



Reference: 413092

February 10, 2025

Krista Scaldwell, President  
Canadian Beverage Association  
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Dear Krista Scaldwell:

Thank you for submitting proposed amendments to the Canadian Beverage Association's Extended Producer Responsibility (EPR) Plan (the "plan") for Refrigeration Units initially on May 1, 2023, in fulfillment of the requirements of Part 2, Section 6 of the [Recycling Regulation](#) (the "regulation") made under the [Environmental Management Act](#). Further, the most recent revision of the plan was submitted on January 31, 2025.

I acknowledge the efforts of the Canadian Beverage Association and the ongoing dialogue between the Canadian Beverage Association and EPR section staff to develop revisions and improvements to the plan to better meet the requirements of the regulation.

Under the regulation, the director, otherwise known as the Statutory Decision Maker (SDM), has the ability to approve an EPR plan on their own initiative, and to approve amendments to an approved plan that have been proposed by a producer. Prior to the issuance of this decision letter, the Canadian Beverage Association was provided with feedback on the proposed plan amendment and has had the opportunity to propose further amendments or provide additional information for consideration.

I have completed my review of the submitted plan, and the Canadian Beverage Association's revisions of the plan in response to the proposed amendments as outlined in my preliminary decision letter of November 28, 2024. Pursuant to section 5(5) of the regulation, I hereby approve the amendments to the plan proposed by the Canadian Beverage Association in the revision of January 31, 2025.

The amended plan addresses the various regulatory requirements. I want to acknowledge the Canadian Beverage Association's commitments to better manage and report on refrigeration

units sold to third parties and those units lost in trade, ensuring all costs are covered by member producers, and reporting on the end fate of refrigeration units and their material components. Along with improved collection rate targets for the overall total, as well as for each type of refrigeration unit, the Canadian Beverage Association is demonstrating a commitment to strong program performance and a commitment to continuous improvement.

### **Ministry Expectations:**

The ministry expects continuous improvement across all future plans and amendments submitted by the Canadian Beverage Association. This includes the following areas of concern, for the Canadian Beverage Association's consideration:

#### **A. Consultation**

For future consultations on the Canadian Beverage Association's EPR plan, it is expected the Canadian Beverage Association consider advertising more widely to reach a broader audience. While the plan states that the public was notified, it is unclear who exactly was notified. This program would impact commercial locations (as this is where the units are placed), the Canadian Beverage Association members (they own the units and collect them for end-of-life or refurbishment), local governments (units could end up at local government collection facilities), and third parties (as units are sold to them). Therefore, it would be beneficial to have extensive efforts towards informing these groups, or any groups most impacted by the program, of the Canadian Beverage Association's EPR program and impacts.

In addition, for future plan consultations, the Canadian Beverage Association should consider holding webinars during the consultation period. It is noted that the Canadian Beverage Association reached out to interested parties through four methods: LinkedIn, Twitter, a newsletter and Association outreach, and interested parties could provide written feedback via direct email or through a link on the Canadian Beverage Association's website. However, having webinars would allow interested parties more opportunities to provide feedback. Please review the ministry's [Recycling Regulation Guidance document](#) for guidance on how to conduct a satisfactory consultation process.

#### **B. End-Fate of Material Components**

To demonstrate continuous improvement, for the next plan submission, the Canadian Beverage Association should improve the tracking and reporting on material recovery of the non-metal components such as the plastics, electronics/circuit boards, lightbulbs, oil, refrigerant, etc. (e.g., how much of what is going where). I understand that member companies have certified recyclers who remove non-metal components, and therefore members are unable to report on the end fate of each material component at this time. However, tracking and reporting on material recovery will increase transparency and accountability that these materials are going to the highest end uses on the pollution prevention hierarchy.

## **Reporting Expectations**

The ministry expects this approval letter to be forwarded to the Canadian Beverage Association's board of directors as well as its member producers, since each producer is responsible for ensuring its agent fulfills the plan, and compliance proceedings may be taken against a producer if the agent fails to implement the plan.

Please be advised, under Part 2, Section 8(2)(h) of the regulation, the director can specify any other information required in the annual report. To ensure the continuity of all performance measures, performance requirements, and targets in the plan, reporting on each of these metrics will be maintained until they are superseded by an approved plan renewal.

## **Next Plan Review Due Date**

Section 6 of the regulation requires a plan review every five years. As per this requirement, the Canadian Beverage Association must review its approved plan, conduct consultation with interested parties, and submit proposed amendments to the director, or notify the director in writing that no amendments to the plan are necessary, by **December 27, 2027**. Guidance on this process can be found on the Extended Producer Responsibility webpage at: [Extended Producer Responsibility - Province of British Columbia \(gov.bc.ca\)](https://www.gov.bc.ca/epwr/).

## **Right to appeal**

If you disagree with this decision, Division 2 of Part 8 of the *Environmental Management Act* provides for appeal of my decision to the Environmental Appeal Board (EAB). In accordance with the *Act* and with the Environmental Appeal Board Procedures regulation, the EAB must receive notice of the appeal no later than 30 days after the date you receive this decision. For further information, please contact the Environmental Appeal Board at (250) 387-3464.

Thank you for your efforts on this plan, and I appreciate the Canadian Beverage Association's continued commitment to achieving compliance in this regard. If you have any questions regarding the implementation of the plan, please contact me at [andreas.wins-purdy@gov.bc.ca](mailto:andreas.wins-purdy@gov.bc.ca) or through the Extended Producer Responsibility inbox at [ExtendedProducerResponsibility@gov.bc.ca](mailto:ExtendedProducerResponsibility@gov.bc.ca).

Sincerely,



Andreas Wins-Purdy, P.Ag.  
Director, Extended Producer Responsibility, Program Delivery  
Authorizations and Remediation Branch  
Environmental Protection Division

cc: Extended Producer Responsibility: [ExtendedProducerResponsibility@gov.bc.ca](mailto:ExtendedProducerResponsibility@gov.bc.ca)  
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Enclosure:

Canadian Beverage Association EPR Plan, submitted January 31, 2025.



## **An Extended Producer Responsibility Plan for Refrigeration Units**

**Submitted: May 1, 2023**  
**Revised: October 4, 2024**  
**Revised: January 27, 2025**  
**Revised: January 31, 2025**

**Canadian Beverage Association**

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Updated Plan Webpage: <https://www.canadianbeverage.ca/industry-initiatives/stewardship/>

Original Stewardship Plan Approval: December 27, 2012.

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## Glossary of Terms and Abbreviations

BC	British Columbia
CBA	Canadian Beverage Association
EOL	End-of-Life
EPR	Extended Producer Responsibility
GHG	Greenhouse Gases
GWP	Global Warming Potential
HFC	Hydrofluorocarbons
ODS	Ozone Depleting Substances

## Introduction

The British Columbia (BC) Recycling Regulation,<sup>1</sup> under the Environmental Management Act, sets out the requirements for extended producer responsibility (EPR) plans. The requirements for the submission of an EPR Plan are outlined in Section 4 of the Recycling Regulation, which states:

*A producer must submit an extended producer responsibility plan, at the time specified in the applicable Schedule, if any, and in a manner and format satisfactory to a director, for the products within the product category of the product the producer uses in a commercial enterprise, sells, offers for sale or distributes in British Columbia.*

## Duty of the Producer

Under Schedule 3, Electronic and Electrical Product Category, beverage brand-owners are financially and environmentally responsible for the recovery of refrigeration units that exhibit their branding or are owned outright by beverage companies. The following Plan addresses the key elements required by the BC Ministry of Environment and Parks to form an EPR Plan:

- Product Management Goals
- Product Life Cycle Management
- Proposed Management System
- Program Performance Measurement (financial/cost management, environmental management)

This updated EPR Plan is available on the website of the Canadian Beverage Association (CBA).<sup>2</sup> If approved, it will replace the CBA's previous Refrigeration Units Stewardship Plan, which was approved on December 27, 2012.

The duty of the producer is outlined in Section 2(1) of the Recycling Regulation under the Environmental Management Act:

*2(1) Except as otherwise specifically provided in this regulation, a producer must*

*(a) have an approved plan under Part 2 [Extended Producer Responsibility Plans] and comply with the approved plan, or*

*(b) comply with Part 3 [Extended Producer Responsibility Program Requirements if No Extended Producer Responsibility Plan]*

*with respect to a product in order to use in a commercial enterprise, sell, offer for sale or distribute the product in British Columbia.*

## Products Covered by the Plan

This EPR Plan covers refrigeration units as listed under **2(1)(c)**, "electronic or electrical appliances," outlined in **Schedule 3** of the **Electronic and Electrical Product** category of the BC Recycling Regulation under the Environmental Management Act.<sup>3</sup>

Under this EPR Plan, refrigeration units include coolers, vending machines and beverage dispensing systems that exhibit the branding of or are owned by a participating CBA-member beverage company. CBA members place these units at commercial locations (such as gas stations, convenience stores, restaurants, offices, factories,

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<sup>1</sup> [http://www.bclaws.ca/civix/document/id/lc/statreg/449\\_2004](http://www.bclaws.ca/civix/document/id/lc/statreg/449_2004)

<sup>2</sup> <https://www.canadianbeverage.ca/industry-initiatives/stewardship/>

<sup>3</sup> [https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/449\\_2004#Schedule3](https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/449_2004#Schedule3)

department stores, shopping centres) and are individually responsible for their maintenance, refurbishment and end-of-life (EOL) management. The products covered under this EPR Plan include the following CBA member-owned and branded refrigeration units:

<b>Product Type</b>	<b>Further Description</b>
<b>Beverage Coolers</b>	Countertop 1 door units 2 door units 3 door units
<b>Beverage Vending Machines</b>	72" and 79" high machines that distribute cans and/or PET bottles
<b>Beverage Dispensing Systems</b>	Bar guns Counter units Drop-in units Combo units

The average lifespan of refrigeration units tends to be extensive. Although maintenance and servicing are required to ensure their longevity, developments in technology have increased the lifespan of these units further. The table below shows the average lifespan of the different types of refrigeration equipment.

