

Consultation timeframe - April 1, 2013 - July 2, 2013

Encorp's Stewardship Plan was prepared to allow for ease of stakeholder comments and input. In addition to online access, the plan was available for review at a series of public meetings held in 6 locations around B.C. The time and place of these meetings was advertised in newspapers and on the Return-It™, SABC, and RCBC websites.

Encorp management outlined a program of direct personal contact through public meetings, paid advertising, use of social media, web-based seminars and a variety of methods that made it easy for stakeholders to submit comments on the plan.

All comments listed in the summary document have been copied verbatim to accurately represent the breadth and variety of input and feedback from stakeholders. Some spelling errors and typos have been corrected for clarity. Comments and questions related to products or programs that are not part of the Encorp Stewardship program or are more broadly public policy issues have been included in the summary however we may not have responded to them because they are not part of our stewardship responsibilities or plan.

**General Comments – Not recorded under a specific section:**

Reference #	Comment Date	Sector	Question/Comment	Response
1.	Apr 15/13	General Public	<p>I went to the bottle depot today for the first time since I moved out of Alberta and I have to say I was highly disappointed. you have many commercials stating how important recycling is and I agree completely but with the way your bottle depots operate its no wonder why people don't recycle as much as they did in the past. the first thing</p> <p>I noticed when I went in there is that you have to sort everything yourself, take off all the lids etc. the second thing I highly disliked was that the lady informed me of no return funds on milk or ensures and then I watched her throw them all away into a GARBAGE, which by the way there was a lot of before I went in I had read on their labels that they ARE recyclable and should be taken for a deposit. If you want people to go back to recycling their cans 7 bottles instead of throwing them away I would HIGHLY suggest looking into the way ALBERTA handles their bottle deposit program and take major notes. It is ridiculous that someone who wants to recycle should have to pay more money to get to the depot than they make when they go in there and on top of it have to spend their time and energy standing there sorting through everything. in the end it's not worth it. The whole point of recycling is to help reduce the carbon footprint of our economy but with the time and gas it takes to go there and get very little money no ones going to want to do it. You should NOT have to pay a deposit on something you do not get back. and to have an environmental fee on top of the normal deposit is barbaric when us consumers have to do the work ourselves anyway.</p>	<p>The Stewardship Plan is designed to address the requirements of the Beverage Container Schedule of the Recycling Regulation which doesn't include milk containers. Since no deposit is paid on milk containers in British Columbia there is no deposit to give back to customers. However, we do recycle milk containers collected at Encorp depots. The plastic jugs and bottles are recycled within our plastic stream and the cartons and paper fibre containers are included in Encorp's fibre stream.</p>
2.	Apr 16/13	Government	Thanks for local bottle depots.	

Reference #	Comment Date	Sector	Question/Comment	Response
3.	Apr 17/13	NGO	I was surprised with the limitations of the product life cycle plan. Plastic pollution is treated as an externality in the life-cycle. In these coming year Encorp must take responsibility to help address pollution because 80 % of debris in the marine environment start on land. Encorp must take leadership to address this growing problem	<p>The Stewardship Plan addresses the variety of different materials identified within the Beverage Container Schedule of BC's Recycling Regulation. The regulated products include more than just plastics.</p> <p>Three out of every four plastic containers are recovered, and recycling plastic within Encorp's system produces 87% energy savings via use of recycled inputs for manufacturing of plastics.</p>
4.	Apr 17/13	Government	I think that Encorp needs to get more involve in reducing litter. If you don't step up to address this problem, who will?	Encorp has several programs that focus on making recycling convenient in outdoor spaces as an alternative to littering. Paying to install container return bins on streets in the City of Vancouver and in provincial parks are two examples.
5.	Apr 25/13	Service Provider	I attended the Encorp Pacific public consultation meeting on April 23, 2013 in Kelowna. Encorp's plan for the next five years was well explained, and staff answered questions to my satisfaction. I applaud Encorp Pacific in achieving a nearly 79% recovery rate for regulated containers in BC. A comment that I have is that the plan to move to an 82% recovery rate, though laudable, sounds very expensive to me, relative to the benefit to the environment. The environmental benefit of moving this 3% higher is difficult to quantify in my view, but the costs to get to that level will certainly place additional financial burdens on BC residents that pay for the system. Perhaps this requirement needs more reflection? All in all I support the Encorp Pacific (Canada) Stewardship Plan as presented.	Encorp feels that achieving the 82% recovery rate target will be both challenging and rewarding and will fall within attainable and acceptable costs while substantially increasing the number of containers recycled each year. A 2% increase in the recovery rate will equate to approximately 26 million containers that are not landfilled.
6.	May 16/13	General Public	Can Ink Catridge be recycled	Ink cartridges are an example of something that are not part of the Encorp Stewardship Plan. But retailers and manufacturers do offer recycling options. For a full list of places to recycle ink cartridges, visit the Recyclepedia <a href="http://www.rcbc.ca">www.rcbc.ca</a> .
7.	May 24/13	NGO	Hey I think Encorp should take more responsibility for plastic pollution in BC. Especially with tsunami debris about to hit the coast!	The Stewardship Plan addresses materials identified in the Beverage Container Schedule of BC's Recycling Regulation which are produced in or imported into British Columbia and sold in BC. This does not include foreign marine waste. Nonetheless, we have provided support for initiatives that seek to address this issue, including the Plastic Shores pilot project and the Artist Response Team, who provide environmental education in elementary schools across BC.

Reference #	Comment Date	Sector	Question/Comment	Response
8.	June 28/13	BCBDA	The BC Bottle Depot Association (BCBDA) submits the following comments in regards to the Encorp Used Beverage Container Stewardship Plan and Renewal 2014-2018	
8 a)		BCBDA	<p><u>Summary of Performance Objectives - Recovery Rates</u>                      The BCBDA maintains that the Encorp Used Beverage Containers is still the best stewardship program for the recovery of materials in the province of British Columbia. The use of deposits to encourage to consumer to “do the right thing” and take materials to a bottle or recycling depot has a proven track record of success that dwarfs other stewardship programs in its simplicity and immediate results. However the deposit level of beverage containers in BC was reduced many years ago to support the Alberta Used Beverage Container Deposit Program and now BC has failed to recognise the value of that symbiotic relationship to Alberta’s program and raise the used beverage containers deposit rates in BC to meet both the deposit levels of Alberta and the recovery rate success associated with the increased deposit levels and to include milk and milk substitute containers into the deposit system.</p>	<p>Despite BC and Alberta having different deposit rates, data collected from both Encorp and ABCRC indicate few significant differences in recovery rates for comparable containers.</p> <p>Also, many stakeholders have differing opinions with regard to deposit levels; Depots, Brand Owners, Consumers among others. All cite varying unsubstantiated evidence on both sides of the argument. A change in the regulation, which would be a decision by the government, is needed to result in a change in deposit levels. The Ministry of Environment has recently conducted a consultation with regard to this matter and concluded no change in deposit levels is necessary at this time.</p>
8 b)		BCBDA	<p><u>Milk and Milk Substitute Containers</u>                      While milk and milk substitute containers are not captured in the Encorp Used Beverage Container Stewardship plan, the fact that milk and milk substitute recovery rates have seen dramatic increases in Alberta after the containers entered the deposit system in BCBDA’s opinion shows a lack of faith on Encorp’s part to recognise the value of their own system and plan. While Encorp manages the voluntary milk program on behalf of the dairy industry the dismal recovery rates for milk and milk substitute containers and the unwillingness of Encorp to take a leadership role to promote the inclusion of milk and milk substitute containers into deposit and / or support the efforts of the BCBDA and other groups to have milk containers included into the deposit system casts a layer of doubt that Encorp truly supports their own deposit system under their stewardship plan.</p>	<p>The Stewardship Plan was designed to address the requirements of the Beverage Container Schedule of the Recycling Regulation, which doesn’t include milk containers.</p> <p>To reference the beverage schedule (Schedule 1) under the Recycling Regulation you can visit <a href="http://www.bclaws.ca/EPLibraries/bclaws_new/document/ID/freeside/449_2004">http://www.bclaws.ca/EPLibraries/bclaws_new/document/ID/freeside/449_2004</a></p>
			The additional fact that the Ministry of Environment need only recognise milk as a beverage (as recognised under the Canada Food Guide) and that in contrary to that the Ministry of Environment has disregarded the will of 90% or more of provincial residents or officials elected to represent them (who have demonstrated by letters of support and petitions delivered by the BCBDA to the Ministry of Environment) have allocated milk containers into the Multimaterial BC Printed Paper and Packaging (PPP) program instead and that milk containers continue to escape the deposit system casts doubt that the Ministry of Environment supports of the deposit system. The BCBDA position is that hidden disposal fees or product price increases to consumers to cover the cost of recycling completely removes the burden of the cost of recycling product discards from manufacturers and shifts that burden to families, individuals and taxpayers in BC.	On behalf of Encorp, Ipsos Reid, Vision Critical and other research companies have conducted a number of consumer surveys. These surveys found that a significant majority of consumers would prefer the convenience of curbside collection than the inclusion of a deposit system for their milk containers.

