

Appendix A

Stakeholder Consultations Summary

BDL undertook extensive stakeholder consultations on its Schedule 1 draft stewardship plan renewal. In addition to the initiatives described on page 14 of the stewardship plan renewal, BDL undertook the following activities to solicit stakeholder feedback:

Public Posting of Draft Stewardship Plan Renewal for comment

Posted for comment on www.EnviroBeerBC.com from October 6, 2014 to December 1, 2014 (a total of 57 days)

In that time, written comments were received from:

- Will Burrows, Coast Waste Management Association
- Paul Shorting, Regional Recycling
- Jeff Guignard, ABLE BC
- Rod Lotzkar, Regional Recycling
- Monica Kozmak, City of Vancouver
- Corinne Atwood, BC Bottle and Recycling Depot Association
- Dave Fowler, Columbia Bottle Recycling
- Andrew Doi, Metro Vancouver
- Savannah Paine, Willowbrook Recycling
- Janine Dougall, Regional District of Bulkley-Nechako
- Scott Fraser, Encorp Pacific (Canada)
- D'Arcy Hipwell, GSBR

These written submissions can be found on the pages following.

Notifications to Stakeholders (public consultations and plan for review)

- Direct e-mail notifications sent to:
 - o RCBC (notification to members on October 8, October 14 and November 4 and notices posted on RCBC website)
 - o CWMA (notification to members around October 8)
 - o UBCM (Inclusion in October 15 member update)
 - o Metro Vancouver
 - o ABLE BC (inclusion in monthly update to members and multiple tweets)
 - o City of Vancouver
 - o BC Product Stewardship Council
 - o BC Bottle & Recycling Depot Association (Inclusion in weekly member updates)
 - o GLOBE Foundation
 - o David Suzuki Foundation
 - o Friends of the Earth Canada
 - o Container Recycling Institute (inclusion in weekly headlines notice sent to 4,000 people)
 - o Kwantlen Polytechnic University Policy Studies Program
 - o Capital Regional District
 - o Fraser-Fort George Regional District
 - o Central Okanagan Regional District
 - o All operators of Return-It Depots
 - o CWTA Communiqué (distribution to over 500 individuals/companies)
- Extensive use of social media to promote plan and public consultations (Twitter, LinkedIn, Facebook, etc.)

- Notice of consultations posted on www.EnviroBeerBC.com, www.call2recycle.ca, www.cwta.ca and www.switchthestat.ca
- Media alert issued regarding the consultations
- October 28, 2014 interview on CBC Radio West regarding stewardship plan renewal and consultations
- Inclusion of draft stewardship plan renewal on USB key given to all CWMA conference attendees

Public Consultations

Vancouver – October 21, 2014

Attendee	Organization
Wanda Truesdell	Vancouver Convention Centre
Rod Lotzkar	Regional Recycling
Savannah Paine	Willowbrook Depot
Corinne Atwood	BC Bottle & Recycling Depot Association
Monica Kozmak	City of Vancouver
John Kandler	Urban Impact

Feedback received at consultation:

- Question posed and information provided on how the recovery rate target was arrived at (from municipal government representative)
- Question posed and information provided on whether there are container recycling fees (CRFs) on containers in the BDL program (from depot representative)
- Question posed about whether it would be possible to levy CRFs on these containers in future (from depot representative)

Victoria – October 22, 2014

Attendee	Organization
Greg Northey	Ministry of Environment
Gwenda Laughland	Ministry of Environment
Sandy Dudley	BDL
Peter Maddock	CESA/Panasonic Canada
Bonny Benton	TSD
Mike Hennessy	Tire Stewardship BC
Bill Chan	Encorp Pacific
Phil Rose	Schilzer Steel
Teresa Conner	Ministry of Environment
Sonya Sundberg	Ministry of Environment
Wendy Dunn	Capital Regional District
Michael Zarbl	MMBC
Andrew Doi	Metro Vancouver
Lucas Harris	Ministry of Environment
Joji Ishikawa	Tire Stewardship BC
Craig Wisehart	EPRA
Shelagh Kerr	EPSC
Julia Bates	Ministry of Environment
Lisa Sullivan	Abbotsford Community Services

Feedback received at consultation:

- Request for BDL (and all stewards) to work together in all Encorp Return-It depots (from Encorp representative)

- Question about possibility of higher compensation for rural depots due to higher costs associated (from depot representative)
- Question posed and information provided about what, if any, materials are going into landfills (from product stewardship representative)
- Question posed and information provided on percentage of containers that are refillable (from product stewardship representative)
- Comment about BDL's pioneering leadership in area of stewardship and deposit-return programs, with encouragement for other programs to follow this example (from depot representative)

Kelowna – October 28, 2014

Attendee	Organization
Clare Cassan	Columbia Bottle Enterprises
Cara Heck	Columbia Bottle Enterprises
Ken Oh	Boucherie Bottle Depot
Karen Oh	Boucherie Bottle Depot
Phil Coates	Public Interest

Feedback received at consultation:

- Request for explanation of and information provided on difference between unlimited return locations and other return locations (from public representative)
- Request for explanation of and information provided on criteria used to determine which depots with which to contract and details regarding geographic distribution of authorized depot locations planning to add during stewardship plan term (from depot representative)
- Discussion of public support for return-to-retail options compared to returning multiple items at a depot location (from depot representative)
- Question about and information provided about trend of some smaller brewers to move to a non-refillable glass container; question whether charging consumer a container recycling fee (CRF) on these containers – as opposed to brewer paying stewardship cost for recovery of refillable bottles – makes the non-refillable container a more desirable option for brewers (from depot representative)

Prince George – October 29, 2014

Attendee	Organization
Helen Binnema	Ministry of Justice – Family Justice Centre
Ken Zeimer	PG Recycling

Feedback received at consultation:

