



2023

Table of Contents

| | | |
|-----|--|----|
| 1. | EXECUTIVE SUMMARY | 4 |
| 2. | INTRODUCTION..... | 5 |
| 3. | CONTAINERS & MATERIALS..... | 6 |
| a. | Schedule 1: Containers | 6 |
| b. | Schedule 5: Packaging and Paper Products | 6 |
| c. | Other Materials | 6 |
| 4. | PLAN PERFORMANCE | 7 |
| 5. | COLLECTION SYSTEM AND CONSUMER ACCESS..... | 8 |
| a. | Background | 8 |
| b. | Deposit Collection System & Deposit Flow | 9 |
| c. | Container Redemption Facilities - Location Methodology, Coverage & Scope | 10 |
| 6. | PERFORMANCE MEASUREMENTS & TARGETS..... | 10 |
| a. | Recovery Rates for Containers | 11 |
| b. | Consumer Accessibility..... | 11 |
| c. | Consumer Promotion & Education..... | 12 |
| d. | Pollution Prevention Benefits | 14 |
| 7. | DISPUTE RESOLUTION | 15 |
| a. | Local Governments | 15 |
| b. | Depots/Return Locations..... | 15 |
| c. | Inquiries or Complaints from Consumers..... | 15 |
| d. | Disputes between BDL and Brewers/Manufacturers that use BRCCC system | 16 |
| e. | Coordination and Cooperation with Other Stewardship Programs | 16 |
| 8. | MANAGEMENT OF ENVIRONMENTAL IMPACTS..... | 17 |
| a. | Background | 17 |
| b. | Refillable Containers | 17 |
| c. | Pollution Prevention Hierarchy | 18 |
| d. | End-of-Life Management Locations | 19 |
| e. | Pollution Avoidance | 19 |
| 9. | STAKEHOLDER CONSULTATIONS | 20 |
| 10. | BEVERAGE CONTAINER AGENCY DETAILS | 20 |
| 11. | FINANCIAL SUMMARY..... | 21 |
| 12. | PERFORMANCE MEASUREMENT SUMMARY TABLE | 22 |

List of Tables

Table 1 – Breakdown of BRCCC Return Locations by Channel (as of December 31, 2018)..... 9

Table 2 – BRCCC Performance Indicators and Associated Tracking Methodologies.....10

Table 3 – Results of Recovered Containers & Packaging 2022.....10

Table 4 – Targeted Number of Unlimited Return Locations by Type.....12

Table 5 – BRCCC Pollution Prevention Performance Indicators.....14

Table 6 – Timelines & Communication Methods for Addressing Potential Stewardship Disputes16

Table 7 – Breakdown of Recycling Attributes for BRCCC Containers & Packaging Streams.....17

Table 8 – Energy, Greenhouse Gas, and Pollutant Reductions from BRCCC Container Recovery.....19

Table 9 - Brand Owners using Refillable Bottles Registered under the BRCCC Plan21

Table 10 – Five Year Summary: Audited Results of Deposit Refund Performance 2014-2018.....21

Table 11 – Summary of BRCCC Plan Performance Measurement Targets 2021-202522

Product Stewardship Plan
2023
– Schedule 1 Containers –

1. EXECUTIVE SUMMARY

- BC Brewers Recycled Container Collection Council (BRCCC) continues to support over 200 brewers that collectively represent the vast majority of the beer producers/sellers in BC, by managing their administrative responsibilities and duties performed on behalf of producers under Schedule 1 of Section 2 of the Recycling Regulation in which a producer must have an approved plan under Part 2 [Extended Producer Responsibility Plans] and comply with the approved plan with respect to a product in order to use in a commercial enterprise, sell, offer for sale or distribute the product in British Columbia.
- Brewers' Distributor Ltd. (BDL) continues its role as a service provider to BRCCC managing container refilling and collection, consolidation, recycling and reporting functions.
- Continued commitment to high performance
 - Set overall program and individual container recovery rate at 90%, (15% over the regulated requirement)
 - Container specific performance remains the highest in the province
 - Is the only container stewardship program that supports reuse through refill
 - Is the only containers stewardship program that provides take-back services from the commercial sector and integrates full goods products delivery with empties pick-up through reverse logistics
- Container Plan (Schedule 1) works in tandem with Packaging and Paper Product (PPP) Program (Schedule 5) supported through efficient and convenient deposit-return systems offering direct incentives for BC consumers resulting in high participation and performance rates.
- Deposit return system supports full traceability of containers through their useable life and to final disposition as recycled
- Emphasis on resource efficiencies and waste reduction through standard container design
- Continued commitment to high materials management standards
 - Support continued use of refillable glass bottles to support the circular economy
 - Aluminum can volume has increased in recent years and represent over 95% percent of sales and offer a 95% reduction in energy use and emissions when recycled
- Continued emphasis on consumer awareness and convenience to support overall performance
 - Commitment to expand BRCCC's return collection network.
 - Target of 215 unlimited return locations by the end of year 5 and no less than 100 depots
 - Establish a minimum of 1 unlimited return location in each Regional District
 - Target of 80% of population within 10-minute drive of an authorized BRCCC return location
 - Conduct a consumer survey on biennial basis to confirm awareness levels and set next steps for any future education programs
- No consumer fees added to the product price at the point of purchase and identified on the consumer receipt of sale

2 INTRODUCTION

The BC Brewers Recycled Container Collection Council (BRCCC) is a not-for-profit society under the BC Societies Act established by the brewing sector to transparently administer the financial and logistical requirements of the industry's stewardship in BC. The BRCCC Board of Directors is composed of members representing Brewers' Distributor Ltd. (BDL), Labatt Breweries Ltd., Molson Coors Canada, Sleeman Breweries Ltd., the BC Craft Brewers Guild and Beer Canada.

Under Schedule 1 of the Recycling Regulation (Reg. 162/2020, BRCCC is the stewardship agency for all refillable glass beer and cider bottles, as well as all metal beverage alcohol cans. BRCCC is seeking to renew this EPR plan on behalf of its stewards, for the collection and processing of these containers.

Under Section 2 of the Recycling Regulation, a producer must have an approved plan under Part 2 [Extended Producer Responsibility Plans] and comply with the approved plan with respect to a product in order to use in a commercial enterprise, sell, offer for sale or distribute the product in British Columbia.

The Recycling Regulation indicates the following:

- Before the agency begins to carry out the duties of the producer under Part 2 of the Recycling Regulation the producer must notify the agency in writing of the appointment, specifying the duties under Part 2 the agency will perform on behalf of the producer – Section 2(2)
- A copy of any notification the agency received from the producer is available upon the request of a director – Section 2(4)(b)
- The EPR plan confirms the duties that the agency will perform on behalf of each producer that has joined the agency; or alternatively, state how written confirmation will be provided to a director under the Regulation – Section 2(3)(a)

BRCCC is the appointed product stewardship agency for the majority of refillable glass bottle and alcohol aluminum can volume generated in BC to carry out the duties of the producer under Part 2 on their behalf with respect to beverage containers. Producers appoint BRCCC to act as an agent on their behalf by written agreement to confirm the duties that BRCCC will perform on behalf of each registered producer. A copy of any notification the agency received from the producer appointing the agency and specifying the duties the agency will perform on their behalf are available upon request by the Ministry.

BDL is a privately-owned distribution and logistics company, operating in the western Canadian provinces of British Columbia, Alberta, Saskatchewan and Manitoba. BDL acts as the collection agent on behalf of the BRCCC. BDL's operations in BC focuses on two primary elements: the warehousing and distribution of beer, cider and coolers for a number of breweries and liquor suppliers to retail locations and licensed establishments throughout BC¹, for sale to the public ("full goods"); and the collection of aluminum cans and refillable glass bottles and related secondary packaging on behalf of the BRCCC.

Governance information can be found on BRCCC's website here: <https://envirobeerbc.ca/about-brccc/>. Board members collectively represent over 95 percent of the beer volume sold in the province, with a cross section of brand owners from local, national and international companies. Additionally, names and affiliations of the members of the BRCCC's Board of Directors and bylaws are posted on BRCCC's [website and updated as needed](#). Should there be any changes to agency structure and governance, and board members or affiliations, it will noted in BRCCC's annual report.

The Canadian brewing industry bases its business on circular economic principals and its program results

¹ BDL's customers include pubs, hotels, restaurants, clubs, cabarets, government liquor stores, agency stores (rural agency stores are small general stores in rural areas authorized by the BC Liquor Distribution Branch to sell beer, cider, coolers, wine and spirits with other goods) and licensee retail stores.

speak for its continued commitment to leadership in environmental stewardship. Canadian brewers have been offering their product in refillable and recyclable containers for more than 90 years, maximizing the inherent value of the containers while minimizing waste. The refillable beer bottle continues to be a gold standard of sustainable packaging and an exemplary model of a circular economy during the current single-use plastics crisis. The deposit-return system builds loyal and longstanding relationships with consumers, leveraging the efficiencies of reverse logistics from home, store consolidation points, to product refill and/or container recycling facilities.

These two inter-connected elements – deposit-refunds and refillable/recyclable containers – have been the cornerstone of the Canadian brewers’ system for decades. Through these mechanisms, the industry assumes full responsibility for end-of-life management of all of its products, including beverage containers and secondary packaging.

This product stewardship plan for containers focuses on maintaining previous high performance and continuous improvement in both reuse and recycling by assuring high consumer awareness through new campaigns and partnerships as well as convenience to promote returns.

3. CONTAINERS & MATERIALS

Under this BRCCC Plan, there are two types of containers: refillable glass bottles and aluminum cans. Audited sales percentage data is provided on an annual basis.

a. Schedule 1: Containers

Refillable Glass Bottles

- In 2022, refillable glass bottles accounted for 3.5% of total BRCCC packaged beer containers sold in BC [excluding kegs].
- The majority of refillable glass bottles sold in BC are the industry standard bottle (ISB): a 341 ml refillable glass bottle that is refilled on average 15 times per container. Beer sales in the ISB represented 2% of total BRCCC containers
- In addition to the ISB, some brand owners retail their products using proprietary refillable glass bottles (i.e. – brand specific bottles). These proprietary bottles represented approximately 1.5% of total BRCCC containers.

Aluminum Cans

- Product sold in cans represented about 96.5% of total BRCCC beer containers sold in BC.
- Domestic and import brand owners sell product in cans of various sizes, the most common of which is the 355-ml variety. BRCCC has been the designated product steward for all beverage alcohol sold in cans, including import beer, since 2006.

b. Schedule 5: Packaging and Paper Products

In addition to refillable glass bottles and aluminum cans, BRCCC also handles a number of other materials, including secondary packaging which is under a separate plan and is available on BRCCC’s website. These stewardship programs operate in tandem, as most refillable bottles are returned in their original packaging and shipped back to brewers for refilling. Information on these programs and their respective performance are provided by BRCCC in its annual report and posted on www.envirobeerbc.com.

c. Other Materials

In addition to the Schedule 1 and Schedule 5 materials noted above, BRCCC also uses, collects and recycles a number of other materials. To the extent possible, BRCCC also reports on the recovery and recycling of these materials in its annual reports to the Ministry.

Refillable Kegs

- Refillable kegs of various sizes are sold by BRCCC brand owners, primarily to licensed establishments. They are shipped back to the brewers, where they are inspected, washed and refilled. Steel beer kegs have an expected service life of over 30 years and require no additional packaging. Kegs of various sizes ranging from 18 litres to 59 litres achieve an average annual recovery rate of 100%.

Shrink-Wrap

- Pallets of beer are often wrapped in plastic shrink-wrap for stability during shipping. Used shrink-wrap is baled and sold to a processor.

Pallets

- Pallets used to transport beer are made of wood and can be reused, repaired, and ultimately recycled.

Can Bins

- Can bins can hold 180 dozen cans, and are used in high volume locations, reducing storage and transportation costs. The bins are reused an average of 20 times and when they reach the end of their useful life, they are recycled.

4. PLAN PERFORMANCE

In its over 90 years of operations, BDL and its predecessors have achieved some of the highest levels of program performance seen in Canada or elsewhere. In its 2015-2019 stewardship plan, BRCCC included several different performance matrices including; container recovery rates, accessibility through return locations, consumer awareness targets and proof of final disposition showing preference for domestic processing options.

While the Recycling Regulation establishes a legislative recovery rate of 75%, BRCCC's plan sets out to exceed that requirement aiming for a 90% recovery rate. BRCCC has achieved this enhanced target year over year with an annual average recovery rate around 90% with exception of 2020 due to Covid-19 pandemic, a result amongst the highest achieved for any product stewardship program globally.

Through this Plan, BRCCC is proposing to continue to maintain its high performance for this renewal period for each performance measurement; container recovery, accessibility, consumer awareness and reuse and recycling activities.