Reference #	Comment Date	Sector	Question/Comment	Response
8 c)		BCBDA	Why has there not been a public review / consultation of the voluntary milk program?	The milk program is currently voluntary, it is not regulated and therefore no public review or consultation is required. The Printed Paper and Packaging regulation due to be implemented in May 2014 will include milk products along with a wide variety of other materials. This program is not an Encorp stewardship program it will be run by MMBC. <a href="http://www.multimaterialbc.ca">www.multimaterialbc.ca</a>
8 d)		BCBDA	<p><u>Consumer Access</u>            Access to bottle depots in major areas continues to be the strength of the Encorp program. However service in smaller or remote regions continues to be problematic. As recent as August 2012 the bottle depot in Nakusp closed as its depot license was not renewed by Encorp due to failed contract negotiations leaving the community without a bottle depot. Local retailers are now left with the responsibility of managing and in some cases transporting used beverage containers they accept back from consumers to the nearest depot in another city in order to get back the refundable deposit they paid back to the consumer. The lack of licensed depots in remote area creates financial hardship for retailers in those areas. In the issues of Nakusp Encorp was at the time being criticised by media and the depot operator for not being flexible in negotiations. In fact a spokesperson for Encorp was later quoted in the media as stating: "There was scepticism about whether or not it (the depot) would be worthwhile, its borderline. The issue is distance for folks. Population is one factor distance is another. The corporation (Encorp) wasn't sure enough returnables would be collected to make the expenditure of gas to ship them worthwhile." Unquote. After reading the media quotes the BCBDA questions the sincerity of the contract negotiations on Encorp's part. The BCBDA would suggest that in smaller communities that have no access to a bottle depot that deposits collected at the time of beverage purchase in that area be returned to that area to groups charged with disposal to cover the cost of disposal or to reimburse or assist with the cost of those retailers now having to transport the used beverage containers to the nearest bottle depot outside their community. The same should apply to all stewards as this might give incentive for stewards to have collection points in all areas.</p>	Encorp supports the accessibility standard that was recently developed by the Stewardship Agencies of BC (SABC). Meeting the SABC standard ensures that a minimum of 97 percent of British Columbians will have access to a container return facility. Encorp already exceeds this standard, but as the provincial or regional populations grow or move we identify new opportunities and needs. In the specific example given, the depot was offered a contract and it was the depot operator's decision not to re-sign the contract.
8 e)		BCBDA	<p><u>Consumer Awareness</u>            Encorp has made an outstanding effort to raise consumer awareness of its used beverage container program. Other stewards could benefit from Encorps examples of good marketing plans that have been launched over the past five years. Bottle depots are also required contractually by Encorp to advertise with the amount spent dependant on the volume of the depot. This advertising partnership has worked very well for the public.</p>	

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8 f)		BCBDA	<u>Carbon Footprint</u> Encorp could significantly reduce its program carbon footprint by allowing the densification of containers within depots before transport with the exception of glass.	Encorp continually looks for ways to improve operations both economically and environmentally including the use of densification.
8 g)		BCBDA	Cooperation with Other Stewardship Agencies	
8 h)		BCBDA	<u>Depot Capabilities</u> BCBDA recognises, appreciates and supports Encorp's concerns to ensure sufficient depot space is available for their program materials within "Return It" locations. To date most of the stewardship plans managed by stewards other than Encorp are not providing enough handling fees for depots to be sustainable if they were stand alone depots. The Encorp plans allow for stability of the collection network. It is only with the combined efforts of all stewards to pay the real costs of recycling that depots can sufficiently plan for future expansion and ensure adequate coverage of service province wide.	
8 i)		BCBDA	Encorp continues to demand depot expansion and renovation that has no verifiable proof of increasing depot volumes at a time when (by their own graphs included in the stewardship plan renewal) sales of beverages has declined. While the BCBDA supports good business practices and encourages depots to keep their depots as efficient and updated as possible, the BCBDA recognises that each depot is different with different business models and that updates cost money and that in its essence the used beverage container program is in place for the collection of used beverage containers not to provide an inflated experience for consumers.	Despite beverage sales slowing down, there are still many unrecovered containers to be collected by depots. Upgraded depots have increased their collections at a faster rate than depots that have not upgraded, which we believe is because they make the consumer experience smoother and simpler. Encorp also has financial incentives to encourage upgrades that make sense for individual depot operations.
8 j)		BCBDA	Encorp has also continued to license more depots again at a time of beverage sales and return volume decline. This only serves to "water down" revenues for existing depots in and industry where currently a depot operates on approximately 15% of monies that flow through the business. Some depots have had demands from Encorp to open second locations within their territories with the assumptions that another location will capture more returns. This practice only serves to increase (sometimes doubling or more) depot operating costs. It has not been proven that another depot in the same territory increases volume recovery in that area.	Recommendations for the siting of new depots are driven to a great extent by population growth in specific areas that are not close or convenient to an existing depot. An example would be significant new neighbourhoods in areas of Metro Vancouver south of the Fraser. This respondent noted earlier the need for consumer accessibility to depots and here notes that there are also business interests that must be considered. Both are part of any discussion about new depot locations.

Reference #	Comment Date	Sector	Question/Comment	Response
8 k)		BCBDA	<p>Depot capacity continues to be a point of confusion. Depots are individually owned and operated and are licensed by Encorp. Encorp carries no financial risk in depot start up or operations. In the past year Encorp through contract renewal with depots has insisted that some depots relocate or expand from approximately 3,000 sq. ft. to upward of 4,500 sq. ft. In the past 5 years Encorp has also introduced the 3 and 5 star depot program to reward depots for upgrading. Now even as Encorp has now revealed at a recent public consultation that they are experimenting with reduced depot sizes of 1,500 sq. ft. or less to facilitate the use of express depots, some depot owners are finding that Encorp is still insisting that their depot expands or relocates if they want to protect their assigned territory as described in their licenses. Some depots are feeling pressured into entering into bad business models of expansion or relocation in an effort to protect their business interests. Opening additional depots in their territory only splits volumes while increasing costs. The costs of relocation do not guarantee better volume and the costs can be staggering and detrimental to depot viability.</p>	<p>Encorp does have minimum operating standards for depots that it licenses, including a minimum footprint that is required to deliver operational requirements and meet consumer experience expectations. We also have voluntary programs, such as 3 and 5 Star, that have proven effective in motivating depots to upgrade their facilities. Depots that have participated in that program have grown at a faster rate than those that have not. Encorp also takes responsibility for certain costs required to run existing and any additional depots, as they determine required, based on reaching recovery targets. These costs include additional transportation requirements, the provision of Point of Return systems (where applicable), consumer awareness materials, and administrative support, all paid for by Encorp. We evaluate on an ongoing basis whether these additional expenses are contributing to increased consumer participation in recycling.</p> <p>Compared to other small businesses, Encorp authorized depots are among the most successful and least susceptible to financial failure.</p>
8 l)		BCBDA	<p>Some depots have outright refused to upgrade to the Encorp 3 and 5 Star rating as the increased costs of upgrades would affect the depots overhead operating costs and in some cases the increased infrastructure costs have led to deficits that have affected the operator's ability to staff larger and costlier depots. As a result entire portions of some depots sit unused after major improvements have been made.</p>	<p>Depot expansions are seldom requested solely to accommodate beverage containers, and such expansions are done voluntarily by depot operators based on programs proposed to them. Typically depots have added more material streams which require space and handling. The requirement is to ensure beverage containers will still be handled efficiently without transferring the costs of additional programs to Encorp.</p>
8 m)		BCBDA	<p>Encorp has also asked depots to enter into a Letter of Intent as Encorp positions itself to be a middleman transporter of Printed Paper and Packaging (PPP) materials collected by depots under the MultimaterialBC (MMBC) program. The cost of the additional space required to house PPP materials will not be covered entirely by financial incentives offered by MMBC. Encorp's financial incentive offer for depots that choose to collect PPP under Encorp's management has not been released as of the time of this stakeholder submission. Some depots have chosen to accept materials for other stewardship plans but as depots are seldom if ever included in the development of stewardship programs depots are unable to respond to the sudden change in collections demand.</p>	<p>Any Printed Paper and Packaging program activities are unrelated to Encorp's Stewardship Plan. PPP is not an Encorp stewardship program; it is run by Multi-Material British Columbia (MMBC). Participation in that system will be an independent decision by a depot operator based on whatever financial and contractual offer is made by MMBC.</p>