- Further details were requested and provided about plastic wrap recycling (from depot representative)

Webinar – November 12, 2014

Attendee	Organization
Andrew Doi	Metro Vancouver
Delphine Lagourgue	Call2Recycle
Emy Lai	City of Richmond
Jay Aarsen	Interior Freight and Bottle Depot
John Jang	
Kathy Bruce	Retreiv Technologies
Meredith Gee	Squamish-Lillooet Regional District
John Bailie	ElectroFed
Sangeeta Lalli	Retail Council of Canada
Crista Copeland	Best Buy Canada

Bryan Pearce	BDL
Mike Allen	BDL

Feedback received at consultation:

- Request for explanation of and information provided on criteria used to determine which depots with which to contract and details regarding geographic distribution of authorized depot locations planning to add during stewardship plan term (from depot representative)

In total, the feedback received was very complimentary of BDL's "high performing" stewardship program and "its exemplary record of recovery of Schedule 1 containers." For example, Metro Vancouver commented that "BDL is also to be commended for the level of achievement in the use of refillable containers. The program has achieved performance, relative to the pollution prevention hierarchy, that is unparalleled in BC." Other comments offered support for the stewardship plan renewal and recommended Director approval of the plan.

Below is a table providing a high-level summary of feedback received on the draft stewardship plan renewal, the general category of stakeholder that provided this feedback and how this feedback has been addressed in the final version of the plan submitted for Director approval. All stakeholders that provided feedback were also contacted directly (either by e-mail or by phone) about the feedback received and how it was addressed.

Feedback	Provided By	How Addressed
Praise for BDL's ongoing stewardship performance with respect to beverage containers and secondary packaging.	ENGO, depot industry, local government, regional district government	Thanked stakeholders for their support of BDL's stewardship programs.
Support for BDL's proposed level of consumer access and convenience.	Depot industry, alcohol retailers	Thanked stakeholders for their support of BDL's stewardship programs.
General support for BDL's stewardship plan renewal.	ENGO, depot industry, alcohol retailers, local government, regional district government	Thanked stakeholders for their support of BDL's stewardship programs.
Praise for BDL's use of refillable containers and performance relative to the pollution prevention hierarchy.	Regional district government, local government	Thanked stakeholders for their support of BDL's stewardship programs.
Praise for BDL's integration of multiple designated materials into one stewardship program.	Regional district government, local government, depot industry	Thanked stakeholders for their support of BDL's stewardship programs.
Praise for BDL recognizing and treating local governments as more than just 'another' stakeholder.	Regional district government, local government	Thanked stakeholders for their support of BDL's stewardship programs.
Formalize data collection, including 'competing' collectors.	Regional district government, local government	Financial incentive of deposit return system means all containers ultimately flow back to BDL and thus can be reported on. This fact is now explicitly set out in the executive summary on page 4 of the plan.
Develop financial arrangement for local governments who receive or pick-up illegally dumped material.	Regional district government, local government	Financial incentive of deposit return system ensures local governments can get compensation for such materials when they flow back through the BDL collection infrastructure. This fact is now explicitly set out in the executive summary on page 4 of the plan.
Recommendation that BDL set a recovery rate target of 90%, rather than 87.5%.	Regional district government, local government	There are significant, recently enacted changes to the BC recycling system. At this time, it is unclear what impact, if any, these changes will

		<p>have on BDL's recovery rate. Due to this uncertainty, BDL will maintain its recovery rate target at 87.5%.</p> <p>This issue is now explicitly addressed in section 6a of the plan.</p>
Potentially conflicting wording regarding pollution prevention targets for collected materials.	Regional district government, local government	Used consistent language in plan to alleviate potential for confusion.
Question regarding 'unique' return-to-retail preferences in Metro Vancouver.	Regional district government, local government	Called stakeholders to discuss issue and provide BDL's data.
Opposition to BDL's expansion of unlimited return retail locations.	Depot industry	Thanked stakeholder for their feedback.
Suggestion that all depots in BC should be authorized for collection of all designated materials.	Depot industry	Thanked stakeholder for their feedback.
BDL should consider implementing container recycling fees (CRF) or other eco-fees to help cover handling and associated costs.	Depot industry	<p>BDL continues to prefer operating as a true EPR program and not to externalize the costs associated with stewardship, as other programs do.</p> <p>As noted in section 11a of the plan, doing so means that BDL is pushed to continually improve the efficiency of its system and BC consumers are spared an 'environmental tax' of approximately \$32 million annually.</p> <p>Based on obligations being placed on BDL and its program, BDL may have to consider levying such fees in future, but BDL intends to only do so if it is necessary.</p>
Request for inclusion of bottle caps in materials section of plan.	Regional district government	BDL has included bottle caps in its Schedule 5 stewardship plan. BDL understands, though, MMBC does not consider bottle caps to be a designated material under Schedule 5.
Breakdown of unlimited return locations by RD so that RDs can promote this to the public.	Regional district government	<p>BDL very much thanks those RDs that wish to help promote its authorized return locations to the public. That being said, BDL strongly encourages all RDs to use and/or direct the residents to the existing resources promoting such locations to ensure residents are receiving accurate and up-to-date information.</p> <p>BDL maintains a postal code-based return location lookup function on its website (www.EnviroBeerBC.com).</p> <p>BDL is also a member of the Stewardship Agencies of BC (SABC) and also helps to fund the RCBC Recycling Hotline and Recyclepedia.</p> <p>Rather than have each RD maintain its own location directory (which becomes increasingly difficult to maintain and update on a timely basis), BDL encourages all RDs to use the BC Recycles information tools, which offer consumers a centralized, one-stop tool for recycling information.</p>

