

Battery Stewardship Informal Regulatory Concept Workshop

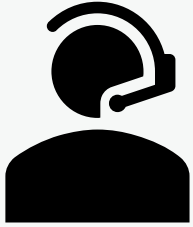
July 11, 2024

California Department of Resources
Recycling and Recovery

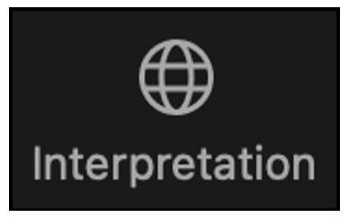
CalRecycle 



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Agenda

Part I: Regulation Concepts

Topic 1: Definitions

Allyson Williams, Environmental Program Manager, Battery EPR Section

Topic 2: State Agency Fees

Michelle Cevallos, Sr. Environmental Scientist Supervisor, Battery EPR Section

Topic 3: Enforcement-Related Provisions

Jason Smyth, Environmental Program Manager, Battery Compliance Section

Part II: Economic Analysis and Data Request

Bahar Nakhjavan, Sr. Environmental Scientist Supervisor, Responsible Battery Recycling Enforcement Unit

Questions

Moderated by Karen Kayfetz, Branch Chief, Product Stewardship Branch

Discussion Document

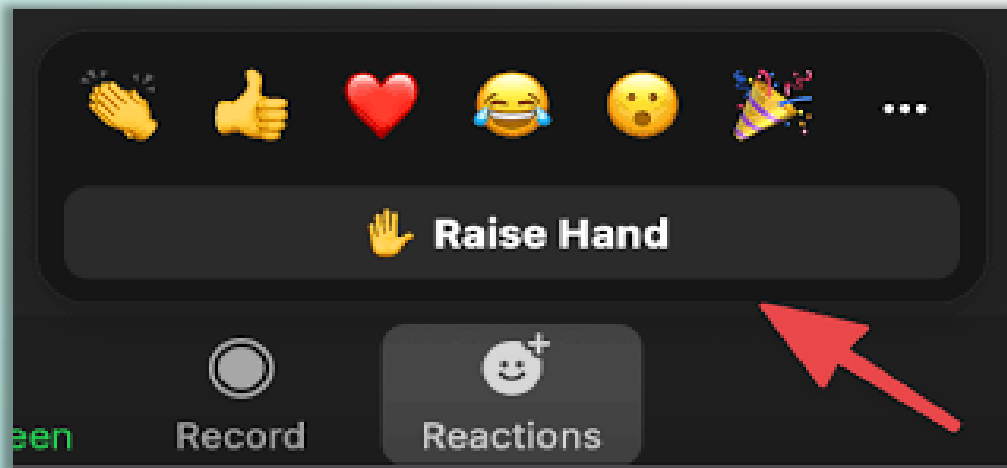
- **Part I: Regulation Concepts**
 - **Topic 1: Definitions**
 - **Topic 2: State Agency Fees**
 - **Topic 3: Enforcement-Related provisions**
- **Part II: Economic Impact Analysis and Data Request**

Follow along in the
Discussion Document



Submitting Questions and Feedback

- To make a comment in-person, please line up at the microphone.
- To make an oral comment via Zoom, please raise your hand and the host will unmute you.
- Submit written feedback after the workshop by **July 25, 2024**, via:
 - CalRecycle's public comment portal: [Battery Stewardship Informal Rulemaking Comment Period](#)
 - Email: regulations@calrecycle.ca.gov
 - Subject: "July 2024 Battery Stewardship Workshop"



Part I. Regulation Concepts

**Department of Resources Recycling and Recovery
Battery EPR Section
Battery Compliance Section**

Rulemaking Process

- The rulemaking process is for implementing, interpreting, or making specific statutes CalRecycle administers or enforces.
- Generally, the rulemaking process must follow the requirements of the Administrative Procedure Act, commencing with Government Code section 11340.
- CalRecycle is informally seeking feedback on potential regulatory concepts for consideration when drafting proposed regulations necessary to implement, interpret, or make specific provisions of The Responsible Battery Recycling Act.

Topic 1: Definitions

Allyson Williams
Battery EPR Section Manager

Terms Relevant to Workshop

- "Act"
- "Brand registration date"
- "Participant registration date"
- "Participant deregistration date"
- "Electronic waste recycler"
- "Chemistry of the covered battery"
- "Common household tools"
- "Designed to be easily removed"
- "Damaged or defective battery"
- "Recalled battery"
- "Permanent collection site"
 - "Regular hours"
- "Temporary collection site"

Topic 1: Definitions – “Act”

Statutory Overview

Public Resources Code (PRC) section 42420: This chapter shall be known, and may be cited, as the Responsible Battery Recycling Act of 2022.



Topic 1: Definitions – “Act”

Regulation Concepts

CalRecycle proposes promulgating regulations to define “Act” to refer to:

- 1) The entirety of the Responsible Battery Recycling Act of 2022 statute for efficiency and readability.



Topic 1: Definitions – “Brand Registration Date”

Statutory Overview

PRC section 42421(a): No later than 180 days after the effective date of this chapter, individual producers shall provide to the department, in a form and manner established by the department, a list of covered batteries and brands of covered batteries that the producer sells, distributes for sale, imports for sale, or offers for sale in or into the state.

(b) A program operator shall update the list described in subdivision (a) and provide the updated list to the department on or before January 15 of each year or upon request of the department, with at least 60 days to respond after a request from the department.

Topic 1: Definitions – “Brand Registration Date” Regulation Concepts

CalRecycle proposes promulgating regulations to define “brand registration date” and specify:

- 1) When each brand becomes subject to an approved stewardship plan.
- 2) Brand registration date is included on the list of covered batteries and brands of covered batteries.

Topic 1: Definitions – “Participant Registration Date”

Statutory Overview

PRC section 42421.2(c): Each producer covered under a stewardship organization shall register with that stewardship organization in accordance with the procedures and requirements established by that stewardship organization and shall comply with those procedures and requirements.

