name and address of the source must be provided.
  - Note: If there are changes in collection locations and/or method of collection, the scope of the Designation needs to be modified.

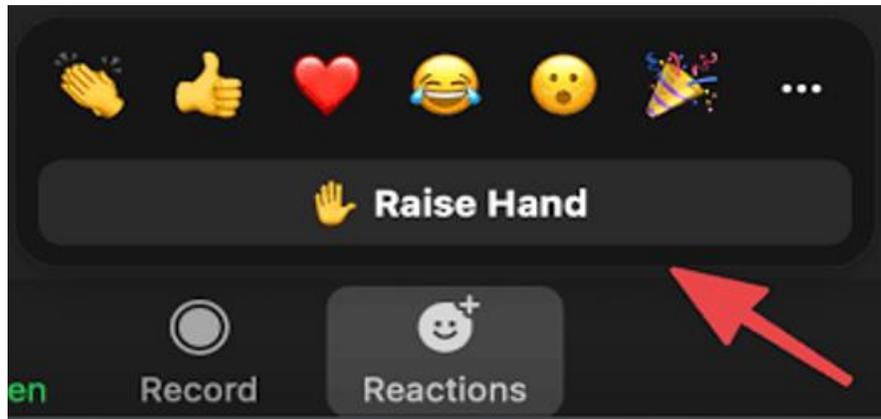
# SB 1215 Regulations Changes

- **Definition of “California Source”:**
  - “California Source” means persons, as defined in Section 42463(r) of the Public Resources Code, who generate CEW after their own use of a Covered Electronic Device within the State of California. Persons who receive, accumulate, consolidate, store, or otherwise handle discarded, donated or collected CEW are not the California sources of those CEW.
  - *For purposes of this chapter, “use” or “using” means operating the Covered Electronic Device in a manner consistent with ownership, including business or personal ownership, or the leasing of a Covered Electronic Device so long as the lessees operate the Covered Electronic Device within the State of California.*
- **Collectors must record the number of CBEP CEW collected (in addition to the number of CRT CEW and non-CRT CEW) on the collection logs.**
- **Collectors are no longer required to record the estimated weights of the CEW collected on the collection logs.**

# Questions

If you would like to ask a question about what was covered so far, you can ask in one of the following ways:

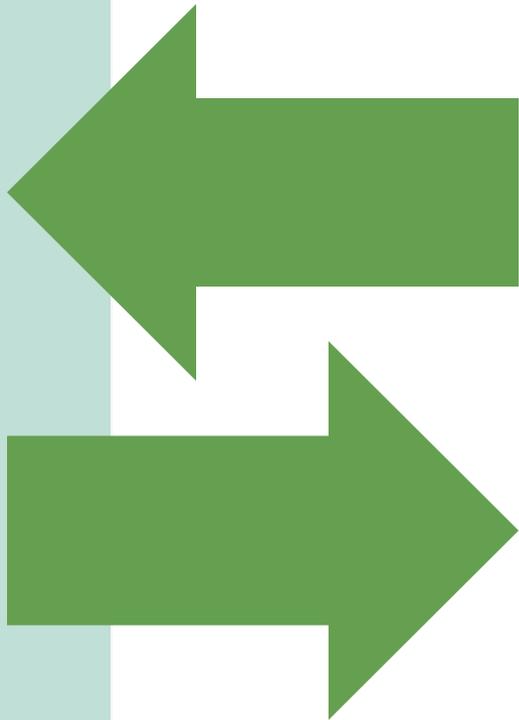
- Raise your hand and the host will unmute you.



- Type your question into the Q&A feature of this meeting, under More.



# UPDATED COLLECTOR FORMS FOR PAYMENT CLAIMS



# Reminder - Revised Application Forms

**If a collector or dual entity intends to begin collecting CBEP CEW on January 1, 2026, or after, it must update the information in the application:**

- A collector application ([CalRecycle 186C](#)): see page 4 for the “battery-embedded product CEW” type checkbox
- A dual entity application ([CalRecycle 186D](#)): see page 5 for the “battery-embedded product CEW” type checkbox
- Submit 30 calendar days prior to the effective date of any proposed changes.
- CalRecycle revised application forms to include CBEP CEW can be found on the [CalRecycle Forms and Information Supporting Participation webpage](#).