<b>Product Type</b>	<b>Average Product Lifespan</b>
<b>Beverage Coolers – Small (countertop)</b>	3-6 years
<b>Beverage Coolers – Larger</b>	13 -15 years
<b>Beverage Vending Machines</b>	9 - 12 years
<b>Beverage Dispensing Systems</b>	7 – 9 years

Currently there are no other agencies, apart from the CBA, appointed to act in a product stewardship capacity for beverage refrigeration units for commercial use in BC. As such, there are no other product stewardship/EPR agencies or plans covering the same products.

## **Public Consultation on the Plan**

Between March 6 and April 20, 2023, the CBA undertook a consultation process on the details of this plan. CBA posted the plan on its website and alerted the public through major social media channels (Linkedin, Twitter [now X]), our association newsletter and direct outreach to Coast Waste Management Association and Recycling Council of BC. An overview of the consultation is provided in Appendix IV.

Interested parties can provide ongoing input into the plan through CBA’s Stewardship website at: <https://www.canadianbeverage.ca/industry-initiatives/stewardship/>

## Program Costs

No consumer fees are charged as the refrigeration units are not consumer facing and are managed through a closed-collection system. The plan is entirely funded by the CBA-member producers participating in this plan and processor costs are determined via contracts negotiated by each individual member and their providers on an annual basis. This includes units sold to third parties. When third party individuals contact CBA to pick up a unit, the member who owns that unit will arrange and pay for pick up, ODS and HFC removal and EOL management. Costs of recycling are offset by the values of resalable scrap materials.

As per Section 5(1)(c)(i) of the BC Recycling Regulation and the BC Ministry of Environment and Parks Guidance document “Producers Paying the Cost of Managing Obligated Materials and Dispute Resolution”, each CBA-member producer participating in the plan will collect and pay the costs of collecting and managing products within each product category covered by the EPR plan. This is regardless of whether the products are currently or previously used in a commercial enterprise, sold or offered for sale in British Columbia.

## Stewardship Agency: Canadian Beverage Association (CBA)

The Canadian Beverage Association (CBA) is the national industry association representing the broad spectrum of brands and companies that manufacture and distribute the majority of non-alcoholic beverages consumed in Canada. It acts on behalf of producers of beverage refrigeration units, which are obligated under the BC Recycling Regulation.

In registering with the CBA, each producer must sign a Participant Agreement that formalizes the role of the CBA as its agent to carry out the duties of the producer as set out in Section 2(2) of the Recycling Regulation. Copies of Participant Agreements are available upon request by the director. This EPR Plan confirms the duties that the CBA will perform on behalf of each registered producer.

A current list of producers that the CBA represents is available on the association’s website at <http://www.canadianbeverage.ca/about-us/>. The three members participating in the EPR Plan, include:

- Coca-Cola Canada Bottling Limited
- PepsiCo Beverages Canada
- Red Bull Canada

As the CBA currently administers the only approved EPR plan for commercial beverage refrigeration units in BC, it is expected that member producers manage all member-owned or branded beverage refrigeration units for commercial use in the province.

## Public Education Materials and Strategies

The EPR Plan only includes commercial products managed and processed internally by CBA members and distributors. To ensure public awareness of the CBA’s efforts to properly manage refrigeration units, the CBA will continue to post its EPR Plan and annual reports on its website. The link to the website is the following:

<http://www.canadianbeverage.ca/environment/stewardship/>

CBA will introduce an updated notification sticker for members to place on all refrigeration units that are sold to a third party. The sticker will direct third party purchasers to contact the CBA for instructions on where the unit can be properly disposed of at its EOL.

Below is an image of the updated sticker to be placed on units covered by this program moving forward:



Contact information is provided on the sticker and the QR code conveniently opens an email to the CBA, so individuals can get in touch with us.

The CBA is a not-for-profit organization incorporated under the Canada Not-for-profit Corporations Act. Full details of the CBA's incorporation are accessible at the following federal government website:  
<https://www.ic.gc.ca/app/scr/cc/CorporationsCanada/fdr/CrpDtls.html?corpId=737119>.

The association's current board of directors is listed in Appendix I.

The CBA maintains transparency with its members and stakeholders by posting annual reports and materials on its website. Annual reports can be accessed at the following link:  
[www.canadianbeverage.ca/environment/stewardship/](http://www.canadianbeverage.ca/environment/stewardship/)

## Annual Report

The CBA will compile an annual report to be submitted to the Ministry of Environment and Parks that includes the following:

1. Program Highlights
2. Supply Data
3. Performance Data
  - a. Recovery
  - b. Post-Collection Management
4. Continuous Improvement

In its annual report to the BC Ministry of Environment and Parks, the CBA will note any changes to its operational structure or Board of Directors since the previous annual report.

## Dispute Resolution

The program will enter into agreement with suppliers or service providers as required. If disputes arise involving the CBA regarding the implementation of this extended producer responsibility plan, the CBA will first discuss the issue directly with the involved party. If necessary, standard commercial legal procedures may be pursued, possibly including mediation, arbitration and civil proceedings. A dispute should be made through the CBA Stewardship website at: <https://www.canadianbeverage.ca/industry-initiatives/stewardship/>

This dispute resolution procedure was made with regard to the BC Ministry of Environment and Parks Guidance document “Producers Paying the Cost of Managing Obligated Materials and Dispute Resolution” and CBA commits to a staged approach to all dispute resolutions.

## Product Life Cycle Management

### Baseline data

The CBA’s Refrigeration Units EPR Plan has been supported by a 2013 Baseline Study prepared by Reclay StewardEdge (RSE), which established the recycling rates for each type of refrigeration unit. The baseline recycling rate analysis found the average recycling rate for all refrigeration units is 83%. In this study, recycling rate was defined as the amount in tonnes of units recycled divided by the amount in tonnes of units sent for EOL managements.

The CBA engaged RSE to conduct a review of the baseline study. After the completion of further research and work to reassess the baseline study to ensure its accuracy, the CBA has determined the original recycling assumptions from the 2013 Baseline Study for CBA-member refrigeration units remains valid and accurate. These retail refrigeration units are only collected through the CBA EPR program, so any information regarding their recyclability rates can be obtained through our annual report.

Every 5 years, as part of this EPR Plan, the CBA will seek existing audited data from processing facilities with the aim of collating this information to recalculate recycling rates. This information would be used to reaffirm the recycling rates listed in the baseline study or to make any adjustments, if required.

### Current Collection System

CBA members continue to operate a closed-collection network and any maintenance, refurbishments or end of life management are undertaken by the beverage company or its local distributor. Therefore, when a unit requires retrofitting or refurbishment, it is collected and transported by the member or distributor to their facility for further triage and maintenance. Units are collected for refurbishment or EOL management at collection locations in the Metro Vancouver Regional District. These collection locations include a company distribution centre and third-party processors. Any metal parts that need to be replaced during maintenance or refurbishment are sent to a metal scrapyards.

When it has been determined that refrigeration equipment can no longer be used by the CBA member, the equipment is removed from the company’s list of assets and is sent to be recycled by a contracted third party in BC (referred to as a processor).

As per 8(2)(e.1) of the Recycling Regulations, the CBA commits to report the total amount of members refrigeration units collected in each regional district. CBA will also annually report the names and locations of the collection and processing facilities used.

## End-of-Life Management

Beverage coolers, vending machines and dispensing system units are owned by beverage companies and placed in commercial facilities for use. Generally, if a unit breaks down in use, it will either be repaired on-site or transported to a member's off-site facility for repair. When the equipment is removed, it is replaced with either a used machine or a new machine. If it is determined that a refrigeration unit is no longer serviceable, it is prepared for EOL management.

Before refrigeration units are recycled, the refrigerant is removed from the compressor by a licensed technician for reclamation or destruction in accordance with provincial regulations. All member companies or contracted technicians that service beverage refrigeration equipment must comply with the Ozone Depleting Substances and Other Halocarbons Regulation under the Waste Management Act (BC Reg. 387/99, as amended), including all requirements for the use of "approved persons" and devices in the removal of the refrigerant, the use of approved containers to store and transport the refrigerant for the purposes of disposal and recycling, and record-keeping. Additionally, the oil and fluorescent lightbulbs, as well as any other useful parts, are removed to be reused or recycled. Most members have external companies perform this removal and manage the recycling. If a member has a repair location, they will reuse parts but, in some cases, this repair location is outside of BC. Once refrigeration units are ready for EOL management, including the required labelling and record keeping as per BC Reg. 387/99, as amended, they are shipped to intermediary scrap metal processors.

Refrigeration equipment from CBA members is a very small percentage of the overall metal managed by intermediary processors. As a result, beverage refrigeration equipment is mixed with other scrap metal, including major appliances (such as washers, dryers and freezers), car bodies and other light mixed metals (e.g., bicycle frames, barbecues, metal sheets and siding, metal doors and shelving) from various residential and commercial sources.

The intermediary processors based within BC then sell the baled metal to downstream scrap metal processors where it is shredded to recover the various ferrous and non-ferrous metals. These scrap metal processors use large electric-powered hammer mill shredders that pulverize bales of mixed metals, which are composed of automobile bodies, appliances and other light mixed scrap metal. Once the scrap metal is pulverized into small pieces, they are then sorted by different "downstream" metal separation processes including magnets, trommels, screens, optical scanners, eddy currents and other types of proprietary process equipment. Shredder output, which is known as "aggregate" in the industry, is an intermediate process material that contains significant amounts of valuable ferrous and nonferrous metal that is separated and sold as commodities. On average, ferrous and non-ferrous metals recovered through these operations account for approximately 75% of the inbound material.

