



BC Brewers Recycled Container Collection Council (BRCCC)

Schedule 1 Product Stewardship Plan Renewal
2015

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Product Stewardship Plan: 2015
– Schedule 1 Containers –

1. EXECUTIVE SUMMARY

- Plan renewal of long-standing environmental program – BC brewers have been practicing extended producer responsibility for over 80 years.
- Plan renewal operates independently from BRCCC’s proposed Schedule 5 stewardship plan, but works in tandem with that pending plan to achieve greater overall diversion.
- Average recovery rate of 93% over past 4 years. Nearly 93% recovery rate (based on audited results) dating back to FY2003.
 - Financial incentive of the deposit-return system means containers ultimately get redeemed through BRCCC’s system, ensuring strong recovery rates and materials are kept out of landfill.
 - Deposit refund attached to program containers also means local governments are compensated for any program containers they recover through their collection channels, when containers are redeemed through BRCCC’s collection infrastructure.
- Emphasis on design for the environment and re-use. All 3 Rs are engaged: packaging is reduced, as bottles and packaging are reused; all other materials are recycled.
 - Many BC brewers use refillable glass bottles. These containers accounted for almost 25% of relevant containers during the previous stewardship plan.
 - Other container type used by manufacturers represented by BRCCC is metal cans, which have well established recycling end markets.
 - Manufacturers represented by BRCCC strive to continuously improve their environmental performance, using vegetable-based inks and water-based glues in their packaging and undertaking research into potential light-weighting of glass bottles. BRCCC targets to direct 100% of recovered materials for re-use or recycling commodity markets and to track the end fate of these materials.
- Plan renewal commits to attain a recovery rate of at least 87.5% overall and for each container type.
- Emphasis on consumer access and convenience as a result of BRCCC’s extensive collection network.
 - As of December 31, 2014, there were 1,135 locations throughout BC where consumers could return their beer containers under this stewardship plan. Based on GIS data, 92% of all BC residents are within a 15 minute drive of a return location.
 - Between 2009 and 2014, more than doubled the number of depots in the collection network, exceeding its target number of depots by more than 100%.
 - Commitment to continue expanding BRCCC’s unlimited return collection network.
 - Target of 385 total locations by 2019 (305 retail stores and 80 depots)
 - BRCCC to achieve at least 1 unlimited return location in each Regional District by end-2016
 - Target of 80% of population within 10 minute drive of an authorized BRCCC return location by 2018
- Extremely high consumer awareness of the program (96% in December 2013/January 2014). Commitment to continue consumer promotion and education.
 - BRCCC commits to undertake a net new initiative in 3 of the 5 years covered by this stewardship plan.
 - BRCCC will strive to produce a combined annual report to Ministry on program performance, recognizing that there will need to be separate reporting of performance measures for each program.
- Commitment to annually consult with municipalities to address concerns that arise.
- Cost of program fully paid by producers. There is no container recycling fee or other visible fees added to the product price at the time of purchase. Represents a saving of approximately \$32-million in eco-fees to BC consumers (based on comparable fees charged).

2. INTRODUCTION

The Canadian brewing industry has a long history of environmental stewardship. Since the end of Prohibition, Canadian brewers have been offering their product in refillable bottles. Closely tied to the use of the refillable bottle has been deposit-refund, used as an incentive measure to enable brewers to get their bottles back so they can be re-filled.

These two inter-connected elements – deposit-refunds and refillable bottles – have been the cornerstones 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.

In BC specifically, Canadian brewers have been reusing, recycling and reducing our packaging for over 80 years. The brewers’ bottle recovery program was BC’s original extended producer responsibility (EPR) program, performed on a voluntary basis before the *Environmental Management Act* and its predecessors were enacted. The brewers’ deposit-return system established the framework for BC’s collection of EPR programs, judged in recent years to be the best in Canada.¹

This plan is submitted with the BC Brewers Recycled Container Collection Council (BRCCC) as the stewardship agency of record. In prior stewardship plans and annual reports, information about the BRCCC had been provided, but Brewers Distributor Limited (BDL) had been listed as the stewardship agency of record. In reality, BDL is a privately-owned distribution and logistics company, operating in the western Canadian provinces of British Columbia, Alberta, Saskatchewan and Manitoba and BDL acts as the collection agent on behalf of the BRCCC.

BDL’s operations in BC comprise 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 BC², for sale to the public (“full goods”); and the collection of certain beer and cider containers (i.e. refillable glass bottles and cans) and related secondary packaging as the product steward acting on behalf of the majority of brewers and cider manufacturers (“product stewardship”).

Under Schedule 1 of the *Recycling Regulation*, BRCCC is the stewardship agency for all refillable glass beer and cider bottles, as well as all metal beverage alcohol cans (hereinafter collectively referred to as “beer containers”). This product stewardship plan seeks to renew the stewardship plan for the collection of these containers, previously identified under BDL but now submitted in the name of BRCCC.

Under this plan renewal, BRCCC seeks to continue and build upon the exemplary record of recovery of Schedule 1 containers, through expansion of BRCCC’s network of return locations and increased public promotion and consumer awareness (in conjunction with its product stewardship activities under Schedule 5).

3. CONTAINERS & MATERIALS

Under the BRCCC plan, there are two types of containers: refillable glass bottles and metal cans. Sales percentage data shown below represent the five year average covering 2008 to 2012; all results have been externally audited and verified.