Topic 1: Definitions – “Participant Registration Date” Regulation Concepts

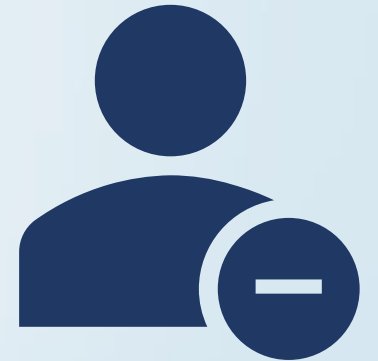
CalRecycle proposes promulgating regulations to define “participant registration date” and specify:

- 1) When each producer becomes subject to an approved stewardship plan.
- 2) Participant registration date is included on the list of covered batteries and brands of covered batteries.

Topic 1: Definitions – “Participant Deregistration Date”

Statutory Overview

PRC section 42425(e)(1): If the department determines a producer is not in compliance with this chapter, the department shall remove the producer, along with its brands and covered batteries, from the list of compliant producers posted on the department’s internet website pursuant to subdivision (a).



Topic 1: Definitions – “Participant Deregistration Date” Regulation Concepts

CalRecycle proposes promulgating regulations to define “participant deregistration date” and specify:

- 1) When a producer is no longer subject to an approved stewardship plan.
- 2) Participant deregistration date is included in a summary statement on the list of covered batteries and brands of covered batteries.

Topic 1: Definitions – “Electronic Waste Recycler”

Statutory Overview

PRC section 42422.1(m)(2): Program operators must describe efforts to coordinate with existing battery collection and recycling programs, including electronic waste recyclers and dismantlers.

PRC section 42463(j): (1) “Covered electronic waste recycler” means a person who engages in the manual or mechanical separation of covered electronic devices to recover components and commodities contained therein for the purpose of reuse or recycling.

(2) A person who changes the physical or chemical composition of a covered electronic device, by deconstructing, size reduction, crushing, cutting, sawing, compacting, shredding, or refining for purposes of segregating components, for purposes of recovering or recycling those components, and who arranges for the transport of those components to an end user.

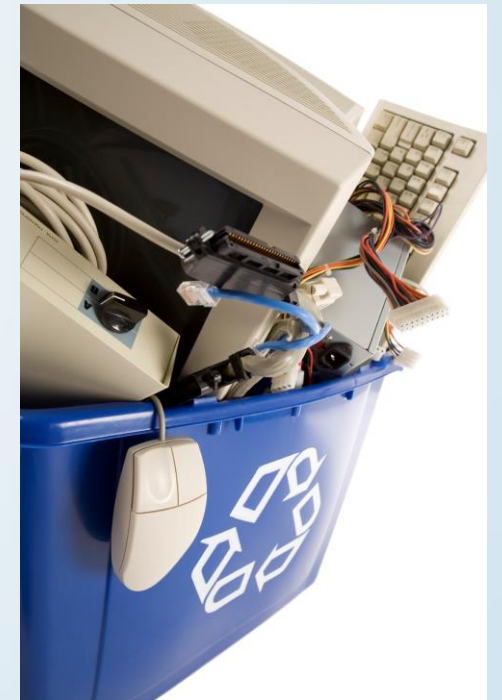
(3) A manufacturer who meets any conditions established by this chapter and Health and Safety Code (HSC) commencing with section 25100 for the collection or recycling of covered electronic waste.

Topic 1: Definitions – “Electronic Waste Recycler”

Regulation Concepts

CalRecycle proposes promulgating regulations to define “Electronic Waste Recycler” to:

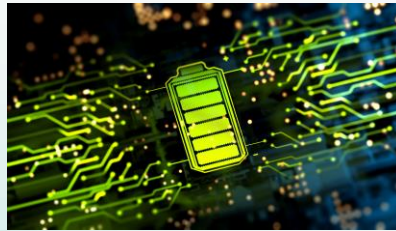
- 1) Have the same meaning as “covered electronic waste recycler” pursuant to PRC section 42463(j).
- 2) Specify one type of existing battery collection and recycling program that program operators must coordinate activities with.



Topic 1: Definitions – “Chemistry of the Covered Battery”

Statutory Overview

PRC section 42422.1(p): Stewardship plans must include developing strategies in coordination with other program operators to develop and implement proper labeling of covered batteries to ensure proper collection and recycling, by identifying the chemistry of the covered battery and including an indication that the covered battery should not be disposed of as household waste.



Topic 1: Definitions – “Chemistry of the Covered Battery”

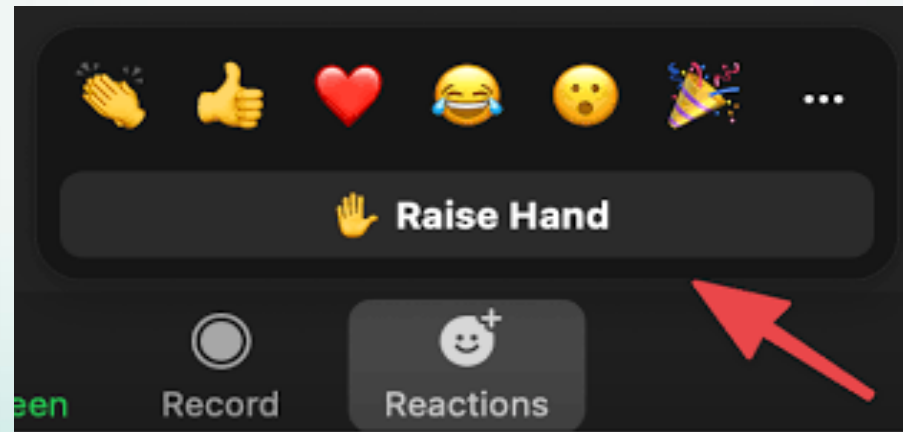
Regulation Concepts

CalRecycle proposes promulgating regulations to define “chemistry of the covered battery” to:

- 1) Refer to the material of a covered battery that produces electrical charge.
- 2) Provide examples of common battery chemistry types, while not limiting future innovations.
- 3) Develop a common understanding and ensure consistency in the information that will be required on covered battery labels.

Questions and Comments

- To make a comment in-person, please line up at the microphone.
- To make an oral comment via Zoom, please raise your hand and the host will unmute you.