The remaining estimated 25% of the material from the shredded equipment cannot be recovered and is commonly referred to as shredder fluff. Shredder fluff is a mixture of largely non-metallic materials resulting from the shredding of auto bodies, appliances, and other scrap metal materials. It consists primarily of foam, fabric, plastics, rubber, tires, glass, wood, and debris materials. This shredder fluff also consists of approximately 1% of non-recoverable ferrous and non-ferrous metals, such as strips of copper or aluminum that are wrapped around parts of the equipment, or metals imbedded in the insulation or plastic materials. This material cannot be recovered and is therefore sent for disposal.

Again, in our research, we found the recycling rate for refrigeration equipment is higher than the industry average. The baseline study prepared by RSE for the CBA shows that, on average, the recycling rate for all beverage refrigeration units is 83%.

## Program Performance Measurement

The CBA will monitor and report on how refrigeration units are managed at their EOL by obligated CBA members.

### Performance measure: Collection Rate

The Recycling Regulation defines the recovery rate as the “amount of product collected divided by the amount of product produced, expressed as a percentage.” However, given that refrigeration units are a commercial product with a longer useful life than many other products under the Electronic and Electrical Product Category, a more appropriate performance measure is the “collection rate.” Each CBA member has its own internal processes to manage the collection of refrigeration units, which corresponds to the pollution hierarchy to reduce, reuse, recycle and recover. The goal is to extend the useful life of refrigeration units for as long as possible before they must be sent for EOL management.

Due to the closed-loop, commercial nature of the beverage sector’s operations, refrigeration units are tracked by CBA members throughout their lifecycle until they are sent for EOL management to contracted recyclers.

A small number of refrigeration units are sold to customers for continued use and exit the plan’s tracking system while a certain number are transferred out of BC for continued use in a different province, where they would be recycled at the EOL. It is only when units are lost-in-trade (that is, either stolen or misplaced by a customer) that they would not be collected for EOL management. Therefore, the plan’s collection rate is calculated in the following way:

**Units Collected** (Units sold to third parties, units collected for refurbishment, units sent for EOL management and units transferred to other provinces)

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**Units Removed from Tracking System:** (Numerator plus # of units lost in trade and other adjustments with a net removed from trade position)

When a unit is collected for refurbishment, it is removed from retail and replaced with another unit from storage that is either new or refurbished. Units collected for refurbishment are included as “removed from the tracking system” as they are put in storage after refurbishment and will then re-enter the tracking system when they are installed in place of another unit. The same unit is not reinstalled at its previous location after it is refurbished.

Units sent for EOL management only include those sent for recycling by the members participating in this plan.

### Performance Targets

The BC Recycling Regulation requires EPR Plans to achieve a recovery rate of 75% whereas the CBA’s EPR plan has had a collection target of 80%.

As part of this EPR Plan, the CBA has set for itself a revised collection target of 85% to be achieved in Year 1 of this Plan with increases in years 2-5, with a target of 89% by year 5. CBA has also set targets by unit type. These targets are found in the table below:

	Year 1	Year 2	Year 3	Year 4	Year 5
<b>Average</b>	85%	87%	88%	88.5%	89%
<b>Beverage Coolers</b>	80	82	83	83.5	84
<b>Beverage Vending Machines</b>	90	92	93	93.5	94
<b>Beverage Dispensing Systems</b>	85	87	88	88.5	89

Due to the closed-loop nature of this program, we have a relatively high collection rate, and most units not collected are those lost in trade. We have made improvements that will hopefully help us improve our collection rate each year. The sticker we place on units will have a QR code for convenience and we will be sending out an annual letter to Waste Management Association of BC, MARR, retailers and convenience store operators. It is the intention of members that this will help reduce stolen units and also increase awareness in those who might receive our machines by mistake. The effectiveness of these measures will be evaluated and modified if deemed insufficient.

### **Program Administration**

Members will report to the CBA annually on the following:

- Number of Units: Number of vending and refrigeration units installed, added and removed from the Province of BC in the reporting period.
- Documented Policies and Procedures: List of company policies/procedures pertaining to the EOL management of vending and refrigeration units (including asset tracking protocols).
- Continuous Improvement Efforts: including, but not limited to, improvements in the EOL management of obligated material.

### **Program reporting**

Members will report to the CBA annually on the following:

- Number of units retrofitted/refurbished in the reporting period.
- Number of units that have reached their EOL and were sent to a recycling facility.
- Improvements made with respect to diversion and recycling as they relate to vending and refrigeration units during the reporting period.

### **Procedure for Third Party Units**

A small percentage of units that are removed from service each year are sold to third parties within the province of BC:

- If sold to a third party, the procedure outlining proper disposal will include:
  - A notification sticker on refrigeration units to direct the third party to contact the CBA for instructions on where the unit can be properly disposed of at its EOL at the applicable CBA member location.

- In addition, a clause will be added to future invoices instructing the purchaser of the obligation to properly dispose of the unit at its EOL at the applicable CBA member location.
- If the CBA is contacted by a third party in possession of a refrigeration unit previously owned by a CBA member, the association will inform that person of the options to properly dispose of the unit at the applicable CBA member location.
- Information on the options to properly dispose of the unit, including locations where third-party generators can send CBA-member branded products for EOL management will be provided to transfer stations and landfill operators in the event that generators attempt to dispose of these units at such locations. A letter (See Appendix II) will be sent annually to MARR and Waste Management Association of BC to remind them of CBA's EPR program for these units and to contact us should they receive one of our units from a third party.
- Costs for pick up and EOL management are completely covered by the applicable CBA member, not the third party.
- The CBA and member producers commit to collect all refrigeration units sold to third parties at EOL that CBA is contacted for. Units will be collected whether they are broken or still functional and will collect the unit regardless of location within the province of British Columbia.
- The CBA will report annually on the EOL management of the units that were sold to third parties.

### **Procedure for Units Transferred out of Province**

Units are typically transferred out of province to be redeployed into trade at a new location or to be received by a member warehouse. The units are still tracked by members, and they are not sold to third parties out of province. One member has their refurbishment centre outside of BC and units must be transferred out of province for larger repairs or refurbishment. At EOL, these units are handled in accordance with the requirements of the province/territory they are in.

### **Procedure for Units Lost in Trade**

These units are a valuable asset for each of the member companies involved in this program. A small number of machines each year are "lost in-trade" where the equipment cannot be accounted for any number of reasons (eg., store closures and the store cannot be accessed anymore, equipment has been removed from the site without notice). To prevent units from being lost in trade, the following is in place:

- Signed agreements that the units are property of the brand owner.
- Annual letter to Restaurants Canada and Convenience Industry Council of Canada to remind them to contact CBA or their supplier if they have a unit that needs to be taken away
- There is an agreement that when a retailer switches beverage supplier, the new supplier will contact the previous supplier to pick up their units
- If the unit is stolen the CBA sticker will still provide them with information on what to do with the unit at EOL.

Furthermore, to understand this variable better, we will better define "lost in trade" by quantifying the number of units that are lost due to natural disasters, floods, lockouts from stores going out of business and unlawful removal of units. By understanding where these units are going CBA can better direct programs and efforts to recover units.

### **Financial and Operational Cooperation with Other Producers**

Few EPR agencies manage similar types of products in BC, but it is possible that our retail units could enter the Major Appliance Recycling Roundtable (MARR) program from third parties. For these situations, a letter (see

Appendix II) is sent to MARR on an annual basis instructing them to contact CBA if they do receive one of our units and the appropriate member will pick it up and determine whether it can be refurbished or should be sent for EOL management.

## **Product Environmental Impact Reduction, Reusability and Recyclability**

Most CBA members' refrigeration units undergo more than one retrofit or refurbishment throughout their lifecycle in order to extend their useful life in-trade. Furthermore, CBA members increasingly use units that depreciate much more slowly, delaying the need for disposal. Further efforts undertaken to reduce environmental impacts include a commitment to recycling and reusing old parts removed from units during refurbishment/repairs.

Efforts in the industry to increase the useful life of all refrigeration equipment through enhanced durability and modular systems that can be more easily replaced and repaired will reduce the number of units managed for EOL over time. Member companies are undertaking initiatives to improve the environmental and energy performance of their refrigeration units as part of their overall sustainability commitments.

## **Leadership on Halocarbon Management**

CBA members are playing a leadership role in reducing the use of hydrofluorocarbons (HFCs) in refrigeration equipment. HFCs are powerful greenhouse gases (GHGs) with a global warming potential (GWP) thousands of times greater than carbon dioxide. These chemicals were introduced for use as refrigerants and blowing agents to replace ozone-depleting substances (ODS).

As part of the CBA's efforts to address climate change, CBA member companies with commercial refrigeration units in BC are phasing out the use of HFCs in refrigeration units. These efforts include transitioning to natural refrigerants or refrigerants with a low GWP and installing HFC-free insulating foam in new refrigeration units. The CBA commits to annually reporting the number of units installed that use natural refrigerants or refrigerants with a low GWP and/or HFC-free insulating foam.

For existing machines that still contain ODSs and HFCs, the CBA commits to the removal of all HFCs and ODS gas from all units collected that contain refrigerant gases used for cooling purposes before the units are sent for recycling. The CBA members also track and manage these chemicals in accordance with BC Regulation 387/99, as amended. Member companies either have their own trained, licensed technician remove refrigerants from the compressors of beverage machines or have a licensed service provider do so for them. All member company or contracted technicians that service beverage equipment must comply with the Ozone Depleting Substances and Other Halocarbons Regulation under the Waste Management Act (BC Regulation 387/99, as amended), including all requirements for the use of "approved persons" and devices in the removal of the refrigerant, the use of approved containers to store and transport the refrigerant for the purposes of disposal and recycling, and record-keeping. After the refrigerant is safely recovered into an approved container, it is then returned to the supplier for reclamation or destruction.