BRCCC acts as product stewardship agency for 24 brewers, cider manufacturers and brewery agents using refillable glass bottles, most of whom are based in British Columbia (See

Table 8 - *Brand Owners using Refillable Bottles Registered under the BRCCC Plan*). BRCCC brand owners continue to account for almost all of the domestic beer sold in British Columbia. Authorization of brand owners to elect BRCCC as steward for beverage alcohol cans is undertaken by the LDB at the time of listing by nomination of BRCCC as part of the listing application.

a. Schedule 1 Containers

Refillable Glass Bottles

- In total, refillable glass bottles accounted for 24.6% of total BRCCC beer containers sold in BC.
- The majority of refillable glass bottles sold in BC are the amber glass industry standard bottle (ISB): a 341 ml refillable glass bottle that is refilled on average 15 times per container. The ISB also represents the vast majority of beer sold in refillable glass bottles across Canada. Beer sales in the ISB represented 18.8% of total BRCCC containers (and approximately 76% of refillable glass bottles) sold in the province.

¹ EPR Canada. 2011 and 2012 EPR Canada Report Card. The report cards and information on the project can be found at www.eprcanada.ca.

² 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.

- 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 about 5.8% of total BRCCC containers (and approximately 24% of refillable glass bottles) sold in BC.

Metal Cans:

- Product sold in cans represented about 75.4% of total BRCCC beer containers sold in BC.
- While the majority of beverage alcohol cans are made of aluminum, a small minority are of the tin-plated steel variety. 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 Materials

In addition to refillable bottles and metal cans, BRCCC also handles a number of other materials, including secondary packaging. The collection of these materials, pursuant to the obligations under Sch. 5 of the Recycling Regulation, is currently pending Director approval. These stewardship programs operate in tandem with each other, but BRCCC's Sch. 1 plan is not reliant on the Sch. 5 plan to operate successfully.

Cardboard Cases and Can Flats:

- Cardboard cases used for bottle sales are reused a number of times. First, they are used to deliver full goods. Second, the consumer uses them to return the empties to the point-of-sale. Third, they are used to transport the empties from the point-of-sale to sorting facilities. Finally, the cases are used to ship the bottles back to brewers. After unloading containers for filling, the cases are recycled. Can flats have a similar life cycle, except that they are sent for recycling either a) from their collection point or b) from sorting facilities. This secondary packaging makes up the vast majority of tonnage under BRCCC's Schedule 5 stewardship plan.

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 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. In fiscal 2013, kegs of various sizes ranging from 18 litres to 59 litres had return rates of over 98%. Approximately 2.6 million kegs, with a volume equivalent to approximately 53,375,000 industry standard bottles or 51,270,000 beer cans (355 ml) were sold last year in BC.

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 recycler. Recycled shrink-wrap may be used to manufacture plastic shopping bags.

Pallets:

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

Can Bins:

- Cardboard can bins are sometimes placed into high volume locations. The can bins can hold 180 dozen cans, reducing storage and transportation costs. The bins are reused an average of 20 times. When they reach the end of their useful life, they are recycled.

4. 2009 – 2014 PLAN PERFORMANCE

As noted in section 2, this stewardship plan renewal is submitted with BRCCC as the stewardship agency of record. It continues the Schedule 1 stewardship plan currently operating by BDL.

In its more than 80 years of stewardship, BDL has achieved some of the highest levels of program performance seen in Canada or elsewhere. The past 5 years have built on this record of success. In the 2009-2014 stewardship plan, commitments were made with respect to the recovery rate that would be achieved, the number of authorized unlimited return locations to offer consumers and the additional activities that would be reported on.

While the *Recycling Regulation* establishes a legislative recovery rate of 75%, the 2009-2014 plan committed to achieving an 85% recovery rate. We are pleased to report that this commitment has been achieved in each year of the 2009-2014 stewardship

plan, as well as having been achieved for each category of containers that BRCCC collects. An average recovery rate of 93% has been achieved over the past 4 years. This recovery rate is amongst the highest achieved for any product stewardship program in North America.

With respect to the number of authorized unlimited return locations, considerable progress was made. There was a commitment to have 42 authorized depots by the end of the 2009-2014 Stewardship Plan. We are pleased to report that, as of December 31, 2014, there are 71 authorized depots within the collection network. This is more than double the number of authorized depots in the network when the 2009-2014 stewardship plan took effect. On this measure, the target was surpassed by over 100%.

With respect to authorized unlimited retail return locations, the target was missed. The 2009-2014 stewardship plan set a target of 305 unlimited retail return locations. As of December 31, 2014, BRCCC has 120 unlimited retail return locations in its collection network, with an additional 22 under consideration. There are a variety of reasons BRCCC missed this target, including concerns amongst retailers of the requirements on them with respect to non-BRCCC containers if they contracted with BRCCC. BRCCC believes it has found ways to address retailers' concerns and will be able to meet this target within 5 years of implementing this stewardship plan.

Finally, with respect to reporting, we were successful in providing the Ministry with expanded annual reporting. In addition to reporting on the recovery rate achieved for Schedule 1 containers, we have been able to provide certain information with respect to the collection of beer and cider secondary packaging, recovery of kegs from bars and restaurants, as well as other materials like pallets and plastic wrap.