5. COLLECTION SYSTEM AND CONSUMER ACCESS

a. Background

BRCCC acts as product steward for over 200 brewers, cider manufacturers and brewery agents using refillable glass bottles and cans, most of whom are based in British Columbia (See Table 9- Brand Owners using Refillable Bottles Registered under the BRCCC Plan). BRCCC brand owners continue to account for substantially all of the total market of the domestic beer sold in British Columbia. Authorization of brand owners to elect BRCCC as steward agent for beverage alcohol cans is undertaken by the LDB at the time that plan members complete full good listing applications.

Return-to-retail remains a vital component of BRCCC's container collection system (refer to graphic on the next page) and one which is highly supported by consumers and stakeholders (see Section 5.b). BRCCC's collection system provides a variety of options for consumers including:

- a) all BC Liquor Stores,
- b) all private retail liquor stores,
- c) all rural agency stores and
- d) selected bottle depots.



As of December 31, 2022, BRCCC offers BC consumers 1,162 container redemption facilities to which they can return their beer containers (and associated secondary packaging) and at 165 of these locations, which include 81 contracted LRS and 84 depots, consumers are able to return an unlimited number of containers. The full list of unlimited collection sites with addresses are provided in Appendix A. All other locations will accept a maximum of 24 containers per day from consumers (with many accepting a larger number than this minimum amount). All retail locations are serviced by BDL to pick up empties in conjunction with full goods delivery regardless of having a contract for unlimited returns or not.

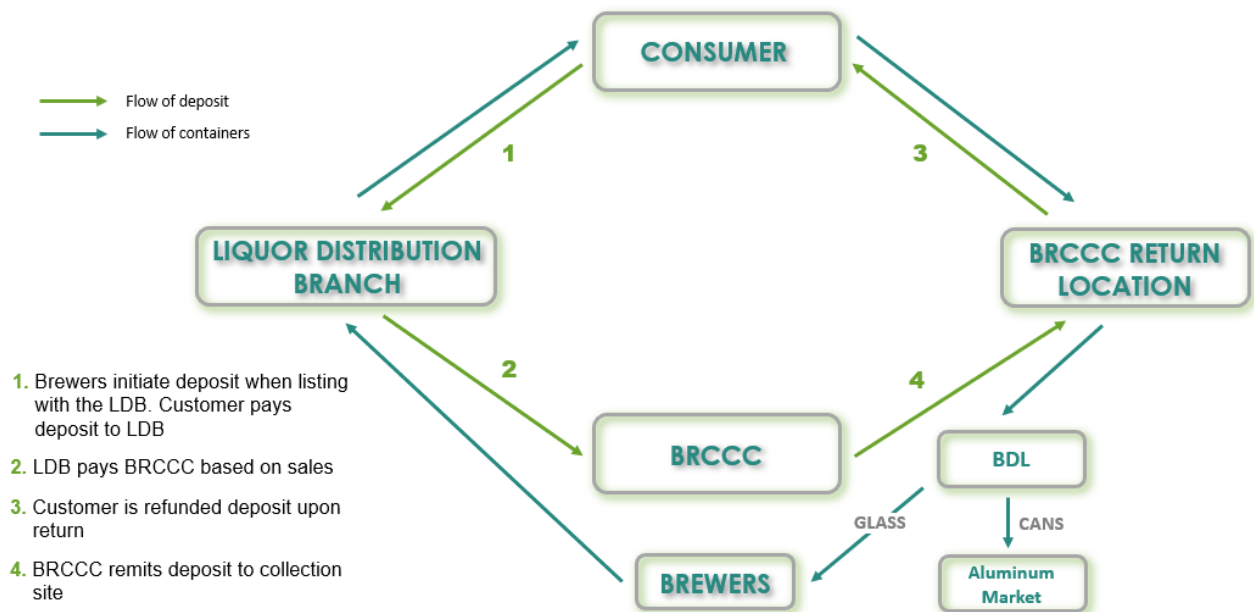
Note that an unlimited return location is defined as a contracted depot or LRS contracted to collect more than 24 containers per day per customer based on Section 6(2) of Schedule 1 of the Recycling Regulation. A container redemption facility or authorized return location is a government liquor store (GLS), licensee retail store (LRS), rural agency store or contracted depot.

**Table 1 – Breakdown of BRCCC Container Redemption Facilities by Channel
(as of December 31, 2022)**

| Location Description | # of Locations |
|---------------------------------------|----------------|
| Licensee Retail Stores (LRS) | 668 |
| Contracted LRS | 81 |
| Government Liquor Stores (GLS) | 198 |
| Rural Agency Stores | 212 |
| BRCCC Contracted Bottle Depots | 84 |
| TOTAL | 1,162 |

b. Deposit Collection System and Deposit Flow

BRCCC brand owners currently sell beer and alcoholic beverages contained in cans or refillable bottles to the Liquor Distribution Branch ("LDB") stores, licensee retail stores, LDB rural agency stores and licensed establishments ("Retailers").



When brand-owners list their full products with the LDB, the brand-owners are charged the applicable deposit for each container by the LDB as part of the wholesale markup when listing their product for purchase. LDB remits the deposit payment to the BRCCC based on sales collected from consumers on each container purchased. BRCCC pays the deposit to its collection sites which reimburse consumers when empty containers are returned. Any unredeemed deposits are used by BRCCC to cover collection, sorting and recycling costs.

Costs associated with managing and collecting BRCCC containers are paid directly by brand owners, with allocations determined by container type and sales volume. As a result, customers are not subject to additional handling or eco fees as an additional cost at the point of sale. BRCCC will continue to work with brewers and collection partners to coordinate the distribution, storage and delivery of goods and containers in ways that promote cost efficient, environmentally responsible practices.

c. Container Redemption Facilities - Location Methodology, Coverage & Scope

Based on BRCCC's annual GIS survey, 80% of BC consumers (or over 3.3 million BC residents) are within a 10-minute drive of an authorized BRCCC return location and 92% of BC consumers (or over 4 million BC residents) are within a 15-minute drive of an authorized BRCCC return location. These GIS results far exceed the accessibility standard established in the Stewardship Agencies of BC Action Plan which suggests "For rural communities with a population of 4000 or more, a 45-minute drive to a collection facility. For urban communities with a population of 4000 or more, a 30-minute drive to a collection facility." This standard is insufficient for BRCCC since BRCCC maintains higher standards to achieve high return rates. When revisiting the SABC standard based on our current return network, BRCCC achieves 98% accessibility for unlimited return sites (contracted LRS and depots) and 100% accessibility for any authorized return site. BRCCC's historical performance of >90% recovery rate is a testament to this coverage.

6. PERFORMANCE MEASUREMENTS & TARGETS

Recovery rates for each of the primary containers within BRCCC's product stewardship categories (industry standard, proprietary refillable bottles and cans) remain the program's core performance measure. In addition to return rates, BRCCC will utilize the following indicators to assess performance:

Table 2 – BRCCC Performance Indicators and Associated Tracking Methodologies

| <u>Performance Indicator</u> | <u>Methodology</u> |
|--------------------------------|---|
| Recovery Rates for Containers | Total number of containers returned ÷ containers sold for each container type |
| Consumer Accessibility | See Subsection B Below |
| Consumer Promotion & Education | See Subsection C Below |
| Pollution Prevention Benefits | See Subsection D Below |

Table 3 – Results of Recovered Containers 2022²

| Type of Container | Results of Recovered Material | |
|--------------------------|---|--|
| Aluminum Cans | 100% Processed for metal recovery | |
| Refillable Glass Bottles | 100% of the material sent to brewers were intended to be refilled | |
| | 99% of material shipped, sent to brewers for reuse | 1% of material shipped, sent directly to a glass recycler for recycling by BDL |

² Results of Recovered Containers reviewed by KPMG LLP

a. Recovery Rates for Containers

Performance Objective:

Achieve a recovery rate of 90% overall by year five and for each container type.

BRCCC will achieve a container recovery rate target of 90% by the end of this stewardship plan renewal period and until such a time that new targets are approved. In keeping with its previous stewardship plan, it is BRCCC's intention that this recovery rate will be achieved for each category of containers type included in the BRCCC program. This commitment well exceeds the mandated provincial target of 75%.

BRCCC has continued its efforts to sustain its unlimited return collection network to support its targets and uses its siting criteria to determine how return locations are allocated.

b. Consumer Accessibility

While consumer accessibility is a central tenant to the success of its high container recovery rate, BRCCC aims to balance the number of sites required to achieve performance objectives while ensuring its services systems remain cost effective. With over 1140 existing return sites, BRCCC is able to maintain the highest performance rate of any product stewardship program in B.C. BRCCC will work to add 33 collection sites to its network over the course of this plan tallying 1178 collection sites, ensuring consumer convenience is improved and current high recovery rates are maintained. BRCCC will also explore options that would improve consumers' return experience and work with relevant stakeholders to engage in pilot projects throughout the duration of this plan. We are exploring opportunities with local charities/social enterprises to arrange special events and/or bottle drives as well as other options (e.g., empty bottle dealers, legions, etc.) to further facilitate convenient returns for consumers.

Performance Objectives:

Increase unlimited return collection network.

- Target of 1178 total locations with 215 collecting unlimited containers (115 retail stores and 100 depots)
- Ensure at minimum 1 unlimited return location in each Regional District

Continue to achieve high levels of consumer accessibility.

- Target of 80% of population within 10-minute drive of an authorized BRCCC return location. BRCCC will repeat geographic information system (GIS) study annually during its annual coverage review process.
- In light of the recent "Enhancing Consumer Access to Recycling Services Under EPR" study commissioned by the MOECCS, BRCCC commits to share the results of its annual coverage review and GIS study against suggested primary factor population targets by community type. As this policy approach is still in development, BRCCC commits to revisit the above target once finalized.

Retail Locations

BC consumers continue to express significant support for the convenience of being able to return their empty containers to the retail locations where they make their purchases. According to the Decision Point Research study conducted for BRCCC in December 2019, approximately 33% of consumers

identified a retail location as where they are most likely to return their empty beer containers.³ Preference for retail locations was more pronounced among urban residents. For this reason, BRCCC continues to place emphasis on contracting with retail locations to be unlimited return locations as a matter of priority (reflected in Table 4 below).

Bottle Depots

When selecting bottle depot locations to act as collectors, BRCCC has siting criteria as described in the plan amendment section, *Producers Paying the Cost of Obligated Materials and Dispute Resolution Process*. Locations will be added as performance and accessibility targets require.

Table 4 – Targeted Number of Unlimited Return Locations by Type

| Program Year | Target Number of LRS Locations | Target Number of Depot Locations | Total Number of BRCCC Locations |
|--------------|--------------------------------|----------------------------------|---------------------------------|
| Year 1 | 109 | 85 | 194 |
| Year 2 | 110 | 90 | 200 |
| Year 3 | 111 | 95 | 206 |
| Year 4 | 113 | 98 | 211 |
| Year 5 | 115 | 100 | 215 |

In addition to maintaining a comprehensive return collection network, BRCCC will seek alternative drop off locations should there be no other feasible options and provide details in annual report accordingly. These sites may provide an opportunity to facilitate unique partnerships including but not limited to service groups, mobile collection options and regions.

Business Take-Back and Reverse Logistics

In addition to collecting from provincial liquor stores, private licensee retail stores, and depots, BRCCC collects from bars, restaurants, and other licensed establishments. Combining product delivery with container pickup increases efficiencies both environmentally and economically, making BRCCC the only beverage container stewardship program that provides take-back services from the commercial sector.

c. Consumer Promotion & Education

Performance Objectives:

Undertake increased consumer awareness and promotional activity.

- Target of 1 net new initiative in the 5-year renewal period of this plan
- Target 95% consumer awareness of deposit return for beer containers

Consumer awareness of the BRCCC program for beer containers is very high and is proven by the program's results.

³ Decision Point Research conducted study on behalf of BRCCC between December 3rd and 17th, 2019. 1,200 adult respondents (aged 19+ years) participated with quota set-up based on Census Profile, 2016 for British Columbia.

BRCCC commissioned Decision Point Research to conduct a consumer awareness study that took place in December 2019 and 2021. The results indicate that 93% of British Columbians are aware that consumers pay a refundable deposit for their beer containers. Among respondents from households that consumed beer within the past year, 94% indicated that they collected and returned beer containers for the refund.⁴ BRCCC will continue to monitor consumer attitudes and conduct a consumer awareness study on a biennial basis to measure and report progress.

BRCCC is committed to maintaining high levels of awareness as it pertains to its deposit-return system. To do this, BRCCC's will undertake a communications strategy throughout the five-year period ensuring consumers are aware of the locations where they can receive a full deposit refund. This strategy includes a new social media campaign and annual sponsorship of Waste Reduction Week in Canada. BRCCC engages a marketing agency to provide targeted promotions when and where applicable. The objective will be to ensure that consumers understand BRCCC's unique and efficient return network that significantly reduces greenhouse gas emissions and supports the only refillable container stewardship program.