Request for greater consumer access in rural areas.	Regional district government	<p>BDL agrees that consumer access and convenience is critical to a high-performing stewardship plan. BDL also recognizes the importance of providing rural residents with an adequate level of access.</p> <p>As noted in section 6b of the plan, 75% of BC residents are within a 10 minute drive of an authorized return location. BDL has committed to increase this level of accessibility to 80% by 2018.</p> <p>These measures go well beyond many existing stewardship programs, as well as the accessibility target recently adopted by SABC in its Action Plan.</p>
Questions regarding number of survey participants and their geographic dispersion.	Regional district government	Inclusion of this information in section 6c of the plan.
Recommendation to explain difference between BDL and Encorp programs in one of BDL's consumer education activities.	Regional district government	This suggestion is being taken into consideration as BDL plans both the research for and how to conduct its consumer awareness campaign.
Request for greater information on what portion of the refunds paid (as identified in Table 9) are refunds paid to consumers.	Regional district government	<p>BDL pays a full \$0.10/container deposit refund on all containers recovered.</p> <p>The figures in Table 9 are audited financial data showing deposit money paid by consumers and deposit money refunded by BDL (which is used to verify BDL's recovery rate).</p> <p>Additional information has been included in the plan to explain the information contained in Table 9.</p>
Question regarding BDL's participation in multi-program collection facilities.	Stewardship agency	<p>BDL already is a significant participant in multi-program collection facilities, as many of the depots with which BDL contracts serve multiple stewardship programs.</p> <p>In addition, as BDL looks to expand the number of authorized depots that are part of its collection network, BDL will give priority to depots that serve multiple stewardship programs (as highlighted in section 6b of the plan).</p> <p>At the same time, BDL notes that many stewardship programs are choosing to follow BDL's example and are focusing on increasing the use of return-to-retail as a way to increase consumer accessibility in a cost-effective manner.</p> <p>BDL also notes that multi-program collection facilities are not limited to depot locations, as many retailers accept sufficient numbers of designated materials to be included in this category.</p>

COAST

WASTE MANAGEMENT ASSOCIATION

Brian Zeiler-Kligman
Director, Sustainability
Canada's National Brewers
5900 Explorer Drive
Mississauga, ON L4W 5L2

November 25, 2014

Via E-Mail: bz-k@nationalbrewers.ca

Dear Brian:

The Coast Waste Management Association (CWMA) is a membership association serving the solid waste industry in coastal British Columbia. We are writing to indicate our support of Canada's National Brewers. Our association's relationship with Canada's National Brewers has been excellent and they are very supportive of our efforts to foster environmental leadership and best practices by providing a forum for discussion, education and networking.

CWMA has enjoyed a very positive and collaborative working relationship with the Canada's National Brewers organization for the past three years. Their team is professional and fully dedicated to advancing reusing, recycling and reducing their packaging, which is evident in their everyday business practices.

We truly value our involvement with Canada's National Brewers, and based on their performance in BC, believe that the organisation will continue to build upon its exemplary record of recovery of Schedule 1 containers.

Sincerely,



Will Burrows
Executive Director
Coast Waste Management Association

Zeiler-Kligman, Brian

From: Canada's National Brewers
Sent: December 1, 2014 12:37 PM
To: Zeiler-Kligman, Brian
Subject: FW: Comments on BDL LTD Draft Stewardship plan

From: Paul and Denice [mailto:pshorting@shaw.ca]
Sent: Sunday, November 30, 2014 5:25 PM
To: Canada's National Brewers
Cc: Meegan.Armstrong@gov.bc.ca
Subject: Comments on BDL LTD Draft Stewardship plan

Good afternoon,

Regional Recycling is pleased to be a commercial partner with BDL and a member of their collection network for beer containers. Having reviewed BDL's draft stewardship plan renewal, we believe it continues to provide the framework for a high performing stewardship program that offers BC consumers plenty of convenient return locations, such as Regional Recycling depots. We strongly support the draft plan and believe it should receive Ministry approval as soon as possible.

Regards,

Paul Shorting
Regional Recycling

Zeiler-Kligman, Brian

From: Canada's National Brewers
Sent: November 28, 2014 5:12 PM
To: Zeiler-Kligman, Brian
Subject: FW: Comments on Schedule 1 Plan Renewal
Attachments: BC - ABLE BC - stewardship plan support letter (Nov 14) FINAL.pdf

From: Danielle Leroux [mailto:danielle@ablebc.ca]
Sent: Thursday, November 27, 2014 3:46 PM
To: Canada's National Brewers
Cc: Zeiler-Kligman, Brian
Subject: Comments on Schedule 1 Plan Renewal

Hello,

Please find attached the Alliance of Beverage Licensees' comments on Schedule 1, Plan Renewal.

If you require anything further, please don't hesitate to let me know.

Sincerely,

Danielle Leroux

Membership Engagement & Communications Coordinator, ABLE BC
E: danielle@ablebc.ca Ph: 604-688-5560 - Fax: 604-688-8560 - 200-948 Howe St. Vancouver BC V6Z 1N9
Website: <http://ablebc.ca/> - Twitter: [@ABLEBC](https://twitter.com/ABLEBC) - Facebook: [@ABLEBC](https://www.facebook.com/ABLEBC)

CONNECTING BUYERS AND SUPPLIERS
AT THE LARGEST HOSPITALITY TRADE
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NOVEMBER 3 & 4, 2014
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ALLIANCE OF BEVERAGE LICENSEES
FOR A RESPONSIBLE LIQUOR INDUSTRY



ALLIANCE OF BEVERAGE LICENSEES
FOR A RESPONSIBLE LIQUOR INDUSTRY

November 27, 2014

Brewers Distributor Ltd.
1711 Kingsway Avenue
Port Coquitlam, BC V3C 0B6

VIA EMAIL: info@nationalbrewers.ca
bz-k@nationalbrewers.ca

To whom it may concern:

British Columbia's Alliance of Beverage Licensees ("ABLE BC") is the voice for all Liquor Primary & Licensee Retail Stores ("LRS") in British Columbia.