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8 n)		BCBDA	<u>Public Consultation</u> Encorp has made good and reasonable efforts for public consultation however through no fault of their own attendance at these events has been poor. Perhaps a webinar would be a good venue for out of town stakeholders to be able to attend in real time without the costs of travel.	We offered two webinars and advertised all consultation opportunities to the public using various media.
8 o)		BCBDA	<u>Section 1 Introduction-Governance</u> Encorp has for the last seven years refused to recognise the BCBDA. The BCBDA as representative for the largest association of depots can assist in streamlining issues between depot and steward. The BCBDA (as requested by members) acts as legal agent for member depots. This assignment of agency is recognised by BC law and should be respected by Encorp. The failure of Encorp to recognise the BCBDA has resulted in unnecessary hardship in working relationships between all parties.	Encorp's agreements are with independently owned and operated depots and not with the BCBDA.
8 p)		BCBDA	The BCBDA has requested that BCBDA be included on the Encorp Advisory Committee and has so far been refused. As a representative of depots the BCBDA should be included on that committee to ensure transparency.	Currently the appointed Encorp Advisory Committee has Depot representation. The current representatives provide a better fit and more practical involvement with the committee's terms of reference than the BCBDA.
8 q)		BCBDA	<u>Section 2 Program Principals</u> The majority of the points of the program principals are accepted by the BCBDA as good effort and design of program with the exception addressing the need and consumer demand to "design for environment and recyclability" of beverage containers. Manufacturers through Encorp could be incentivized to continually improve the recyclability of their product discards. For manufacturers who fail to address the need to provide good recyclable containers a penalty should be in place and implemented.	Because every container type pays for its own collection and recycling costs, some brandowners pay significantly more for their container management.
8 r)		BCBDA	<u>Section 3 Program History</u> <u>b) Sales and Recovery Growth</u> Encorp should continue to calculate recovery by units and not weight. Weight would offer a much more desirable performance outcome on paper for Encorp materials than per unit but performance is based on sales versus units recovered and therefore weight of recovered materials has no bearing on the actual outcomes.	A system that charges and refunds deposits based on units will always need to measure those units. As for assessing the impact of materials diverted from landfill or other disposal, weight is a significant factor to consider.

Reference #	Comment Date	Sector	Question/Comment	Response
8 s)		BCBDA	<p>c) <u>Refer to comments of Performance Objectives, item 2. Mobile and Commercial Collectors</u>                      Concern has been raised recently about the practice of discounting meaning the customer does not received the full deposit back upon return of the container for recycling. Encorp recognises that discounting occurs within their system through rogue depots that exist. BCBDA maintains that Encorp licensed Mobile and Commercial Collectors who ask for a percentage of the container value or a set fee or a donation in return for pick up of the containers are also discounting. The terminology takes many forms but in the end if the customer does not receive their full refund back discounting has occurred.</p>	<p>Companies or Organizations that choose to use the services provided by Mobile collectors are knowingly charged for those services provided. They have made a decision to pay a fee to have the containers they use recycled by an outside company rather than absorb the internal cost of having a staff member be responsible for this task.</p> <p>Discounting the amount of deposit returned to individual consumers who return containers themselves are a different matter. We are not aware of, and indeed we would act to stop, any discounting of deposit returns on containers for which we are the steward. We believe that in the comment the reference is to containers outside of Encorp's program, specifically beer containers returned to a depot that does not hold a contract with the Brewers Distributors Ltd.</p>
8 t)		BCBDA	<p>Mobile and Commercial Collectors through their contract with Encorp are able to operate within depot territories thus further watering down volumes for established depots.</p>	<p>Mobile and commercial collectors within Encorp's system are established in areas where traditional depots have not been able to be located. These collectors deliver their containers to authorized Depot locations. Most depots also provide mobile collection as part of their business model.</p>
8 u)		BCBDA	<p><u>Section 4 Consumer Awareness Refer to item 3 of Summary of Performance Objectives Section 5 Management of Program Costs</u>                      The BCBDA maintains that the consumer is paying the lion's share of the costs of the program. With the combination with unredeemed deposits and container recycling fees the producers have relieved themselves of any financial costs of recycling. As Encorp is managing consumer's money extra care and transparency should be practiced.</p>	<p>The cost to operate the collection system is included in the price of every beverage container. It's something the consumer ultimately pays whether it is visible (separate from the retail price) or not. Encorp always seeks to provide full financial transparency. We publish detailed information annually on both financial and non-financial performance, including independently audited statements showing all major components of funding and expenditure.</p>
8 v)		BCBDA	<p>Encorp and other stewards should also be made to pay the cost of disposal of materials not recovered through their programs to whatever municipal or regional entity has disposed of the materials.</p>	<p>Encorp is working with other stewards and local governments to minimize municipal costs. Encorp does not support or encourage consumers to put beverage containers into municipal systems.</p>
8 w)		BCBDA	<p>Encorp's current annual report shows no reference to the substantial revenues returned to Encorp through depot audits. It is the opinion of BCBDA audits should be used to improve the system through education and not as a means of having depots comply with other issues.</p>	<p>Audits are used to assist depots to improve their accuracy and to ensure system integrity. Handling fee expenditures shown are net of any amounts recovered through audits. In any case, those amounts are very small and not financially material to the cost of the system.</p>

Reference #	Comment Date	Sector	Question/Comment	Response
8 x)		BCBDA	<p><u>Section 6 Management of Environmental Impacts - b) Management in Accordance with Pollution Prevention Hierarchy</u>                      The submitted revised plan continues to ignore key points of consumer demand to reduce environmental impacts of packaging including the transportation of used beverage packaging. The Encorp Stewardship Plan does not speak to encouraging manufacturers either by reward (for good environmental design of packaging) or increased manufacturer costs of participation in the program (for poor choices of packaging) to revise the design and / or material type of packing used by manufactures to reduce the environmental impacts of millions of containers sold province wide.</p>	Refer to response under Reference # 's 43, 44 & 46
8 y)		BCBDA	<p>The densification of containers should occur at all depots to reduce transportation costs and the associated environmental costs of fossil fuel consumption pollution.</p>	Encorp is concerned about measuring and reducing our greenhouse gas (GHG) emissions and began a program to benchmark and measure emissions several years ago. We are currently reviewing various measures that can contribute to GHG reductions and densification of containers is one of those measures. Because the current system was not developed with densification in mind, incorporating it requires significant operational and audit process changes. It also has significant equipment cost ramifications at the depot level.
8 z)		BCBDA	<p><u>Section 7 System Challenges a) Depot Capacity Refer to item 6 of the Summary of Performance Objectives c) Funding Sources for the Deposit / Return System Refer to Section 5 Section 8 Dispute Resolution Process</u>                      While it appears that the described Dispute Resolution process of meetings, Mediation or when all else fails Commercial Arbitration is a fair process the process fall flat when the two parties in disagreement are a lone depot operator regardless of size and the agent for the beverage manufacturers. The BCBDA as representative to the largest number of associated depots is also unable to provide the financial resources needed to see a complaint made by a depot/s through mediation, arbitration or legal recourse.</p>	
8 aa)		BCBDA	<p>In most case the costs of a depot attending the process is a substantial portion of the depots annual operating revenue as the dispute resolutions are always carried out at Encorp's convenience in the lower mainland. The travel and preparation costs for the individual depot are prohibitive.</p>	