The aforementioned consumer research revealed that poster signage and BRCCC's website are the most effective tools to communicate about BRCCC's program. As such, branded posters (an example is found above) have been developed to help consumers identify BRCCC authorized return locations. BRCCC continues to update its consumer website (www.brccc.ca) regularly to improve the user experience and to provide more information on the environmental benefits of refillable bottles and the recycling of alcoholic cans through BRCCC. The website's location tool will also be continuously updated to allow customers find their nearest authorized return location by their region or postal code and filter by location type. BRCCC also plans to post digital copies of any BRCCC branded promotional materials (such as signage currently posted at authorized return locations). The website is mobile-enabled and contains a number of features designed for search-engine optimization.

BRCCC also produced updated on-line information video outlining BRCCC's stewardship activities in BC. The video is posted on its website and made available on YouTube. The video is designed to provide consumers with insight into BRCCC's flow of containers and the logistics of the recycling networks. BRCCC will also revisit opportunities to further promote these videos and the overall program on social media and determine any new media touchpoints required.

BRCCC also plans to provide more educational resources for local communities and to coordinate efforts with community clean-up events and charity bottle drives. BRCCC has partnered with a number of collection locations to support Earth Day events, participates in BC Recycles summer ambassador tour, and supports numerous depot partners at consumer awareness and open house events providing information on the return system. New promotional items with BRCCC's logo and website has been distributed at these events.

BRCCC will also seek opportunities with other cooperative stewardship programs in consumer education efforts to help increase overall awareness of BC product stewardship while also helping consumers to understand the differences of each program. BRCCC is a member of the Stewardship Agencies of British Columbia (SABC) and in this capacity, and in partnership with the Recycling Council of British Columbia's (RCBC), participates in various consumer information vehicles, such as the Recycling Hotline, the RCBC website and the Recyclepedia tool.

⁴ Ibid, pg. 11

In addition to its revamped website, BRCCC will direct consumers to the “BC Recycles” portal as a one-stop location for information on recycling in BC. BRCCC also actively participates and sponsors stewardship and recycling related events, such as the annual conferences of RCBC and Coast Waste Management Association (CWMA).

d. Pollution Prevention Benefits

Performance Objective:

Direct all collected materials for re-use or to recycling for highest end use.

All BRCCC containers are made from non-toxic, inert materials with established secondary markets. Furthermore, all glass containers (when not suitable for refilling) and cans are sent for processing at designated recycling facilities, focusing when possible, on domestic options.

BRCCC will continue reporting on its pollution prevention achievements, calculated using a) life-cycle inventory data sets made available by the US Environmental Protection Agency (EPA), and b) reports prepared for or by Environment Canada or Natural Resources Canada. A list of performance indicators and metrics can be found below.⁵

Table 5 – BRCCC Pollution Prevention Performance Indicators

| Performance Indicator | Metric |
|----------------------------------|------------------------|
| Weight Materials Diverted | Tonnes |
| Avoided Greenhouse Gas Emissions | MT-CO ₂ -eq |
| Avoided Energy Consumption | GJ |
| Weight of Avoided Pollutants | Tonnes |
| Avoided Tipping Fees (Estimated) | \$ |

Container Management

Each year, the densified aluminum cans collected within the BRCCC collection system are marketed to a purchaser for recycling. Within that contract the purchaser’s material specifications are outlined along with the negotiated pricing terms and allowable payment adjustments. In addition, the purchaser provides BDL, on behalf of BRCCC, with a confirmation letter indicating that material sold to them is recycled and is not disposed in landfill, sent for incineration nor used in road aggregate.

Refillable bottles are sent back to brewers for re-use. Brewers provide a letter of intent to refill, and also provide details of the number of refillable glass bottles received that are not suitable for refilling and must instead be recycled.

⁵ Government of Canada. “Pollution Prevention”. <https://www.ec.gc.ca/p2/>. Accessed May 9, 2014

7. DISPUTE RESOLUTION

a. Local Governments

BRCCC intends to maintain continued dialogue with local governments and other stewardship agencies to stay informed and ahead of any potential program cross over issues or feedback that may serve to improve the program and its performance. Additionally, the new Field Services Manager role will be dedicated to strengthening network relationships and addressing local needs.

BRCCC will invite local governments to meet on an annual basis to provide an opportunity for feedback and actively work with them to provide better education to their residents. BRCCC will track and monitor any inquiries from local governments and report any new program developments as a result.

b. Depots/Return Locations

Return locations play a pivotal role in ensuring positive consumer experience and overall program performance. If a return location is found to be in violation of its contractual commitments or legal obligations, BRCCC will take appropriate measures within the terms of its partnership agreements to rectify any issues and to ensure compliance with existing provisions. All BRCCC agreements with standard depots, consolidation agents and processors include dispute resolution terms and procedures. More information is available on separate plan amendment posted on BRCCC's website.

c. Inquiries or Complaints from Consumers

Consumer inquiries or complaints are directed to the appropriate manager for follow-up and resolution. Through BRCCC's refreshed website www.BRCCC.ca, consumers have access to information on BRCCC's product stewardship plans and annual reports and it is continuously updated to provide the latest information as needed. The website provides an e-mail link for consumers who have any questions or complaints regarding either BRCCC's bottle return or its beer secondary packaging return programs. The website includes an e-mail address, contact phone number and a mailing address for public comments on BRCCC product stewardship activities. Consumer concerns will generally be addressed in writing (for example, e-mail questions are responded to via e-mail).

BRCCC receives an average of ten direct complaints annually which are predominately focused on consumers that chose to take their empty containers to unlicensed depots, thus receiving only part of their deposits. These incidences are tracked and if they persist BRCCC will explore the opportunity to add additional collection site in the area or deploy local communication/education efforts.

BRCCC will continue to work hard to mitigate any consumer deposit discounting by expanding the number of collection points to ensure convenient and comprehensive network of drop off sites, that are in-keeping with the 10-minute drive threshold for consumers.

While customer experience and convenience are of paramount interest to BRCCC it must ensure its collection and processing network do not overlap service levels between collectors resulting in overall system costs increases for brand owners which may affect product cost to consumers to cover their costs. BRCCC will work to balance the collection network between service convenience, program performance and overall cost efficiencies.

The Decision Point Research study conducted for BRCCC indicated that more than half of respondents

would go to another facility if they could get back their full deposit for their empty containers.⁶ BRCCC remains committed to continue awareness efforts to ensure consumers know where to receive a full deposit refund and to collaborate on communication with all collection sites so that consumers are provided with accurate information on return options, including the location of licensed redemption locations.

d. Disputes between BDL and Brewers/Brand Owners that use BRCCC system

BRCCC's container recovery system is subject to the listing and product approval process related to beer sales in the province under the BC Liquor Distribution Act. As part of the listing and approval process, brand owners must indicate their intention to designate BRCCC as their product steward for containers prior to selling their products in BC. Ongoing compliance is monitored through tracking within accounts receivable and internal brand registry systems. BRCCC is also committed to provide greater support and education for BC craft brewers to help assist them with their stewardship reporting obligations.

For the purposes of initiating an action with the Ministry of the Environment and Climate Change, non-compliance is defined by BRCCC as a lack of responsiveness from a brand owner after more than four written notices have been sent. In the event that BRCCC does not receive a signed agency appointment agreement from the brand owner within the prescribed timeframe, BRCCC may utilize the following notifications to underscore the importance of compliance with the Recycling Regulation.

Table 6 – Timelines & Communication Methods for Addressing Potential Stewardship Disputes

| No. of Attempts | Timeline | Details |
|-----------------|--|---|
| 1st Contact | 60 Days Prior | Letter is sent to brand owner obligated under the Recycling Regulation, informing them of their responsibilities |
| 2nd Contact | No Response within 30 Days of 1st Contact | A second letter is sent to the brand owner for lack of reply from the previous correspondence. In this letter, BRCCC will point out that the brand owner is liable if their company contravenes the Act |
| 3rd Contact | No Response within 30 Days of 2nd Contact | A final letter with a deadline for submitting membership documents is sent by BRCCC. At this stage, BRCCC will consider each brand owner on a case-by-case basis to decide whether to proceed to the final stage. |
| 4th Contact | No Response by Stipulated Deadline in 3rd Contact Letter | A request for non-compliance actions is sent to the Ministry of the Environment, with a copy to the brand owner. |

e. Coordination and Cooperation with Other Stewardship Programs

With respect to other stewards' collection networks, BRCCC will monitor its overall recovery performance and will coordinate with other cooperative stewardship programs as necessary to ensure overall recovery performance and program efficiency. BRCCC is in active discussion with both Recycle BC and Encorp Pacific Canada.

⁶ Ibid, pg. 11

8. MANAGEMENT OF ENVIRONMENTAL IMPACTS

a. Background

BC brewers have a long and established history of environmental leadership. Consistent with the requirements of the Recycling Regulation, all of the containers included in BRCCC product stewardship plans are re-useable, recyclable or both (see table below).

Table 7 – Breakdown of Recycling Attributes for BRCCC Containers & Packaging Streams

| Container Description | Re-usable (Y/N) | Recyclable (Y/N) |
|---------------------------------|--------------------|---------------------|
| Industry Standard Glass Bottles | Y | Y |
| Proprietary Glass Bottles | Y | Y |
| Aluminum Cans | N | Y |
| Kegs | Y | Y |

b. Refillable Containers

The BRCCC container collection system continues to support refillable containers. Manufacturers have a cost-efficient system for getting refillable containers back. BRCCC remains the only B.C. product stewardship agency that maintains a percentage of its products in refillable containers. While the volume of refillable bottles has declined over the past decade and was further challenged due to supply chain concerns during the Covid-19 pandemic, the refillable beer bottle continues to be a gold standard of sustainable packaging and an exemplary circular economy model. BRCCC supports brewers to maintain this important model and will assist in future studies to understand climate impacts and savings specific to BC.

Given that refillable bottles can be re-used an average of 15 times over their life-cycle, and the return rate for all refillable bottles averaged 92.4% during the previous program period. BRCCC producers utilized approximately 327 million fewer containers versus an alternative system utilizing one-way containers over a 5-year period.⁷

The majority of refillable containers utilized in British Columbia are of the industry standard bottle (ISB) variety. The ISB generates further environmental benefits, by reducing sorting costs and minimizing container transportation as empty bottles can be returned to the nearest brewery for re-use, rather than only to the brewery where they originated.

⁷ Figures provided for a) return rates and b) container savings are representative of data covering 2014 - 2018.

c. Pollution Prevention Hierarchy

BRCCC brand owners utilize two types of containers under the Schedule 1 product stewardship plan: refillable glass bottles and recyclable cans. Both methods of waste management are among the “most preferable” in the expanded hierarchy (see Figure 1). BRCCC containers are 100% recyclable, non-toxic, and have established secondary markets. Similarly, current container designs emphasize both reusability and recyclability.

Reduce

The refillable glass bottle has a long history of use and its track record as an environmentally preferable container is well established. Refillable glass containers have superior environmental performance compared to the production of one-way glass containers. At present, BRCCC’s closed loop system for refillable containers effectively reduces the total amount of bottles produced by approximately 75 million.

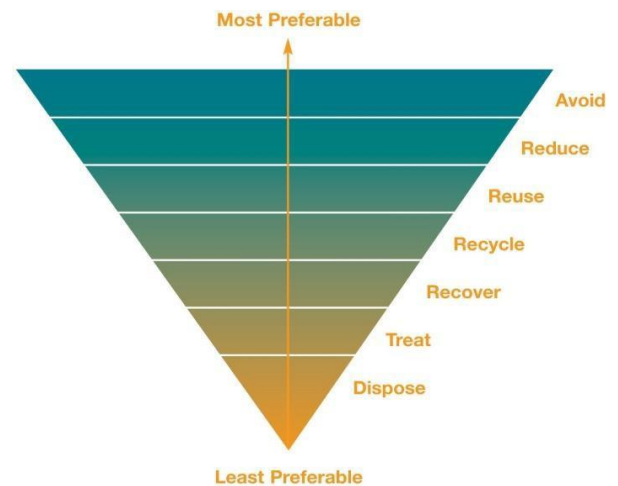


Figure 1 – Expanded Hierarchy of Waste Management Principles for Effective Environmental Protection

Reuse

Reusing glass bottles, comparably to producing new, saves considerable energy and reduces CO2 emissions. Energy requirements associated with washing and cleaning refillable bottles remain lower than those associated with producing new glass stock.

Similarly, kegs can be reused hundreds of times before approaching end-of-life. On a single trip, each keg can replace more than 160 bottles or cans. Kegs are repaired on an as-needed basis and can remain in service for up to 30 years. Finally, the secondary packaging used by brewers is similarly regularly re-used. Beer bottle cases and cartons often serve up to 5 different functions before they are ultimately recycled. Consumer re-use of this packaging is why BRCCC is able to offer brewers a second stewardship program for managing their packaging and printed paper as these programs work in tandem.

Recycle

The collection and recycling of aluminum cans also generates significant environmental benefits versus the production of new, one-way containers. For every ton of aluminum recycled, more than 200 GJ of energy are saved from avoided production processes including bauxite mining, alumina refining, and electrolysis.⁸ The energy required to make aluminum cans from recycled aluminum is 95% less than energy utilized in creating virgin aluminum.

