



Ministry of  
Environment

## Hazardous Waste Update

### Disposal of Used or Spent lead-acid Batteries For Manufacturers & Suppliers of Batteries

Over the last two years, the Ministry has been working with the lead-acid battery supply and service sector to clarify the Hazardous Waste Regulation (HWR) for requirements collecting, storing, transporting and recycling used or spent lead-acid batteries. This bulletin presents the revised guidance that is a result of this work.

#### **Does this guidance apply to me?**

This guidance applies to you if your primary business activity is the *original* manufacture or supply of new, never-been-used lead-acid batteries **and** you meet the definition of *producer* in the Recycling Regulation. To qualify as a *producer*, you must either be a member in good standing of an approved stewardship plan under Part 2 of the Recycling Regulation or meet all the requirements under Part 3 of the Recycling Regulation. The following web site provides a list of qualified Recycling Regulation producers:

Canadian Battery Association (CBA) <http://recyclemybattery.ca/british-columbia>

This guidance does not apply to suppliers of only recycled or refurbished batteries or parties whose principal business is the management of used or spent batteries. If you are a supplier of only recycled or refurbished batteries, please see the following bulletin:

[http://www2.gov.bc.ca/assets/gov/environment/waste-management/recycling/recycle/batteries/disposal\\_of\\_used\\_lead-acid\\_batteries-other\\_receivers.pdf](http://www2.gov.bc.ca/assets/gov/environment/waste-management/recycling/recycle/batteries/disposal_of_used_lead-acid_batteries-other_receivers.pdf)

#### **When is a used or spent lead-acid battery considered hazardous waste?**

A used or spent lead-acid battery is considered “waste” as soon as it is no longer useful for its original purpose. However, it is only “hazardous waste” under certain circumstances.

A used or spent lead-acid battery *is* hazardous waste when:

- It is being shipped from its original user, or any other generator, to a battery recycler, an interim or intermediate storage facility, a processor for breaking or dismantling batteries, or a smelter for recovery of lead or other materials.
- It has been dropped off at a return collection facility (RCF)<sup>1</sup> by a member of the public and is shipped directly or indirectly to a recycler, interim or intermediate storage facility, processor, or smelter.
- It has been returned to the original manufacturer or supplier, who has then determined that the battery cannot be reused or refurbished.

### **What are the rules for Manufactures and Suppliers?**

You are expected to assess all incoming used or spent lead-acid batteries immediately after receipt. If they cannot be reused or refurbished, you must store and transport them in compliance with the HWR.

### **When is a used or spent lead-acid battery *not* considered hazardous waste?**

A used or spent lead-acid battery *is not* hazardous waste when it is being returned directly to the original manufacturer or supplier, or if it was dropped off by a member of the public at a RCF and then transported directly back to the original manufacturer or supplier from the RCF.

### **Am I a producer, a generator or a receiver?**

You are a battery *producer* if you are a manufacturer or supplier that meets the definition of a *producer* under the Recycling Regulation. To be a producer, you must also either be a member in good standing of an approved stewardship plan under Part 2 of the Recycling Regulation or meet all the requirements under Part 3 of the Recycling Regulation.

You become a hazardous waste *generator* when a lead-acid battery has been returned *by its original user* to you, as an original manufacturer or supplier of batteries, *and* you then determine that the battery cannot be reused or refurbished. If in any 30-day period you generate more than 2,000 kg of hazardous waste batteries (approximately 90 typical vehicle batteries), or if you store this quantity at any time, you must register them as hazardous waste with the Ministry, get a BC generator registration number (BCG#) and store the batteries in compliance with the HWR. Establishing a storage area at your facility will likely require the preparation of designated plans (plans and specifications, contingency plans and closure plans) and may, in some situations, include posting financial security at the discretion of a director.

You become a hazardous waste *receiver* if you accept in any one day, or store at any time, more than 2,000 kg of used batteries that were *not* returned directly to you from original users or a RCF operated for the public (for example, if the batteries are shipped to you from a used or waste battery collector's or refurbisher's facility). If you become a receiver, you must register and get a registered site number (RS#) with the Ministry, and operate in compliance with the HWR as an "authorized consignee."

---

<sup>1</sup> A return collection facility is defined in the Hazardous Waste Regulation as: a household hazardous waste collection facility or a mobile household hazardous waste collection facility.

**How do I know if a used or spent battery was “returned directly”?**

A battery has been returned directly when it has been transported directly from the original user (the consignor) to your facility (the consignee) without being unpacked or otherwise disturbed while in transit.

Transporters may build up battery loads via a “milk run”–type pickup from original battery users, as long as their shipping vehicle returns to the manufacturer’s or supplier’s facility to offload the batteries. Whether they are transporting in a single shipment or as a “milk run,” transporters must deliver the batteries to the manufacturer’s or supplier’s facility within 7 days of the date they first picked up any batteries.

**What are the rules for transportation of used batteries?**

All used or spent lead-acid batteries, whether or not they are hazardous waste, are “dangerous goods” and are fully subject to the federal Transportation of Dangerous Goods Regulations, including requirements for shipping documentation, labelling and placarding of vehicles. Batteries that are classified as hazardous waste are also subject to the provincial HWR.

If a battery is being transported directly from the battery user to you, as the original manufacturer or supplier, it may be transported by your vehicles, a contracted dangerous goods carrier, or an independent dangerous goods carrier.

If more than 1,000 kg of used or spent lead-acid batteries (about 45 typical vehicle batteries) are being transported to anyone other than the original manufacturer or supplier, they must be transported by licensed carriers, using BC hazardous waste manifests, and sent only to authorized receivers or consignees. All parties involved in managing, generating, transporting and receiving these batteries must meet all applicable requirements under the HWR.

**What if I have questions?**

Contact the Ministry at [hazwaste@victoria1.gov.bc.ca](mailto:hazwaste@victoria1.gov.bc.ca).