Units transferred out of province are processed at EOL according to the requirements of the province they are in. This includes ODS and HFC management.

Units sold to third parties in BC can contact the CBA (as per the sticker on the unit) and CBA will ensure the ODS and HFCs are handled in accordance with this Plan. If a unit is received by MARR or a landfill operator in BC, we circulate a letter annually to ensure they are aware of our program.

## Pollution Prevention Hierarchy

The CBA plan for refrigeration units is a closed loop system and it is in the producer’s best interest to maintain the units for as long as possible. As such, the principles of the pollution prevention hierarchy are promoted wherever it is technically possible and economically feasible.

As part of pollution prevention, any new units installed since 2012 use natural refrigerants or those with a low GWP and HFC-free insulating foam. As mentioned previously, the CBA commits to reporting annually on the number of units installed using these materials.

The typical lifespan of our unit types is listed on page 5 of this document. Achieving a very long lifespan on public facing equipment can be difficult and CBA is committed to refurbishing equipment whenever possible. During the refurbishment process, the unit is removed from retail and a contractor is hired to replace broken components with either a new or reused part. For some members, refurbishments happen outside of BC in a centre servicing multiple provinces. Reporting on only those units from BC would be difficult.

If it is determined that the unit cannot be refurbished, it is sent for EOL processing. As part of this processing, refrigerant is removed as described under End-of-Life Management on page 9. Member producers pay for the cost of removing the refrigerants from the unit.

Further details on the Pollution Prevention Hierarchy can be found in Appendix III.

## Plan Performance Summary

All performance measures, reporting commitments and targets will be maintained moving forward until such a time that new performance measures, reporting commitments and targets are approved.

Summary of Program Performance Measures:

Performance Measure	Target/Reporting Commitment
<b>Operation Structure:</b>	
Changes to Operational Structure of the CBA Board of Directors	Report annually
<b>Program Performance:</b>	
The CBA will review annually reported recycling rates to determine whether recycling targets are being met or need to be re-evaluated.	Report annually
The number of units installed and added, by unit type The number of units collected, by unit type The number of units retrofitted/refurbished, by unit type The number of units sent for recycling, by unit type The number of units sold to third parties, by unit type The number of units transferred out of province, by unit type	Report annually

<p>“The total amount of members refrigeration units collected in each regional district.</p> <p>The number of units lost in trade, by unit type.</p> <p>The number of units collected from third parties and sent for EOL management</p> <p>The number of units lost in trade due to flood, natural disasters, lockout due to store closure and unlawful removals.</p>																															
<p>Collection Rate targets by beverage refrigeration unit type and overall average</p>	<p>Report annually</p> <p><b>Collection Targets:</b></p> <table border="1" data-bbox="812 625 1534 999"> <thead> <tr> <th></th> <th>Year 1</th> <th>Year 2</th> <th>Year 3</th> <th>Year 4</th> <th>Year 5</th> </tr> </thead> <tbody> <tr> <td><b>Average</b></td> <td>85%</td> <td>87%</td> <td>88%</td> <td>88.5%</td> <td>89%</td> </tr> <tr> <td><b>Beverage Coolers</b></td> <td>80%</td> <td>82</td> <td>83</td> <td>83.5</td> <td>84</td> </tr> <tr> <td><b>Beverage Vending Machines</b></td> <td>90%</td> <td>92</td> <td>93</td> <td>93.5</td> <td>94</td> </tr> <tr> <td><b>Beverage Dispensing Systems</b></td> <td>85%</td> <td>87</td> <td>88</td> <td>88.5</td> <td>89</td> </tr> </tbody> </table>		Year 1	Year 2	Year 3	Year 4	Year 5	<b>Average</b>	85%	87%	88%	88.5%	89%	<b>Beverage Coolers</b>	80%	82	83	83.5	84	<b>Beverage Vending Machines</b>	90%	92	93	93.5	94	<b>Beverage Dispensing Systems</b>	85%	87	88	88.5	89
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<b>Beverage Dispensing Systems</b>	85%	87	88	88.5	89																										
<p>Location of collection facilities and processors along with any change in the number and location of these facilities from the previous report.</p>	<p>Report annually</p>																														
<p>The CBA will seek existing audited data from processing facilities with the aim of collating this information to recalculate recycling rates. This information would be used to reaffirm the recycling rates listed in the baseline study or to make any adjustments, if required.</p>	<p>Every 5 years</p>																														
<p><b>Consumer Awareness</b></p>																															
<p>The Canadian Beverage Association commits to sending a letter to any party that may receive a Canadian Beverage Association refrigeration unit from a third party at EOL including but not limited to the Major Appliance Recycling Roundtable, Waste Management Association of BC, regional and local government transfer stations and landfills, Restaurants Canada, Convenience Industry Council of Canada.</p> <p>The Canadian Beverage Association commits to report annually the number of letters sent out and to whom the letters were sent to.</p> <p>The Canadian Beverage Association commits to evaluate the effectiveness of measures to reduce stolen units and will modify them if deemed insufficient. Any changes will be reported in annual reports.</p>	<p>Report annually</p> <p>Evaluated annually, changes reported as required</p>																														

**Pollution Prevention Hierarchy**

A description of how the refrigeration units were managed in accordance with the pollution prevention hierarchy at EOL, including:

- Number of units installed with natural refrigerants and/or HFC-free foam
- Safe Removal of ODS gas from all units collected that contain refrigerant gases used for cooling purposes.
- CBA commits to recycle and reuse old parts removed from units during refurbishment/repair.

The Canadian Beverage Association commits to report initiatives taken by member companies to improve the environmental and energy performance of their refrigeration units.

The Canadian Beverage Association commits to report on the end fate of the refrigeration units, as well as the end fate of each of the material components of a refrigeration unit (i.e., metal, glass, circuit boards, plastics, oil, lightbulbs and refrigerants).

Report annually

**Reporting Commitments**

CBA commits to publishing the annual reports for collection rate targets as stated in this EPR Plan.

The Canadian Beverage Association commits to report on any programs or efforts to recover lost units.

Report annually

## Appendix I – Canadian Beverage Association Board of Directors

CBA's current board of directors are listed below:

Sassan Jahan [Chair]  
Vice President, Marketing  
PepsiCo Beverages Canada  
5205 Satellite Drive, Mississauga ON L4W 5J7

Neil Antymis  
Director, Government Affairs  
PepsiCo Beverages Canada  
4815 78 Ave SE, Calgary AB T2C 2Y9

Claire Bara  
President  
A. Lassonde Inc.  
755 Principale Street, Rougemont, QC J0L 1M0

Jason Blake  
President  
PepsiCo Beverages Canada  
5205 Satellite Drive, Mississauga, ON L4W 5J7

Phil Cox  
General Manager of Canada  
The Coca-Cola Company  
335 King Street East, Toronto ON M5A 1L1

Keith DeGrace [Treasurer]  
Vice President/General Manager  
Red Bull Canada Ltd.  
99 Atlantic Ave Unit 200, Toronto ON M6K 3J8

Olivier Lemire  
President  
Keurig Dr Pepper Canada  
3700, Jean-Rivard, Montreal QC H1Z 4K3

Kathy Murphy  
Vice President, Public Affairs and Communications  
Coca-Cola Canada Bottling Ltd.  
335 King Street East, Toronto ON M5A 1L1

Cynthia Shanks  
Senior Director, Communications & Sustainability  
Keurig Dr Pepper Canada  
3700, Jean-Rivard, Montreal QC H1Z 4K3

Avi Yufest  
Senior Director of Public Affairs, Communications and Sustainability  
The Coca-Cola Company  
335 King Street East, Toronto ON M5A 1L1

## Appendix II – Annual Reminder letter to Waste Management Association of BC, MARR Program, Restaurants Canada, Convenience Industry Council of Canada



Canadian Beverage Association  
Association canadienne des boissons

September 2024

**RE: BC Stewardship Program for Beverage Refrigeration Units**

To whom it concerns:

The Canadian Beverage Association (CBA) is the national industry association representing more than 60 brands of non-alcoholic beverages in Canada and the companies that manufacture and distribute them. In British Columbia, the CBA also manages a stewardship program for retail refrigeration units owned by some of our members. These include vending machines, retail beverage coolers and beverage dispenser systems.

These units can be identified by their CBA contact sticker or member company branding. At end of life, these units need to be responsibly managed. Convenience stores and restaurants must contact their company sales representative when a unit needs to be repaired or removed. If a unit is received by a landfill site or by the Major Appliance Recycling Roundtable (MARR) program, please contact the CBA using the following methods:

**Email:** [info@canadianbeverage.ca](mailto:info@canadianbeverage.ca)

**Phone:** 1-416-362-2424

Details on the CBA BC Refrigeration Stewardship plan can be found at:  
[www.canadianbeverage.ca/industry-initiatives/stewardship](http://www.canadianbeverage.ca/industry-initiatives/stewardship)

Sincerely,

The Canadian Beverage Association

## Appendix III – Pollution Prevention Hierarchy

CBA members strive to promote the principles of the Pollution Prevention Hierarchy (PPH) where technically feasible and economically viable. Reusability of these beverage refrigeration units is the primary focus of the CBA Stewardship Plan. Cost of these units are borne by the producer companies, and the units are maintained as long as possible to divert materials from the waste stream. Options and strategies employed by CBA member organizations under this Plan for managing end-of-life major appliances based on the pollution prevention hierarchy are described below, along with factors influencing the decision-making process, and areas for further research and development or materials processing.