⁸ PE Americas. Life Cycle Impact Assessment of Aluminum Beverage Cans. 2010 Report.

Despite being reused an average of 15 times over their life-cycle, refillable glass bottles eventually require end-of-life management., In 2022, 1% of refillable containers were sent to a glass recycler for recycling by BDL. Cullet from these containers was recycled into new, high-end use products including new bottles and fibreglass insulation.

Similar to refillable glass bottles, steel kegs also eventually approach the end of their individual life-cycles. Irreparable kegs are retired and sold to scrap dealers for recycling.

d. End-of-Life Management Locations

After being used and returned, empty glass containers are sent to brewery locations identified in Table 8 (Page 15). BRCCC ensures that containers are sent to the closest appropriate brewery in order to minimize the environmental impacts associated with transportation. Compacted aluminum cans are sent to processing plants for recycling. Similarly, reject glass from brand owners are sent to a recycling facility.

e. Pollution Avoidance

Where possible, BRCCC will continue to quantify the pollution avoidance associated with its product stewardship plan during its annual reporting process. The US Environmental Protection Agency’s (EPA) life cycle inventory (LCI) database provides the inputs and outputs for all stages in aluminum can, as well as glass bottle, production. The data enables BRCCC to determine the avoided nitrogen dioxide, sulphur dioxide, particulate matter and related industrial solid waste from resource extraction and production.

Table 8 – Energy, Greenhouse Gas, and Pollutant Reductions from BRCCC Container Recovery

| Pollutant/Symbol | Metric |
|--|------------------------|
| Landfill Diverted (Glass) | MT |
| Landfill Diverted (Aluminum) | MT |
| Avoided Emissions (GHG) | MT CO ₂ -eq |
| Avoided Energy Use (Gigajoules) | GJ |
| Avoided Nitrogen Oxide (NOX) ¹⁴ | MT |
| Avoided Sulphur Oxide (SO ₂) ¹⁵ | MT |
| Avoided Particulate Matter (PM) ¹⁶ | MT |
| Avoided Solid Waste | MT |

Landfill Avoidance:

The BRCCC product stewardship plan has generated significant benefits in terms of landfill avoidance. In 2018, 7,956 tonnes of aluminum and 13,079 tonnes of glass were diverted away from landfill.

Reduced Energy Consumption:

BRCCC's closed loop distribution system also reduces energy requirements associated with the distribution of containers. As empty containers are collected when full goods are delivered, container exchange becomes fully integrated into the existing distribution system, reducing the need for one-way distribution trips. Additionally, for years BRCCC has aluminum cans densified/baled through several contracted processing depots throughout the province before shipping to optimize transportation routes and reduce the need for more trucks on the road.

9. STAKEHOLDER CONSULTATIONS

BRCCC ensured all interested and affected stakeholders had the opportunity to provide their feedback into this plan. The BRCCC Schedule 1 Container Stewardship Plan was posted publicly for comment on www.EnviroBeerBC.com from July 22, 2019 to October 4, 2019 (a total of 74 days). BRCCC is in regular contact with key program stakeholders, including the network of depot owners, private retail liquor store owners, the Liquor Distribution Branch and BC municipalities. BRCCC met with each of these stakeholders to review and gather feedback on the draft plan during the approvals process.

In addition to these individual stakeholder meetings, BRCCC posted the stewardship plan on www.EnviroBeerBC.com for public review. In addition to posting the plan and hosting various stakeholder meetings, the following additional public consultations will be undertaken:

- Member advisories to RCBC and CWMA members about the posting of the stewardship plan and stakeholder feedback mechanisms
- Use of social media to promote the stewardship plan to create additional awareness and encourage feedback
- Inclusion in a UBCM weekly newsletter to their members
- Inclusion in a CWMA information update
- Hosted in-person meeting with depot partners
- Presented at the SIWMA Conference in Vernon

Please refer to Appendix B for a complete list of consulted stakeholders with a table outlining the main feedback received from throughout the consultation process and BRCCC's response.

10. BEVERAGE CONTAINER AGENCY DETAILS

Name & Address:

BC Brewers Recycled Container Collection
Council (BRCCC)
1711 Kingsway Ave
Port Coquitlam, BC V3C 0B6, Canada

Contact Individual:

Rachel Morier, Chair
and Secretary

As all beer sold in cans in BC are part of the BRCCC plan and due to the number of canned brands and the frequency with which canned brands are added and deleted, a full list of brand names has not been included but can be made available upon request. However, the brand owners using refillable glass bottles registered under the BRCCC product stewardship plan are listed on the following page.

Table 9 - Brand Owners using Refillable Bottles Registered under the BRCCC Plan (as of December 31, 2022)

| Brewer Name | Brewer Address |
|------------------------------------|---|
| Brick Brewing Co. | 181 King St. South, Waterloo, ON., N2J 1P7 |
| Chilkoot Brewing/Yukon Brewery | 102 Copper Road, Whitehorse, YT Y1A 2A8 |
| Columbia Brewery | 1220 Erickson Street, Creston, BC V0B 1G0 |
| Garrison Brewery | 1149 Marginal Road, Halifax, NS B3H 4P7 |
| Granville Island Brewing | 1000 1200 73 West, Vancouver, BC V6P 6G5 |
| Great Western Brewing | 519 Second Avenue North Saskatoon, SK S7K 2C6 |
| Labatt Breweries Ltd. | Box 580, 210 Brunette Avenue, New Westminster, BC V3L 4Z2 |
| McAuslan Brewing | 5080 St. Ambroise, Montreal, PQ H4C 2G1 |
| Molson Coors Canada | #1100-601 West Broadway, Vancouver, BC V5Z 4C2 |
| Moosehead | 89 Main St. West, Saint John, NB, E2M 3H2 |
| Nelson Brewing | 512 Latimer Street, Nelson, BC V1L 4T9 |
| Okanagan Spring | 2808 – 27 Avenue, Vernon, BC V1T 9K4 |
| Oland Specialty Products | #402, 1148 Homer Street, Vancouver, BC V6B 2X6 |
| Phillips Brewing | 201 Government Street, Victoria, BC V8T 4P1 |
| Propeller Brewing Company | 2015 Gottingen Street, Halifax, NS B3K 3B1 |
| R&B Brewing | 54 East 4 Avenue, Unit 100, Vancouver, BC V5T 1E8 |
| Russell Brewing Company/Fort Garry | 202 13018 80 Avenue, Surrey, BC V3W 3A8 |
| Sleeman Breweries Ltd. | 551 Clair Road West, Guelph, ON N1L 1E9 |
| Steam Whistle | 255 Bremner Blvd., Toronto, ON M5V 3M9 |
| Unibroue Inc. | 80 Des Carrieres, Chambly, PQ, J3L 2H6 |
| Vancouver Island Brewing | 2330 Government Street, Victoria, BC V8T 5G5 |
| Vincor International | P.O. Box 1650, Oliver, BC V0H 1T0 |
| Mill Street Brewery | 21 Tank House Lane, Toronto, ONT, M5A 3C4 |

11. FINANCIAL SUMMARY

BRCCC will continue to provide annual audited reports on the revenues associated with its deposit return system. These audited reports are based on the total deposit monies received by BRCCC and the total deposit refunds paid, to arrive at a recovery rate based on each container bearing a \$0.10 or \$0.20 deposit (i.e., aluminum cans or mini-kegs over 1L) and refund paid on each container collected.

The summary audited deposit information for the past 5 reporting periods is outlined below:

Table 10 – Five Year Summary: Audited Results of Deposit Refund Performance 2018-2022

| Reporting Period | Deposits Received | Refunds Paid | Return Rate |
|------------------|-------------------|---------------|-------------|
| 2018 | \$71,396,551 | \$62,195,012 | 89.24% |
| 2019 | \$73,021,937 | \$64,397,788 | 90.76% |
| 2020 | \$78,378,591 | \$61,526,943 | 77.11% |
| 2021 | \$81,978,862 | \$70,756,256 | 88.69% |
| 2022 | \$76,710,654 | \$70,061,941 | 91.78% |
| TOTAL | \$381,486,595 | \$328,937,940 | 87.52% |

Please refer to separate plan amendment for information on BRCCC's program funding.

12. PERFORMANCE MEASUREMENT SUMMARY TABLE

Unless otherwise stated, BRCCC commits to provide an audited annual report based on each of the following metrics:

Table 11 – Summary of BRCCC Plan Performance Measurement Targets

| Measure | Year 1 | Year 2 | Year 3 | Year 4 | Year 5 |
|--|---|---|---|---|--|
| Recovery/ Collection Targets | Aluminum cans: | | | | |
| | 87.5% | 87.5% | 88% | 89% | 90% |
| | Refillable glass bottles: | | | | |
| | 87.5% | 87.5% | 88% | 89% | 90% |
| Accessibility Targets | 1157 return locations | 1163 return locations | 1169 return locations | 1174 return locations | 1178 return locations |
| | 194 unlimited - 109 LRS - 85 Depots | 200 unlimited - 110 LRS - 90 Depots | 206 unlimited - 111 LRS - 95 Depots | 211 unlimited - 113 LRS - 98 Depots | 215 unlimited - 115 LRS - 100 Depots |
| | At least 1 unlimited return location in each Regional District | | | | |
| | 80% of population within 10 min. drive of BRCCC authorized return location* | | | | |
| Consumer Awareness Targets | 1 net new consumer promotion/ education initiative | | | | |
| | 95% consumer awareness of deposit return for beer containers | | | | |
| Pollution Prevention Hierarchy/Product Life Cycle Targets | Target to direct 100% of collected materials for re-use or to recycling commodity markets | | | | |

* Note – Percentage of population within a 10-minute drive of a BRCCC authorized return location will continue to increase as more unlimited return locations are signed up. BRCCC also commits to share the results of its annual coverage review and GIS study against suggested primary factor population targets by community type in recent "Enhancing Consumer Access to Recycling Services Under EPR" study commissioned by the MOECCS. As this policy approach is still in development, BRCCC commits to revisit the above target once finalized.

APPENDIX A

BRCCC Unlimited Collection Sites (as of December 2022)

| | | |
|-------------------------------------|------------------------|----------------|
| HOSPITALITY INN LICENSED LIQUOR | 3835 REDFORD ST | PORT ALBERNI |
| ALBERNI LIQUOR STORE | 2970 ALBERNI HWY | PORT ALBERNI |
| UCLUELET LODGE LIQUOR STORE | 250 MAIN ST | UCLUELET |
| BEST WESTERN PLUS BARCLAY HOTEL | 4277 STAMP AVE | PORT ALBERNI |
| HOPS COLD BEER AND WINE | 470 STUART DR W | FORT ST JAMES |
| HOMESTEAD INN & SUITES | 190 1ST ST W | VANDERHOOF |
| SOOKE RIVER HOTEL BEER STORE | 6309 SOOKE RD | SOOKE |
| MONKEY TREE PUB BEER STORE | 4025 BORDEN ST | VICTORIA |
| MA MILLERS LICENSE LIQUOR STORE | 2903 SOOKE LAKE RD | LANGFORD |
| BUFFY'S LICENSED LIQUOR STORE | 6858 WEST COAST RD | SOOKE |
| MATTICK'S FARM LIQUOR PLUS | 5325 CORDOVA BAY RD | VICTORIA |
| SAANICH CENTRE LIQUOR PLUS | 3991 QUADRA ST | VICTORIA |
| HILLSIDE LIQUOR STORE | 3201 SHELBOURNE ST | VICTORIA |
| LIQUOR PLUS | 4468 WEST SAANICH RD | VICTORIA |
| ESTEVAN LIQUOR PLUS | 2579 CADBORO BAY RD | VICTORIA |
| 17 MILE HOUSE LICENSED LIQUOR STORE | 5126 SOOKE RD | SOOKE |
| SOUTH QUESNEL LIQUOR STORE | 2330 HYDRAULIC RD | QUESNEL |
| PS LIQUOR STORE | 245 DONALD RD | WILLIAMS LAKE |
| COMER STATION PUB BEER STORE | 3015 MACKENZIE AVE N | WILLIAMS LAKE |
| HUME HOTEL LIQUOR BOUTIQUE | 422 VERNON ST | NELSON |
| MISSION MERCHANTS | 4600 LAKESHORE RD | KELOWNA |
| CREEKSIDE PUB BEER STORE | 3929 LAKESHORE RD | KELOWNA |
| LEEWARD INN BEER STORE | 649 ANDERTON AVE | COMOX |
| COURTENAY LIQUOR PLUS | 2751 CLIFFE AVE | COURTENAY |
| BLACK SWAN BEER STORE | 2890 SHAWNIGAN LAKE RD | SHAWNIGAN LAKE |
| DUNCAN LIQUOR PLUS LTD | 127 TRANS CANADA HWY | DUNCAN |
| LIQUOR PLUS COBBLE HILL | 1400 COWICHAN BAY RD | COBBLE HILL |
| BEVERLY CORNERS LIQUOR STORE | 102-2763 BEVERLY ST | DUNCAN |
| GREAT CANADIAN LIQUOR WAREHOUSE | 2100 WILLOWBROOK DR | CRANBROOK |
| FERNIE MOUNTAIN SPIRITS | 1641 7 AVE | FERNIE |
| BONNET LIQUOR STORE | 6957 GISCOME RD | PRINCE GEORGE |
| LIQUOR WAREHOUSE FOOTHILLS | 4182 15TH AVE | PRINCE GEORGE |
| FIRST LITRE PUB BEER STORE | 1724 STRATHCONA AVE | PRINCE GEORGE |
| EASTWAY LIQUOR BOX | 1836 BOUNDARY RD | PRINCE GEORGE |
| NOBLE SPIRITS LIQUOR STORE | 100 TABOR BLVD S | PRINCE GEORGE |
| BX NEIGHBOURHOOD PUB BEER STORE | 433 CARNEY ST | PRINCE GEORGE |
| PG LIQUOR BOX | 9912 SINTICH RD | PRINCE GEORGE |
| SPRUCELAND 10TH AVENUE LIQUOR STORE | 3244 10TH AVE | PRINCE GEORGE |
| DEWDNEY INN BEER STORE | 8793 RIVER RD S | DEWDNEY |
| FRASER VALLEY INN BEER | 33790 ESSENDENE AVE | ABBOTSFORD |
| 14TH AVENUE BEER & WINE STORE | 32516 14 AVE | MISSION |
| SASQUATCH INN LICENSED LIQUOR | 46001 LOUGHEED HWY | HARRISON MILLS |
| JOLLY COACHMAN BEER & WINE STORE | 19167 FORD RD | PITT MEADOWS |