Request for Feedback

CalRecycle is requesting feedback to inform the development of a definition for “chemistry of the covered battery,” including:

- 1) How do you interpret the term "chemistry of the covered battery?"
- 2) What types of information are currently on battery labels?
- 3) In what manner and locations is battery chemistry currently identified (e.g., on each battery, on battery packaging, through use of abbreviations, etc.)?
- 4) Are there existing legal definitions that describe battery chemistry?

Topic 1: Definitions – “Common Household Tools”

Statutory Overview

PRC section 42420.1(d)(1)(A): “Covered battery” includes a loose battery that is either sold separately from a product or that is designed to be easily removed from a product by the user of the product, with no more than common household tools.



Topic 1: Definitions – “Common Household Tools” Regulation Concept

CalRecycle is considering promulgating regulations to define “common household tools” to specify:

- 1) They are readily available and routinely used by majority of households.
- 2) Examples of common household tools, such as slotted and crosshead screwdrivers, paperclips, coins, and hex keys.
- 3) Examples of tools that are not common household tools for the purposes of the Act, such as hammers, knives, or tools that require application of heat, solvents, or significant force to separate a covered battery from a product.

Topic 1: Definitions – “Designed to be easily removed”

Statutory Overview

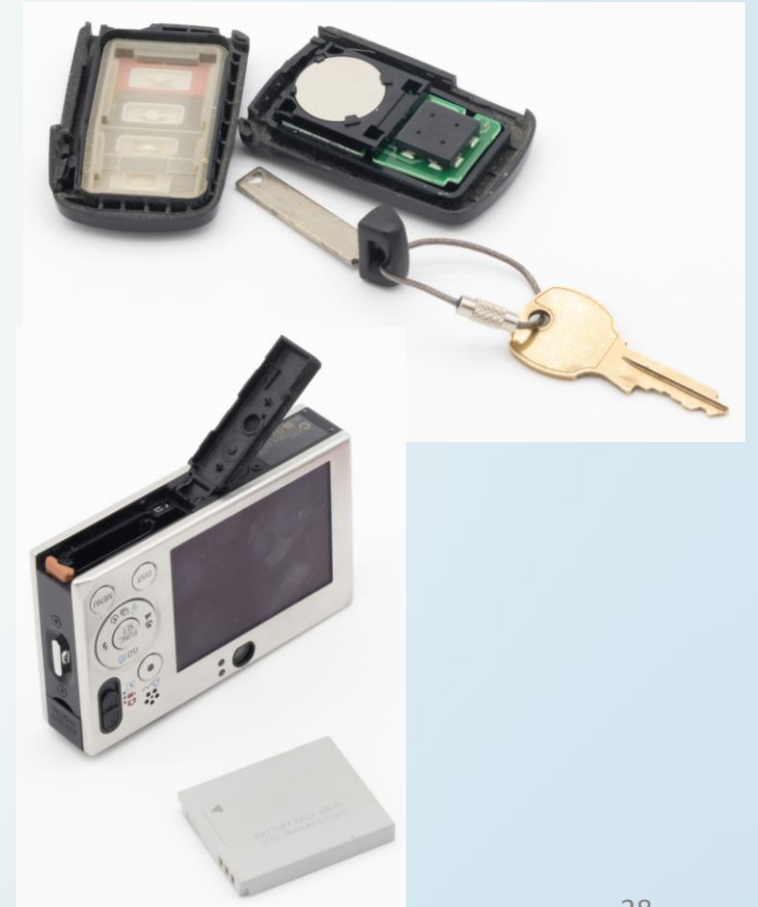
PRC section 42420.1(d)(1): “Covered battery” includes a loose battery that is either sold separately from a product or that is designed to be easily removed from a product by the user of the product, with no more than common household tools.



Topic 1: Definitions – “Designed to be easily removed” Regulation Concept

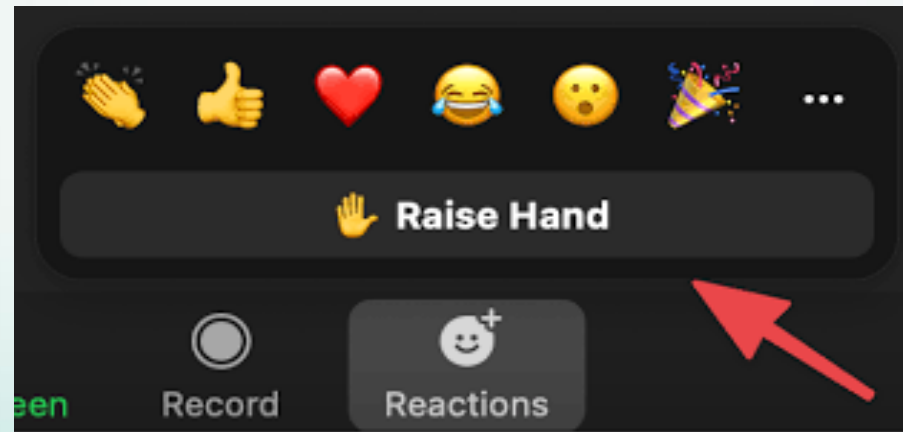
CalRecycle is considering promulgating regulation to define “designed to be easily removed” to specify:

- 1) The attributes of an electronic device that enable covered batteries to be separated from the device they power.



Questions and Comments

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Request for Feedback

CalRecycle is requesting feedback to inform potential definitions of “common household tools” and “designed to be easily removed,” including:

- 1) Is it necessary to define these terms or does the Act provide sufficient specificity?
- 2) Should the scope of covered batteries be specified differently?
- 3) What tools are commonly used to remove batteries from products (e.g., slotted and crosshead screwdrivers, hex keys, coins, paper clips, etc.)?
- 4) What design features enable a battery to be easily removed? Are these always replaceable?
- 5) Do product manuals or warranties typically address whether batteries are replaceable?

Topic 1: Definitions – “Damaged or Defective Battery”

Statutory Overview

PRC section 42422.1(d)(2): Collection sites shall not be required to collect covered batteries that are damaged, defective, or recalled.