5. COLLECTION SYSTEM AND CONSUMER ACCESS

a. Background

Return-to-retail remains a vital component of BRCCC's container collection system and one which is highly supported by consumers and stakeholders (see Section 5.b). BRCCC's collection system includes a variety of options for consumers which include: a) all BC Liquor Stores, b) all private retail liquor stores, c) all rural agency stores and d) selected bottle depots. In total, BRCCC offers BC consumers 1,135 locations to which they can return their beer containers (and associated secondary packaging) as of December 31, 2014. At 191 of these locations, consumers are able to return an unlimited number of beer containers. All other locations will accept at least 24 containers per day from consumers (with many accepting a larger number than this minimum amount).

Table 1 – Breakdown of BRCCC Return Locations by Channel (as of December 31, 2014)

Location Description	# of Locations
Licensee Retail Stores (LRS)	648 (Active)
Government Liquor Stores (GLS)	195
Rural Agency Stores	221
BRCCC Contracted Bottle Depots	71
TOTAL	1,135

b. Deposit Collection System

BRCCC acts as the product stewardship agency for the brewers, ciders manufacturers and brewery agents selling products in metal cans, as well as those listed in this Stewardship Plan as selling in refillable bottles ("Brand-Owners"). Brand-Owners currently sell beer and certain alcoholic beverages contained in cans or refillable bottles ("Containers") to the Liquor Distribution Branch ("LDB") stores, licensee retail stores, LDB rural agency stores and licensed establishments ("Retailers") for the Retailers to sell to consumers.

When Brand-Owners sell Containers to Retailers, Brand-Owners issue an invoice that includes the applicable deposit to be paid by Retailers on the sold Containers. Brand-Owners have appointed BRCCC to collect the invoiced deposits from Retailers associated with the sale of Containers. Brand-Owners have directed Retailers to pay the invoiced deposits to BRCCC.

Any unredeemed deposits are used by BRCCC to cover collection, sorting and recycling costs.

This remittance of deposits from Retailers directly to BRCCC, rather than to the Brand-Owner, contributes to the cost-effective financing and achievement of the Stewardship Plan objectives.

c. Location Methodology - Coverage & Scope

In determining the appropriate system coverage, BRCCC utilizes geographic information systems (GIS) technology to identify potential service gaps as it pertains to container return locations. If a particular area of the province appears to be under-served, BRCCC will enter into a service arrangement with a licensee retail store or bottle depot in that area to ensure there is appropriate coverage throughout the province. With respect to very small communities, the retailer in such communities is often an LDB agent. These retail locations all accept container returns from consumers.

Based on BRCCC’s most recent GIS survey, 75% 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 recent Stewardship Agencies of BC Action Plan. Further, as outlined below in Section 5.b, BRCCC commits to expand its collection network, thereby increasing this already very high level of consumer convenience.

d. Current BRCCC Locations

Between 2009 and 2014, BRCCC more than doubled the number of depots in its collection network, exceeding its target number of depots by more than 100%.³ While BRCCC exceeded this target, it fell short on its targeted number of retail locations contracted to be unlimited return locations. In speaking with these locations, BRCCC understands operational considerations from Licensee Retail Stores and concerns about the collection of non-beer containers limited BRCCC’s ability to expand coverage as desired. BRCCC remains committed to expanding this return channel. As set out in Section 5.b, BRCCC believes it has made some changes to its requirements of retail collectors that will make it feasible for a large number of these locations to become part of BRCCC’s unlimited return network.

BRCCC has a contractual agreement with the Liquor Distribution Branch regarding the collection of empty beer containers. As a matter of general business practice, BC Liquor Stores have a flexible and varied return system and have accommodated more than the regulatory limit of 24 containers per customer per day in some locations. However, due to staffing and space constraints, BC Liquor Stores may enforce the regulatory limit of 24 containers per customer per day at their discretion.

6. PERFORMANCE MEASUREMENTS & TARGETS

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

Table 2 – BRCCC Performance Indicators and Associated Tracking Methodologies

<u>Performance Indicator</u>	<u>Methodology</u>
Recovery Rates for Containers	Net Sales vs. Net Returns by Container Type
Secondary Packaging Recovered	as per BRCCC Schedule 5 Stewardship Plan
Consumer Accessibility	See Subsection B Below
Consumer Promotion & Education	See Subsection C Below
Pollution Prevention Benefits	See Subsection D Below

a. Recovery Rates for Containers

Performance Objective:

- Achieve a minimum recovery rate of 87.5% overall and for each container type

BRCCC will target a minimum 87.5% recovery rate in each year of this stewardship plan renewal. As in the previous stewardship plan, it is BRCCC’s intention that this elevated recovery rate will be achieved for each category of beer containers included in the BRCCC program. This commitment exceeds the mandated provincial target of 75% and builds upon BRCCC’s prior commitment to attain a recovery rate of 85%.

³ In 2013, BRCCC provided additional commitments to increase its unlimited return collection network. From the beginning of 2013 through August 31st 2014, BRCCC added another 26 unlimited return locations to its collection network.

It is BRCCC's desire that the target recovery rate will be surpassed by a healthy margin in each year of the stewardship plan renewal. While consideration was given to setting a higher recovery rate target, it was ultimately decided that the significant, recently-enacted changes to the BC recycling system gave rise to substantial amount of uncertainty that made a higher recovery rate target unfeasible at the present time.