Reference #	Comment Date	Sector	Question/Comment	Response
8 bb)		BCBDA	The BCBDA asserts that with the disparity in conflicting party resources that there is not one depot in the province that can success fully make use of the Dispute Resolution as a result the Dispute Resolution is deemed inadequate by BCBDA.	Encorp utilizes recognized and well established standard commercial processes in dealing with any disputes that should arise. Encorp utilizes a Council of Depot Operators, an Advisory Committee and regular consultation with individual depots to work through issues before they become a dispute.
9.	Oct 11/13	MoE	Will Encorp be committing to participation in Waste characterization studies	Encorp is willing to participate in waste characterization studies based on an approach such as the one indicated under the SABC Action Plan – Group 4 Local Government Relations point #3(i)

**Summary of Performance Objectives:**

Reference #	Comment Date	Sector	Question/Comment	Response
10.	Apr 18/13	Government	Consider removing comment section at the end of each section. Comments/concerns/questions for each section may be addressed later in the document. This would avoid receiving unnecessary comments.	The insertion of comments by section was to simplify the response process for the public. All comments and responses will be summarized in an appendix to the final document and will not appear in each section within each section of the plan.
11.	Apr 18/13	Government	Is there a summary of your questions at the end if you submit them at each stage?	All comments get filed in a system, in which Encorp can respond to any comments that require clarification. Comments were collected and summarized until July 2, 2013. A list of comments and responses will be available in the appendix of the final plan.
12.	Apr 23/13	Service Provider	This format of the public consultation presentation is great, shows people how to use the website.	
13.	Apr 23/13	Service Provider	Are depots set up by agreement or regulation?	Agreement.
14.	May 3/13	Other	I propose that collection targets be set to over 90% by container type as this is an established program.	The Stewardship Plan we have presented establishes overall recovery targets well in excess of those set in the Regulation.
			I propose that the collection rate be set by container type because there are some containers that have very poor collection rates and some that have very good collection rates.	Although the target in the regulation is 75% in aggregate, as we note in section 3 of the stewardship plan, Encorp reports recovery rates by material type and have set targets and objectives to increase the rate for low performing container types.

Reference #	Comment Date	Sector	Question/Comment	Response
15.	Jun 21/13	NGO	The Nechako Waste Reduction Initiative, a volunteer organization dedicated to minimizing waste and promoting recycling in the town of Vanderhoof, applauds the performance objectives outlined by Encorp and appreciates that Encorp has recognized the unique context in which depots in smaller centres are run. We believe that assessing smaller depots for upgrades, relocations, and extended hours will go a long way towards increasing Encorp's recovery rate and contributing to the goal of 82% recovery of beverage containers.	
15 a)			We would like to note the particular importance of the objectives related to cooperating with other stewardship agencies in smaller centres and rural areas. In addition to providing convenience for consumers (as stated in the Stewardship Plan), in smaller centres, cooperation with other stewardship agencies is also crucial to providing access for consumers. In Vanderhoof, for example, there are currently no depots for electronic recycling. The issue is one of access, not necessarily convenience. Cooperation between Encorp's beverage stewardship agents and Encorp's electronics stewardship agents, for example, would go a long way towards improving access for consumers.	As part of a broader initiative under the Stewardship Agencies of BC, all stewards are working together to identify where there are opportunities to develop more "multi-product" depots and encouraging depot owners, if space and resources are appropriate, to add stewarded products to their offerings.
<b>Public Consultation</b>				
Reference #	Comment Date	Sector	Question/Comment	Response
15 b)	Jun 21/13	NGO	The membership of the Nechako Waste Reduction Initiative appreciates being given the opportunity to provide feedback on Encorp's 2014-2018 Stewardship Plan. The community members who represent the Nechako Waste Reduction Initiative would like to highlight three particular items of feedback for Encorp to consider:	The Stewardship Plan outlines the overall objectives for the coming 5 years which include improving small and remote community depots. Operational plans include details for specific depots in specific areas including the Nechako area.
15 c)			1) In its 2014-2018 Stewardship Plan, Encorp should consider re-evaluating or implementing minimum standards based on shared best practice for recycling in smaller centres and rural areas. The differences in depot services, quality, and consumer experience between smaller centres are pronounced and unfortunate.	Encorp is working with other stewards and also with SABC who have proposed an Accessibility Standard for approved product stewardship plans. <a href="http://www.bcstewards.com">www.bcstewards.com</a> (under the Action Plan tab)
15 d)			2) As per the Performance Objective related to smaller centres, the Nechako Waste Reduction Initiative would appreciate if Encorp could assess the local depot in Vanderhoof and implement steps to improve accessibility and upgrade the facility in order to increase recovery rates.	

Reference #	Comment Date	Sector	Question/Comment	Response
15 e)			3) The Nechako Waste Reduction Initiative strongly supports Encorp's objectives related to collaborating and connecting with other stewardship programs. In smaller centres, this collaboration and the possibility of one-drop locations for consumers are vital to increase recovery rates and promote recycling. There are several working depots in smaller centres that offer collection of multiple items so there are models in place that demonstrate that this can work.	
<b>Section 1. Introduction</b>				
Reference #	Comment Date	Sector	Question/Comment	Response
16.	May 1/13	General Public	Governance - The program is sufficiently mature that it could benefit from having some non-member officers on its board. These directors could come from local government or environmental organizations and help to ensure the program is living up to its mandate as well as decrease the potential for problems by bringing different perspectives.	For a number of years Encorp's Board of Directors has included members with no affiliation to either the beverage or food retailing industry. These members are required within our bylaws and are chosen for their corporate, governance and financial expertise.
<b>Section 2. Program Principles</b>				
Reference #	Comment Date	Sector	Question/Comment	Response
16 a)	May 1/13	General Public	Some amendment of these principles would assist the program in meeting its mandate from the Recycling Regulation.	
16 b)		General Public	a. The program is meant to reduce the environmental impact of its products, not merely divert products from landfill and incineration.	Diverting products from landfill or incineration does reduce their environmental impact through landfill reduction, less extractive industry activity, and reduced energy and resource usage in new product creation.
16 c)		General Public	b. The goal should not be about having the lowest possible impact on consumer prices, but rather to deliver a cost-effective program that achieves its environmental objectives.	Cost effective is not the same as cheapest. In fact, to achieve the higher-than-mandated return rate that currently exists requires substantial investment in consumer education and a comprehensive return network. The outcome of a cost effective program is the lowest possible impact on consumer prices to achieve all goals, including return rate.

Reference #	Comment Date	Sector	Question/Comment	Response
16 d)		General Public	c. Each container type should not cross-subsidize another but only when unredeemed deposits are not factored in. Otherwise the types of containers with low return rates are in fact rewarded for this. In fact, types of containers with low return rates should be penalized with a higher cost. Similarly, the fees should be set not only to recover costs but also to shift use of materials from low refillability/recyclability/return rate types to ones that achieve higher outcomes.	Unredeemed deposits from underperforming container types have been used to improve recovery rates for that container type. No cross-subsidy is one of Encorp's core principals.
16 e)		General Public	d. Rather than "find useable end products which maximize the value of recovered materials", the program should work to ensure high quality recyclable materials are used to maximize the use of these materials again in as high a quality product as possible.	The higher the quality of material collected results in higher commodity value. Encorp reviews the end use of the products we collect and recycle on a regular basis and when a higher value end use is developed and proven we invest time and effort to determine the viability of use for our material streams.
16 f)		General Public	e. In addition to transparency, the program should also work for accountability (to the citizens of BC).	Encorp has set the standard for product steward accountability in BC by being the first agency to produce an audited public annual report before such reports were required.
16 g)	May 25/13	General Public	There is a huge need to keep plastic food containers out of the landfills. These are the yogurt, cottage cheese, honey and margarine type of containers of which there must be millions that go into landfills on a daily bases in BC alone. Encorp should look at incorporating those in a no refund type of program similar to the gable top beverage containers.	The Stewardship Plan addresses the Beverage Container Schedule of the Recycling Regulation. Plastic food containers fall under the PPP schedule of the recycling regulation run by MMBC.
17.	May 24/13	Government	For consumer access, what are the standards?	There is no fixed number of people per depot. Location selection is based on a number of factors including ease of access, site capacity, etc.  A guideline used by stewardship agencies, which results in coverage of 97 percent of BC's population, is available for public review at <a href="http://www.bcstewards.com">www.bcstewards.com</a> under the Action Plan tab. Encorp already exceeds that standard.
18.	May 24/13	Government	In Nanaimo, fewer Encorp depots (from 3 to 2), 88k people and the 2 depots are only 1km apart	Collection numbers in Nanaimo are consistent with similar sized communities and volume growth is consistent with market trends. New depot locations require suitably zoned areas which is a local government responsibility. The operator in Nanaimo is nonetheless assessing the feasibility of siting a depot in another area of that city.