# CBEP Collector Information Update

- The new application forms are best suited for new applicants and renewals for existing participants.
- If you are already an approved collector, not in the renewal cycle, and your intention is to only add collection of CBEP, use the collector update template that was provided on November 14, 2025.
- Changes must be sent electronically:  
[ewasteapplications@calrecycle.ca.gov](mailto:ewasteapplications@calrecycle.ca.gov)

Dear CalRecycle,

Per the requirements in 18660.18(c) **ORGANIZATION NAME** notifies CalRecycle as follows:

(A) Name of organization and CEWID number.

**ORGANIZATION NAME**

CEWID: **XXXXXX**



(B) Mailing address and physical address.

Mailing: **ADDRESS**

Physical: **ADDRESS**

(C) Name of the Authorized Signatory.

(D) Telephone number(s) of the Authorized Signatory and any other persons identified in the application.

(E) E-mail address of the Authorized Signatory, and any other persons identified in the application.

(C) Name	(D) Phone Number	(E) Email

(F) The types of CEWs the approved collector intends to recover.

**Recovery: Battery Embedded Products**

(G) The anticipated start date of recovery of the CEWs.

**Anticipated start date: 1/2/2026**

(H) A statement, signed under penalty of perjury by an Authorized Signatory, that the information submitted is true and correct, and that the collector has satisfied the requirements of section 18660.12 of this Chapter.

*The undersigned collector, under penalty of perjury, certifies that the information submitted is true and correct, and that the collector has satisfied the requirements of Sections 18660.12 of this Chapter.*

Authorized Signatory's Printed Name: **CONTACT NAME**

Authorized Signatory's Signature: **CONTACT SIGNATURE**

# Changes to Approved Collector Forms

- CalRecycle updated the existing payment claims forms that are used by collectors and recyclers to include the additions and revisions made by SB 1215 Covered Battery-Embedded Products Emergency Regulations.
- **The following forms are posted on our [website](#):**
  - Covered Electronic Waste Transfer Receipt (CalRecycle 197)
  - Covered Electronic Waste Transfer Summary (CalRecycle 197S)
  - Covered Electronic Waste Collection Log (CalRecycle 198)
  - Covered Electronic Waste Source Anonymous Collection Log (CalRecycle 198SA)
- Starting January 1, 2026, CBEP CEW are eligible to be collected as part of the CEW Recycling Program and these updated collection and transfer forms can be used by collectors.

# Changes to Transfer Receipt (Form 197)

State of California  
CalRecycle 197 (Rev. 1/2026)

Department of Resources Recycling and Recovery  
MMLA/E-Waste and Battery Embedded Products

## COVERED ELECTRONIC WASTE (CEW) TRANSFER RECEIPT

### I. Transfer Information

Date of Transfer	Approved Collector Name	Collector CEWID #	Approved Recycler Name	Recycler CEWID #

### II. Transfer Amounts and Discrepancy

Check Here If Operating as a Dual Entity During This Transaction.

CEW Type	Certified Units Transferred	Certified Weights Pounds Transferred	SA Units From Units Transferred
CA Sourced CRT CEWs		lbs.	
CA Sourced Non-CRT CEWs		lbs.	
CA Sourced CBEP CEW		lbs.	
Totals		lbs.	

#### COLLECTOR ACTIVITY

Description of any activity, such as storage, repair, refurbishment, resale, reuse, transfer, packaging, or consolidation/export that explains any discrepancy between the CEWs transferred and the CEWs collected as documented in the collection log.

### III. Documents Attachments Provided

Check all that apply:

- Attach Copies of all applicable portions of Collection Logs/CalRecycle 198/CalRecycle 198SA received from the Approved Collector listed above for this transaction.
- Attach Copies of all Proof of Designations/CalRecycle 184s received from the Approved Collector listed above for this transaction.