As retailers of beverage alcohol, ABLE BC's LRS members are subject to Section 6(1) of Schedule 1 of the *BC Recycling Regulation* whereby they must accept up to 24 containers per person per day and provide a full refund of the deposit to the person redeeming those containers.

ABLE BC members are pleased to be part of BDL's extensive collection network, which we believe offers BC consumers many convenient options for redeeming their beer containers. Return-to-retail container redemption contributes to consumer convenience and higher beverage container recycling rates and, as such, it is an important component of the BC beverage container return system.

ABLE BC has recently renewed a long-standing financial and logistic agreement with BDL for beer container redemption from its members. Our members are proud to contribute to the impressive results BDL has been able to achieve – such as the average recovery of 93% over the past four years.

ABLE BC supports the continuation of return-to-retail for container redemptions. We are pleased to partner with BDL to ensure BC consumers have convenient access to redemption facilities and that private retail liquor store owners are properly remunerated for their redemption of beverage alcohol containers from the public. This last component is critically important to our members, as other beverage container stewards provide retail liquor store owners with neither a handling fee for redemption of relevant containers from consumers nor a collection service to transport those containers for recycling.



ALLIANCE OF BEVERAGE LICENSEES
FOR A RESPONSIBLE LIQUOR INDUSTRY

ABLE BC has reviewed BDL's draft Schedule 1 2015-2019 stewardship plan and we strongly support it. The plan offers significant benefits for BC's environment, BC beer consumers and, unlike the stewardship plans of other product stewards, for BDL's collection agents.

Sincerely,

Jeff Guignard
Executive Director, Alliance of Beverage Licensees

Zeiler-Kligman, Brian

From: Canada's National Brewers
Sent: November 28, 2014 5:12 PM
To: Zeiler-Kligman, Brian
Subject: FW: Comments on Brewers Distributors Ltd. Draft Stewardship Plan

From: Rod Lotzkar [mailto:rlotzkar@regionalrecycling.ca]
Sent: Friday, November 28, 2014 5:03 AM
To: Canada's National Brewers
Cc: Meegan.Armstrong@gov.bc.ca
Subject: Comments on Brewers Distributors Ltd. Draft Stewardship Plan

Regional Recycling is pleased to be a commercial partner of BDL and a part of their collection network for beer containers. Having reviewed BDL's draft stewardship plan renewal, we believe it continues to provide the framework for a high performing stewardship program that offers BC consumers plenty of convenient return locations, such as the Regional Recycling depots. We strongly support the draft plan and believe it should receive Ministry approval as soon as possible.

Regards,

Rod Lotzkar



Rod Lotzkar
Regional Recycling
604.968.1505

www.regionalrecycling.ca

Zeiler-Kligman, Brian

From: Kosmak, Monica [Monica.Kosmak@vancouver.ca]
Sent: November 27, 2014 8:41 PM
To: Zeiler-Kligman, Brian
Cc: Meegan Armstrong; Andrew Marr; Andrew Doi; Shames, Albert; Underwood, Chris; Iacoe, Sarah
Subject: RE: BDL Schedule 1 Product Stewardship Plan 2015-2019
Attachments: BDL Schedule 1 2015-2019 Product Stewardship Plan - Metro Vancouver Comm....docx

Hi Brian,

City of Vancouver staff echo Metro Vancouver's comments. We provided input on the comments in their Word document (reattached for our records, with thanks to Metro for compiling them). Thanks for the opportunity to provide input on your plan.

Monica Kosmak | Project Manager
Vancouver Services Review | Office of the City Manager
City of Vancouver
453 W. 12th Ave. Vancouver, BC V5Y 1V4
604.673.8069 | monica.kosmak@vancouver.com

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From: Andrew Doi [mailto:Andrew.Doi@metrovanvancouver.org]
Sent: Thursday, November 27, 2014 10:27 AM
To: Brian Zeiler-Kligman
Cc: Meegan Armstrong; Andrew Marr; Kosmak, Monica
Subject: BDL Schedule 1 Product Stewardship Plan 2015-2019

Hi Brian,

Thank you for the opportunity to submit comments on the BDL Schedule 1 Product Stewardship Plan 2015-2019. The comments and suggestions included in the two attached documents are submitted on behalf of Metro Vancouver staff.

Please do not hesitate to contact me if you have any questions or would like further information.

Thanks,

Andrew Doi, MCIP, RPP
Environmental Planner
Metro Vancouver
Solid Waste Services
4330 Kingsway
Burnaby, B.C.
V5H 4G8
Canada

Zeiler-Kligman, Brian

From: Andrew Doi [Andrew.Doi@metrovancover.org]
Sent: November 27, 2014 1:27 PM
To: Zeiler-Kligman, Brian
Cc: Meegan Armstrong; Andrew Marr; Monica Kosmak
Subject: BDL Schedule 1 Product Stewardship Plan 2015-2019
Attachments: BDL Schedule 1 2015-2019 Product Stewardship Plan - Metro Vancouver Comments.docx;
BC-Schedule-1-Stewardship-Plan-draft-for-public-consultation-Sept-14 - MV Edits.pdf

Hi Brian,

Thank you for the opportunity to submit comments on the BDL Schedule 1 Product Stewardship Plan 2015-2019. The comments and suggestions included in the two attached documents are submitted on behalf of Metro Vancouver staff.

Please do not hesitate to contact me if you have any questions or would like further information.