PRC section 42422.1(e)(1): Plans must include an explanation of the process by which the program operator will, upon request, provide to an HHW collection facility as defined in HSC section 25218.1, at no cost, and to all other collection sites, at cost, packaging consistent with U.S. D.O.T.’s hazardous materials regulations and the necessary forms and instructions for the safe collection and transportation of damaged or defective covered batteries.

PRC section 42422.1(j): No program operator shall be required, as a condition of plan approval or otherwise, to accept damaged, defective, or recalled batteries at sites served by the program operator. Program operators shall provide to sites participating in their programs, information for persons seeking to recycle damaged or defective batteries informing those persons of the requirements for doing so and of the closest location at which damaged or defective batteries may be accepted.

Topic 1: Definitions – “Damaged or Defective Battery” Regulation Concept

CalRecycle proposes promulgating regulations to define “damaged or defective battery,” including to:

- 1) Describe the characteristics that indicate battery damage or defects.
- 2) Establish a common understanding of how to identify batteries with damage or defects that collection sites are not required to accept, present potential safety issues, and must be transported in special packaging.

Topic 1: Definitions – “Recalled Battery”

Statutory Overview

PRC section 42422.1(j): No program operator shall be required, as a condition of plan approval or otherwise, to accept damaged, defective, or recalled batteries at sites served by the program operator. Program operators shall provide to sites participating in their programs information for persons seeking to recycle recalled batteries informing those persons of instructions to contact any entity recalling batteries to determine the appropriate handling of those batteries.

Topic 1: Definitions – “Recalled Battery”

Regulation Concept

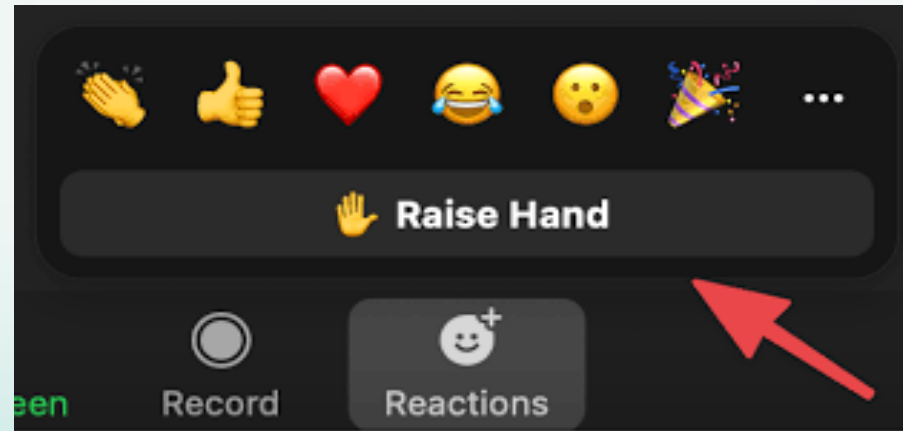
CalRecycle proposes promulgating regulations to define “recalled battery,” including to:

- 1) Establish a common understanding of how to identify recalled batteries.
- 2) Provide appropriate sources where one can find information on battery recalls.



Questions and Comments

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Request for Feedback

CalRecycle is requesting feedback to inform the development of potential definitions for “damaged or defective battery” and “recalled battery,” including:

- 1) How can damaged or defective batteries be identified?
- 2) Where can consumers and collection sites find information on battery recalls (e.g., websites of the producer, manufacturer, program operator, or governmental entities)?
- 3) What information is typically included in recall notices (e.g., producer and brand name, model number, serial number, lot number, how to manage the recalled product)?
- 4) How should damaged, defective, and recalled batteries be managed?

Topic 1: Definitions – “Permanent Collection Site”

Statutory Overview

PRC section 42420.1(b): “Collection site” means a permanent or temporary location at which covered batteries are collected and prepared for transport in accordance with the requirements of this chapter.

HSC section 25218.1(h): “Permanent household hazardous waste collection facility” means a permanent or semipermanent structure at a fixed location that meets both of the following conditions:

- (1) The facility is operated at the same location on a continuous, regular schedule.
- (2) The hazardous waste stored at the facility is removed within one year after collection.

Topic 1: Definitions – "Permanent Collection Site"

Regulation Concept

CalRecycle proposes promulgating regulations to define "permanent collection site" to specify:

- 1) Sites are at a fixed location.
- 2) Covered batteries may be dropped off at no cost during regular hours.
- 3) Site is open to the public.
- 4) Permanent Household Hazardous Waste Collection Facilities as defined in HSC section 25218.1(h) count as permanent.

Topic 1: Definitions – "Regular Hours" Statutory Overview

PRC section 42422.1(i): A retailer with five or more locations in the state shall make all locations serve as permanent collection sites for covered batteries, and shall comply with the rules and conditions of the program in which it participates, as part of a stewardship program.



Topic 1: Definitions – "Regular Hours" Regulation Concept

CalRecycle proposes promulgating regulation to define "regular hours," for the purposes of specifying when retailers are considered a "permanent collection site," including:

- 1) Identifying free collection must be offered during the same hours the location sells covered batteries.



Topic 1: Definitions – "Temporary Collection Site"

Statutory Overview

PRC section 42420.1(b): "Collection site" means a permanent or temporary location at which covered batteries are collected and prepared for transport in accordance with the requirements of this chapter.



Topic 1: Definitions – "Temporary Collection Site" Regulation Concept

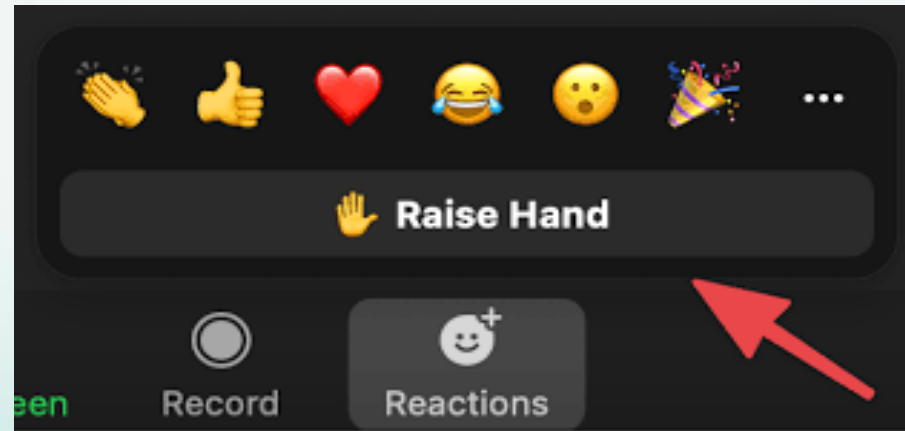
CalRecycle proposes promulgating regulations to define "temporary collection site" to mean:

- 1) A non-permanent collection site where the public may drop off covered batteries at no cost.