Reference #	Comment Date	Sector	Question/Comment	Response
19.	May 24/13	Government	Should be a consideration for a standard in regards to consumer access	All BC product stewards are working collectively to establish consumer access standards. These standards can be found at the website listed above, Reference #16.
20.	Jun 21/13	NGO	Related to Principle #2: "Develop and operate a system which provides consumer-friendly and convenient return points throughout the Province", the Nechako Waste Reduction Initiative would encourage Encorp to consider minimum standards or shared best practice for return points in smaller centres and rural areas. In our experience, return points in Northern B.C. vary significantly based on the types of products they accept, the quality of the services offered, the open times, and more. Having minimum standards or shared best practices between return points would allow for depot operators to learn from one another and ensure that the return system treats consumers equally, regardless of their location.	BC product stewards are working collectively to establish consumer access standards. This group is called Stewardship Agencies of BC and the website is <a href="http://www.bcstewards.com">www.bcstewards.com</a>

**Section 3. Program History**

Reference #	Comment Date	Sector	Question/Comment	Response
21.	Apr 17/13	Government	tetra packs are most likely disappearing at schools. How is the promotion of the encorp school grant going? Does it need to be pushed more? we don't see the same retruns form schools as we use to.	Encorp does not provide grants to schools. We have developed a highly regarded and well used School Recycling Program available to both Elementary and High Schools. Containers collected and recycled have consistently increased year over year. The program provides incentives, tools, and information for teachers, students, principals, PAC groups and the public to reinforce the benefits of recycling.
22.	Apr 18/13	Government	Are you looking at automated technologies for collecting beverage containers? Is this being looked at for expansion as part of the plan?	We are always looking at best practices and most effective methods to collect containers, particularly considering current consumers' expectations of convenience and service. The use of technology, whether to collect, count, audit or provide a consumer interface, is always part of that assessment.
23.	Apr 23/13	Service Provider	So Encorp feels like it has decent coverage of the province?	There are a few remote areas that don't have traditional or permanent depot coverage. The City of Vancouver is our most under-serviced area. Eight more depots would be needed to sufficiently handle the volume based on typical population-to-depot ratios. We're currently looking for innovative solutions since rent in Vancouver is very high. There's also no zoning in the City of Vancouver for bottle depots.

Reference #	Comment Date	Sector	Question/Comment	Response
24.	May 1/13	General Public	Smaller communities and rural areas - The plan seems to view depot viability as based on this program alone where in fact, a depot that may not be viable based solely on beverage containers can be viable when it offers other services such as partnering with other programs. As all Encorp depots are independent businesses, this "siting" decision should be made by the depot with Encorp's input instead of vice versa. Rather than a commitment to the same number of depots, it may be better for the program to commit to sitting down with each Regional District to determine what optimum coverage would look like for this product, community by community. Communities without depots may be some of the ones where Return-to-retail is more heavily promoted.	The majority of depots are independently owned and operated for profit. The beverage container program is the only program which provides consistent, reliable revenues for depots. Without beverage containers, independent depots are seldom viable, and to be successful they must serve a sufficient population from a location convenient to consumers. Encorp's costs for depot support, transportation and administration increase with each new depot, so we too have a vested interest in the decision process. Thus, siting decisions involve discussion, negotiation and compromise from all parties.
25.	May 1/13	General Public	Depot space - As space is a limiting factor for many depots, Encorp's intention to look at compaction is a good one.	
26.	May 1/13	General Public	Depot relations - The plan reads as if the depots were owned and operated by Encorp whereas most or all( ?) depots are independent businesses contracted by Encorp as well as by other entities to provide services. Encorp's troubled relationship with its depot partners has impacted not only its own operations but other programs and in fact, BC's reputation on EPR. To resolve this, the program should work towards a more harmonious relationship where the depots are seen as valued partners instead of using the command and control methods of the past. One step would be to rewrite the plan to reflect this (particularly section 7.a.1). This will require some time to repair this relationship and an external third party such as a Ministry representative or mediator could be helpful.	BC's beverage container return system is one of the highest performing and best respected in North America. This could only be achieved through the general cooperation and performance of all participants in the system, including depots.
27.	May 1/13	General Public	Wholesale depots and retailers - The Regulation states that a plan "adequately provides for (i) the producer collecting and paying the costs of collecting and managing products within the product category covered by the plan, whether the products are currently or previously sold, offered for sale or distributed in British Columbia." In the case of service to smaller retail sites or other collection hubs, this does not appear to be happening. The program should review situations where fees are charged for collection service and determine if the program ought to be paying for those. The program should be providing pick up service from retailers (and paying the Mobile and Commercial Collectors to do this could be one avenue).	The commenter's request to collect from small retailers would appear to be inconsistent with earlier remarks about return-to-retail affecting depots in smaller communities. A principled approach is in place to pay retailers for product they collect and sort and pay depots for the product they collect and sort. This principle ensures that Encorp does not pay twice for the same service. Since retailers are required to collect beverage containers under the regulation we have no choice but to include them into the collection network.
28.	May 1/13	General Public	Collection Rates - Encorp is to be congratulated on the high collection rates for many types of containers. However, more can still be done, particularly for underachieving types of containers such as polycoat and others.	Continuous improvement is always the goal.

Reference #	Comment Date	Sector	Question/Comment	Response
29.	May 1/13	General Public	Return-to-retail - The plan notes that this aspect is under-used and to some degree underserved (in terms of not collecting from smaller locations). As the program is experiencing challenges in siting depots in some locations, the Regulation mandates retailer participation and the more options a consumer has, the higher the return rates can be, the program should embrace this option, advertising it more, working with retailers to enhance the consumer experience and rewarding the retailers for their assistance. Pick up from the retail locations should be provided free of charge by the program. As more consumers are starting to bring reusable bags, the program can piggy-back on this behaviour by reminding people to bring their containers as well. The program should advocate for retailers taking back all brands and not just their own to remove a further obstacle to consumer participation.	Experience has shown a strong consumer preference for taking all returnable containers (and other items, such as electronics and other stewarded materials) to one location, i.e. a depot. Depots are designed for taking back products. Promoting return-to-retail would eliminate any opportunity for efficiencies, including compaction or consolidated transportation, and result in a much higher environmental footprint.
30.	May 1/13	General Public	Targets - The Recycling Regulation states that "the plan will achieve, or is capable of achieving within a reasonable time, (i) a 75% recovery rate or another recovery rate established by the director, (A) for each subcategory listed in section 4 of Schedule 1 for the beverage container product category". As the beverage container program is well-established, there is no reason that each subcategory target should not be 75% at a minimum and even higher for those that have already met that. For example, the targets could be 95% for glass, 80% for plastic, 85% for aluminum, 75% for polycoast and other.	The Stewardship Plan establishes overall recovery targets well in excess of the 75% target set in the Regulation. We have currently reached a 79% recovery rate.
31.	Jun 21/13	NGO	In our experience, "customer convenience and satisfaction with the depot" and depot efficiency varies markedly between smaller communities. In the town of Vanderhoof, for example, the depot is open a limited number of hours and accepts only beverage containers. In Fraser Lake, however, the depot is open full-time hours, accepts electronics and other products in addition to beverage containers, and offers services such as a tab system and sorting by staff that are very well-received by consumers. We greatly appreciate Encorp's commitment to enhancing the consumer experience in smaller centres in 2014-2018. We believe that two ways to accomplish this while also contributing to a higher recovery rate would be to implement minimum standards based on best practice for smaller centres and rural areas as well as to support connections between various stewardship programs in smaller centres. As there are several rural depots already connected to diverse stewardship programs, there are clearly working and profitable models for this type of collaboration in place for Encorp to draw on.	Encorp continues to work with other Stewardship Agencies to improve levels of service in rural and remote areas.
32.	Jul 2/13	Government	Unit Recovery Rates (Page 9): Recommend setting the target recovery rate at 85%. Given that Encorp has already achieved an impressive recovery rate of 80.4%, and a 5-year average of 79%, the 82% recovery rate target does not appear ambitious enough.	The Stewardship Plan establishes overall recovery targets well in excess of those set in the Regulation. Review section 3, unit recovery rates by category. It is proving increasingly difficult and costly to increase the recovery rate. We believe that the proposed targets are ambitious yet achievable given recent experience and that they can be achieved at an acceptable cost to consumers.