| | | |
|-----------------------------------|------------------------------|--------------------|
| WALDORF PUB BEER STORE | 1489 HASTINGS ST E | VANCOUVER |
| HOOK & LADDER PUB BEER STORE | 8555 132 ST | SURREY |
| JOHN B PUB BEER STORE | 1000 AUSTIN AVE | COQUITLAM |
| LENNOX LIQUOR STORE (GARDEN CITY) | 9100 BLUNDELL RD | RICHMOND |
| BY BAILEY'S PUB BEER STORE | 11232 DARTFORD ST | MAPLE RIDGE |
| LEGENDS PRIVATE LIQUOR STORE | 3671 WESTMINSTER HWY | RICHMOND |
| | 106 & 107 3246 CONNAUGHT | |
| | CRES | |
| MOUNTAINSIDE LIQUOR STORE | | NORTH VANCOUVER |
| WEST COAST LIQUOR COMPANY | 7651 ROYAL OAK AVE | BURNABY |
| GILLNETTER PUB LIQUOR STORE | 1864 ARGUE ST | PORT COQUITLAM |
| SAILOR HAGARS PUB | 221 WEST 1ST ST | NORTH VANCOUVER |
| NORTHERN MOTOR INN BEER STORE | 3086 HWY 16 E | THORNHILL |
| DAYS INN | 4620 LAKELSE AVE | TERRACE |
| WEE GEORDIE'S PUB BEER STORE | 178 NECHAKO CTR | KITIMAT |
| 28 INN (2008) LTD - LRS | 4545 10 AVE | NEW HAZELTON |
| TERRACE INN LIQUOR STORE | 3005 KALUM ST | TERRACE |
| BIG JIM'S SPIRITS STORE (195342) | 225 276 CITY CENTRE | KITIMAT |
| WELLINGTON HOTEL - BEER & WINE | 3956 VICTORIA AVE | NANAIMO |
| HAREWOOD ARMS PUB BEER STORE | 508 EIGHTH ST | NANAIMO |
| GREENROCK LIQUOR STORE | 1860 DUFFERIN CRES | NANAIMO |
| SHADY REST HOTEL COLD BEER WINE | 3109 ISLAND HWY W | QUALICUM BEACH |
| SUMMERLAND LIQUOR STORE | 4 - 7519 PRAIRIE VALLEY ROAD | SUMMERLAND |
| TUMBLER RIDGE INN BEER STORE | 110 FOUNDERS PL | TUMBLER RIDGE |
| BEAR MOUNTAIN LIQUOR | 12121 8TH ST | DAWSON CREEK |
| DUKE'S LIQUOR STORE | 4493 MARINE AVE | POWELL RIVER |
| BELMONT HOTEL BEER STORE | 725 3RD AVE W | PRINCE RUPERT |
| LIQUOR WAREHOUSE | 1125A PARK AVE | PRINCE RUPERT |
| REYNOLDS BEER STORE | 1237 MAIN ST | LILLOOET |
| ELDORADO LIQUOR STORE - SQUAMISH | 37991 2 AVE | SQUAMISH |
| VICTORIA'S PRIVATE LIQUOR STORE | 667 MAIN ST | LILLOOET |
| ROYAL COACHMAN LIQUOR STORE | 84 DOGWOOD ST | CAMPBELL RIVER |
| OYSTER RIVER LIQUOR STORE | 2207B GLENMORE RD | CAMPBELL RIVER |
| GOLD RIVER LIQUOR EXPRESS | UNITS 3 & 4 MUCHALAT DR | GOLD RIVER |
| LIQUOR STORE (SECHELT) | 4330 SUNSHINE COAST HIGHWAY | SECHELT |
| LIGHTHOUSE LIQUOR STORE | UNIT 2 - 5740 TEREDO STREET | SECHELT |
| BALFOUR SUPERETTE | 7824 HIGHWAY 3A | BALFOUR |
| MAPLE LEAF STORE | 1303 HIGHWAY 6 | CRESCENT VALLEY |
| DEE'S GENERAL STORE | 1537 LOST CREEK ROAD | BIRCH ISLAND |
| | | HERIOT BAY, QUADRA |
| HERIOT BAY TRU-VALUE | 1536 HERIOT BAY ROAD | ISLAND |

APPENDIX B

Stakeholder Consultations Summary

BRCCC Container Plan Renewal Consultation Process and Timeline

The BRCCC Schedule 1 Container Stewardship Plan was posted publicly for comment on www.EnviroBeerBC.com from July 22, 2019 to October 4, 2019 (a total of 74 days). BRCCC invited the public and other valued stakeholders to provide feedback on ways to improve BRCCC's existing system and to achieve greater environmental performance. Comments were submitted to stewardship@BDL.ca and the option was also provided to participate in one of three webinar sessions to provide feedback via a live Q&A session. In addition to the actions described on page 20 of the stewardship plan renewal, BRCCC also hosted an in-person meeting with depot partners and presented at the SIWMA Conference in Vernon.

| Action | Timeframe |
|--|-----------------------|
| Post plan publicly for consultation | July 2019 |
| Send plan to key stakeholders | July 2019 |
| Three (3) public consultation webinar sessions | August/September 2019 |
| Hold in-person stakeholder meetings | September 2019 |
| Chart feedback, revise plan and present to board | October 2019 |

Direct e-mail notifications were sent to the following:

1. Union of BC Municipalities (UBCM) – including in Compass newsletter on July 31st
2. Coast Waste Management Association (CWMA) – notification sent to CWMA members
3. Stewardship Agencies of BC (SABC) – notification sent to SABC members
4. Recycling Council of BC (RCBC)
5. BC Product Stewardship Council (BCPSC) – information sent to BCPSC membership
6. Ocean Legacy
7. Greenpeace
8. David Suzuki Foundation
9. Ocean Wise
10. Environmental Defense
11. GLOBE Foundation/Delphi Group
12. Metro Vancouver
13. City of Vancouver
14. Municipality of Richmond
15. Regional District of North Okanagan
16. Regional District of Kootenay Boundary
17. ABLE BC
18. BC Bottle & Recycling Depot Association
19. Regional Recycling
20. Adanac Recovery Ltd.

21. Columbia Bottle Enterprises
22. Vanguard
23. Island Return It

Written comments were received from the following stakeholders:

- Ian Thorpe, Regional District of Nanaimo
- Jamie Benton, Fraser Valley Regional District
- Andrew Doi, Metro Vancouver
- Rod Lotzkar, Regional Recycling
- D'Arcy Hipwell, Adanac Recovery Ltd.
- Allen Langdon, Encorp Pacific

Summary of Key Topics:

| Topic | Comment | Response |
|----------------------------|---|--|
| Overall | <ul style="list-style-type: none"> - Recognition that BRCCC continues to exceed the regulated recovery target of 75% - Notes the 'closed-loop system' as a circular economy model - Efficient handling and warehousing | <ul style="list-style-type: none"> - We appreciate continued support of the program |
| Performance Target | <ul style="list-style-type: none"> - Demonstrate continuous improvement by increasing the recovery rate target to 90%-91% by 2024 | <ul style="list-style-type: none"> - BRCCC is committed to continually improve our recovery where our mission is "<i>To continue to lead the way in environmental stewardship to achieve the highest return rate for alcoholic beverage containers and related packaging.</i>" - Increased target to 90% |
| Education | <ul style="list-style-type: none"> - Reduce consumer confusion with other stewardship plans (i.e., Encorp) - Suggest consumer awareness goal for returns through retail | <ul style="list-style-type: none"> - BRCCC has committed to a more robust consumer education / awareness campaign as part of the plan and will work with other cooperative stewardship groups - BRCCC will incorporate promotion for returns through retail as part of the campaign |
| Secondary Packaging | <ul style="list-style-type: none"> - Address caps, six pack rings and boxboard associated with beer containers | <ul style="list-style-type: none"> - Details of BRCCC's secondary packaging program and initiatives are part of our Schedule 5 plan |
| Accessibility | <ul style="list-style-type: none"> - Justify why return locations focus on return-to-retail rather than depots | <ul style="list-style-type: none"> - BRCCC's current network allows for high performance - We continually monitor where new return locations, either return-to-retail or depot, will |

| | | |
|---------------------|---|--|
| | | allow for the most amount of returns |
| Partnerships | <ul style="list-style-type: none"> - Work with other stewardship agencies, namely Recycle BC and Encorp to account for containers that do not flow through BRCCC | <ul style="list-style-type: none"> - BRCCC's high recovery rate is reflective of containers collected directly through the network. - BRCCC will review opportunities with other cooperative stewardship agencies on a case by case basis - BRCCC works with other stewardship agencies through our membership with Stewardship Agencies of BC (SABC) |

Public Consultations

Please refer to attachments that follow this section for the presentation slides that were used during consultation sessions.

Webinar Session #1 - August 20, 2019

| Attendee Name | Organization |
|----------------------|-------------------------------------|
| Andrew Doi | Metro Vancouver |
| Avery Bruenjes | Retail Council of Canada |
| Baljit Lalli | Encorp Pacific |
| Jillian Kittson | BC Ministry of Environment |
| Nicole Kohnert | Regional District of North Okanagan |

Feedback received at consultation:

- Explain preference of return-to-retail locations rather than depots for accessibility coverage in Metro Vancouver area
- Provide more details on how BRCCC plans to reach out and work with local government
- Noted instance of "discounting" from Metro Vancouver committee member
- Recognition of high recovery rate target – noted that BRCCC's previous plan had increased the target and would like to see BRCCC be more ambitious with this plan and increase target again

Webinar Session #2 - August 22, 2019

| Attendee Name | Organization |
|----------------------|---|
| Meghan Ebueza | Regional District of Nanaimo |
| Erin Blaney | Regional District of Kitimat-Stikine |
| Darren Murray | Regional District of North Okanagan |
| Loryn Day | Peace River Regional District |
| Wendy Dunn | Capital Regional District |
| Cameron Baughen | Regional District of Okanagan-Similkameen |
| Andrea Patrao | Sunshine Coast Regional District |
| Jamie Denton | Fraser Valley Regional District |

| | |
|----------------|---|
| Abby McLennan | qathet Regional District's Waste Reduction Education Team |
| Ben | <i>Unknown</i> |
| <i>Unknown</i> | <i>Unknown</i> |

Feedback received at consultation:

- Request for more information on public education campaigns and partnering with Encorp on education programs to promote awareness
- Comment on working with Encorp to include all Encorp depots and/or Recycle BC sites to eliminate consumer confusion
- Noted that six-pack rings are not currently accepted for curbside recycling and that this packaging is not included in this plan – depots may not be aware to take back six-pack rings.
- Question about Recycle BC taking back aluminum containers and if containers are leaked into another system, is the volume of those containers included in BRCCC's recovery rate
- Comment on collaboration with other stewardship agencies, particularly Encorp and Recycle BC, in order to provide coverage for rural locations where options are limited and often containers are left at curbside
- Comment on stewardship awareness and concerns that the public may not know the difference between the stewardship groups

Webinar Session #3 - September 6, 2019

| Attendee Name | Organization |
|----------------------|---|
| Bill Chan | Encorp Pacific |
| Tai Uhlmann | qathet Regional District's Waste Reduction Education Team |
| Abby McLennan | qathet Regional District's Waste Reduction Education Team |
| Ingalisa Burns | qathet Regional District's Waste Reduction Education Team |

Feedback received at consultation:

- Request for explanation of the limit of 24 containers per day per customer for certain retail locations
- Question on whether BRCCC collects six-pack rings and if this type of package is turned into engineered fuel
- Question about the acceptance of six-pack rings at all authorized return locations

Meeting with Depot Partners in Summerland, BC - September 10, 2019

| Attendee Name | Organization |
|----------------------|-------------------------|
| Lawrence Engelsman | Chilliwack Bottle depot |
| Brook Lotzkar | Regional Recycling |
| Ashley Hunter | Marpole Containers |
| Emily Kim | Courtney Return-It |
| Darcy Buryan | Nechako Bottle Depot |
| Keith Chase | Chasers Bottle Depot |
| Neil Tyler | Parksville Bottle Depot |

| | |
|--------------|-------------------------|
| Cara Heck | Columbia Bottle Kelowna |
| Clare Cassan | Columbia Bottle Kelowna |
| Drew Cassan | Columbia Bottle Kelowna |
| Jong Jin Lee | J&C Penticton depot |
| Dave Woolley | Vanguard |
| Jamie Giroux | Vanguard |
| Jay Aarsen | Interior Freight |

Feedback received at consultation:

- Question regarding the handling and collection of six-pack rings by depots and the subsequent recycling of this plastic
- Overall concerns with expansion of the Express system and handling of BRCCC containers that are missorted into this system, noting that glass in plastic bags is also a health and safety concern
- Noted that there have been more cases of bottles being returned with caps on due to consumer confusion from other beverage containers
- Question posed on signing all depots if there are concerns about discounting
- General discussion on evolving deposit return methods/technologies for consumers (e.g., bag-drop systems, unmanned sites, reverse vending machines).