### IV. California Source Declaration and Weight Verification

I have verified that all CEWs transferred to the Approved Recycler for which recovery payments are requested are solely from California sources, and have not been previously submitted for payment.

Signature of Approved Collector	Printed Name

I have verified that the unit counts and weights of CEWs transferred and recorded on this receipt are true and accurate and have not been previously submitted for payment.

Signature of Approved Recycler	Printed Name

### II. Transfer Amounts and Discrepancy

Check Here If Operating as a Dual Entity During This Transaction.

CEW Type	Certified Units Transferred	Certified Weights Pounds Transferred	SA Units From Units Transferred
CA Sourced CRT CEWs		lbs.	
CA Sourced Non-CRT CEWs		lbs.	
CA Sourced CBEP CEW		lbs.	
Totals		lbs.	

#### COLLECTOR ACTIVITY

Description of any activity, such as storage, repair, refurbishment, resale, reuse, transfer, packaging, or consolidation/export that explains any discrepancy between the CEWs transferred and the CEWs collected as documented in the collection log.

### III. Documents Attachments Provided

Check all that apply:

- Attach Copies of all applicable portions of Collection Logs/CalRecycle 198/CalRecycle 198SA received from the Approved Collector listed above for this transaction.
- Attach Copies of all Proof of Designations/CalRecycle 184s received from the Approved Collector listed above for this transaction.

# Changes to Collection Log (Form 198)

State of California  
CalRecycle 198 (Rev. 1/2025)

Department of Resources Recycling and Recovery  
MMLA/E-Waste and Battery Embedded Products

## Covered Electronic Waste (CEW) Collection Log

### I. Approved Collector or Handler Information

Approved Collector/Handler <u>Organization</u> :	CEWID #:
Approved Collector/Handler Address, City, Zip:	
<u>Primary</u> Contact Name:	Telephone #:
<u>Description of CEW Collection Activity</u> :	
Location of Collection Event (if different from above):	

### II. Material Received from California Source

Date (m/d/y)	Type of CA Source	Name	Address, City, Zip	Contact Person Name & Phone*	CRT CEWs Units	Non-CRT CEW Units CRTs CEWs Estimated Pounds	CBEP CEW Units Non-CRT CEWs Units	FOR CALRECYCLE USE ONLY
N/A	N/A	N/A	N/A	N/A				

### I. Approved Collector or Handler Information

Approved Collector/Handler <u>Organization</u> :	CEWID #:
Approved Collector/Handler Address, City, Zip:	
<u>Primary</u> Contact Name:	Telephone #:
<u>Description of CEW Collection Activity</u> :	
Location of Collection Event (if different from above):	

\*For transfers of 5 or more units provide contact person name & phone (Title 14, CCR § 18660.20(i)(1)(C)).

### II. Material Received from California Source

Date (m/d/y)	Type of CA Source	Name	Address, City, Zip	Contact Person Name & Phone*	CRT CEWs Units	Non-CRT CEW Units CRTs CEWs Estimated Pounds	CBEP CEW Units Non-CRT CEWs Units	FOR CALRECYCLE USE ONLY

# Changes to Source Anonymous Collection Log (Form 198SA)

State of California  
CalRecycle 198SA (Rev. 1/2026)

Department of Resources Recycling and Recovery  
MMLA/E-Waste and Battery Embedded Products

## Covered Electronic Waste (CEW) Source Anonymous (SA) Collection Log

### I. Approved Collector Information

Approved Collector <u>Organization</u> :	CEWID #:
Approved Collector Address, City, Zip:	
Primary Contact Name:	Telephone #:

### II. Source Anonymous Incident Information

Incident Date (m/d/y)	Date Collected (m/d/y)	Description of Activity or Incident/Incident Site Contact Name & Affiliation	Contact Person Name/ & Phone & Organizational Affiliation	Facility Name and Incident Location/Address	Load Check/ Illegal Disposal	CRT CEWs Units
N/A	N/A	N/A	N/A	N/A		
						Page Totals