Reference #	Comment Date	Sector	Question/Comment	Response
33.	Jul 2/13	Government	Consumer Access to Collection Points (Page 10): The plan provides commentary on the variable ratios of population to depot service within Metro Vancouver. This simple comparison fails to acknowledge the use of return-to-retail outlets. If comparisons are to be made between municipalities, recommend conducting a complete analysis of all available collections points.	Return-to-retail takes place in all parts of the Province and is part of the analysis for collection points everywhere, not just in Metro Vancouver. However, return-to-retail accounts for just 7 percent of volume collected. Although population to depot ratios only look at depots, we have found it a much more appropriate measure of market coverage given the significant volume that is recovered through depots and strong consumer preference for depots.
<b>Section 4. Consumer Awareness</b>				
Reference #	Comment Date	Sector	Question/Comment	Response
34.	Apr 16/13	Other	it is confusing to the public to distinguish between drink containers covered by the program and those that are not. it should be one system for all drink containers. at some depots you get full deposit on beer, others you don't - it should be the same.	Domestic beer containers are not part of the Encorp Stewardship Plan. Concerns regarding discounting of deposits on domestic beer containers should be directed to Brewers' Distributors Ltd. and the Ministry of Environment.
35.	Apr 18/13	Government	Is consumer awareness done against the categories? For example, it's common knowledge that pop cans can be recycled, compared to pouches.	Awareness is measured by categories. We measure cans, bottles, juice boxes, gable top, and separately what type of beverage they contain (pop, water, etc.). The awareness rate is reported as a net percent. 100% of people use and consume at least one container or beverage type. We measure those who are aware of the deposit on containers they use. If people don't buy or use them, then measurement of awareness becomes irrelevant. Cans have a very high awareness. Juice box awareness is lower, in the 50-60% range.
36.	May 1/13	General Public	Milk and milk substitutes - As Encorp has been running a voluntary program for this and now these containers are regulated, Encorp should adopt these into their beverage container program (similar to how the Brewer's Distributed Program added the plastic rings and cardboard boxes) and add a deposit to them. This will be in keeping with what Encorp has been asking consumers to do and will enable Encorp to significantly increase collection rates.	The Stewardship Plan addresses the requirements of the Beverage Container Schedule of the Recycling Regulation which does not include milk containers.
37.	May 1/13	General Public	Consumer awareness - Encorp is to be congratulated on its very high level of consumer awareness. As it has had an average of 99% awareness of the past 5 years, the target would be better set at 95% or over.	

Reference #	Comment Date	Sector	Question/Comment	Response
38.	May 24/13	General Public	Based on current success, is it possible to set target of 95%?	Other than the most recognized brands in the world, 90% is more than most brands could ever expect. We believe that maintaining above 90 percent awareness is sufficient to have consumers ready to recycle. It will then fall on other elements, such as return location accessibility, consumer experience, etc., to drive actual participation in recycling.
39.	May 24/13	General Public	What is Encorp's intent around community based social marketing around certain demographics?	Stewardship plans are required to be short, show an overall picture and be simplified. There are multiple, annual strategic and tactical plans directed to various audiences in separate documents and our annual report, including social marketing, however they are not appropriate to include within a five year stewardship plan.

**Section 5. Management of Program Costs**

Reference #	Comment Date	Sector	Question/Comment	Response
40.	Apr 16/13	Service Provider	i have some difficulty seeing Encorp sponsoring all sorts of events. some you could argue are part of consumer awareness. some i would argue show that you could reduce the handling fees because you are making too much money or pay the depots more so that they can in turn pay their employees better	To meet our mandated objectives Encorp must encourage recycling of containers everywhere that they are consumed. Outdoor spaces and events are notable challenges. Encorp's sponsorship of events consists of providing assistance to organizers in the form of collection bins, education and in some cases advertising designed to ensure that consumers at these events have the opportunity and the incentive to recycle containers.
41.	Apr 18/13	Depot Operator	Are brandowners concerned now high costs of CRFs will affect their sales?	Container recycling fees are always a concern for brandowners as they are very conscious of consumer shelf prices of the products they sell.
42.	Apr 18/13	Depot Operator	What are the total CRFs a year that Encorp collects?	The total CRF collected ranges from about 52-55 million dollars. This represents 64% of the funds that Encorp receives. They system is still viable if we have 100% return rates.
43.	Apr 18/13	Depot Operator	A higher recovery rate and a higher recovery fee?	Because of the way the system is funded, the higher the recovery rate, the higher the container recycling fee will be. The only exception is aluminum, because of the value of the commodity itself. Recycling fees for glass are very high. In fact the recycling fee on a wine bottle is 12 cents a bottle, or, or almost \$1.50 per case. It is becoming a significant part of the costs.

Reference #	Comment Date	Sector	Question/Comment	Response
44.	Apr 18/13	Depot Operator	Why isn't glass processed locally? Used to be processed on the island. What about the carbon footprint?	<p>Currently there is no value-added end market locally for glass. Glass was being channelled into low-value uses like construction applications. Now it's being used to make new bottles for the California wine industry.</p> <p>70% of all costs to handle containers are within the handling fees paid to collectors, so those costs exist regardless of end fate for the container. Transportation costs would be lower if processed locally, but are small in comparison to the fees paid to depots to collect containers. We always monitor the markets for commodities that we work with and agree that ideally we will find a local value-added use for glass that will allow us to reduce both costs and greenhouse gas emissions.</p>
45.	Apr 18/13	Depot Operator	CRFs and handling fees have increased, but I don't see where the costs have increased.	<p>These are 2 different sets of economics. When recovery rates increase there is less unredeemed deposit value, so regardless of other costs if we increase recovery rates then CRFs must increase to compensate for the reduced leftover deposits. Commodity values are cyclical - the CRF is the buffer. It makes up the difference; so again, even if other costs are constant, and change in commodity values (or exchange rates) may result in a CRF change.</p>
46.	Apr 18/13	Government	Is this glass problem across North America?	<p>Yes it is and it is also a problem in Europe. Glass is collected separately because of problems and costs. Glass used for packaging has wonderful attributes to those who chose to use it and it is unlikely it will disappear as packaging material, but it does pose issues for recovery programs. It is our highest cost material to recover and has the lowest value.</p>
47.	Apr 18/13	Government	Do producers pay higher rates to theoretically influence design?	<p>Although the primary intention of EPR is to ensure that products are recycled, additionally there is the intent to motivate packaging and design changes for better recycling at the end of the products life. Often other factors are larger drivers of change. On the non-alcohol side (eg juice), we have seen a movement away from glass, though this is usually largely due to the significant savings that can accrue from lower transportation costs, not CRFs. Spirits have also seen more of a move towards plastic. Encorp charges more to producers for using glass - they pay a higher CRF.</p>