Questions and Comments

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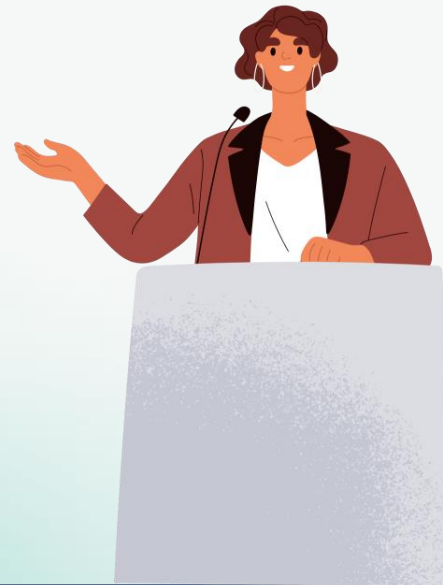
Request for Feedback

CalRecycle is requesting feedback to inform potential regulatory definitions for “permanent collection site” and “temporary collection site,” including:

- 1) How should temporary sites count towards the convenience standard?
- 2) Should there be a required ratio of permanent to temporary sites to achieve the convenience standard (i.e., a maximum percent of sites in each county that are temporary)?
- 3) Should permanent sites be required to operate certain hours (e.g., retailers accept batteries during hours batteries are sold, or collect on a continuous, regular schedule)?

Request for Feedback

CalRecycle is requesting feedback regarding all terms presented in this workshop and any other terms in statute that interested parties think need to be defined.



Topic 2: State Agency Fees

Michelle Cevallos
Battery EPR Unit Supervisor

Topic 2: State Agency Fees – Anticipated Costs

Statutory Overview

PRC section 42423(a): No later than 90 days before a budget is submitted to the Department of Toxic Substances Control, the department and the Department of Toxic Substances Control shall notify each program operator of each agency's respective anticipated actual and reasonable regulatory costs directly related to implementing and enforcing this chapter in relation to the program operator's activities as the criteria for those costs are defined in the regulations adopted pursuant to Section 42420.2. This may include the actual and reasonable costs associated with regulatory regulation development pursuant to Section 42420.2 and other startup activities prior to stewardship plan submittal and approval, relative to the role of the program operator's program compared to other programs.

Topic 2: State Agency Fees – Anticipated Costs

Regulation Concepts

CalRecycle proposes promulgating regulations to identify a process for notifying program operators of its anticipated costs, including:

- 1) Specifying a mechanism for CalRecycle and DTSC to know:
 - a) Who will be submitting a stewardship plan.
 - b) When a stewardship plan will be submitted to DTSC.
- 2) Enabling CalRecycle and DTSC to inform program operators of anticipated regulatory costs 90 days before budget submittals to DTSC.

Topic 2: State Agency Fees – Cost Criteria

Statutory Overview

PRC section 42423(b): Program operators shall, on a schedule determined by the department and DTSC, as applicable to each agency's fees, pay the department and DTSC, respectively, fees incurred to reimburse the department and the DTSC for incurred costs. The fees shall not exceed the department's or DTSC's actual and reasonable regulatory costs to implement and enforce this chapter as the criteria for those costs are defined in the regulations adopted pursuant to Section 42420.2. The fees shall be paid by each producer, either individually, if the producer is complying with the requirements of this chapter individually, or through a stewardship organization.

Topic 2: State Agency Fees – Cost Criteria

Regulation Concepts

CalRecycle proposes promulgating regulations to specify its cost criteria, including:

- 1) Full personnel costs related to administration, implementation, and enforcement.
- 2) Labor, fringe benefits, travel, equipment, supplies, and contracts.
- 3) Costs calculated using State Administrative Manual section 9213.1, including for general administration, budgeting, accounting, business services, training, and legal.

Topic 2: State Agency Fees – Payment Schedule

Statutory Overview

PRC section 42423(b): Program operators shall, on a schedule determined by the department and DTSC, as applicable to each agency's fees, pay the department and DTSC, respectively, fees incurred to reimburse the department and the DTSC for incurred costs. The fees shall not exceed the department's or DTSC's actual and reasonable regulatory costs to implement and enforce this chapter as the criteria for those costs are defined in the regulations adopted pursuant to Section 42420.2. The fees shall be paid by each producer, either individually, if the producer is complying with the requirements of this chapter individually, or through a stewardship organization.

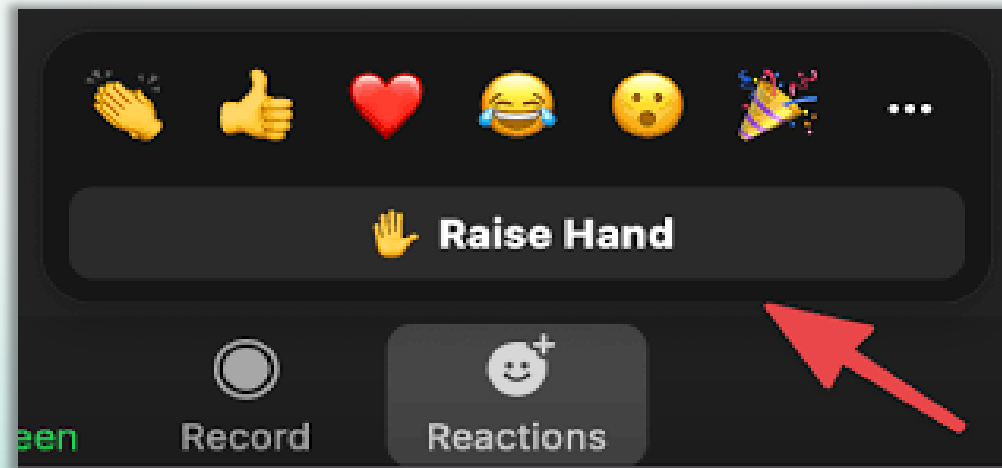
Topic 2: State Agency Fees – Payment Schedule Regulation Concepts