- a) Reduce the environmental impact of producing the refrigeration units by eliminating toxic components and increasing energy and resource efficiency

CBA member companies with refrigeration units in BC are phasing out the use of HFCs in these units. These efforts include transitioning to natural refrigerants or refrigerants with a low GWP and installing HFC-free insulating foam in new beverage machines.

- b) Redesign the product to improve reusability or recyclability

These refrigeration units are designed to be repaired and refurbished to maximize its life. When units are called for service, the goal is to repair units on site or send them to a refurbishment centre for repair and redeployment in the market. Our cooler design supports this by having removable and accessible parts that facilitate easy repair and/or exchange without disposing of the entire unit.

- c) Eliminate or reduce the generation of unused portions of a product that is consumable

This element does not apply as our refrigeration units are not considered consumable.

- d) Reuse the product

These units are meant to be repaired and reused. If there is an issue that cannot be resolved onsite, the unit is removed from retail and taken to a refurbishment centre. When a unit is removed, it is replaced with either a new or refurbished machine. Furthermore, some units are sold to third parties which promotes the reuse of the units.

Before a beverage machine is recycled, the refrigerant is removed from the compressor by a licensed technician for reclamation or destruction in accordance with provincial regulations. Additionally, the oil and fluorescent lightbulbs, as well as any other useful parts, are removed to be reused or recycled.

- e) Recycle the product

As previously mentioned under our Component Management section, the metal (ferrous and non-ferrous) components of unrepairable units are recycled by a third-party processor. The portion of the units that can be recycled are outlined below and in the Component Management section:

<b>Unit</b>	<b>Reused</b>	<b>Recycle</b>	<b>Energy Recovery</b>	<b>Land Fill</b>
<b>Vending Machines</b>	<b>0%</b>	<b>82%</b>	<b>0%</b>	<b>18%</b>
<b>Cooler Units</b>	<b>0%</b>	<b>84%</b>	<b>0%</b>	<b>16%</b>
<b>Beverage Dispensing Systems</b>	<b>0%</b>	<b>75%</b>	<b>0%</b>	<b>25%</b>

f) Recover material or energy from the product

The metal from the units is recovered and recycled by the third-party processor. None of the units or their components are used as a fuel source for energy at the EOL.

g) Otherwise dispose of the waste from the product in compliance with the Act

The table under e) above also outlines the portion of each unit type that is sent to landfill at end of life. Recyclers are authorized to manage the end of life of the equipment to maximize the amount of material that is recycled.

**Appendix IV – Canadian Beverage Association Extended Producer Responsibility Plan  
for Refrigeration Units – Public Consultation Summary**



**BC Refrigeration Units Stewardship Plan**

**2013 Baseline Study Report**

**Submitted to the British Columbia Ministry of the Environment by:  
Canadian Beverage Association  
November 30 2013**



**CANADIAN BEVERAGE ASSOCIATION EXTENDED PRODUCER  
RESPONSIBILITY PLAN FOR REFRIGERATION UNITS  
PUBLIC CONSULTATION SUMMARY**

*Prepared by MNP*

May 1, 2023



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## SECTION ONE: OVERVIEW

### Background

The Canadian Beverage Association (CBA) is a national industry association representing the diverse set of companies that manufacture and distribute most non-alcoholic refreshment beverages consumed in Canada. CBA represents over 60 brands of juice, juice drinks, bottled waters, sports drinks, ready-to-serve iced teas and coffees, new-alternative beverages, carbonated soft drinks, energy drinks, and other non-alcoholic beverages.

It is the leading source of information on the non-alcohol refreshment beverage industry in Canada. The *Environmental Management Act's* British Columbia Recycling Regulation sets requirements for Extended Producer Responsibility Plans (ERP). The requirements for ERP submissions are outlined in Section 4 of the British Columbia Recycling Regulation:

*A producer must submit an extended producer responsibility plan, at the time specified in the applicable schedule, if any, and in a manner and format satisfactory to a director, for the products within the product category of the product the producer uses in a commercial enterprise, sells, offers for sale or distributes in British Columbia.*

CBA embarked on a 45-day consultation process for *An Extended Producer Responsibility Plan for Refrigeration Units* (the Plan) (attached as Appendix A). During this period, beverage brand-owners and producers (the stakeholders) were allowed to ask questions and offer written feedback to the Plan.

### Consultations

CBA consulted with stakeholders on *An Extended Producer Responsibility Plan for Refrigeration Units* for a 45-day period between March 6, 2023 and April 20, 2023.

CBA reached out to Stakeholders through four methods:

Method	Details
LinkedIn	<ul style="list-style-type: none"> <li>CBA LinkedIn account (1,250+ followers)</li> </ul>
Twitter	<ul style="list-style-type: none"> <li>CBA Twitter account</li> </ul>
Newsletter	<ul style="list-style-type: none"> <li>CBA newsletter</li> </ul>
Association Outreach	<ul style="list-style-type: none"> <li>Coast Waste Management Association</li> <li>Recycling Council of British Columbia</li> </ul>

Copies of the outreach are attached as Appendix B.

Stakeholders were provided the opportunity to provide written feedback to the Plan via two methods:

Method	Details
Direct Email	<ul style="list-style-type: none"> <li>alex@canadianbeverage.ca</li> </ul>
Website Link	<ul style="list-style-type: none"> <li><a href="https://www.canadianbeverage.ca/industry-initiatives/stewardship/">https://www.canadianbeverage.ca/industry-initiatives/stewardship/</a></li> </ul>

Two responses were received during the consultation period.

This document provides a summary of the consultation process and includes all feedback along with comments provided by the stakeholders.

### Consultation Reporting

CBA engaged MNP, a major Canadian accounting and consulting firm, to support stakeholder consultation including:

- Collection and compilation of stakeholder feedback;
- Preparation of this Consultation Summary Report that includes stakeholders' feedback regarding the Extended Producer Responsibility Plan for Refrigeration Units, as well as CBA's responses; and
- Limitations.

MNP has relied upon the completeness, accuracy, and fair presentation of all information and data obtained from CBA and through the consultations. The accuracy and reliability of the findings and opinions expressed in this report are conditional upon the quality of this same information. As a result, MNP cautions readers regarding their reliance on the findings and disclaims any associated liability.

Additionally, the findings and expressed opinions constitute judgments as of the date of the report and are subject to change without notice. MNP is under no obligation to advise of any such change brought to its attention which would alter those findings or opinions.

## SECTION TWO: SUBMISSIONS

Two submissions were received during the consultation period. As noted below, they focused on 14 areas of the Plan:

Section	Number of Questions/Comments
1. Program Costs	1
2. Stewardship Agency: Canadian Beverage Association	1
3. Public Education Materials and Strategies	1
4. Agency Governance	1
5. Product Life Cycle Management <ul style="list-style-type: none"> <li>• Baseline data</li> <li>• Current Collection System</li> <li>• End of Life Management</li> </ul>	5
6. Program Performance Measurement <ul style="list-style-type: none"> <li>• Performance Measure: Collection Rate</li> <li>• Performance Target</li> </ul>	4
7. Product Environmental Impact Reduction, Reusability, and Recyclability	3

The submissions are attached as Appendix C.

## SECTION THREE: RESPONSE TO SUBMISSIONS

### Stakeholder Feedback Related to *An Extended Producer Responsibility Plan for Refrigeration Units*

The following table summarizes the questions and comments received during the consultation period and CBA's response. The information includes the comment itself, the individual and their respective organization, CBA's response, and their chosen communication channel. Beneath the section title, there is a column dedicated to naming the theme found in each comment. For example, "Non-Participating Companies", relates to the comment provided for the section Stewardship Agency.

Question/Comment	Submitter	CBA Response	Communication Channel
<b>1. Program Costs</b>			
We appreciate that the members are fully paying for their own costs.	Sue Maxwell Board Chair Zero Waste BC	Noted, thank you.	Direct Email
<b>2. Stewardship Agency: Canadian Beverage Association</b>			
<b>Non-participating Companies</b>			
The plan notes the four members of the plan but does not note if there are other non-participating companies and what it is doing to address that.	Sue Maxwell Board Chair Zero Waste BC	The CBA's -- Extended Producer Responsibility Plan for Refrigeration Units covers the four CBA member's coolers, vending machines, and beverage dispensing systems that exhibit the branding of or are owned by a participating CBA-member beverage company. CBA is not aware of any other CBA members, beyond the four listed in the EPR Plan, that have an obligation under the BC Recycling Regulation with respect to this product category.	Direct Email

Question/Comment	Submitter	CBA Response	Communication Channel
<b>3. Public Education Materials and Strategies</b>			
Collection Tracking			
This section addresses the needs for an internal collection system-based program, but given that collection is still not 100%, this, along with a better tracking system, should be strengthened. The program should conduct research to determine what the gaps are and then implement a program to address them. This plan could come with setting a target for internal awareness within the member companies if this is determined to be a factor in the missing units.	Sue Maxwell Board Chair Zero Waste BC	The CBA program plan has an overall collection target of 85%, which CBA expects to achieve annually for the duration of the five-year program plan approval (and until a new plan has been approved). This is considerably higher than the requirement of 75% in the Recycling Regulation.	Direct Email
<b>4. Agency Governance</b>			
Community Inclusion			
It would also be good to broaden the perspectives at the board to go beyond only industry members to include local government, environmental, Indigenous, design and recycling perspectives. The Board should be made up of at least 50% British Columbians, up from the current 0%.	Sue Maxwell Board Chair Zero Waste BC	The CBA Board is made up of representatives of companies that employ over 20,000 Canadians with production facilities, offices, and distribution centers in virtually every jurisdiction across the country, including British Columbia. The sale of member's products through grocery retail, foodservice, vending, and convenience channels supports tens of thousands of independent businesses and hundreds of thousands of retail and foodservice jobs.	Direct Email