SIWMA Conference in Vernon, BC - September 20th, 2019

Feedback received after plan presentation:

- Comment on working with other stewardship groups to join marketing and public education efforts
- Comment was made that many consumers do not understand the differences between programs
- General feedback for BC stewardship programs to find more innovative solutions to allow for accessibility for smaller communities
- Request for information on why there is a limit of 24 containers per day per customer for most retail locations

The overall feedback received was supportive of BRCCC's high performance and ability to achieve its performance targets.

Below is a table providing a high-level summary of feedback received on the draft stewardship plan renewal, the stakeholder type that provided the feedback, and how the feedback has been addressed in the final version of the plan. All stakeholders that provided feedback were contacted by e-mail about the feedback received (notice was given on November 6th, 2019 that stewardship plan reviews were paused until the Ministry has processed the feedback from the public and stakeholders on the CleanBC Plastics Action Plan).

| Stakeholder Group | Comment/Questions | How Addressed |
|--|--|--|
| <i>Regional district government, local</i> | - Recognition of high recovery rates exceeding 90% and that BRCCC continues to exceed the regulated recovery target of 75% | - Thanks and appreciation for continued support of BRCCC's program |

| | | |
|---|---|--|
| <i>government, depot industry</i> | | |
| <i>Regional district government, local government, depot industry</i> | <ul style="list-style-type: none"> - Use of refillable bottle and that the industry standard bottle (ISB) is an example of a 'closed-loop system' and circular economy model | <ul style="list-style-type: none"> - Thanks and appreciation for continued support of BRCCC's program |
| <i>Depot industry</i> | <ul style="list-style-type: none"> - BRCCC system allows for efficient handling and warehousing | <ul style="list-style-type: none"> - Thanks and appreciation for continued support of BRCCC's program |
| <i>Regional district government, local government</i> | <ul style="list-style-type: none"> - Create more ambitious target and suggest increasing the recovery rate target to 90%-91% by 2024 | <ul style="list-style-type: none"> - BRCCC remains committed to continually improve our recovery where our mission is "<i>To continue to lead the way in environmental stewardship to achieve the highest return rate for alcoholic beverage containers and related packaging.</i>" - Increased target to 90% |
| <i>Regional district government, local government</i> | <ul style="list-style-type: none"> - Reduce consumer confusion with other stewardship plans (i.e., Encorp) | <ul style="list-style-type: none"> - BRCCC has committed to a more robust consumer education / awareness campaign as part of the plan and will work with other cooperative stewardship groups as noted in Section 7e |
| <i>Local government</i> | <ul style="list-style-type: none"> - Suggest consumer awareness goal for returns through retail | <ul style="list-style-type: none"> - BRCCC will incorporate promotion for returns through retail as part of the consumer awareness strategy outlined in Section 6c |
| <i>Regional district government, local government</i> | <ul style="list-style-type: none"> - Work with other stewardship agencies, namely Recycle BC and Encorp to account for containers that do not flow through BRCCC | <ul style="list-style-type: none"> - BRCCC reports on containers collected through our system and not container outside our collection network. BRCCC's high recovery rate is reflective of containers collected directly through the network. - BRCCC will review opportunities with other cooperative stewardship agencies on a case by case basis as noted in Section 7e - BRCCC works with other stewardship agencies through our membership with Stewardship Agencies of BC (SABC) |
| <i>Regional district government</i> | <ul style="list-style-type: none"> - Why is there a limit of 24 containers per day per customer for certain retail locations? | <ul style="list-style-type: none"> - Requirement of refund by retailer of 24 containers per day is according to Schedule 1, Section 6 (2) of the Recycling Regulation - BRCCC currently works with LRS locations to offer unlimited returns and aims to have 115 contracted LRS locations by 2025 |
| <i>Regional district government,</i> | <ul style="list-style-type: none"> - Justify why return locations focus on return-to-retail rather than depots in certain urban areas | <ul style="list-style-type: none"> - BRCCC's current network allows for high performance; current consumer research indicates preference for retail locations is |

| | | |
|---|--|---|
| <i>local government</i> | | <p>more pronounced among urban residents as noted in Section 6b</p> <ul style="list-style-type: none"> - We continually monitor where new return locations, either return-to-retail or depot, will allow from the most amount of returns - Section 5a further explains vital role of return-to-retail to maximize efficiencies through return empty container trips coordinated with full goods deliveries, thereby significantly reducing greenhouse gas emissions |
| <i>Local government</i> | <ul style="list-style-type: none"> - Provide more details on how BRCCC plans to reach out and work with local government | <ul style="list-style-type: none"> - Section 7a has been modified to include: BRCCC will invite local governments to meet on an annual basis to provide an opportunity for feedback and actively work with them to provide better education to their residents. BRCCC will track and monitor any inquiries from local governments and report any new program developments as a result. - BRCCC will have an additional resource to manage field services and engage with stakeholders across the province to address local needs |
| <i>Regional district government, local government</i> | <ul style="list-style-type: none"> - Address caps, six pack rings and boxboard associated with beer containers | <ul style="list-style-type: none"> - Details of BRCCC's secondary packaging program and initiatives are part of our Schedule 5 plan |
| <i>Regional district government, local government, depot industry</i> | <ul style="list-style-type: none"> - Question regarding the handling of six-pack rings by depots and the subsequent recycling of this plastic | <ul style="list-style-type: none"> - Plastic bales produced by BDL's Port Coquitlam warehouse are mainly pallet stretch wrap used on the full goods product with only a small amount comprising of returned packaging, including six-pack rings. There has not been any negative feedback from the recycler on the plastic bales to date. - Both alcoholic and non-alcoholic cans use the same six-pack rings, so it is difficult to determine portion of returns directly linked to BRCCC program - With the anticipated federal ban on single-use plastics, including six-pack rings, many brewers are exploring alternative packaging solutions which BRCCC will continue to monitor and manage |

| | | |
|---|---|---|
| <i>Depot industry</i> | <ul style="list-style-type: none"> - Increased instances of bottles being returned with caps on due to consumer confusion from other beverage containers | <ul style="list-style-type: none"> - Caps should remain off refillable bottles - BRCCC will work to increase consumer knowledge on secondary packaging as part of plan for more robust consumer education / awareness |
| <i>Local government</i> | <ul style="list-style-type: none"> - Note minor typos | <ul style="list-style-type: none"> - Corrected |
| <i>Stewardship agency, local government, depot industry</i> | <ul style="list-style-type: none"> - License all depots to address discounting | <ul style="list-style-type: none"> - BRCCC receives a low number of direct consumer inquiries regarding discounting and maintains a high accessibility target of 80% of the BC population within a 10-minute drive. - BRCCC has increased target of number of licensed depot locations to 100 by 2025 as indicated in Section 6b. Adding over 20 additional depots to BRCCC's network in the five-year period will ensure to meet coverage requirements, especially in growing areas, while also limiting discounting - Issuing licenses for all depots will make the system less efficient by redirecting containers away from return-to-retail and decreasing backhauling volumes while not necessarily resulting in more containers being recovered. Greater system efficiency allows for less cost burden to the consumer. - Decision Point Research study conducted for BRCCC in December 2019 indicated that more than half of respondents would go to another facility if they could get back their full deposit for their empty containers. BRCCC is committed to ramp up awareness efforts to ensure consumers know where to receive a full deposit refund and to collaborate with all collection sites so that customers are informed and are encouraged to redirect consumers to licensed depots. - Added authorized location siting criteria and new application, selection and annual coverage review process |
| <i>Stewardship agency</i> | <ul style="list-style-type: none"> - Participation in Encorp's Express bag drop program | <ul style="list-style-type: none"> - BRCCC's understands the potential convenience of the Express bag drop system for non-alcoholic beverage containers, however, it blurs the distinction |

| | | |
|---------------------------|--|---|
| | | <p>between the two programs and contributes to consumer confusion</p> <ul style="list-style-type: none"> - We maintain our preference for consumers to return their empties at the return location counter, to ensure the proper handling and safety of refillable containers and to also encourage the return secondary packaging with containers under Schedule 5 of our program. There is added reporting challenges when commingling different program containers. - BRCCC will consider options for areas that have accessibility gaps; Our stewardship analysts use GIS mapping to make suggestions on what locations to consider should there be changes to our network (a depot closes or moves, for example) or if there are opportunities for improved accessibility. |
| <i>Stewardship agency</i> | <ul style="list-style-type: none"> - Remove disparity in handling fees between stewardship agencies | <ul style="list-style-type: none"> - BRCCC maintains a competitive fee rate setting process with our contracted depots. - Every system has different factors to consider and as such, direct comparison of handling rates is misleading - BRCCC will undergo the contract renewal process as early as 2021 to restart renewal discussions with depot stakeholders. This is outlined in Section 6b. |
| <i>Depot industry</i> | <ul style="list-style-type: none"> - Has BRCCC considered other deposit return methods/technologies for consumers? (e.g., bag-drop systems, unmanned sites, reverse vending machines) | <ul style="list-style-type: none"> - Yes, BRCCC will also explore options to help improve consumers' return experience as noted in Section 6b. - BRCCC will work with relevant stakeholders to trial any new methods/technologies through pilot projects |

October 1, 2019

Brewers Recycled Container Collection Council
Email: stewardship@bdl.ca

Re: RDN Response on Brewers Recycled Container Collection Council Draft Container Stewardship Plan

Dear Brewers Recycled Container Collection Council:

Thank you for the opportunity to comment on the Brewers Recycled Container Collection Council (BRCCC) Draft Container Stewardship Plan. The Regional District of Nanaimo (RDN) recognizes that the efforts of the BRCCC have been effective in allowing British Columbia to achieve a 91% recovery rate for beer glass bottles and metal cans. We recognize that BRCCC plans to continue to exceed the regulated requirement of 75% and it would be beneficial to see the increased target goal in the Plan.

In the recent consultation on the BRCCC Container Stewardship Plan Consultation BC Product Stewardship Council members, including RDN staff, discussed recommendations to advance the EPR program and included the following:


1. Education
 - a. There is no indication in the Plan that BRCCC intends to work with Encorp on public engagement strategies. This education partnership should be encouraged to reduce customer confusion.
 - b. BRCCC should commit to working with Encorp depots to minimize customers having to go to different locations for beer containers vs. all other beverage containers.
2. Recyclability of BRCCC packaging
 - a. While the plan does mention refillable kegs, shrink-wrap, pallets and can bins, there is minimal information provided on recycling of secondary packaging. Considerations for minimizing and recovering secondary packaging should be presented in the plan.
 - b. The consultation plan should specifically address caps, six pack rings and boxboard associated with beer containers. There was some indication in the webinar that all BRCCC depots must accept these products.
 - c. There should be a level of fairness and clarity between Recycle BC and BRCCC as lids and boxboard are going into the Recycle BC stream and six pack rings are frequently disposed of as garbage.

3. Improved reporting on containers processed through other Stewardship agencies
 - a. From the call BRCCC has no formal processing agreement with Recycle BC and the percentage received through Recycle BC is not counted towards BRCCC diversion rate. There should be a commitment that BRCCC work with Recycle BC in terms of capture of beverage containers and the allocation of deposits collected for containers that do not flow through BRCCC. EPR programs should be responsible for accounting for their product no matter how it is diverted.