Thanks,

Andrew Doi, MCIP, RPP
Environmental Planner
Metro Vancouver
Solid Waste Services
4330 Kingsway
Burnaby, B.C.
V5H 4G8
Canada
604-436-6825
Andrew.Doi@metrovancover.org

Metro Vancouver Staff Comments – Stewardship Plan Renewals (Fall 2014)

Comments for All EPR Programs:

- **Compensate collectors.** Although some of the programs have achieved stellar recovery rates, many collectors are not compensated for their activities. As a result, recovery of obligated material is likely lower, and there are early indications of some collectors transferring materials to other collectors because there is no meaningful benefit for the collector to 'go the extra mile'.
- **Data Collection.** Formalize the collection of data, including options that exist outside of the official EPR collection network. If 'competing' collectors do not have an incentive to report data, paying for data or providing an incentive to report should be considered 'in-scope' for program obligations.
- **Options for Local Government.** All EPR programs should develop an arrangement for local governments who receive, or pick-up illegally dumped material, to be paid for managing and handling this material, whether or not the facility is designated as a depot. Local governments, generally, do not seek to compete with private depot operators, yet still receive this materials from residents and businesses. (A recommended project for the Stewardship Agencies of BC would be to find out the root causes for people who dump illegally, who bring materials to transfer stations even when there are permanent depots available, prefer 'round-up' events to permanent depot locations, and 'hide' banned materials in residential loads. Such a study is recommended to include possible solutions to address these issues, such as enhanced collection models that go beyond the drop-off approach, and financial incentives to encourage product and packaging recovery directly through the EPR programs' collection infrastructure.)

Brewers Distributor Ltd. (Deadline: December 1, 2014)

General Comments:

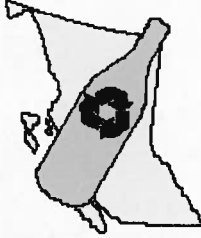
- BDL is to be congratulated for its high level of performance in recovering containers, which has been sustained over several decades.
- BDL is also to be commended for the level of achievement in the use of refillable containers. The program has achieved performance, relative to the pollution prevention hierarchy, that is unparalleled in BC. The 'industry standard bottle' is an example of a closed-loop system that can be a circular economy model for other businesses.
- BDL is also to be commended for integrating both Schedule 1 and Schedule 5 products into a single annual report, which will greatly simplify the experiences for stakeholders in reviewing the program's performance.
- The Plan is written in a clear and concise manner, and only a few minor typos were detected and noted in the attached PDF document.

Key Comments:

- **6. a. Page 8. Recovery Rates for Containers.** Although the 87.5% recover rate for each container type represents an incremental improvement of the 85% target in the last plan, based on several years of high performance, the program is encouraged to be more ambitious in targeting a 90% recovery rate for each container type.

Specific Comments:

- **1. Executive Summary, Page 4.** The executive summary includes the following statements, “targets to direct 100% of recovered materials for re-use and recycling” and “commitment to direct 100% of collected materials for re-use and recycling”. The wording, although similar provides different connotations, one being ‘no better than’ while the other reads as ‘no worse than’. Suggest selecting one of these statements and then applying it consistently throughout the plan.
- **6. b. Consumer Accessibility, Page 8.** The Plan identifies unique preferences for return-to-retail and a tendency to re-purchase upon return of empty containers in Metro Vancouver. Is BDL aware of the reasons behind these consumer preferences in the region?
- **7. a. Complaints for Local Governments, Page 10.** BDL should be acknowledged for recognizing that local governments are not ‘just another stakeholder’ and require distinct options for communication and alternatives for resolving issues. Other EPR programs are encouraged to adopt a similar approach.



BC Bottle and Recycling Depot Association
#33030, 11198 84th Avenue,
Delta, BC, V4C 8E6
Phone: 604-930-0003 Fax: 604-930-0060
Email bcbda@telus.net

November 2014

To Brian Zeiler-Kligman
Director, Sustainability
Canada's National Brewers (BDL)

Submission Regarding BDL Beverage Container Return Program Renewal
Consultations and the BDL Printed Paper and Packaging Program Plan.

Executive Summary

The BC Bottle and Recycling Depot Association (BCBRDA) formerly the BC Bottle Depot Association (BCBDA) was founded in January 1997 by independently owned and operated bottle depots. The BCBDA represents a substantial group of depots across BC. The BCBDA recently changed its name and mandate to make membership available to all recycling industry businesses and agencies inside BC and abroad.

The Mission of the BC Bottle Depot Association is to advance the best interests of its members and to promote sustainable recycling programs that support a healthy environment and benefit the public and our communities.

The Board of Directors, Members and Staff of the BCBDA have had the opportunity to review the proposed Brewers Distributing (BDL) 5 year renewal plan through distribution of the plan by BDL, in person consultations and webinars hosted by BDL and by follow up of any questions raised by the BCBDA. The BDL consultation process was accessible and informative and we congratulate BDL on their efforts and willingness to identify significant changes to their program and their continued willingness to work with the BCBDA on any future issues that may arise.

The BCBDA recognises that each of our members operates a business model truly unique to their location and size and that where possible this consultation submission will indicate where potential conflicting concerns may occur between members.

We offer our kudos and concerns of the proposed 5 year renewal plan throughout the body of this document.

Yours truly

Corinne Atwood CAE
Executive Director, BCBDA

BDL Used Beverage Containers Performance Targets and Measures

The BC Bottle and Recycling Depot Association (BCBRDA) supports the proposed expansion (as seen in the BDL 5 year renewal plan) of contracts to bottle depots over the next five years. A target of contracting directly with 80 depots by 2019 compared with approximately half that number a few short years ago is an impressive increase in consumer full refund accessibility and good news for our member depots. These direct contracts with depots allow for the depot to offer back full deposit refund back to the customer versus discounting thereby increasing customer satisfaction in their depot experience.

However some depots continue to decline BDL contracts and instead purchase used beer containers from customers at a "discount" thereby deriving their handling fees from the difference. In this practice a depot offers 5-8 cents back to customers from the 10 cent deposit paid by customers when they purchased the beverage. This 2-5 cent margin per bottle is more than the depot would receive for handling fees if a depot had a direct contract with BDL. These discounted beer containers are then sold to other BDL contractors who work with very large volumes.