Question/Comment	Submitter	CBA Response	Communication Channel
5. Product Life Cycle Management			
Unit Calculation and Tracking			
<p>Better tracking should be done to understand where all the units go. Care should be taken when exporting units from the region that these units are still viable (and so the question is why they are being sold) rather than a way to offload costs. It is also unclear if units sold to third parties (removed from program counts) that are returned to the program members for recycling are counted as collected (but not part of the program) or if there are procedures to correct for this.</p>	<p>Sue Maxwell Board Chair Zero Waste BC</p>	<p>Thank you for your comment regarding the potential double counting of the number of units collected (i.e., the numerator in the Collection Rate calculation. Because annual reporting of the collection rate submitted to the Director on or before July 1 each year covers the previous calendar year, it is highly unlikely that any units sold-to-third parties during the calendar year would be collected and sent for recycling in the same calendar year. They would not be counted twice in the collection rate calculation.</p>	<p>Direct Email</p>
<p>I had a comment about the collection rate calculation, specifically related to units sold to third parties. The Plan explains that a small number of units may be sold to third parties and are counted in the amount of “Units Collected” because they exit the CBA system. Further, the Plan states that third party units may be later returned to CBA members at EOL. I suggest some additional language in the Plan which explains the procedures for how these units are not also included in the ‘units sent for EOL management’ amounts as part of the “Units Collected” number, otherwise these units would be counted twice in the collection rate calculation.</p>	<p>Andrew Doi Environmental Planner Metro Vancouver</p>	<p>Having said this, CBA will ensure that any units that are “sold to third-parties” in a calendar year that are subsequently returned to one of CBA’s member companies for EOL management in the same calendar year, will only be reported under “units sent for EOL management” in the Annual Report, and not under “units sold to third-parties,”</p>	<p>Direct Email</p>

Question/Comment	Submitter	CBA Response	Communication Channel
Third-Party Data Verification			
Third party verification of data should be provided wherever possible and not just for the elements required by the Ministry.	Sue Maxwell Board Chair Zero Waste BC	Third-party verification of CBA's Extended Producer Responsibility Plan Annual Report is not required by the Ministry.	Direct Email
Environmental Standards			
The program should develop environmental standards and ensure that all of their processors meet these standards.	Sue Maxwell Board Chair Zero Waste BC	<p>The CBA's Extended Producer Responsibility Plan ensures that all contracted parties involved in the management of refrigeration units covered under the plan adhere to all applicable legislation and regulations. Contracted parties shall possess and adhere to:</p> <ul style="list-style-type: none"> <li>• all legally required permits, approvals, authorizations, or licenses applicable to their business</li> <li>• the removal, handling, and disposal of Substances of Concern, and all components, by-products and scrap resulting from the dismantling of refrigeration units including, but not limited to, the BC Environmental Assessment Act, the BC Environmental Management Act, the BC Hazardous Waste Regulation, and the BC Waste Management Act, including Ozone Depleting Substances and Other Halocarbons Regulation (BC Reg. 387/99, as amended).</li> </ul>	Direct Email
Current Collection Process			

Question/Comment	Submitter	CBA Response	Communication Channel
The program plan does not explain why there are no collection facilities outside of the Lower Mainland (whether that is because all units from the member companies are sent internally to the Lower Mainland before going to be processed or if units elsewhere in BC are landfilled). The plan should be clear that all units in BC will go to a qualified processor.	Sue Maxwell Board Chair Zero Waste BC	Thank you for your comment regarding collection facilities. The language in the plan will be updated to reflect that the facilities in the lower mainland receive refrigeration units from all locations across British Columbia and that these facilities refer to locations where CBA member companies aggregate and assess refrigeration units for either repair, refurbishment, or end-of-life processing.	Direct Email
The process for collecting ozone depleting substances appears sound and it is appreciated that the program reuses or recycles parts, oil and light bulbs.	Sue Maxwell Board Chair Zero Waste BC	Noted, thank you.	Direct Email
<b>6. Program Performance Measurement</b>			
<b>Collection Rate</b>			
The collection rate target should be 100%. The BC Recycling Regulation aims for a recovery rate of 75% “or another recovery rate established by the director”. In a case of closed-loop recovery of large expensive units, there is no reason why this of all programs should not have a target of 100%. The program should prove there is a collection system for 100% of the units.	Sue Maxwell Board Chair Zero Waste BC	The collection rate calculation in the Program Plan accounts for the number of units that are “lost in trade” due to unit thefts or misplacement by a customer/retailer. While CBA member companies have mechanisms in place to avoid such occurrences, it is expected that there will be some leakage of refrigeration units due to units being unavoidably “lost in trade”. Member companies are incented to minimize the number of units” lost in trade” as this represents a loss of economic value.	Direct Email
<b>Continuous Improvement</b>			

Question/Comment	Submitter	CBA Response	Communication Channel
Continuous improvement targets should include increased lifespan, design changes and increases in the percentage of materials recycled per unit. A target of 100% tracking should be one of them. Aiming for 95% of material content recycled by the end of the five year plan is recommended. Additional targets could be a 2% increase in lifespan over the next five years for each type of product, a target set for reuse of parts and a suitable target for disassembly to assist in meeting the recycling target.	Sue Maxwell Board Chair Zero Waste BC	As the individual member companies retain ownership of the refrigeration units throughout the product life cycle, they are naturally incented to ensure that these assets can be deployed in their customers location for as long as possible. This reduces the life cycle costs associated with these products.	Direct Email
<b>7. Product Environmental Impact Reduction, Reusability, and Recyclability</b>			
<b>Reduction, Reusability, and Recyclability</b>			
The program members are commended for their intent to increase the products use the old parts. The members are also commended for the work to reduce the use of HFCs. The program seems to have good systems to manage refrigerants.	Sue Maxwell Board Chair Zero Waste BC	Noted, thank you.	Direct Email
The program should work to change the design of the refrigeration units in order to extend the lifespans, increase repairability and increase recyclability of all components. Members could aim to minimize the number of types of units used in order to be better able to keep and reuse parts to maintain the units.	Sue Maxwell Board Chair Zero Waste BC	As the individual member companies retain ownership of the refrigeration units throughout the product life cycle, they are naturally incented to ensure that these assets can be deployed in their customers location for as long as possible. This reduces the life cycle costs associated with these products.	Direct Email

Question/Comment	Submitter	CBA Response	Communication Channel
<p>Minimizing shredder fluff and increasing recycling should also be achieved by dismantling the units before processing to set aside the glass, rubber, plastic and other non-metal components.</p> <p>The program should develop a system to collect and process the insulating foam in a way that minimizes GHGs released; shredding should not be used on this material.</p>	<p>Sue Maxwell Board Chair Zero Waste BC</p>	<p>On average, 83% of refrigeration units used by CBA member companies are comprised of metals that are effectively captured through the process of shredding and downstream metal recycling. While on average 17% percent of the weight of refrigeration units are comprised of other materials that end up as shredder residue, this represents a relatively small component of total weight of refrigeration units collected.</p> <p>The added costs of disassembly of non-metal components and the lack of end markets for such materials are not proportionate to the additional recycling efficiencies expected.</p> <p>CBA member companies ensure that all processing of refrigeration units takes place in facilities that are in compliance with the Ozone Depleting Substances and Other Halocarbons Regulation under the Waste Management Act (BC Reg. 387/99, as amended), which in its current iteration does not require the capture of ozone depleting substances and other halocarbons found in insulating foams.</p>	<p>Direct Email</p>

#### SECTION FOUR: MNP SUMMARY OF CONSULTATION

The Canadian Beverage Association's 45-day consultation process for the *Extended Producer Responsibility Plan for Refrigeration Units* provided stakeholders an appropriate length of time to review the Plan and submit written comments and questions.

Zero Waste BC and Metro Vancouver were the only two stakeholders to respond and provide written submissions. Their submissions focused on 14 areas of the Plan.

*Product Life Cycle Management* received the most comments, with five comments on baseline data, current collection system, and end of life management.

*Program Performance Measurement* received four comments on collection rates and performance targets; *Product Environmental Impact Reduction, Reusability, and Recyclability* received three comments; and *Program Costs, Stewardship Agency: CBA, Public Education Materials and Strategies,* and *Agency Governance* each received one comment.

It is MNP's understanding that CBA will take feedback from the stakeholders into consideration and may revise or expand the detail within the *Extended Producer Responsibility Plan for Refrigeration Units*.

## APPENDICES



*Appendix A: An Extended Producer Responsibility Plan for Refrigeration Units*



## **An Extended Producer Responsibility Plan for Refrigeration Units**

**Posted for Consultation on March 6, 2023**

### **Canadian Beverage Association**

20 Bay Street

WaterPark Place, 11th Floor

Toronto, ON M5J 2N8

[www.CanadianBeverage.ca](http://www.CanadianBeverage.ca)

Phone: 416-362-2424

Fax: 416-362-3229

Primary Contact: Alex Greco [alex@canadianbeverage.ca](mailto:alex@canadianbeverage.ca)

Updated Plan Webpage: <https://www.canadianbeverage.ca/industry-initiatives/stewardship/>

Original Stewardship Plan Approval: December 27, 2012.