In addition, as required under s. 8(2)(f) of the *Recycling Regulation*, BRCCC will provide independently audited financial statements detailing all deposits received and refunds paid by producers as part of its annual reporting.

b. Consumer Accessibility

Performance Objectives:

- Continued expansion of BRCCC's unlimited return collection network
 - Target of 385 total locations by 2019 (305 retail stores and 80 depots)
 - BRCCC to achieve at least 1 unlimited return location in each Regional District by end-2016
- Continued high levels of consumer accessibility
 - Target of 80% of population within 10 minute drive of an authorized BRCCC return location by 2018

As noted above, BC consumers continue to express significant support for the convenience of being able to return their empty containers to the retail locations where they bought them. For this reason, BRCCC continues to place a strong emphasis on contracting with retail locations to be unlimited return locations as it looks to expand its program coverage (reflected in Table 3 below).

According to an Ipsos Reid poll conducted for BRCCC in December 2013 and early January 2014, a significant minority prefer returning their empty beer containers to a retail location. Approximately 30% of consumers identified a retail location as where they are most likely to return their empty beer containers.⁴ Preference for retail locations was more pronounced among Metro Vancouver residents and those over 34 years old.

At the same time, while many consumers may not use a retail store as their primary return location, they are likely to return their empty beer containers to a retail store if they are also intending to buy more beer. Nearly half of British Columbians who return beer containers say they purchase more beer either 'each time' or 'sometimes.' Once again, this preference was more pronounced among Metro Vancouver residents, as well as those who typically return their empty beer containers to government liquor stores. For these consumers, BRCCC's return-to-retail model reduces the number of required trips, as well as the overall distance travelled.

Current GIS data, emphasized by BRCCC's very high return rates, indicate existing consumer accessibility is very strong, particularly compared to other stewardship programs. Even so, expanding the unlimited retail return network will provide additional convenience for BC residents.

When selecting bottle depot locations with which to contract, BRCCC will place priority on contracting with locations that already serve multiple stewardship programs. While this will be an influential factor, final decisions regarding depot locations with which to contract will be based upon what makes most sense for the program, financially and operationally. BRCCC will also commit to work with the MOE to respond to specific depot requests or complaints that may arise over the course of this stewardship plan term.

BRCCC is in the process of developing revised handling standards that take limited retail footprints into consideration. After completing pilots, BRCCC will review system performance and elicit feedback from private retail store operators. Pending results, full implementation will proceed by approaching non-contracted private retail store locations. Progress with respect to performance targets will be included in BRCCC's Annual Product Stewardship Report filed under the plan.

⁴ Ipsos Reid survey conducted on behalf of Canada's National Brewers between December 23, 2013 and January 2, 2014. 1,251 adult respondents (aged 19+ years) participated – generating an estimated margin of error of ±2.8 percentage points.

Table 3 – 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
2015	165	71	236
2016	180	72	252
2017	210	75	285
2018	250	78	328
2019	305	80	385

c. Consumer Promotion & Education

Performance Objectives:

- BRCCC to undertake increased consumer awareness and promotion activities
- Target of 1 net new initiative in 3 of the 5 years covered in this plan renewal

Consumer awareness of the BRCCC program for beer containers is very high. BRCCC commissioned Ipsos Reid to conduct a consumer survey that took place in late December 2013 and early January 2014, receiving 1,251 responses from BC residents 19 years of age or older. The sample included 726 respondents who were the primary person in their household to return beer containers and the data were statistically weighted to ensure the sample’s region, age and gender composition reflects that of the actual BC population according to census data. The margin of error for a survey of this size is estimated at plus or minus 2.8%, 19 times out of 20. This survey was similar in scope (and asked many of the same questions) as surveys commissioned in 1997, 2000, 2006 and 2011.

The survey results indicate nearly all (96%) British Columbians say they are aware that consumers pay a refundable deposit for their beer containers.⁴ In addition to high consumer awareness, program participation rates are also very high. Among respondents from households that consumed beer within the past year, 86% indicated that they collected and returned beer containers for the refund.⁵ Importantly, consumer satisfaction with the current range of locations available to return beer containers for deposit is also high. More than nine-in-ten respondents indicated that they were either ‘very satisfied’ (42%) or ‘satisfied’ (49%) with BRCCC’s current stewardship network. These results remain consistent with those of previous surveys undertaken in 2011, 2006, 2000 and 1997.

BRCCC is committed to maintaining and improving levels of awareness as it pertains to our deposit-return system. BRCCC will continue to monitor consumer attitudes and conduct surveys on an as-needed basis.

A number of new initiatives to promote the BRCCC program and to improve consumer awareness of authorized BRCCC return locations have been developed in recent months and will continue to be rolled out over the course of the stewardship plan. New BRCCC branded posters (an example is found above) have been developed to designate BRCCC authorized return locations. BRCCC will use consistent images and colour schemes in its promotional materials to provide a consistent consumer experience and reinforce for consumers which locations are authorized BRCCC return locations. BRCCC also recently launched an updated consumer website: www.EnviroBeerBC.com. The website includes digital copies of BRCCC branded promotional materials (currently posted at authorized return locations), information on the environmental benefits of refillable bottles, and directions to authorized return locations (via a postal code search). The website is mobile-enabled and contains a number of features designed for search-engine optimization.

One such feature is social media integration. The website is linked with the twitter account @EnviroBeerGuy, ensuring the website regularly has updated information, including information about BRCCC program achievements and/or recycling in BC. Another strategy includes the production of a video outlining BRCCC’s stewardship activities in the province. The video, posted on the website and on YouTube, is designed to provide consumers with insight into BRCCC’s reverse logistics and recycling networks.