This practice of discounting continues as it has for years within both of the used beverage container EPR programs including the non alcohol and spirit used beverage container programs and we believe it will continue for some time.

Currently both Used Beverage Container Programs offer handling fees per container. The handling fees vary greatly by container type but so do the responsibilities under the respective contracts. Volume is a contributing factor. Determining the collection cost per container in either of the used beverage plans is difficult as this is information proprietary to each plan. Depot expenses vary greatly complicating the issue of "are depots being offered adequate handling fees?" when asked if they are satisfied with the BDL program.

Two things greatly affect depot viability. Overhead expenses such as property and utilities costs (that vary greatly from city to city) and labour costs. As previously stated each depot business model is unique. Further complicating matters is that the BC the Ministry of Environment continues to approve other recycling (EPR) programs that allow manufacturers to operate monopolistic material collection plans that do not pay the real or any costs of material recovery. The "Deposit System" is a proven and effect way to incentivise consumers to return discards but continues to be ignored by most stewards as the preferred recovery method as cost is their motivation in program design. The BCBRDA feels the establishment of an independent governing agency would provide a forum in which all EPR programs could be vetted.

More than 15 EPR programs other than the Used Beverage Containers plan exist in this province, most piggy back on existing depot networks but fail to adequately compensate or compensate at all collection depots for the real costs of collection. Most EPR program in BC could not survive as stand alone businesses. Depots are currently able to remain viable due to handling fees derived from used beverage containers. Depot operators faced with ever increasing costs and diminished volumes and material streams are forced to look for alternatives to increasing revenue. Discounting is an easy and quick means to that end.

While discounting is not condoned by the BCBRDA, a number of our members practice discounting. Not all of bottle depots have a contract with BDL and therefore are not obligated to accept beer returns but do so to accommodate customers. It is a natural assumption for people returning used beverage containers to want to bring their beer containers to the depot for unlimited returns. Government and private Liquor stores currently accept up to 2 dozen containers per person per day.

This same desire to offer better customer service makes depots feel obligated to accept many of the other EPR programs even if they are negative revenue programs in an attempt to offer one stop recycling service to their customers. Accepting these other programs for little or no compensation puts a strain on depot revenues and the associated expense of handling more materials and as such the cost of keeping a depot viable forces depot operators to look for ways to increase revenues.

If deposits were applied where applicable as part of these other EPR programs we would see a marked increase in recovery rates due to people being incentivised and depots would likely be better compensated. This could also reduce the need to discount.

It is the opinion of BCBRDA that all EPR programs must be made to prove they are paying the true cost of collection before being approved by the Ministry of Environment. The BCBRDA feels that by allowing EPR programs that do not adequately compensate depots or other collection agents to handle their materials, other true EPR programs such as BDL are made to pay more than their share in order to keep depots viable and discounting will continue.

In addition the spirit and non alcohol beverage manufacturer's agents continue to drive up costs of their collection system in their ongoing attempt to portray the deposit system as an expensive system. Their administration costs alone are by comparison to the BDL system over what should be expected and they continue to prohibit depots from condensing containers on site to reduce depot and transportation costs. It is widely thought that their goal is to be included in other programs that offer lower cost to manufacturers at the expense of recovery rates (Compare the recovery rates of milk in BC to Alberta following the inclusion of milk containers into the Alberta deposit system).

The BDL system of recovery has worked effectively for decades but has come under scrutiny for lack of full refund locations when in fact depots have been offered contracts and have declined citing discounting as the preferred method of collection. The BCBRDA has cooperated with BDL in an effort to assist them with expansion of their contracts and have had little success in persuading depots to abandon discounting for the reasons stated above. If there is an opportunity to increase revenue the depots are going to use it. BDL just happens to be the visible entity in this activity but discounting of spirit and non alcoholic used beverage containers also exists.

Recovery Rates

The BDL used beverage container program is supported by an effective logistics system performs brilliantly enabling BDL to continue to enjoy the highest recovery rates while decreasing their carbon footprint. This efficient logistics system keeps the costs of the program down by not engaging hauling service for one way loads and keeping check on administration costs.

BDL has continued efforts towards increased recovery of their containers by keeping a higher deposit level. This higher deposit has proven in many jurisdictions to be an incentive for people to "do the right thing" and bring containers back for recycling. The higher deposit level also insures that BDL containers are preferred over the lesser deposit bearing used beverage containers for returns.

Strategies for Improvement

The BCBRDA believes that BDL is on the right track continuing to expand their contracts to more bottle depots who can offer unlimited returns. The public has shown by the rate of returns to bottle depots with the average depot visit rendering between 15 and 25 dollars in refunds that they prefer a one stop unlimited bottle return centre for all beverage containers. The 24 container limit at retail outlets can be problematic for some people.

However the BCBRDA is not largely supportive of BDL contracting with private liquor stores to increase their 2 dozen limits to 10 dozen per day limit. In our opinion this would further erode depot volumes and affect depot viability. This would be particularly harmful to depots in remote areas that struggle to survive, some subsidized by presence grants.

Retail stores in the past have expressed concerns that increased returns increase nuisance related issues that can have a detrimental affect on the retail stores ability to secure prime retail space. Prime retail space also comes at a hefty price. Current handling fees do not adequately compensate all retailers for the space and staff costs of handling the returned containers.

BDL Printed Paper and Packaging Component

The BCBRDA supports a combined stewardship plan for both Used Beverage Containers and the association Printed Paper and Packaging. It has long been a practice of the general public to return beer containers in their original cardboard/ boxboard packaging. This practice has been integrated into the packaging for shipment requirement for depots. Bottles are sorted and put in card board/ box board beer cases and then shrink wrapped for shipment. BDL provides extra boxboard cases for use by depots whenever customer submitted cases do not match inventory.