The RDN Solid Waste Management Plan, which was submitted to the Ministry in July 2018, targets a 90% waste diversion goal over the 10 year plan period. The Plan outlines that this target can be achieved through the combined efforts of the RDN initiatives and the Province's action on advancing EPR programs. Further advancing EPR programs is in line with the RDN and Provincial interest in waste diversion.

On behalf of the RDN Board, I thank you in advance for your consideration of this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ian W. Thorpe".

Ian W. Thorpe, Chair
Regional District of Nanaimo

cc: Bob McDonald, Director, Extended Producer Responsibility, Bob.McDonald@gov.bc.ca
Meegan Armstrong, Unit Head, Industry Products Stewardship, Meegan.Armstrong@gov.bc.ca

Metro Vancouver Staff Comments – Stewardship Plan Renewal (Fall 2019)

Brewers Recycled Container Collection Council (BRCCC) Container Stewardship Plan 2020-2024 (Deadline: Sept 13, 2019)

Overall Comments:

- BRCCC is to be congratulated for its high level of performance in recovering containers, which has been sustained over several decades.
- BRCCC 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 organizations.
- The Plan is written in a clear and concise manner, however, a few typos were detected and noted in the attached PDF document.

Specific Comments:

- 4. 2020-2024 Plan Performance, Page 7: "Through this Plan, BRCCC is proposing to continue to maintain its high performance for this renewal period 2020 – 2024 for each performance measurement; container recovery, accessibility, consumer awareness and reuse and recycling activities." Admittedly, BRCCC has demonstrated its ability to achieve very high container recovery rate performance for many years, and as a consequence, BRCCC is encouraged to be more ambitious in setting a higher container recovery target (e.g., 90%) for this Plan renewal.
- 6. Retail Locations, Page 11: "Preference for retail locations was more pronounced among Metro Vancouver residents." Can BRCCC provide further explanation as to the reasons why the preference for return-to-retail is notable in Metro Vancouver?
- 7. a. Local Governments, Page 15: "BRCCC intends to maintain continued dialogue with local governments and other stewardship agencies to stay informed and ahead of any program cross over issues or feedback that may serve to improve the program and its performance." Can BRCCC provide further details on the way it intends to maintain dialogue with local governments? Are there particular issues that BRCCC intends to address specifically with local governments?
- 7. c. Inquiries or Complaints from Consumers, Page 15: "BRCCC will continue to work hard to mitigate any consumer deposit discounting by expanding the number of collection points to ensure convenient and comprehensive network of drop off sites...". BRCCC is encouraged to evaluate and implement collection options and consumer awareness initiatives to address consumer deposit discounting. Metro Vancouver and member municipal staff are aware of anecdotal reports of resident questions related to not receiving the expected deposit from some bottle depot locations.

Morier, Rachel

From: Gentile, Michael
Sent: Monday, October 7, 2019 11:01 AM
To: Morier, Rachel
Subject: Fw: BRCCC Container Stewardship Plan 2020-2024

FYI

From: Jamie Benton <jbenton@fvrld.ca>
Sent: Friday, October 4, 2019 5:31 PM
To: Stewardship <Stewardship@bdl.ca>
Subject: BRCCC Container Stewardship Plan 2020-2024

To Whom it may Concern,

Thank you for the opportunity to comment on the BRCCC Container Stewardship Plan 2020-2024. As the leading stewardship program based on recovery rate the Fraser Valley Regional District implores BRCCC to set a high standard and continuous improvement in its stewardship plan.

It is noted that the minimum recovery rate for each container type will remain at 87.5% from 2020-2024. This recovery rate remains the same from the previous stewardship plan and given that you reported an overall 91 % return for the 2017 year the FVRD requests that BRCCC sets a continuous improvement scale over its next 5 year plan.

2020 – 88 %
2021 – 88.5 %
2022 – 89 %
2023 – 89.5 %
2024 – 90 %

These recovery rates are above the legislative 75 % minimum but sets a high bar for a stewardship plan which should be looking to improve year on year.

Consumer awareness and promotional activity – Consumer survey results indicate a very high awareness result for consumers knowing that a refundable deposit exists and with an 86 % positive response from households indicating that they collected and returned beer containers for a refund. What is the awareness for BRCCC collection sites other than bottle depots under the Encorp stewardship program. BRCCC has indicated that it would prefer more refundables to go back to retail and with the secondary packaging. What is the current recovery rate of materials that go back to retail vs encorp facilities? It would be good to set a consumer awareness goal around this to increase returns to retail.

This is especially the case if there is to be no further improvements on partnerships with Encorp or Recycle BC to capture BRCCC materials.

As identified by others, public engagement with both Encorp and Recycle BC would help to improve the image of BRCCC and reduce customer confusion between the stewardship programs. There could be stronger wording in the stewardship plan to support this and increase your recovery rates.

Please do not hesitate to contact me if you have any questions regarding the above comments and the context.

Kind regards,

Jamie Benton

Jamie Benton

Environmental Services Co-ordinator

45950 Cheam Ave, Chilliwack, BC V2P 1N6

P [604.702.5021](tel:604.702.5021) || **W** www.fvrd.ca



ADANAC RECOVERY LTD
4261 Glanford Ave
Victoria, BC
V8Z 4B9

BRCCC 2020-2024 Stewardship Plan Review Comments

We support BRCCC's Stewardship Plan and congratulate them for taking their Stewardship responsibilities seriously and exceeding the minimum performance requirements - obligations other Stewards struggle with. As well, for having an interest in keeping the program cost effective and allowing us to dramatically minimize the handling and footprint of the non-refillable packaging in our facilities. We can take the equivalent of 32 Pallets of Air Cans and reduce it to a single bundle on 1 Pallet. This eliminates pressure both on our warehousing and BDL's transporters who serve us on backhauls from full goods delivery. On Vancouver Island, Labour and Occupancy are 90% of our operating costs and under immense pressure. Having an efficient handling and warehousing is critical to long term viability and success.

Adanac Recovery is a BC owned and operated company. Adanac Recovery owns and operates 3 recycling depots on Vancouver Island, all of which are BRCCC Stewardship Depots. We also own Government Street Bottle Return, a company we started in 2002, who is one of the beer industries commercial collectors.

Stewardships and Depots only perform the collection leg of the Recycling Loop, yet Stewardship Plans are not required to minimize the carbon footprint they add through collection activities or their impact on the collectors. Stewards are basically logistics and administrative compliance agencies. Stewards add a layer of carbon footprint through their collection programs yet there is no requirement to minimize its footprint. BRCCC/BDL is the exception and a model for all to follow, they allow us to consolidate product and use backhauls for collection – because it makes good business sense!

We strongly support and congratulate BRCCC/BDL for providing much needed leadership to the Provinces Stewardship regime.

Regards,

D'Arcy Hipwell

hdhipwell@gmail.com



October 4, 2019

To Whom It May Concern:

Subject: BRCCC 2020-2024 Stewardship Plan Review Comments

Regional Recycling supports BRCCC's Stewardship Plan and congratulate them for taking their Stewardship responsibilities seriously and exceeding the minimum performance requirements – an obligation all other Stewards struggle with. As well, for keeping the program cost effective and allowing us to dramatically minimize the handling and storage footprint of the non-refillable packaging in our facilities. We can take the equivalent of 32 Pallets of whole Beer Cans and reduce it to a single bundle on 1 Pallet utilizing onsite densification at all locations. This eliminates pressure both on our warehousing and BDL's transporters who serve us on backhauls from full goods delivery. In Southwestern BC, Labour and Occupancy are 85% of our operating costs and are under immense pressure. Having efficient handling and warehousing is critical to long term viability and success.

Regional Recycling owns and operates 8 recycling depots in southwestern BC, all of which are BRCCC Stewardship Depots. We also own Marpole Containers Ltd., a company we acquired in 2005, who is one of the beer industries original commercial collectors and who's service to local brewers goes back over 60 years. Regional Recycling is a BC owned and operated company. Combined with Pacific Metals Ltd., we have been continuously operating in BC for over 107 years. We participate in more than 20 other Stewardship Programs <https://www.regionalrecycling.ca/>.

Stewardship Agencies and Depots only perform the collection leg of the Recycling Loop, yet Stewardship Plans are not required to minimize the carbon footprint their activities generate or their impact on the collectors/depots. BRCCC/BDL is the exception and a model for all to follow, they allow us to consolidate product and use backhauls for collection – because it makes good business sense!

We strongly support and congratulate BRCCC/BDL for providing much needed leadership to the Provinces Stewardship regime.

Regards,

Rod Lotzkar
President



October 1, 2019

Submitted via Email: stewardship@bdl.ca

Attention: Brewers' Recycled Container Collection Council

RE: BRCCC CONTAINER STEWARDSHIP PLAN CONSULTATION COMMENTS

Thank you for the opportunity to respond to the Brewers' Recycled Container Collection Council (BRCCC) Stewardship Plan.

Encorp Pacific, better known as Return-It, is an industry owned, not for profit, product stewardship agency with beverage container management as its core business. Our mandate is to develop, manage and operate a cost effective system for the responsible collection and recycling of beverage containers across British Columbia.

We have been operating extended producer responsibility (EPR) programs in B.C. for 25 years and are focused on providing a convenient, efficient and environmentally sustainable network for everyone in B.C. This includes ensuring we are building a recycling infrastructure that is fair and equitable for both the consumers that use the system and the small businesses that operate within the system.

As part of the consultation process, we have summarized our comments and suggestions to BRCCC's Container Stewardship Plan as follows:

1. Need for BRCCC to license all Return-It depots across British Columbia to refund aluminum beer cans

Currently, less than half of the Return-It depots across B.C. are licensed by BRCCC to refund aluminium beer cans. The rest have no choice but to accept BRCCC containers for deposit refund as customers do not distinguish between the licensed and non-licensed depot and they expect all containers to be accepted at the Return-It depots. To offset the cost of handling containers for which depots receive no handling fees, some of the unlicensed depots discount deposit refunds. This has created significant inequity for depot operators, and for consumers who are not receiving the full deposit refund they paid at the time of purchase.

Given this gap, every year, approximately 150 million aluminum beer cans (30% of aluminum beer cans) are 'discounted' at our Return-It depots to cover the short fall from not receiving any handling fees to manage this material. This means 1 in 3 aluminum beer cans are being 'discounted'; and a \$2.7 million annual cost that is passed on to the consumer. With the potential of a unified 10-cent deposit in British Columbia, this will only increase and create further challenges.

We also regularly receive complaints from consumers who have not been refunded their full 10-cent deposit for aluminum beer cans at a Return-It depot. While we appreciate BRCCC cites 1,145 existing return sites, primarily within the retail sector, the majority of consumers are still





returning their beverage containers to the depot. There is a need to expand licenses to all Return-It depots in B.C. BRCCC's existing retail return sites also have limits on the number of beverage containers consumers can return for a refund whereas the Return-It depots will accept unlimited amounts of beverage containers from all consumers. Consumers value convenience and prefer returning all of their aluminum beverage containers at one location.

Creating complexity and disparity in the recycling of aluminium beer cans leads to confusion, frustration and is a financial burden that impacts affordability. The beverage deposit system is intended to be a motivator for consumers to recycle and when this motivator is being discounted or not paid, it is unfair and not equitable.

2. BRCCC's participation in our Return-It Express Program

We are interested in collaborating with BRCCC to include aluminum beer cans within our Return-It Express program. Our Return-It Express program is all about enhancing the consumer experience at the Return-It depots by making it fast, easy and convenient to recycle all beverage containers. We have over 50 thousand registered users signed up for the Express system. It has proven to attract new customers, with 95% improved customer satisfaction levels, and increased the number and variety of containers consumers recycle. Currently, consumers are being discounted and not refunded their full deposit when using Express for aluminum beer cans. We would like to collaborate with you to change that given the rapid growth of this program.

This is also consistent in how we manage our relationship with BRCCC when Encorp related containers are collected within BRCCC's return sites. When non-refillable glass bottles are captured within BRCCC's material stream, consistent with the extended producer responsibility model, Encorp will pick up these containers at its own cost and pay BRCCC a handling fee to manage this material. We ask for the same reciprocal relationship in return for the containers we manage on behalf of BRCCC.

3. Remove the disparity in handling fees between alcohol and non-alcohol aluminum cans

For the 42% BRCCC licensed Return-It Depots where a handling fee is paid, the payments are disproportionately less for aluminum beer cans than what Encorp pays depots for non-alcohol aluminum cans. Encorp pays a handling fee that is 90% higher than that of BRCCC. Given the material is identical, we recommend the same handling fee be applied regardless of whether it contains alcohol or not.

We are subsidizing aluminum beer cans within our system and expect this to further increase if the Ministry of Environment and Climate Change Strategy's proposed unified 10-cent deposit is expanded to non-alcohol beverage containers.

Eliminating this disparity and improving equity is also consistent with the Ministry of Environment and Climate Change Strategy's recent guidance document *Producers Managing the Cost of Obligated Materials and Dispute Resolution (2018)*.





We thank you for the opportunity and look forward to your response.