⁵ 15% of respondents indicated that their households don’t buy beer. Results listed above are extrapolated after removing these respondents from the results. 76% of total respondents indicated that they were the primary person to collect and return beer containers for the refund.

BRCCC is also a member of the Stewardship Agencies of British Columbia (SABC). As a member of SABC, BRCCC funds the Recycling Council of British Columbia's (RCBC) various consumer information vehicles, such as the Recycling Hotline, the RCBC website and the Recyclepedia. BRCCC updates the authorized return locations listed on these on a regular basis. 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.

d. Pollution Prevention Benefits

Performance Objective:

- Target to direct 100% of collected materials for re-use or to recycling commodity markets

All BRCCC containers are made from non-toxic, inert materials with established secondary markets. Furthermore, all refillable glass containers and cans are sent for processing at designated recycling facilities; significant portions are used to produce new primary beer and cider containers. According to Environment Canada, "minimizing or avoiding the creation of pollutants and wastes can be more effective in protecting the environment than treating them, or cleaning them up after they have been created. This approach is needed to secure a safe and healthy environment and a sound and prosperous economy. It is a key component of environmental protection and sustainable development".⁶

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:

Table 4 – 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)	\$

7. DISPUTE RESOLUTION AND ONGOING STAKEHOLDER CONSULTATION

1) DISPUTE RESOLUTION

a) Complaints from Depots/Return Locations

If the issue involves a return location, BRCCC will investigate the issue and will make sure the return location is aware of the issue. If a return location is found to be in violation of its contractual commitments or legal obligations, BRCCC will take appropriate measures to ensure compliance (including potential dispute resolution procedures outlined in written contracts).

b) Disputes between BDL and Brewers/Manufacturers 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 *Liquor Distribution Act*. As a result of this listing and approval process, most brand owners designate BRCCC as their product steward for containers prior to selling their products in BC. Ongoing compliance is monitored through tracking within our accounts receivable and our brand registry systems.

In the event that BRCCC does encounter a problem with producer compliance, for the purposes of initiating an action with the Ministry of the Environment, non-compliance is defined as a lack of responsiveness from a brand owner after more than two notices on producers' responsibilities have been sent from BRCCC. 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*:

⁶ Government of Canada. "Pollution Prevention". <https://www.ec.gc.ca/p2/>. Accessed May 9, 2014

Table 5 – Timelines & Communication Methods for Addressing Potential Stewardship Disputes

# of Attempts	Timeline	Details
1 st Contact	60 Days Prior	Letter is sent to brand owner obligated under the Recycling Regulation, informing them of their responsibilities
2 nd Contact	No Response within 30 Days of 1 st 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
3 rd Contact	No Response within 30 Days of 2 nd 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.
4 th Contact	No Response by Stipulated Deadline in 3 rd Contact Letter	A request for non-compliance actions is sent to the Ministry of the Environment, with a copy to the brand owner.

2) ONGOING STAKEHOLDER CONSULTATION

a) Complaints from Local Governments

As with its Schedule 5 stewardship plan, BRCCC intends to conduct an annual consultation with local governments. It is anticipated that, through this annual consultation, the vast majority of issues from local governments will be addressed through continual open communications between BRCCC and local governments. In the event that an issue remains that cannot be resolved through this annual consultation process, BRCCC will ensure that local governments (through a variety of channels, including UBCM and contact information at the Ministry of Environment) have access to information to directly contact BRCCC regarding these issues. BRCCC will look to meet in person, to the extent possible, with the relevant local government to discuss the issue and try to find an appropriate solution.

b) Complaints from Consumers

Consumer complaints are directed to the appropriate manager for follow-up and resolution. Through BRCCC's refreshed website www.EnviroBeerBC.com, consumers have access to information on BRCCC's product stewardship plans. The website also 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 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).

c) Coordination and Cooperation with Other Stewardship Programs

There may be some volumes of beverage containers that are part of the BRCCC stewardship plan that enter other stewards' collection networks. BRCCC has an agreement with Encorp Pacific (Canada) to cover such situations. With respect to other stewards' collection networks, BRCCC will monitor its overall recovery performance and will coordinate with other stewardship programs as necessary to ensure overall recovery performance and efficiency.

8. MANAGEMENT OF ENVIRONMENTAL IMPACTS

a. Background

As mentioned earlier, BC brewers have a long and established history of environmental leadership in B.C. 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). BRCCC recycles all returned packaging associated with containers under its stewardship program.

Table 6 – 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		Y
Kegs	Y	Y
Cardboard Cases and Can Flats	Y	Y
Shrink-Wrap		Y
Can Bins	Y	Y

BRCCC's Schedule 1 Stewardship Plan incorporates many important elements of the Polluter Pays Principle, a concept recognized by the OECD as the academic forbearer of EPR. An application of Pigouvian economics, the Polluter Pays Principle is an attempt to remove negative environmental externalities associated with economic activity. The concept advocates that "manufacturers and importers of products should bear a significant degree of responsibility for the impacts including the production process itself, and downstream impacts from the use and disposal of the products."⁷

Costs associated with managing and collecting BRCCC containers are paid by brand owners, with allocations determined by container type and sales volume. Efficient system management by BRCCC has kept these stewardship fees low, thus enabling brand owners to internalize stewardship costs into the shelf-prices of full goods. As a result, customers are not required to pay an additional *Container Recycling Fee (CRF)* or *Environmental Handling Fee (EHF)* at the point of purchase, as is common with other stewardship programs, including those under Schedule 1 of the *Recycling Regulation*. 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.

b. Emphasis on Refillable Containers

The BRCCC container collection system places a strong emphasis on refillable containers. Manufacturers have a cost efficient system for getting refillable containers back. BRCCC remains the only B.C. product steward that maintains a significant percentage of refillable containers. Between 2008 and 2012, refillable bottles represented 24.6% of total BRCCC containers collected.