### I. Approved Collector Information

Approved Collector <u>Organization</u> :	CEWID #:
Approved Collector Address, City, Zip:	
Primary Contact Name:	Telephone #:

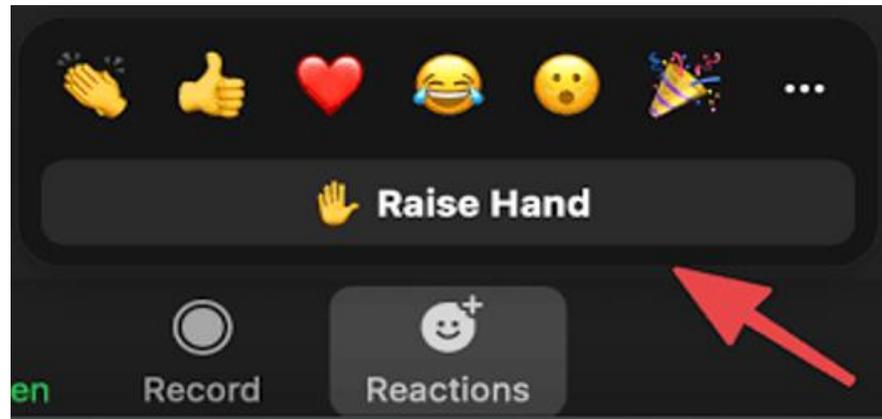
### II. Source Anonymous Incident Information

Incident Date (m/d/y)	Date Collected (m/d/y)	Description of Activity or Incident/Incident Site Contact Name & Affiliation	Contact Person Name/ & Phone & Organizational Affiliation	Facility Name and Incident Location/Address	Load Check/ Illegal Disposal	CRT CEWs Units	Non-CRT CEW Units CRTs CEWs Estimated Pounds	Non-CRTB CBEP CEWs Units	Non-CRT CEWs Estimated Pounds

# Questions

If you would like to ask a question about what was covered so far, you can ask in one of the following ways:

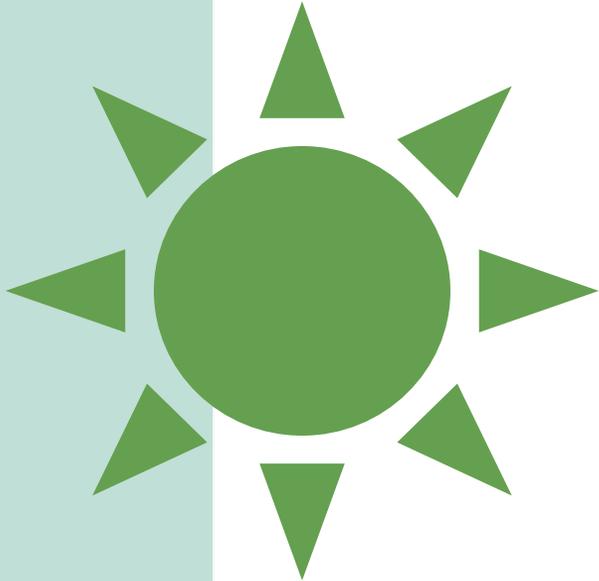
- Raise your hand and the host will unmute you.



- Type your question into the Q&A feature of this meeting, under More.



# FUTURE TRAININGS AND OUTREACH



# Recycler Forms

**CalRecycle will post the updated recycler forms in January 2026:**

- Worksheet A - CRT (CalRecycle 196A)
- Worksheet B - Non-CRT (CalRecycle 196B)
- Worksheet C - CBEP (CalRecycle 196C):  
*new*

Forms will be available at [Forms and Information Supporting Participation in the Covered Electronic Waste Recycling Program - CalRecycle Home Page](#)



# Important Dates

**January 1, 2026:** Collection of CBEP CEW began.

**January 28, 2026:** Recycler training webinar. The webinar will be recorded and posted on our website.

**March 2026:** Webinar to assist with electronic payment claim submissions. Recyclers will be notified on the specific date once the date is set.