Reference #	Comment Date	Sector	Question/Comment	Response
48.	Apr 23/13	Service Provider	Is the audit done by an accounting firm?	Yes professional audit firms are contracted to perform the work and we change auditors approximately every 5 years. We have also started to audit non-financial information.
49.	Apr 23/13	Service Provider	Does Encorp audit brandowners?	Our auditors conduct a sample audit of brandowners to make sure that they are remitting fairly. Encorp also requires specified procedure audits from our brandowners which we use to monitor the accuracy of sales reporting.
50.	Apr 23/13	Service Provider	Auditing is becoming contentious and needs to be standardized across Canada.	
51.	May 1/13	General Public	Return of deposit - The Regulation states that the full deposit must be returned and so the plan should state that Encorp will only use depots that meet this requirement.	All Encorp contracted Return-It Depots must pay full deposit refund on the containers which are part of this Stewardship Plan.
52.	May 1/13	General Public	Fee setting - In addition to the points made in the above recommendations, there should be a lower fee set for local refillable glass. This will encourage the use and refilling of this type of material as well as recognizing the benefits of using glass when it is refilled and circulated in a local economy.	There are no refillable containers currently registered by brandowners in the Encorp system.
53.	May 1/13	General Public	Unredeemed deposits - These should remain in trust for if and when these containers come back. The goal should be to reduce them to zero (i.e. 100% return). They should not be used to subsidize the costs of individual container types. Should the account grow too large, some of this money should be used to promote return rates.	Encorp operates under a not-for-profit model; therefore all funds are used to increase recovery rates and, as noted above, unredeemed deposits for certain underperforming container types have been used to improve recovery rates for those containers.
54.	May 1/13	General Public	Deposits - Deposits are set in the regulation as the minimum amount. Encorp should raise these deposits for their program to match inflation in order to maintain the incentive level. This is particular important as the lowest deposit is 5 cents, at a time when Canada is phasing out pennies, this shows how the deposits have not kept pace with the cost of living. Encorp should keep raising the deposit rates on the various containers until they reach the targets. Encorp should not be lobbying the provincial government to keep them low. Research shows that financial incentives need to be maintained in order for them to remain effective. By keeping the rates static, their usefulness is slowly eroded.	<p>There are many stakeholders who have differing opinions with regard to deposit levels; Depots, Brand Owners, Consumers among others. All cite varying unsubstantiated evidence on both sides of the argument. A change in the regulation, which would be a decision by the government, is needed to result in a change in deposit levels. The MoE has recently conducted a consultation in regards to this matter and concluded no change in deposit levels is necessary at this time.</p> <p>Deposit levels are only one factor in recovery rates. The Encorp system has containers with a 20 cent deposit which have lower recovery rates than some with only a 5 cent deposit. Also note that despite higher deposit levels in Alberta the recovery rate is comparable to BC's.</p>

Reference #	Comment Date	Sector	Question/Comment	Response
55.	May 24/13	General Public	Is there a plan to use fees to drive materials up the PP hierarchy eg. refillable containers over plastic?	No brandowners who have registered products with Encorp use refillable containers. Each category or material stream pays its full recovery costs. There is no cross subsidization. Some CRFs costs are much higher than others. Consumers can see each of the different CRFs by product type on the shelf price and they can make knowledgeable decisions and chose to purchase products based on this if they want to. Encorp does not make packaging choices for brandowners or consumers.
56.	May 24/13	General Public	Encorp's mandate is to the follow the PP hierarchy; why not use the unredeemed deposits to further this?	Unredeemed deposits are included in the formula used to establish consumer awareness programs tactics and initiative. The unredeemed deposits are not used for subsidizing other container types.
<b>Section 6. Management of Environmental Impacts</b>				
Reference #	Comment Date	Sector	Question/Comment	Response
57.	Apr 16/13	Service Provider	Sleemans has shown that reusing glass is feasible for beverage containers at the mass market level - Encorp should encourage reuse containers instead of downcycling. glass containers are the easiest to reuse	75% of domestic beer sales in BC are in aluminum cans. The choice of container type is made by the brandowner.
58.	Apr 18/13	Government	Going back to the PPH, there's nothing there on energy recovery or disposal?	We are the only stewardship program where the regulation does not allow energy recovery through incineration. There are residuals that remain for a few container types. On the polycoat containers, for example, those residuals are recorded in our annual report but are not incinerated.
59.	Apr 18/13	Government	What's the status of the laminate pouches?	We are still looking for a good recycling solution for them. We're continually looking at ways to bring them into the system. We hold on to all of the ones we collect. They are a small fraction when measured in units/weight (3-4/tonnes/year). The problem is that with a small quantity it is hard to find an end-market – no one has an incentive to set up facilities unless there is a large volume.

Reference #	Comment Date	Sector	Question/Comment	Response
60.	Apr 18/13	Government	With the program for packaging, is this type of packaging [laminated pouches] prominent in other products to increase viability in market?	There are other products that use this or a similar type of packaging, for example chip bags. However, under the packaging and printed paper program incineration is allowed, for Encorp it is not. Therefore we can't combine these streams because then we'd be outside the Regulation.
61.	Apr 18/13		So Encorp is just stockpiling these [laminated pouches]?	Yes, now testing for solutions.
62.	Apr 18/13		Do the manufacturers know that there is no way to recycle laminated pouches?	Yes, we inform the manufacturers that we don't have a way to recycle them.
63.	Apr 18/13	Government	Are manufacturers paying for the storage of stockpiled laminated pouches?	Yes, that's considered in the CRF.
64.	May 1/13	General Public	Management of collected materials - The Regulation states "8 (1) A producer must ensure that its redeemed containers are refilled or recycled. (2) A person must not dispose of redeemed containers in a landfill or incinerator." The program should work to phase out low-or non-recyclable materials like polycoat, tetrapaks and "other" through working with producers and fee –setting, similar to what Multi Material BC has committed. The present plan is weak on the impact of the other layers in a polycoat container and silent on what happens to the "other" type of containers or the contamination of recycling systems generated by some of this material. The plan needs to be far more transparent on this issue.	Currently Encorp processes recover and recycle about 75% of the material in poly coated containers; this is not a "low- or non-recyclable" container. Residual materials are of insufficient volume to incentivise further processing based on current technologies.
65.	May 1/13	General Public	Pollution prevention - The plan should address the additions to the container (tabs, straws, other packaging) and what will be done to encourage reduction, redesign and recycling of these parts. Research should be conducted to see if program fees could be reduced where recycled content is used and if this is a positive step for the environment or results in a lower grade material being used. The program could also work with producers to limit the unused portions of the product (such as by designing containers where all the liquid can come out or by ensuring the availability of more reasonably sized single portion containers.	Tabs on aluminum cans are required by regulation to be non-removable. Encorp continues to advise collectors not to remove them. Program fees are reviewed annually and include a calculation of the value of the container material. Consumers are encouraged to fully empty containers prior to presenting them for refund.

Reference #	Comment Date	Sector	Question/Comment	Response
66.	May 1/13	General Public	Refillables - The Regulation states that "7 (1) A seller must offer for sale or sell a beverage only in a container that can be refilled or recycled". As the program is also required to do everything at one level of the pollution prevention hierarchy before moving down to the next, it is time for Encorp to develop a system to promote and facilitate the refilling of containers and the switch to refillable containers. In this plan, Encorp should state the actions that will be taken to achieve this and a series of incremental targets for the percentage of containers that will be refilled. One initial pilot could look at wine bottles given the number of local producers and the fact that some are looking for refillable options.	There are no refillable containers currently in the Encorp system. Encorp would provide interested brandowners with estimates for handling refillable containers if requested.
67.	May 1/13	General Public	Product Lifecycle Management - While there are no hazardous materials, there is still an environmental impact downstream of the collected commodities and the program should work to reduce this.	The program tracks materials until they re-enter the market as commodities for use in new products.
68.			Greenhouse Gas Emissions - The program should be commended for starting to measure this. It may be helpful to include an explanation for the change in GHG avoided since 2008 in the plan.	
69.	Jul 2/13	Government	Management in Accordance with the Pollution Prevention Hierarchy (Page 15): Consider providing incentives (e.g., reduced fees) for producers to begin using refillable containers. For example, Multi-Material BC has adopted a plan to charge greater fees to producers who do not use recyclable packaging.	As noted above, Encorp would provide estimates to handle refillable containers when requested but the additional sorting, packaging; shipping and handling required by refillable containers would not result in lower fees for this container type. In fact they would be higher.