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 93.2% during the aforementioned period, BRCCC producers utilized 560 million fewer containers versus an alternative system utilizing one-way containers.⁸

The vast 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 because empty bottles can be returned to the nearest brewery for re-use, rather than only to the brewery they originated from.

c. Pollution Prevention Hierarchy

BRCCC brand owners utilize two types of containers under the Schedule 1 product stewardship plan: refillable glass bottles and recyclable aluminum cans. Both methods of waste management are among the "most preferable" in the expanded hierarchy (see Figure 1).⁹ As mentioned previously, BRCCC containers are 100% recyclable, non-toxic, and have established secondary markets. Similarly, current container designs emphasize both reusability and recyclability. BRCCC will attempt to work with container manufactures to improve the energy efficiency, recycled content, and renewable energy content of containers while reducing associated emissions.

⁷ Organisation for Economic Cooperation and Development (OECD). Environment Directorate, Paris, France (2006). "Extended Producer Responsibility." Project Fact Sheet.

⁸ Figures provided for a) return rates and b) container savings are representative of data covering 2009-2013.

⁹ See Zero Waste SA: South Australia's Waste Strategy 2011-2015. 2011 Report.

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. Every year, BRCCC's closed loop system for refillable containers effectively *reduces* the total amount of bottles produced by approximately 112 million.

Reuse:

Reusing glass bottles, in comparison to making new ones, saves considerable energy and reduces CO2 emissions associated with container requirements. 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 50 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 separate stewardship program for managing their packaging and printed paper – these programs work in tandem, but are not reliant upon each other to operate.

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.¹⁰ The energy required to make aluminum cans from recycled aluminum is 95% less than energy utilized in creating virgin aluminum. A study by the Container Recycling Institute in the U.S., found that while aluminum typically accounted for only 1.4% of landfill materials by weight, it represented 14.2% of the energy required to replace a typical ton of landfill virgin material.¹¹

Despite being reused an average of 15 times over their life-cycle, refillable glass bottles eventually require end-of-life management. When refillable glass bottles are identified as needing treatment, often by high-tech scanners on beer production lines, they are separated from the general stock and sent to the appropriate facility (see below). In 2013, BRCCC sent more than 756,000 ISB's, weighing approximately 440,000 pounds for destruction. Cullet from these containers was recycled into new, high-end use products including new bottles and fiberglass insulation.

Similar to refillable glass bottles, steel kegs also eventually approach the end of their individual life-cycles. Unlike other metals, metallurgical impurities rise during the steel recycling process; resulting in a product that is practically indistinguishable from virgin sources. Last year, the global end-of-life recycling rate for steel was estimated at 90%.¹² Irreparable kegs are retired and sold to scrap dealers for processing before recycling can occur.

In addition to primary beverage containers, BRCCC also collects and recycles all packaging associated with products sold by registered brewers. This includes: a) shrink-wrap from goods delivered to licensees, b) cardboard mother cartons, sub-packs & trays, and c) high-cone rings. BRCCC has been voluntarily collecting these materials since operations first began. Materials are consolidated and bailed before being sold to secondary markets.¹³ Bailed shrink-wrap is often used to manufacture plastic shopping bags. Bailed cardboard is used to make a variety of recycled paper products. Can bins are bailed with other cardboard streams after an average of 20 uses.

d. End-of-Life Management Locations

After being consumed and returned, empty glass containers are sent to brewery locations identified in Table 8. 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 via rail to Alcoa, Tennessee for recycling into new cans. Similarly, reject glass from BDL and brand owners is sent to a facility in the Greater Vancouver Area for processing.

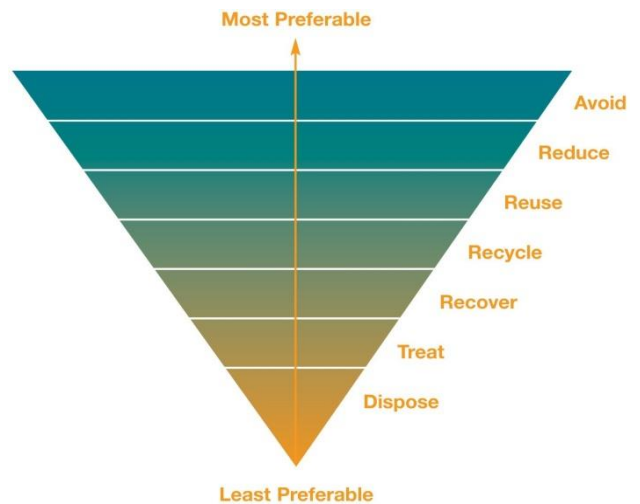


Figure 1 – Expanded Hierarchy of Waste Management Principles for Effective Environmental Protection

¹⁰ PE Americas. Life Cycle Impact Assessment of Aluminum Beverage Cans. 2010 Report.

¹¹ See Trashed Cans: The Global Environmental Impacts of Aluminum Can Wasting in America, CRI, 2002 Report.

¹² UNEP. Recycling Rates of Metals: A Report of the Working Group on Global Metal Flows. 2011 Report

¹³ See BRCCC Schedule 5 Stewardship Plan for additional details.