**April 1, 2026:**

- Payment claims for CBEP CEW collected on or after January 1, 2026, may be submitted.
- All payment claims (CRT CEW, non-CRT CEW, and CBEP CEW) must be submitted electronically through CalRecycle's website.
- CalRecycle is currently building the submittal system through our CEWIS database.

# Future Education Campaign

CalRecycle is in the process of developing a consumer campaign for CBEPs.

Goal is to educate consumers on:

- Why consumers pay the fee
- What are CBEPs
- Why it is important not to throw embedded battery products away
- Fire related incidents
- Recovery of precious metals
- Building the circular economy
- Where to recycle

Accomplished through:

- Advertising
- Social Media
- Flyers

Rollout:

- 2027
- 2–3-year education campaign

## Embedded Batteries, Embedded Dangers

Many everyday items contain embedded batteries that can spark fires in trash and recycling bins.



# QUESTIONS AND ANSWERS



# CBEPs Questions and Answers (Q&A)

- To assist regulated stakeholders, such as manufacturers, retailers, approved collectors, and approved recyclers, CalRecycle developed a new webpage and a question and answer (Q&A) document.
- [Manufacturer Notice Guidance webpage](#)
- The questions in the Q&A are from inquiries that CalRecycle received from stakeholders, and we will continue to add to the list of Q&As. Whenever CalRecycle posts an updated Q&A, a listserv will be sent out to inform stakeholders.

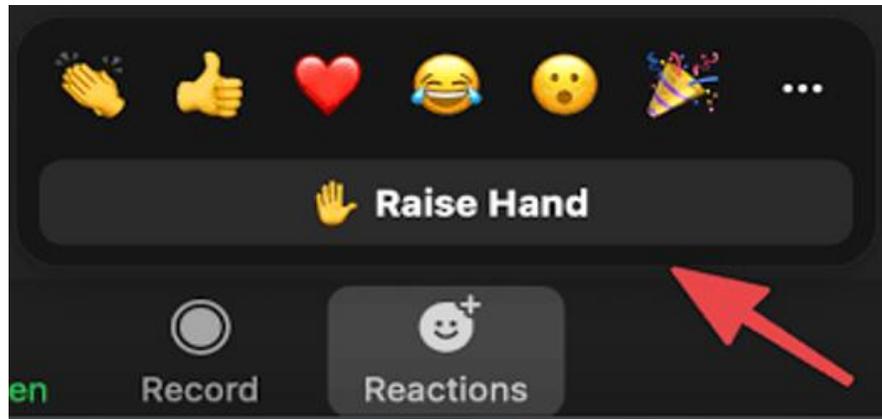
Covered Battery-Embedded  
Products (CBEPs) Questions  
and Answers (Q&A)

Download the PDF 

# Questions

If you would like to ask a question about what was covered so far, you can ask in one of the following ways:

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- Type your question into the Q&A feature of this meeting, under More.



# Disclaimer:

*This communication is neither intended to, nor does it constitute definitive legal counseling, conclusions, or advice in any way. Instead, the contents of this communication and any analysis, guidance, or other information is intended to objectively address the questions presented based on the current existing, known facts and legal authority as described to and understood by the author and/or CalRecycle at the time of this communication. Please be advised that any relevant facts or legal authority or authorities that are undisclosed or unknown at the time of this communication may affect or alter any analysis, guidance, or other information herein. Please be further advised that any analysis, guidance, or other information herein may be subject to change and/or correction based on changed facts or legal authority, actual or understood, subsequent to the time of this communication. No analysis, guidance, or other information herein should be construed as a waiver of any rights or remedies available to CalRecycle. Recipients of this communication are encouraged to seek the assistance of legal counsel to comply with applicable state law based on current facts and circumstances.*



# THANK YOU FOR YOUR PARTICIPATION!

For Questions: [EwasteClaims@CalRecycle.ca.gov](mailto:EwasteClaims@CalRecycle.ca.gov)