BDL has been doing for years voluntarily what others have been regulated to do, run an efficient system for both used beverage containers and the associated packaging. On occasion some BDL packaging finds its way into blue boxes or other collection streams but it is our impression that those other waste streams represent a small portion of what BDL distribute through beer sales and are confident that BDL will report their PPP accurately.

Zeiler-Kligman, Brian

From: Columbia Bottle Recycling
Sent: November 27, 2014 3:00 PM
To: Zeiler-Kligman, Brian; Zeiler-Kligman, Brian
Subject: FW: Support BDL's draft stewardship plan renewal

From: Columbia Bottle Recycling
Sent: November 27, 2014 2:57 PM
To: 'Zeiler-Kligman, Brian '
Subject: FW: Support BDL's draft stewardship plan renewal

Brian,
I got a bounce back from 'info@nationalbrewers.ca.' so I am forwarding this to you

Dave

From: Columbia Bottle Recycling
Sent: November 27, 2014 2:54 PM
To: 'info@nationalbrewers.ca.'
Subject: Support BDL's draft stewardship plan renewal

To whom it may concern:

I would like to state that I am proud to be an agent for Brewers Distributors Ltd (BDL) Located in the Municipality of Creston and fully support BDL's "Draft stewardship plan" proposal and renewal., Our location provides a no maximum return facility which services the east shore of Kootenay Lake and surrounding areas of Creston's 20,000 population.

I particularly support the statements made in BDL's draft stewardship plan renewal listen under section "a Program Funding":

- **The cost for recovering the container is factored into the price of the product**
- **A fundamental tenet of EPR is that costs internalized to producers result in producers designing products and systems to reduce environmental and financial cost**
- **BDL's program is run on a cost-recovery basis and is funded by the manufacturers participating in the program**

In contrast, the non-alcohol Stewardship program has a container recycling fee (CRF) and as an agent for this stewardship, I am asked on occasion to explain the fee and why it isn't also refunded. It is obvious that the fee which appears on the bottom of a till tapes does not explain to which container the fee's apply, and that the consumer would be able to make an informed decision to what packaging of the product to purchase if this fee was included in the shelf price.

One other factor I believe that has made BDL the leading Steward in beverage container recovery is the 10 cent deposit for 1 liter and under containers and that non alcohol containers should be "brought in line" with the deposit levels of alcohol containers .

In closing I am pleased to be part of BDL's collection network for beer containers. I believe through locations like my depot, BDL offers BC consumers convenient options, as reflected by BDL's very high recovery rate year in and year out,

and continues to provide the framework for a high performing stewardship program. I strongly support the draft plan and believe it should receive Ministry approval as soon as possible.”

Dave Fowler - Owner
Columbia Bottle Recycling Ltd. Creston B.C
Phone: (250) 428-2929
Fax: (250) 428-8613
E-Mail Columbia@bdl.ca



We are a return It Centre located in British Columbia and wish to put forward our remarks regarding the renewal of stewardship plans with Call2Recycle Canada, Inc., Recycle My Cell, Switch the 'Stat, and Brewers Distributor Ltd. and the British Columbia Ministry of Environment for 2015-2019.

Please consider our comments below...

This is an exciting time for our industry. Much change has occurred and there much more to come ☺

1. We have concerns regarding adequate remuneration for services and believe that the stewardship plans require initiative in paying fees that are consistent with the actual costs of storage and processing of the items collected. The depot collection sites are imperative to the process yet they are struggling to maintain because the handling fees are inadequate or nil and do not cover the expenses incurred during the process. In some cases the depots have not had an increase in their fees for 15+ years. It would be suggested that all stewardship systems be examined for fair dealing where depots can report actual costs and handling fees can be attuned to cover them.
2. Continuing to use the depot system structure that is in effect throughout B.C. is logical and less expensive in maintaining and to increasing recovery rates. The Return It locations in B.C. have built their clientele over many years of service to the public. We believe all depots should be licensed to collect beer and all items in accordance with the laws of British Columbia. Their customers definitely appreciate the "one stop" convenience and payment of full deposit without discounts or return limits. For this to happen, fair and equitable handling fees need to be applied as well as the granting of licenses to each depot where licensing is in effect.
3. We would like to express support in the consideration of consumer recycling fees (crf's) being implemented if necessary for these stewardship programs to help cover handling fees and associated costs.

Thank-you for the opportunity to comment on the various plans that are up for renewal, we appreciate having our ideas and remarks considered.

Kind regards,

Willowbrook Recycling Inc.
savannah@willowbrookrecycling.com
19641 60th Ave.,
Langley, BC V3A 3Z6
Ph. 604-532-0239

Zeiler-Kligman, Brian

From: carolynn.lane [carolynn.lane@rdbn.bc.ca]
Sent: November 28, 2014 5:22 PM
To: Zeiler-Kligman, Brian
Cc: janine Dougall
Subject: Brewers Distributor Product Stewardship Plan Comments
Attachments: RDBN Comments on BDL 2015-2019 Stewardship Plan Draft.pdf

Good Afternoon,

The Regional District of Bulkley-Nechako has prepared comments on the Brewers Distributor Schedule 1 Product Stewardship Plan 2015-2019, which are attached to this email.

Thank you,
Carolynn

Carolynn Lane
Sustainability Assistant
Regional District of Bulkley-Nechako
carolynn.lane@rdbn.bc.ca
Phone: 250-692-3195
Fax: 250-692-1220

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REGIONAL DISTRICT
OF BULKLEY-NECHAKO
"A WORLD OF OPPORTUNITIES WITHIN OUR REGION"

November 27, 2014

Comments Regarding Brewers Distributor Schedule 1 Product Stewardship Plan 2015-2019 Draft

Prepared by: Regional District of Bulkley-Nechako (RDBN)
Submitted by: Janine Dougall - Director of Environmental Services
E-mail: janine.dougall@rdbn.bc.ca
Telephone: 250-692-3195

The efforts and hard work of BDL are very much appreciated and the document produced is well written and comprehensive.