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## Glossary of Terms and Abbreviations

BC	British Columbia
CBA	Canadian Beverage Association
EOL	End-of-Life
EPR	Extended Producer Responsibility
GHG	Greenhouse Gases
GWP	Global Warming Potential
HFC	Hydrofluorocarbons
ODS	Ozone Depleting Substances

## Introduction

The British Columbia (BC) Recycling Regulation,<sup>1</sup> under the Environmental Management Act, sets out the requirements for extended producer responsibility (EPR) plans. The requirements for the submission of an EPR Plan are outlined in Section 4 of the Recycling Regulation, which states:

*A producer must submit an extended producer responsibility plan, at the time specified in the applicable Schedule, if any, and in a manner and format satisfactory to a director, for the products within the product category of the product the producer uses in a commercial enterprise, sells, offers for sale or distributes in British Columbia.*

### Duty of the Producer

Under Schedule 3, Electronics and Electrical Products, beverage brand-owners are financially and environmentally responsible for the recovery of refrigeration units that exhibit their branding or are owned outright by beverage companies. The following Plan addresses the key elements required by the BC Ministry of Environment and Climate Change Strategy to form an EPR Plan:

- Product Management Goals
- Product Life Cycle Management
- Proposed Management System
- Program Performance Measurement (financial/cost management, environmental management)

This updated EPR Plan is available on the website of the Canadian Beverage Association (CBA).<sup>2</sup> If approved, it will replace the CBA's previous Refrigeration Units Stewardship Plan, which was approved on December 27, 2012.

The duty of the producer is outlined in Section 2(1) of the Recycling Regulation under the Environmental Management Act:

*2 (1) Except as otherwise specifically provided in this regulation, a producer must*

*(a) have an approved plan under Part 2 [Extended Producer Responsibility Plans] and comply with the approved plan, or*

*(b) comply with Part 3 [Extended Producer Responsibility Program Requirements if No Extended Producer Responsibility Plan]*

*with respect to a product in order to use in a commercial enterprise, sell, offer for sale or distribute the product in British Columbia.*

---

<sup>1</sup> [http://www.bclaws.ca/civix/document/id/lc/statreg/449\\_2004](http://www.bclaws.ca/civix/document/id/lc/statreg/449_2004)

<sup>2</sup> <https://www.canadianbeverage.ca/industry-initiatives/stewardship/>

## Products Covered by the Plan

This EPR Plan covers refrigeration units as listed under **2(1)(c)**, “electronic or electrical appliances,” outlined in **Schedule 3** of the **Electronic and Electrical Product** category of the BC Recycling Regulation under the Environmental Management Act.<sup>3</sup>

Under this EPR Plan, refrigeration units include coolers, vending machines and beverage dispensing systems that exhibit the branding of or are owned by a participating CBA-member beverage company. CBA members place these units at commercial locations (such as gas stations, convenience stores, restaurants, offices, factories, department stores, shopping centres) and are individually responsible for their maintenance, refurbishment and end-of-life (EOL) management. The products covered under this EPR Plan include the following CBA member-owned and branded refrigeration units:

Product Type	Further Description
<b>Beverage Coolers</b>	Countertop 1 door units 2 door units 3 door units
<b>Beverage Vending Machines</b>	72” and 79” high machines that distribute cans and/or PET bottles
<b>Beverage Dispensing Systems</b>	Bar guns Counter units Drop-in units Combo units

The average lifespan of refrigeration units tends to be extensive. Although maintenance and servicing are required to ensure their longevity, developments in technology have increased the lifespan of these units further. The table below shows the average lifespan of the different types of refrigeration equipment.

Product Type	Average Product Lifespan
<b>Beverage Coolers – Small (countertop)</b>	3-6 years
<b>Beverage Coolers – Larger</b>	13 -15 years
<b>Beverage Vending Machines</b>	9 - 12 years
<b>Beverage Dispensing Systems</b>	7 – 9 years

Currently there are no other agencies, apart from the CBA, appointed to act in a product stewardship capacity for beverage refrigeration units for commercial use in BC. As such, there are no other product stewardship/EPR agencies or plans covering the same products.

<sup>3</sup> [https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/449\\_2004#Schedule3](https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/449_2004#Schedule3)

## Program Costs

No consumer fees are charged. As per Section 5(1)(c)(i) of the BC Recycling Regulation under the Environmental Management Act, CBA-member producers participating in this plan are paying the costs of collecting and managing their owned and branded refrigeration units within the product category covered by this EPR plan, including products that are currently or previously sold, offered for sale or distributed in BC.

## Stewardship Agency: Canadian Beverage Association (CBA)

The Canadian Beverage Association (CBA) is the national industry association representing the broad spectrum of brands and companies that manufacture and distribute the majority of non-alcoholic beverages consumed in Canada. It acts on behalf of producers of beverage refrigeration units, which are obligated under the BC Recycling Regulation.

The CBA acts as the agent to carry out the duties of the producer as set out in Section 2(2) of the BC Recycling Regulation. This EPR Plan confirms the duties that the CBA will perform on behalf of each registered producer.

A current list of producers that the CBA represents is available on the association's website at <http://www.canadianbeverage.ca/about-us/>. The three members participating in the EPR Plan, include:

- Coca-Cola Canada Bottling Limited
- PepsiCo Beverages Canada
- Red Bull Canada

As the CBA currently administers the only approved stewardship plan for beverage refrigeration units in BC, it is expected that member producers manage all member-owned or branded beverage refrigeration units for commercial use in the province.

## Public Education Materials and Strategies

The EPR Plan only includes commercial products managed and processed internally by CBA members and distributors. To ensure public awareness of the CBA's efforts to properly manage refrigeration units, the CBA will continue to post its EPR Plan and annual reports on its website. The link to the website is the following: <http://www.canadianbeverage.ca/environment/stewardship/>

CBA members will continue to place a notification sticker on all refrigeration units that are sold to a third party in order to direct that third party to contact the CBA for instructions on where the unit can be properly disposed of at its EOL. To contact the CBA, please visit:

<https://www.canadianbeverage.ca/contact-us/>

## Agency Governance

The CBA is a not-for-profit organization incorporated under the Canada Not-for-profit Corporations Act. Full details of the CBA's incorporation are accessible at the following federal government website: <https://www.ic.gc.ca/app/scr/cc/CorporationsCanada/fdriCrpDtIs.html?corpId=737119>.

The association's current board of directors is listed in Appendix I.

The CBA maintains transparency with its members and stakeholders by posting annual reports and materials on its website. Annual reports can be accessed at the following link: (<http://www.canadianbeverage.ca/environment/stewardship/>).

## Annual Report

The CBA will compile an annual report to be submitted to the Ministry of Environment and Climate Change Strategy that includes the following:

1. Program Highlights
2. Supply Data
3. Performance Data
  - a. Recovery
  - b. Post-Collection Management
4. Continuous Improvement

In its annual report to the BC Ministry of Environment and Climate Change Strategy, the CBA will note any changes to its operational structure or Board of Directors since the previous annual report.

## Dispute Resolution

The program will enter into contract agreement with suppliers or service providers as required. Any disputes arising from contracts would be resolved using normal commercial legal procedures.

## Product Life Cycle Management

### Baseline data

The CBA's Refrigeration Units Stewardship Plan has been supported by a 2013 Baseline Study prepared by Reclay StewardEdge (RSE), which established the recycling rates for each type of refrigeration unit. The baseline recycling rate analysis found the average recycling rate for all refrigeration units is 83%.

The CBA engaged RSE to conduct a review of the baseline study. After the completion of further research and work to reassess the baseline study to ensure its accuracy, the CBA has determined the original recycling assumptions from the 2013 Baseline Study for CBA-member refrigeration units remains valid and accurate.

Going forward, as part of this EPR Plan and the annual reporting process, the CBA will seek existing audited data from processing facilities with the aim of collating this information to recalculate recycling rates. This information would be used to reaffirm the recycling rates listed in the baseline study or to make any adjustments, if required.

### **Current Collection System**

CBA members continue to operate a closed-collection network and any maintenance, refurbishments or end of life management are undertaken by the beverage company or its local distributor. Therefore, when a unit requires retrofitting or refurbishment, it is collected and transported by the member or distributor to their facility for further triage and maintenance. Units are collected for refurbishment or EOL management at collection locations in the Metro Vancouver Regional District. Any metal parts that need to be replaced during maintenance or refurbishments are sent to a metal scrapyards.

When it has been determined that refrigeration equipment can no longer be used by the CBA member, the equipment is removed from the company's list of assets and is sent to be recycled by a contracted third party in BC (referred to as a processor).

### **End-of-Life Management**

Beverage coolers, vending machines and dispensing system units are owned by beverage companies and placed in commercial facilities for use. Generally, if a unit breaks down in use, it will either be repaired on site or transported to a member's off-site facility for repair. When the equipment is removed, it is replaced with either a used machine or a new machine. If it is determined that a refrigeration unit is no longer serviceable, it is prepared for EOL management.

Before refrigeration units are recycled, the refrigerant is removed from the compressor by a licensed technician for reclamation or destruction in accordance with provincial regulations. All member companies or contracted technicians that service beverage refrigeration equipment must comply with the Ozone Depleting Substances and Other Halocarbons Regulation under the Waste Management Act (BC Reg. 387/99, as amended), including all requirements for the use of "approved persons" and devices in the removal of the refrigerant, the use of approved containers to store and transport the refrigerant for the purposes of disposal and recycling, and record-keeping. Additionally, the oil and fluorescent lightbulbs, as well as any other useful parts, are removed to be reused or recycled. Once refrigeration units are ready for EOL management, including the required labelling and record keeping as per BC Reg. 387/99, as amended, they are shipped to intermediary scrap metal processors.

Refrigeration equipment from CBA members is a very small percentage of the overall metal managed by intermediary processors. As a result, beverage refrigeration equipment is mixed with other scrap metal, including major appliances (such as washers, dryers and freezers), car bodies and other light mixed

metals (e.g., bicycle frames, barbeques, metal sheets and siding, metal doors and shelving) from various residential and commercial sources.