CalRecycle proposes promulgating regulations to specify its payment schedule, and is considering:

- 1) Other EPR laws' payment schedules, including:
 - a) Quarterly – Carpet and Paint programs.
 - b) Every 3 months – Mattress program.
 - c) Semi-annually – Pharmaceutical and Sharps programs.
 - i. Invoice for projected costs and reconcile.
- 2) Payment from program operators due within 30 days of invoice.

Questions and Comments

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Request for Feedback

CalRecycle is requesting feedback regarding promulgating regulations relevant to state agency fees, including:

- 1) How will CalRecycle and DTSC identify who will submit a stewardship plan and when these plans will be submitted?
- 2) If CalRecycle and DTSC do not know which, or how many, entities intend to become program operators, how should the departments notify prospective program operators of anticipated costs 90 days prior to plan submission to DTSC?
- 3) Are there any existing laws that specify state agency cost criteria that we can consider?
- 4) What would be a reasonable schedule for program operators to pay for oversight and enforcement costs?

Topic 3: Enforcement-Related Provisions

Jason Smyth

Battery Compliance Section Manager

Topic 3: Enforcement-Related Provisions – Record Keeping Statutory Overview



PRC section 42425.3: Entities (producers, program operators, stewardship organization, manufacturers, distributors, retailers, importers, recyclers, or collection sites) are required to maintain and produce records available for review and copy by CalRecycle. Penalties will be imposed if records cannot be accessed.

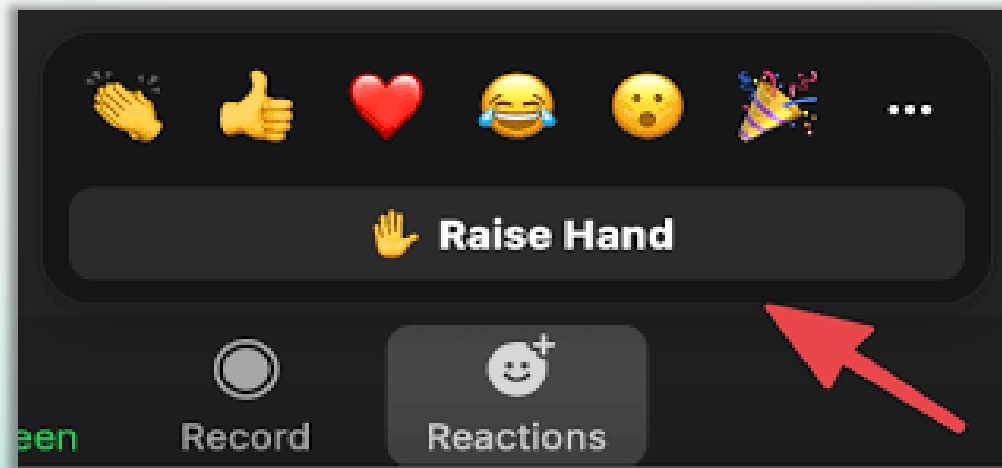
Topic 3: Enforcement-Related Provisions – Record Keeping Regulation Concepts

CalRecycle proposes promulgating regulations to specify recordkeeping requirements:

- 1) Maintain chain of custody so non-compliant parties can be identified.
- 2) Who receives batteries and when.
- 3) Permits, licenses, clearances.
- 4) Recycling and residual amounts at recyclers to calculate recycling efficiency rate (PRC 42424.1(i)).

Questions and Comments

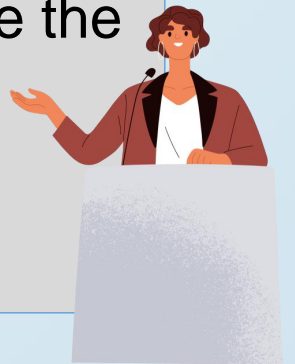
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Request for Feedback

CalRecycle is requesting feedback regarding promulgating regulations relevant to recordkeeping provisions, including:

- 1) Are there any additional records that regulated entities should be required to maintain?
- 2) Are there any additional required permits, licenses, or clearances CalRecycle should be aware of for these regulated entities?
- 3) What records should a recycler maintain to enable CalRecycle to calculate the recycling efficiency rate?
- 4) What records regarding the chain of custody of covered batteries do the regulated entities already maintain?



Topic 3: Enforcement-Related Provisions – Compliance Evaluation & Determination Statutory Overview



PRC section 42425.1(a): The department shall establish, through regulations adopted by the department pursuant to Section 42420.2, a process that shall include an informal hearing process by which the penalties will be assessed.

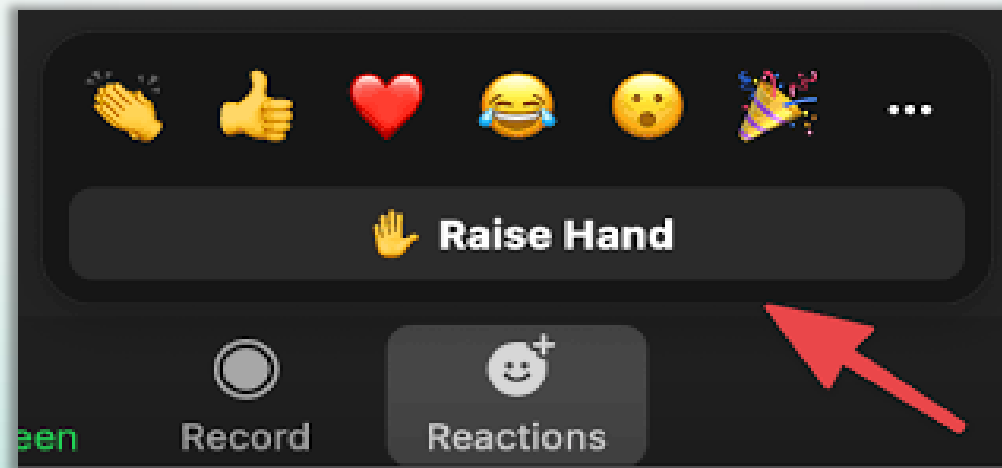
Topic 3: Enforcement-Related Provisions – Compliance Evaluation & Determination Regulation Concepts