Recycled Aluminum is delivered to:
 ALCOA Recycling
 2300 North Wright Road,
 Alcoa, TN 37701-3141

Recycled Glass is delivered to:
 Pacific Metals Recycling International
 8360 Ontario Street,
 Vancouver, BC V5X 3C5

e. Pollution Prevention

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 7 – 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 (NO _x) ¹⁴	MT
Avoided Sulphur Oxide (SO ₂) ¹⁵	MT
Avoided Particulate Matter (PM) ¹⁶	MT
Avoided Solid Waste	MT

Landfill Diversion:

The BRCCC product stewardship plan has generated enormous benefits in terms of landfill diversion. In 2014, almost 7,000 tons of aluminum and nearly 22,000 tons of glass were diverted from landfill. In addition, over 31,000 tons of solid waste were avoided as a result of this stewardship plan.

Reduced Energy Consumption:

Annual energy savings associated with the plan have historically been equivalent to the annual heating requirements of 7,800 homes. That's equivalent to approximately 12% of the homes in a community the size of Nanaimo.¹⁷ BDL's closed loop distribution system also reduces energy requirements associated with the distribution of containers. As BDL picks up empties when it delivers full goods to retail locations, container pickup is fully integrated into its existing distribution system reducing the need for one-way distribution trips.

9. STAKEHOLDER CONSULTATIONS

While the BRCCC program for the recovery of beer containers is well-established, BRCCC will ensure stakeholders have significant opportunities to shape this plan and to provide their feedback on it. BRCCC is in regular contact with key program stakeholders, including our network of depot owners, bottle depot associations, private retail liquor store owners and the Liquor Distribution Branch. BRCCC met with each of these groups in May 2014 to discuss this draft plan and gain their feedback on it. Also in May 2014, BRCCC held a public consultation on its initial stewardship plan renewal targets at the Recycling Council of British Columbia

¹⁴ Nitrogen Dioxide (NO_x) is one of the main ingredients involved in the formation of ground-level ozone, which can trigger serious respiratory problems. It reacts to form nitrate particles, acid aerosols, which can cause respiratory problems. NO_x also contributes to formation of acid rain; contributes to nutrient overload that deteriorates water quality, reacts to form toxic chemicals, and contributes to global warming.

¹⁵ Sulphur Dioxide (SO₂) contributes to respiratory illness, particularly in children and the elderly, and aggravates existing heart and lung diseases. SO₂ also contributes to the formation of acid rain, and the formation of atmospheric particles.

¹⁶ Particulate Matter (PM) is microscopic solids or liquid droplets can get deep into the lungs and cause serious health problems including: decreased lung function, aggravated asthma, chronic bronchitis, and premature death.

¹⁷ 92 GJ of energy are used on average to heat households in Canada. Source: Improving Energy Performance in Canada: 2003-2004. Source for number of Nanaimo households, BC Stats, Ministry of Labour and Citizens' Services.

(RCBC) conference. The feedback provided through these interactions has shaped the plan that BRCCC has put forward for consideration and approval.

In addition to these individual stakeholder meetings, BRCCC posted this stewardship plan on the Recycling Council of British Columbia (RCBC) website and on www.EnviroBeerBC.com for public consultation in the fall of 2014. A series of public meetings and webinars took place in the fall of 2014 to ensure the broadest possible public feedback on this plan renewal. These public meetings and webinars were advertised to the public through a variety of social, print and other media. In addition to posting the plan on the websites and to the public meetings and webinars mentioned, the following additional public consultations were also undertaken:

- Member advisories to RCBC and CWMA members about the posting of the stewardship plan and the public consultations
- Use of social media to promote the stewardship plan and these public meetings to create additional awareness, encourage attendance at the meetings and solicit additional feedback
- Inclusion in a UBCM weekly newsletter to their members
- Inclusion in a CWMA information update

A complete list of stakeholders from whom specific feedback was obtained, as well as a table outlining the main feedback received from stakeholders throughout the consultation process (with the general category of stakeholder providing this feedback identified) and how this feedback has been addressed in this final plan can be found in Appendix A.

10. STEWARDSHIP AGENCY DETAILS

Name & Address:

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

Contact Individual:

Brian Zeiler-Kligman
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. However, the brand owners using refillable glass bottles registered under the BRCCC product stewardship plan are listed below.

Table 8 - Brand Owners using Refillable Bottles Registered under the BRCCC Plan (as of December 31, 2014)

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
Dead Frog	1-27272 Gloucester Way, Aldergrove, BC V4W 4A1
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 Brewing and Malting Co. Ltd.	551 Clair Road West, Guelph, ON N1L 1E9
Steam Whistle	255 Bremner Blvd., Toronto, ON M5V 3M9
Tree Brewing	1083 Richter Street, Kelowna, BC V1X 2K6
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

11. FINANCIAL SUMMARY

BRCCC will continue to provide audited reports annually 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 by BRCCC, to arrive at a recovery rate based on each container bearing a \$0.10 deposit and a \$0.10 refund being paid on each container collected (which is the amount that BRCCC pays on every container it recovers and reports on).