Regards,

ENCORP PACIFIC (CANADA)

Allen Langdon
President & CEO

Cc: Mark Zacharias, Deputy Minister, BC Ministry of Environment and Climate Change Strategy
Laurel Nash, Assistant Deputy Minister, Environmental Protection Division, BC Ministry of
Environment and Climate Change Strategy
Bob McDonald, Director, Extended Producer Responsibility, BC Ministry of Environment and
Climate Change Strategy



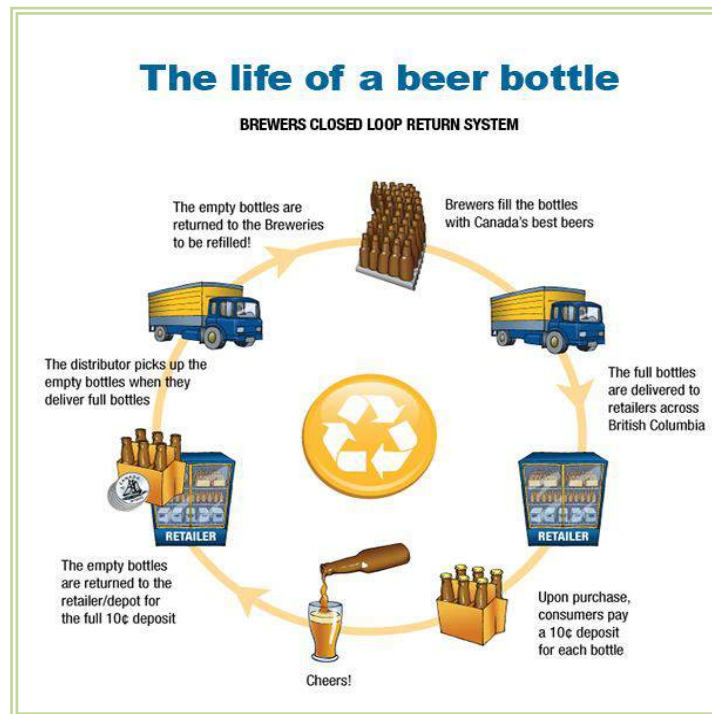


BREWERS RECYCLED CONTAINER
COLLECTION COUNCIL

Container Plan 2020-2024 Consultation Webinar

Introduction

- ▶ BC Brewers Recycled Container Collection Council (BRCCC) supports over 200 brewers presenting the majority of beer producers/sellers in BC
- ▶ Container Plan (Schedule 1) works in tandem with Packaging and Printed Paper (PPP) Plan (Schedule 5)
- ▶ Only container stewardship plan that supports refilling



Our Vision

“ To continue to lead the way in environmental stewardship to achieve the highest return rate for alcoholic beverage containers and related packaging ”



Performance Highlights

| Measure | 2020 | 2021 | 2022 | 2023 | 2024 |
|---|---|--|--|--|--|
| Recovery/ Collection Targets | 87.5%* | 87.5%* | 87.5%* | 87.5%* | 87.5%* |
| Accessibility Targets | 1145 return locations 182 unlimited | 1145 return locations 182 unlimited | 1146 return locations 184 unlimited | 1147 return locations 185 unlimited | 1148 return locations 186 unlimited |
| | At least 1 unlimited return location in each Regional District | | | | |
| | 80% of population within 10 min. drive of BRCCC authorized return location** | | | | |
| Consumer Awareness Targets | 1 net new consumer promotion/ education initiative | | | | |
| Pollution Prevention Hierarchy/ Product Life Cycle Targets | Target to direct all collected materials for re-use or to recycling commodity markets | | | | |

*Applies to both overall rate and the rate of each container type

**Stated target is reflective that BRCCC will undertake new GIS study in 2024 rather than on an annual basis

Performance Objectives

Overall Recovery Rate

- ▶ Achieve a minimum recovery rate of 87.5% overall and for each container type
 - ▶ Beverage alcohol cans
 - ▶ Refillable glass containers
 - ▶ Industry standard bottle (ISB)
 - ▶ Proprietary refillable bottle
- ▶ Exceeds mandated provincial target of 75%

Performance Objectives

Accessibility

- ▶ Continue to increase unlimited return collection network
 - ▶ Target of 1148 total return locations with 186 collecting unlimited containers (112 retail stores and 74 depots)
 - ▶ Ensure minimum of 1 unlimited return location in each Regional District by end of 2020
- ▶ Continue to achieve high levels of consumer accessibility
 - ▶ Target of 80% of population within 10-minute drive of an authorized BRCCC return location



Performance Objectives

Consumer Promotion & Education

- ▶ Undertake increased consumer awareness and promotional activity.
 - ▶ Target of 1 net new initiative in the 5-year renewal period of the plan
 - ▶ Examples:
 - ▶ New depot signage
 - ▶ Consumer awareness survey
 - ▶ Updated website features
 - ▶ Revamp social media strategy
 - ▶ Partnerships



Performance Objectives

Pollution Prevention Benefits

- ▶ Direct all collected materials for re-use or to recycling for highest end use
 - ▶ End fate of materials are tracked
 - ▶ Continue to report pollution prevention achievements



Continuous Improvement Program Funding

- ▶ BRCCC pays, through BDL, the collection partners for collecting containers and arranging transportation for cans to be recycled and bottles to be refilled
- ▶ BRCCC revenue streams:
 - ▶ Container fees from brand owners
 - ▶ Unredeemed deposits
 - ▶ Aluminum material sales
- ▶ BRCCC Board of Directors meets on a regular basis to review the program's performance
- ▶ Support ongoing consumer awareness and explore new opportunities and/or pilot projects to encourage more returns

Continuous Improvement

Ensuring Ongoing Performance

- ▶ Return site coverage is continually monitored
- ▶ Deposit discounting is addressed by providing the nearest authorized return location(s) according to the consumer's postal code
- ▶ BRCCC website provides return location finder:
envirobeerbc.com/location/
- ▶ BRCCC aims to balance number of sites to achieve performance and convenience while ensuring its services system remains cost effective
- ▶ Continued dialogue and collaboration with key program stakeholders



BREWERS RECYCLED CONTAINER
COLLECTION COUNCIL

Questions?

Next Steps of Consultation

- ▶ Please spread the word!
- ▶ In-person meetings the week of September 9th
- ▶ Please submit your comments to stewardship@bdl.ca by Friday, September 13th, 2019.



BREWERS RECYCLED CONTAINER
COLLECTION COUNCIL

Thank you!



BREWERS RECYCLED CONTAINER
COLLECTION COUNCIL

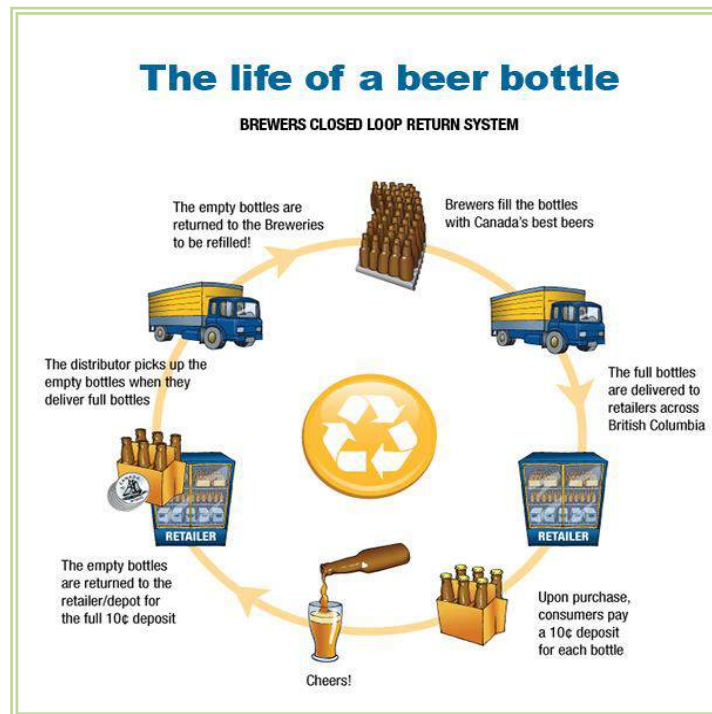
Leading Environmental Stewardship in BC



SIWMA 2019 Conference
September 20th, 2019
Vernon, BC

Introduction

- ▶ BC Brewers Recycled Container Collection Council (BRCCC) supports over 200 brewers representing the majority of beer producers/sellers in BC
- ▶ Container Plan (Schedule 1) works in tandem with Packaging and Printed Paper (PPP) Plan (Schedule 5)
- ▶ Only container stewardship plan that supports refilling



Our Vision

“ To continue to lead the way in environmental stewardship to achieve the highest return rate for alcoholic beverage containers and related packaging ”



Our Success

2018 Program Performance:

- ▶ Cans 89.47 % recovered
- ▶ Refillable Bottles 86.59% recovered
 - ▶ Industry Standard Bottles 94.71%
 - ▶ Proprietary Refillable Bottles 71.21%
- ▶ **Total for All Containers 89.24% recovered**
- ▶ Secondary Packaging 71.11%



Performance Highlights

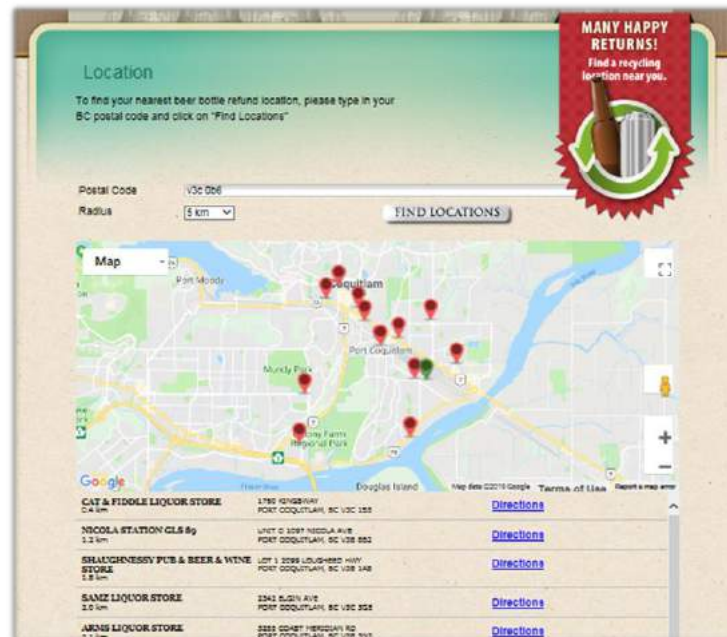
| Measure | 2020 | 2021 | 2022 | 2023 | 2024 |
|---|---|--|--|--|--|
| Recovery/ Collection Targets | 87.5%* | 87.5%* | 87.5%* | 87.5%* | 87.5%* |
| Accessibility Targets | 1145 return locations 182 unlimited | 1145 return locations 182 unlimited | 1146 return locations 184 unlimited | 1147 return locations 185 unlimited | 1148 return locations 186 unlimited |
| | At least 1 unlimited return location in each Regional District | | | | |
| | 80% of population within 10 min. drive of BRCCC authorized return location** | | | | |
| Consumer Awareness Targets | 1 net new consumer promotion/ education initiative | | | | |
| Pollution Prevention Hierarchy/ Product Life Cycle Targets | Target to direct all collected materials for re-use or to recycling commodity markets | | | | |

*Applies to both overall rate and the rate of each container type

**Stated target is reflective that BRCCC will undertake new GIS study in 2024 rather than on an annual basis

Performance Monitoring

- ▶ Return site coverage is continually monitored
- ▶ BRCCC aims to balance number of sites to achieve performance and convenience while ensuring its services system remains cost effective
- ▶ BRCCC website provides return location finder:
envirobeerbc.com/location/



Continuous Improvement

- ▶ BRCCC pays, through BDL, the collection partners for collecting containers and arranging transportation for cans to be recycled and bottles to be refilled
- ▶ BRCCC revenue streams:
 - ▶ Container fees from brand owners
 - ▶ Unredeemed deposits
 - ▶ Aluminum material sales
- ▶ Support ongoing consumer awareness and explore new opportunities and/or pilot projects to encourage more returns



Accessibility in Rural & Seasonal Communities

- ▶ Continued dialogue and collaboration with key program stakeholders
- ▶ Gain better understanding of how alcoholic cans and refillable bottles are managed in these areas
- ▶ Explore short-term and long-term solutions
 - ▶ Liquor stores / return to retail
 - ▶ Local community groups
 - ▶ Bottle drives
 - ▶ Seasonal pickups
 - ▶ Bin placement
 - ▶ Emerging technologies



Schedule 1 Plan Renewal Consultation

- ▶ Please submit your comments to stewardship@bdl.ca
- ▶ Deadline for submission has been extended to **Friday, October 4th, 2019**





BREWERS RECYCLED CONTAINER
COLLECTION COUNCIL

Thank you!

Rachel Morier
Chair of the Board
416-200-6759

Rachel.Morier@thebeerstore.ca

ENVIROBEERBC.COM