CalRecycle proposes promulgating regulations to specify compliance evaluation and determination requirements, including:

- 1) CalRecycle conducts investigations.
 - a) Entities produce relevant records, and comply with inspections.
- 2) Each distinct condition or action is determined as one violation.
- 3) Two types of recordkeeping violations, include failure to:
 - a) Maintain records.
 - b) Provide timely access to records.

Questions and Comments

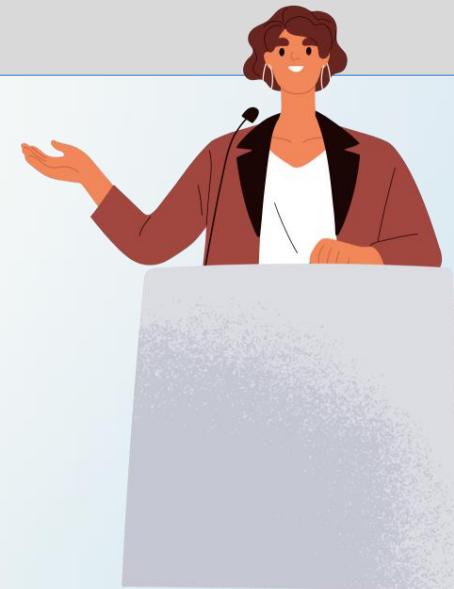
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Request for Feedback

CalRecycle is requesting feedback regarding promulgating any other relevant regulations relevant to the compliance evaluation and determination process, including:

- 1) Are there additional aspects of the compliance evaluation and determination process that should be clarified in the regulations?



Topic 3: Enforcement-Related Provisions – Additional Actions Statutory Overview

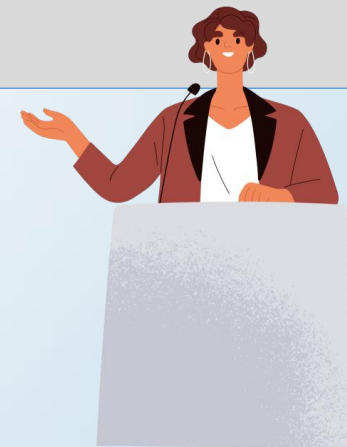
PRC section 42425.2(a): the department may, after affording the entity a reasonable opportunity to respond to, or rebut, the finding:

- (1) Revoke the program operator's stewardship plan approval or require the program operator to resubmit the plan.
- (2) Remove the producer, along with its brands and covered batteries from the department's list of compliant producers, as specified in Section 42425.
- (3) Impose additional compliance reporting requirements.
- (4) Post the noncompliant entity onto a list of noncompliant entities.

Request for Feedback

CalRecycle is requesting feedback regarding promulgating regulations related to additional actions CalRecycle may take, including:

- 1) Should the process for any of these actions be specified in regulations?
- 2) Are there any additional actions within CalRecycle's statutory authority that it should consider taking if material requirements of the chapter are not met?



Part II.

Economic Analysis and Data Request

Department of Resources Recycling and Recovery
Battery Compliance Section

Bahar Nakhjavan
Responsible Battery Recycling Enforcement Unit
Supervisor

Economic Analysis for Rulemaking Overview

The economic analysis includes information on the estimated economic (private) and fiscal (governmental) monetary impacts of the proposed regulation. Rules governing the Form STD. 399 can be found in the State Administrative Manual, sections 6600 through 6615.

CalRecycle is responsible for understanding impacted parties and estimating costs and benefits.



Economic Analysis: Impacted Parties

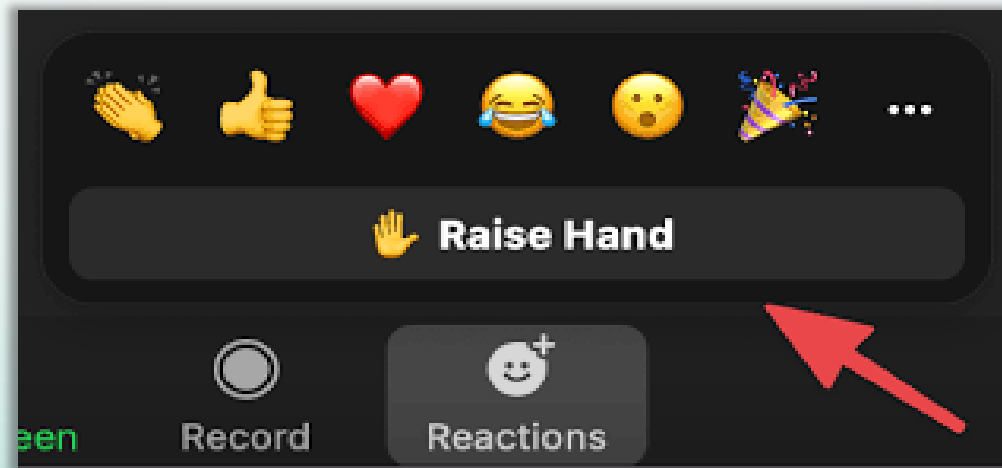


- 1) Manufacturers
- 2) Importers
- 3) Distributors
- 4) Retailers
- 5) Consumers
- 6) Collection sites
- 7) Program operators
- 8) Local governments
- 9) Waster haulers
- 10) Recyclers



Questions and Comments

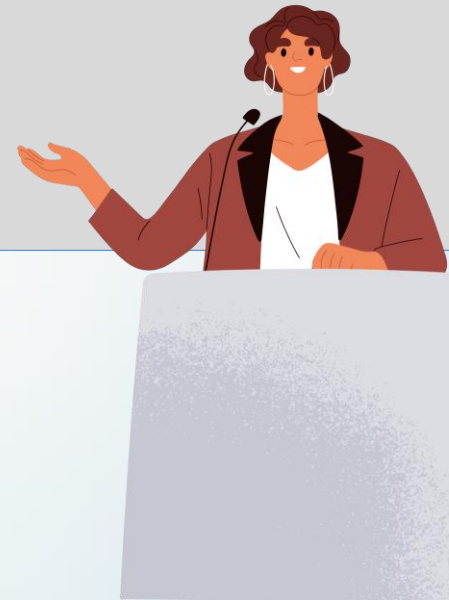
- To make a comment in-person, please line up at the microphone.
- To make an oral comment via Zoom, please raise your hand and the host will unmute you.