The summary audited deposit information for the past 10 reporting periods is outlined below:

Table 9 – Ten Year Summary: Audited Results of Deposit Refund Performance 2003-2012

Reporting Period	Deposits Received	Refunds Paid	Return Rate
FY 2003	\$56,289,694	\$53,752,752	95.49%
FY 2004	\$58,223,284	\$54,433,098	93.49%
FY 2005	\$58,955,880	\$53,462,038	90.68%
FY 2006	\$58,479,727	\$54,253,837	92.77%
FY 2007	\$59,649,312	\$54,225,381	90.91%
FY 2008	\$60,101,182	\$55,172,432	91.80%
FY 2009	\$58,678,873	\$54,740,548	93.29%
CY 2010	\$60,475,190	\$56,863,271	94.03%
CY 2011	\$59,709,307	\$55,386,720	92.76%
CY 2012	\$59,229,010	\$54,983,228	92.83%
TOTAL	\$589,791,459	\$547,273,305	92.79%

a. Program Funding

BC brewers pay the full costs of managing their container recovery program. The cost for recovering the container is factored into the price of the product as any other input cost, such as labour, energy or transportation. As all costs of the BRCCC system are internalized, any inefficiency in the BRCCC system accrues to brewers as lost margin and deadweight cost. Accordingly, brewers demand that BRCCC be aggressive in ensuring the system is highly cost-effective, while maintaining best-in-class environmental performance and customer service levels.

A fundamental tenet of EPR is that costs internalized to producers result in producers designing products and systems to reduce environmental and financial cost – an effect often described as “design for the environment” or DfE. The BC brewers’ approach to container management is a practical example of this economic mechanism at work.

On the other hand, other producers have the consumers fund their container recovery program through the levying of ‘container recycling fees’ or visible eco-fees charged at the point of sale in addition to the product price. In such a system, it is exclusively the consumer that pays for the collection and recycling of beverage containers. Producers bear no financial responsibility and face no financial consequences. It is consumers, not producers, who pay for any system inefficiencies. This reduces the impetus to pursue operational policies that would reduce cost.

The lack of incentive to reduce cost can be seen in the actual cost to consumers. In 2012, well over \$50 million (and as much as \$65 million) was charged to BC consumers for the collection of their non-beer beverage containers.¹⁸ On this basis, BRCCC's cost internalization saved BC consumers over \$32 million in eco fees.

BRCCC's program is run on a cost-recovery basis and is funded by the manufacturers participating in the program.

With respect to refillable glass bottles, BRCCC's program will continue to be funded through charging participating brewers an established fee per dozen bottles handled. With respect to cans, the BRCCC regularly reviews its program finances to determine whether a fee needs to be charged for the collection of beverage alcohol cans.

The BRCCC is a not-for-profit society established by the brewing sector to transparently administer the financial and logistical requirements of the industry's stewardship in BC. The BRCCC is composed of members representing BDL, Labatt Breweries Ltd., Molson Coors Canada, Sleeman Brewing and Malting Co. Ltd., the BC Craft Brewers Guild and Canada's National Brewers. As a result, the Board is made up of representatives of each of these companies or organizations that together represent over 95 percent of the beer volume sold in the province and is a representative cross section of brand owners that are local, national and international and that own or are the agents for brands in each category of stewardship.

The skills possessed by Board members range from financial, planning and logistics expertise to customer service, marketing and brand management professionals. The BRCCC meets to review audited and projected material revenues, unredeemed deposits, producer costs, container fees, service levels and environmental standards and measures.

BRCCC engages BDL to act as its agent in dispensing these regulatory stewardship obligations. BDL, on behalf of the BRCCC, collects container fees from brand owners, retains unredeemed deposits with respect to can sales (forwarded to BDL from the LDB) and retains material revenues from aluminum material sales. From these revenues, the BRCCC, through BDL, pays container collection partners for collection of beer cans and arranges for the transportation and preparation of cans for recycling.

¹⁸ Encorp Pacific (Canada). *2012 Annual Report*, pg. 47.

12. PERFORMANCE MEASUREMENT SUMMARY TABLE

Unless otherwise stated, BRCCC will report annually on each of the following metrics:

Table 10 – Summary of BRCCC Plan Performance Measurement Targets 2015-2019

Measure	2015	2016	2017	2018	2019
Recovery/ Collection Targets	87.5%*	87.5%*	87.5%*	87.5%*	87.5%*
Accessibility Targets	236 unlimited return locations (165 LRS, 71 depots)	252 unlimited return locations (180 LRS, 72 depots)	285 unlimited return locations (210 LRS, 75 depots)	328 unlimited return locations (250 LRS, 78 depots)	385 unlimited return locations (305 LRS, 80 depots)
		At least 1 unlimited return location in each Regional District	At least 1 unlimited return location in each Regional District	At least 1 unlimited return location in each Regional District	At least 1 unlimited return location in each Regional District
	75% of population within 10 min. drive of BRCCC authorized return location**	75% of population within 10 min. drive of BRCCC authorized return location**	75% of population within 10 min. drive of BRCCC authorized return location**	80% of population within 10 min. drive of BRCCC authorized return location**	80% of population within 10 min. drive of BRCCC authorized return location**
Consumer Awareness Targets	3 net new consumer promotion/ education initiatives				
Pollution Prevention Hierarchy/Product Life Cycle Targets	Target to direct 100% of collected materials for re-use or to recycling commodity markets and to track end fate of materials				

**Note – Stated target collection/recovery rate applies to both the overall rate and the rate for each container type*

*** 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. However, the stated target is reflective that BRCCC will undertake a new GIS study in 2018, rather than on an annual basis. As a result, the performance on this measure will only be able to be measured when a new study is undertaken.*