The Regional District of Bulkley-Nechako has put forward the following comments with the intent of assisting in the development of a comprehensive and effective stewardship plan for the recycling of beer containers and associated secondary packaging in British Columbia. The comments have been broken down by section.

3. Containers and Materials

- There is no mention of bottle caps in this section. As part of beer packaging, whether primary or secondary, bottle caps should be included in the Stewardship Plan. How does BDL plan to address this material type?

5. Collection System and Consumer Access

- A list of existing unlimited BDL retail locations and BDL contracted bottle depots would be beneficial to this section of the plan, broken down by Regional District. This information would be useful for Regional Districts that wish to assist in advertising and educating the public on return options in their communities.
- How does BDL plan on addressing the concerns surrounding retail return locations with limited capacity? It is not efficient or reasonable for rural residents who live out of town to be expected to bring in 24 beer containers at a time to a return facility, and they are equally entitled to receive a full refund. In this circumstance, it is recommended that BDL consider establishing either a) an unlimited retail return location OR b) working

with a local bottle depot to become licensed for BDL materials and hence a full refund and unlimited location.

- It has been found that bottle depot locations provide a convenient “one stop shop” for residents in smaller communities. It is appreciated that you have considered this and in the Stewardship Plan have committed to place priority on contracting with locations that provide multiple stewardship program services. Are there plans to expand BDL contracted bottle depots in the RDBN to enable residents to receive the full refund?
- The goal of at least one unlimited return location in each region is low, especially for large geographical regional districts such as the RDBN.

6. c) Consumer Promotion and Education

- How many consumers participated in the survey, and where were the respondents located?
- There is still significant confusion for residents regarding the BDL-Encorp Bottle Depot relationship. Specifically, people do not understand why full refunds are provided at some bottle depot locations while not at others (non-BDL contracted bottle depots). Perhaps this issue needs to be considered for future public education efforts.

11. Financial Summary

- In your financial summary Table 9, what portion of the “Refunds Paid” amounts are returned to consumers (full refund locations) vs. consumer/bottle depot (not consumer full refund) locations? When a consumer returns a beer container to a bottle depot that is not a full refund location (ie. not contracted with BDL) the consumer only receives a portion of the deposit back. It is assumed that the portion of the deposit not paid to the consumer is used to pay the depot for handling fees. In this circumstance, the refunds paid would be equivalent to the deposit received, however the consumer would in essence be paying a portion of the deposit for convenience in the use of the bottle depot. It would be important to see the breakdown of the refunds paid, to show how much is being paid to depots in handling fees versus consumers. If a significant amount of the refunds paid is actually going to depots in handling fees, this could be an indicator that consumers are not using BDL return to retail locations effectively and would suggest that BDL should consider expansion of the bottle depot network as a greater priority in its Stewardship Plan.

Thank you again for the opportunity to submit comments regarding the Brewers Distributor Ltd., Schedule 1 Product Stewardship Plan 2015-2019 Draft. Should you have any questions, or require clarification on the comments provided, please contact either Janine Dougall, Director of Environmental Services or Carolyn Lane, Sustainability Assistant at 250-692-3195.

Zeiler-Kligman, Brian

From: Canada's National Brewers
Sent: December 1, 2014 9:13 PM
To: Zeiler-Kligman, Brian
Subject: FW: Stewardship Plan Comments
Attachments: brewers distributors.pdf

From: Sharon Boyce [mailto:sboyce@returnit.ca]
Sent: Monday, December 01, 2014 4:33 PM
To: Canada's National Brewers
Cc: Scott Fraser; Bill Chan
Subject: Stewardship Plan Comments

Good afternoon,

Please refer to the attached document in response to your request for comments on your draft stewardship plan.

If you require additional information, please feel free to contact us.

Thank-you

Sharon E. Boyce
Executive Assistant

Encorp Pacific (Canada)
206, 2250 Boundary Road
Burnaby, BC V5M 3Z3

Phone: 604-473-2416
Fax: 604-473-2411

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Date: December 1, 2014

To: Brewers Distributor Ltd.

via e-mail info@nationalbrewers.ca

From: Scott Fraser

President & CEO

Re: **Encorp Comments on your Stewardship Plan**

Dear Sir/Madam:

Please see Encorp Pacific's comments on your draft stewardship plan below.

Consumers continue to seek one-stop convenience for recycling at what are often referred to as 'eco-depots'. Recognizing that currently the emphasis in your plan is on return to retail, how do you see adapting your approach to incorporate more depot collection?

Regards,

A handwritten signature in black ink, appearing to read "S. Fraser", is written over a light blue horizontal line.

Scott Fraser

Zeiler-Kligman, Brian

From: Canada's National Brewers
Sent: December 3, 2014 12:46 PM
To: Zeiler-Kligman, Brian
Subject: FW: Comments on Bowers Distributors Ltd. Draft Stewardship Plan

From: dhipwell [mailto:dhipwell@bottledepot.ca]
Sent: Monday, December 01, 2014 7:39 PM
To: Canada's National Brewers
Cc: Meegan.Armstrong@gov.bc.ca
Subject: Comments on Bowers Distributors Ltd. Draft Stewardship Plan

GSBR is pleased to be an Agency for BDL and a part of their collection system. Having reviewed BDL's draft stewardship plan renewal , we believe it continues to provide the framework for a high performing stewardship program that offers B.C. consumers plenty of convenient return locations , such as the Bottle Depots in Saanich and Victoria . We strongly support the draft plan and believe it should receive Ministry approval as soon as possible .

Yours Truly ,
D'Arcy Hipwell
250.361-8483
dhipwell@bottledepot.ca