Request for Feedback

CalRecycle is requesting information, data, and feedback regarding impacted parties, including:

- 1) Are there any other impacted parties that should be included in the economic analysis?
- 2) How should these impacts be quantified?



Economic Analysis: Costs



Program Operator:

Initial Cost: purchase and installation of collection bins

Ongoing Cost: maintenance of the bins

Recycler:

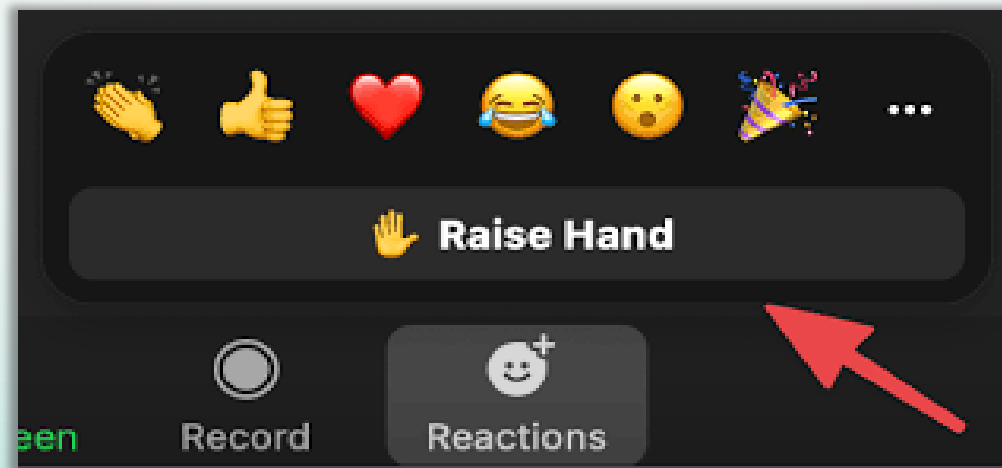
Initial Cost: additional equipment

Ongoing Cost: additional staff and maintenance of recycling equipment



Questions and Comments

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Request for Feedback

CalRecycle is requesting information, data, and feedback regarding initial and ongoing costs, including:

- 1) What types of costs are incurred for each battery collection site, including initial and ongoing costs and what specific expenses are included?
- 2) For impacted parties, how do costs scale with increased processing volumes of recycling batteries, considering both initial setup costs and ongoing operational costs?
- 3) What additional costs, beyond those specified in questions 1 and 2 are incurred?

Economic Analysis: Benefits



Quantitative:

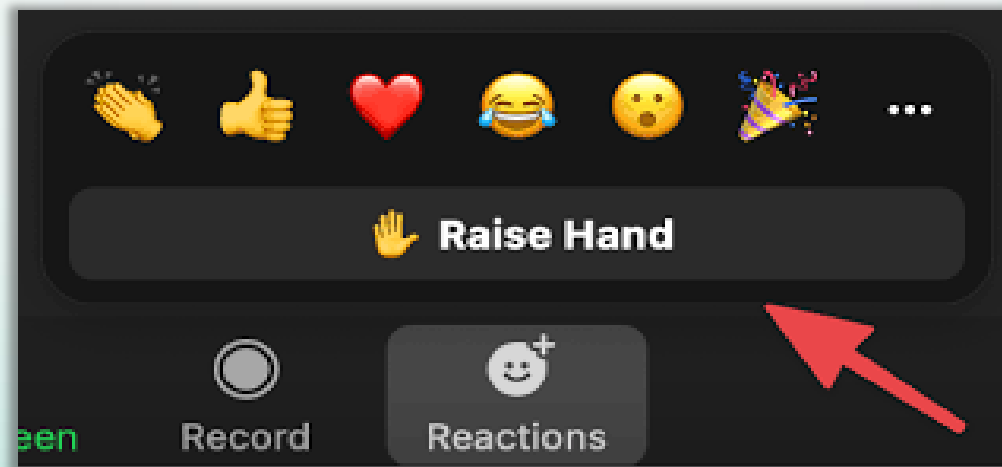
- Number of jobs created

Qualitative:

- Improved air quality
- Decreased insurance premiums

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Request for Feedback

CalRecycle is requesting information, data, and feedback regarding qualitative and quantitative benefits, including:

- 1) What data or resources are available to assist with estimating reduced facility insurance premiums due to a decrease in battery-related fires?
- 2) What data or resources are available to calculate environmental impacts (e.g., air quality improvements due to a decrease in battery-related fires)?
- 3) What other benefits might be realized, such as business expansions, creation of jobs, or improvements to the health and safety of California residents and workers?

Opportunity for Written Feedback

Written feedback and questions may be submitted after the workshop, in one of the following ways:

- Email regulations@CalRecycle.ca.gov with subject line “July 2024 Battery Stewardship Workshop”
- CalRecycle’s public comment portal: [Battery Stewardship Informal Rulemaking Comment Period](#)

We request all written feedback by **Thursday, July 25, 2024.**



Ways to Stay Informed



Sign-up for our Battery Stewardship Listserv:
[Battery Stewardship Listserv](#)



Regulations Unit Email for information about the rulemaking process:
Regulations@CalRecycle.ca.gov



Battery Stewardship Team Email for program questions or comments:
Batteries@CalRecycle.ca.gov