**Section 7: System Challenges**

Reference #	Comment Date	Sector	Question/Comment	Response
70.	Apr 18/13	Service Provider	What's the physical capacity for other programs to be included at depots?	The Return-It Depots are the only-province wide network that other programs could piggy backed on. Encorp is also the only stewardship agency in a position to coordinate depot shipments for efficiency. Currently there are no rules on space allowances, but there are minimum operating standards that depots must meet regarding beverage containers, and some of these naturally require a certain space. Encorp's primary or core business is the beverage container system and to meet cost and operating efficiency goals we require smooth functioning inside depots. The locations need to provide a level of capacity to keep the entire system going. Working with SABC we have identified approximately 75 depots that facilitate multi-programs (at least 3 programs products). There are a number of depots who would be able to add stewarded products to their collection mix. We are also working to find ways to reduce the amount of space needed for certain products. Increasing the pick-up frequency of beverage containers is not an economically or environmentally sound solution. We're analysing and testing innovative ideas to increase efficiencies.
71.	Apr 23/13	Service Provider	Is there any opportunity to have the mandatory return-to-retail rescinded?	The Ministry of Environment has reviewed this recently and decided not to make any changes at this time.
72.	Apr 23/13	Other	50% of depots collect for other stewardship programs - how is this calculated?	All Depots collect at least one other stewardship product. We have identified 75 depots, or almost half of all depots, that accept at least 3 different programs.
73.	Jun 1/13	General Public	how about re-cycle EVERY PIECE OF PLASTI that is sold ie... laundry- olive oil- vinegar- cooking oils etc	The Stewardship Plan addresses the Beverage Container Schedule of the Recycling Regulation. Other packaging falls under the Multi-Material BC stewardship plan.
74.	Jun 21/13	NGO	The Nechako Waste Reduction Initiative commends Encorp's objective to cooperate and participate with other stewardship programs in order to provide one drop convenience for consumers. We believe that this is particularly valuable in smaller centres where, without collaboration, other stewardship programs may not be able to exist at all. We appreciate Encorp's stated concerns for the physical capacity of depots and believe that the performance objective related to supporting upgrades in smaller centres is well-suited to address this concern. In smaller centres, we believe that effective collaboration together with knowledge sharing and modest support for upgrades will greatly improve the consumer experience and improve recovery rates.	

Reference #	Comment Date	Sector	Question/Comment	Response
75.			The Nechako Waste Reduction Initiative supports Encorp's commitment to exploring local markets and processors for collected materials.	
76.	Jul 2/13	Government	System Challenges (Page 17): Lack of physical space available to depots is identified as a concern in the Plan. Recommend enhancing/accelerating the "testing and rollout of in-depot compaction equipment" (page 17) in all depots to maximize the use of physical space.	Compaction is one of many initiatives we are currently studying to determine the most effective methods to reduce space requirements while ensuring the accuracy and auditability of container counts.
77.	Jul 2/13	Government	Mandatory Return-To-Retail (Page 18): Not clear about the relevance of this discussion related to "voluntary return-to-retail" since the Recycling Regulation states in Schedule 1, Part 6, that "a retailer whose premises are not identified in an approved plan, must accept containers for return and pay to the person returning the containers a cash refund". Please provide further discussion of the relevance of this topic.	After a complete review of the public consultation we made changes to this section of our plan including the removal of the comments regarding mandatory return to retail.
<b>Appendix 1. Public Consultation</b>				
78.	Apr 18/13	Government	Will people get responses back from the consultation feedback form if they input their e-mail?	All comments listed in the summary document have been copied verbatim to accurately represent the breath and variety of input and feedback from stakeholders. Some spelling errors and typos have been corrected for clarity. Comments and questions related to products or programs that are not part of the Encorp Stewardship program or are more broadly public policy issues have been included in the summary however we may not have responded to them because they are not part of our stewardship responsibilities or plan.
79.	Apr 18/13	Depot Operator	Deposit system is the financial incentive that gets them out of landfill, gets higher rate of recovery. Some containers here in BC, to increase the recovery rate it would be easy by increasing deposit rates. Rates have been stagnant vs. inflation. CRFs are high, but could make higher deposit rate for higher recovery rate, or higher revenues from unredeemed.	The regulation is Provincial and the provincial government sets deposit rates. The Ministry of Environment did conduct a review of the regulation last year and from this decided to leave the rates as currently set. Also reference the response to feedback # 54.
80.	Apr 18/13	Government	In the Nov 2011 consultation with the MoE, was it decided to make any changes to the prescriptive parts of the regulation?	No changes were made at that time.

Reference #	Comment Date	Sector	Question/Comment	Response
81.	Apr 18/13	Depot Operator	What will we do differently to hit this higher rate of recovery?	Encorp has determined that there are three ways: 1) Looking at new ways for consumers to easily drop off containers - people currently throw out containers because there is a perceived lack of convenience. Encorp is piloting express return systems where people can drop a bag and go. 2) Areas without a lot of coverage, eg City of Vancouver, Operators are having trouble finding sites for locations - Encorp is looking at mini locations where the required operating space needed is smaller. We are also investing in enhanced public spaces recycling options. 3) Growing areas where populations are increasing, multi-family dwellings are growing, locating permanent sites in these areas is key. These initiatives will result in a higher recovery rate. The cost to collect the increased volume will, however, be much higher than that for the first 80%. CRF's may need to increase because of this.
82.	Apr 18/13	Depot Operator	Prices will be high in Vancouver [to add depots], almost need a truck on standby to deal with this.	Innovative solutions are being tested, including smaller footprint, and therefore lower rent, drop-and-go format mini depots. Cost is one barrier in Metro Vancouver, but simply being able to site a depot is a bigger hurdle.
83.	Apr 18/13	Government	The curiosity is return-to-retail in Vancouver.	Only 7% of the total containers collected in British Columbia are collected by retailers. This is a very small percentage and they are mainly within the City of Vancouver where there is no other available access. Not only is the total number of containers collected by retailers small the number in each transaction is small as well. Small amounts are purchased more often for convenience of lifestyle in high density areas.
84.	Apr 18/13	Government	Couldn't residents of the City of Vancouver just put their cans/bottles in the blue box?	Vancouver is primarily made up of multi-family dwellings and residents can choose to forgo the deposit refund and put them into the facility recycling bins or blue box, they can also take them to a recycling location, or a depot. People typically want to do the right thing but it's often inconvenient to do so.
85.	Apr 18/13	Depot Operator	If deposits were raised, wouldn't you see higher rates of return in the City of Vancouver?	Reference feedback #45 & #79

Reference #	Comment Date	Sector	Question/Comment	Response
86.	Apr 18/13	Depot Operator	If there was one deposit level and it was high, people are going to take [containers] back. That way people who aren't recycling who pay for the program, rather than with high CRFs.	If a higher deposit level increased the recovery rate, the unredeemed deposit would unfortunately decrease in tandem. It is therefore not certain that CRFs would be lower.
87.	Apr 18/13	Depot Operator	Trying to target groups in high rises [to increase return rates]- what about electronics, etc.?	Encorp continuously searches to establish additional locations in the City of Vancouver and test innovative ideas to increase recovery rates.
88.	Apr 18/13	Depot Operator	Discounting of beer is not the main priority. The main priority is to increase recovery rates.	Our primary commitment under our stewardship plan is increasing the recovery rate. However we often get complaints that “depots are not giving back the right amount” and this impacts the reputation of the system as a whole. Further, our data shows that recovery numbers for Encorp-stewarded containers have increased at a faster rate at depots that do not discount return of beer container deposits compared to depots that do discount. This suggests that discounting and recovery rates are in fact linked.
89.	Apr 18/13	Depot Operator	1 tier deposit system would improve credibility with consumers. That's where we hear the complaints from consumers that they're being ripped off.	A one tier deposit level would be easier to administer and could create efficiencies throughout the system. For example, sorting would be much easier and could lead to reductions in the overall handling costs in the system.
90.	May 24/13	General Public	How is attendance at the various sessions?	Participation, input and attendance was low. The attendance and feedback to our plan confirms that we have developed a good plan which people are generally satisfied with.