The intermediary processors based within BC then sell the baled metal to downstream scrap metal processors where it is shredded to recover the various ferrous and non-ferrous metals. These scrap metal processors use large electric-powered hammer mill shredders that pulverize bales of mixed metals, which are composed of automobile bodies, appliances and other light mixed scrap metal. Once the scrap metal is pulverized into small pieces, they are then sorted by different “downstream” metal separation processes including magnets, trommels, screens, optical scanners, eddy currents and other types of proprietary process equipment. Shredder output, which is known as “aggregate” in the industry, is an intermediate process material that contains significant amounts of valuable ferrous and nonferrous metal that is separated and sold as commodities. On average, ferrous and non-ferrous metals recovered through these operations account for approximately 75% of the inbound material.

The remaining estimated 25% of the material from the shredded equipment cannot be recovered and is commonly referred to as shredder fluff. Shredder fluff is a mixture of largely non-metallic materials resulting from the shredding of auto bodies, appliances, and other scrap metal materials. It consists primarily of foam, fabric, plastics, rubber, tires, glass, wood, and debris materials. This shredder fluff also consists of approximately 1% of non-recoverable ferrous and non-ferrous metals, such as strips of copper or aluminum that are wrapped around parts of the equipment, or metals imbedded in the insulation or plastic materials. This material cannot be recovered and is therefore sent for disposal.

Again, in our research, we found the recycling rate for refrigeration equipment is higher than the industry average. The baseline study prepared by RSE for the CBA shows that, on average, the recycling rate for all beverage refrigeration units is 83%.

## Program Performance Measurement

The CBA will monitor and report on how refrigeration units are managed at their EOL by obligated CBA members.

### Performance measure: Collection Rate

The Recycling Regulation defines the recovery rate as the “amount of product collected divided by the amount of product produced, expressed as a percentage.” However, given that refrigeration units are a commercial product with a longer useful life than many other products under the Electronic and Electrical Product Category, a more appropriate performance measure is the “collection rate.” Each CBA member has its own internal processes to manage the collection of refrigeration units, which corresponds to the pollution hierarchy to reduce, reuse, recycle and recover. The goal is to extend the useful life of refrigeration units for as long as possible before they must be sent for EOL management.

Due to the closed-loop, commercial nature of the beverage sector’s operations, refrigeration units are tracked by CBA members throughout their lifecycle until they are sent for EOL management to contracted recyclers.

A small number of refrigeration units are sold to customers for continued use and exit the plan’s tracking system while a certain number are transferred out of BC for continued use in a different

province, where they would be recycled at the EOL. It is only when units are lost-in-trade (that is, either stolen or misplaced by a customer) that they would not be collected for EOL management. Therefore, the plan's collection rate is calculated in the following way:

**Units Collected** (Units sold to third parties, units collected for refurbishment, units sent for EOL management and units transferred to other provinces)

**Units Removed from Tracking System:** (Numerator plus # of units lost in trade and other adjustments with a net removed from trade position)

### **Performance Target**

The BC Recycling Regulation requires EPR Plans to achieve a recovery rate of 75% whereas the CBA's stewardship plan has had a collection target of 80%.

As part of this EPR Plan, the CBA has set for itself a revised collection target of 85% to be achieved in Years 1 to 5 of this Plan. These targets will be maintained moving forward until such a time that new targets are approved.

### **Program Administration**

Members will report to the CBA annually on the following:

- Number of Units: Number of vending and refrigeration units installed, added and removed from the Province of BC in the reporting period.
- Documented Policies and Procedures: List of company policies/procedures pertaining to the EOL management of vending and refrigeration units (including asset tracking protocols).
- Continuous Improvement Efforts: including, but not limited to, improvements in the EOL management of obligated material.

### **Program reporting**

Members will report to the CBA annually on the following:

- Number of units retrofitted/refurbished in the reporting period.
- Number of units that have reached their EOL and were sent to a recycling facility.
- Improvements made with respect to diversion and recycling as they relate to vending and refrigeration units during the reporting period.

### **Procedure for Third Party Units**

A small percentage of units that are removed from service each year are sold to third parties:

- If sold to a third party, the procedure outlining proper disposal will include:

- A notification sticker on refrigeration units to direct the third party to contact the CBA for instructions on where the unit can be properly disposed of at its EOL at the applicable CBA member location.
- In addition, a clause will be added to future purchase agreements instructing the purchaser of the obligation to properly dispose of the unit at its EOL at the applicable CBA member location.
- If the CBA is contacted by a third party in possession of a refrigeration unit previously owned by a CBA member, the association will inform that person of the options to properly dispose of the unit at the applicable CBA member location.
- Information on the options to properly dispose of the unit, including locations where third-party generators can send CBA-member branded products for EOL management will be provided to transfer stations and landfill operators in the event that generators attempt to dispose of these units at such locations.

## **Product Environmental Impact Reduction, Reusability and Recyclability**

Most CBA members' refrigeration units undergo more than one retrofit or refurbishment throughout their lifecycle in order to extend their useful life in-trade. Furthermore, CBA members increasingly use units that depreciate much more slowly, delaying the need for disposal. Further efforts undertaken to reduce environmental impacts include the recycling and reuse of old parts removed from units during refurbishment/repairs.

Efforts in the industry to increase the useful life of all refrigeration equipment through enhanced durability and modular systems that can be more easily replaced and repaired will reduce the number of units managed for EOL over time. Member companies are undertaking initiatives to improve the environmental and energy performance of their refrigeration units as part of their overall sustainability commitments.

### **Leadership on Halocarbon Management**

CBA members are playing a leadership role on reducing the use of hydrofluorocarbons (HFCs) in refrigeration equipment. HFCs are powerful greenhouse gases (GHGs) with global warming potentials (GWP) thousands of times greater than carbon dioxide. These chemicals were introduced for use as refrigerants and blowing agents to replace ozone-depleting substances (ODS).

As part of the CBA's efforts to address climate change, CBA member companies with facilities in BC are phasing out the use of HFCs in refrigeration units. These efforts include transitioning to natural refrigerants or refrigerants with a low GWP and installing HFC-free insulating foam in new refrigeration units.

For existing machines that still contain ODSs and HFCs, CBA members track and manage these chemicals in accordance with BC Regulation 387/99, as amended. Member companies either have their own trained, licensed technician remove refrigerants from the compressors of beverage machines or have a licensed service provider do so for them. All member company or contracted technicians that service

beverage equipment must comply with the Ozone Depleting Substances and Other Halocarbons Regulation under the Waste Management Act (BC Regulation 387/99, as amended), including all requirements for the use of “approved persons” and devices in the removal of the refrigerant, the use of approved containers to store and transport the refrigerant for the purposes of disposal and recycling, and record-keeping. After the refrigerant is safely recovered into an approved container, it is then returned to the supplier for reclamation or destruction.

## Plan Performance Summary

Summary of Program Performance Measures:

Measures	Year 1	Year 2	Year 3	Year 4	Year 5
Collection Rate	Collection Target is 85%.	Collection Target is 85%.	Collection Target is 85%.	Collection Target is 85%.	Collection Target is 85%.
Collection System	No specific target. CBA members to continue to maintain reverse logistics for products retained which remain in operation or “in-trade” until EOL. For products sold to third parties for continued use (~2% of products available at end of life), CBA commits to educate and provide collection options.				
Consumer Awareness	No specific target. CBA members to maintain current processes. Given product longevity and specificity of market, CBA commits to continue to make third parties aware of EPR Plan through notification on product itself and details included in purchase agreements.				
Pollution Prevention Hierarchy	Target all products for collection and management according to Pollution Prevention Hierarchy	Target all products for collection and management according to Pollution Prevention Hierarchy	Target all products for collection and management according to Pollution Prevention Hierarchy	Target all products for collection and management according to Pollution Prevention Hierarchy	Target all products for collection and management according to Pollution Prevention Hierarchy
Reporting commitments	CBA commits to publishing the annual reports for collection rate targets as stated in this EPR Plan.				

## Appendix I

CBA's current board of directors are listed below:

Amy Griffith [Chair]

Group Director Public Affairs, Communications and Sustainability-  
North Zone The Coca-Cola Company  
One Coca Cola Plz NW, Atlanta, GA 30313

Neil Antymis [Treasurer]

Director, Government Affairs  
PepsiCo Beverages Canada  
4815 78 Ave SE, Calgary AB T2C 2Y9

Keith DeGrace

Vice President/General Manager  
Red Bull Canada Ltd.  
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Sassan Jahan

Vice President, Marketing  
PepsiCo Beverages Canada  
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Olivier Lemire

President  
Keurig Dr Pepper Canada  
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Kathy Murphy

Vice President, Public Affairs and Communications  
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Michael Ruff

President

PepsiCo Beverages Canada

5205 Satellite Drive, Mississauga ON L4W 5J7

Cynthia Shanks

Senior Director, Communications & Sustainability

Keurig Dr Pepper Canada

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Pierre Turner

Senior Vice President, Innovation, Quality, Sustainability

Lassonde Industries Inc.

755 Principale Street, Rougemont, QC J0L 1M0

Avi Yufest

Director of Public Affairs, Communications and Sustainability

The Coca-Cola Company

335 King Street East, Toronto ON M5A 1L1

Krista Scaldwell

President

Canadian Beverage Association

20 Bay St. 11th Floor, WaterPark Place

Toronto ON M5J 2N8



Appendix B: Stakeholder Outreach CBA LinkedIn

Post

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**Canadian Beverage Association's Post**

**CBA** Canadian Beverage Association 1,275 followers 1w

Have your say! The CBA's 45-day consultation period on the B.C. Refrigeration Stewardship Plan started on March 6, 2023. The consultation deadline is April 20.

View the updated plan here: <https://lnkd.in/gt4rZzcj>

#stewardship #refridgeration

**Canadian Beverage Association**  
 Association canadienne des boissons  
**An Extended Producer Responsibility Plan**  
**for Refrigeration Units**

Posted for consultation on March 6, 2023

Canadian Beverage Association  
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[www.canadianbeverage.ca](http://www.canadianbeverage.ca)  
 Phone: 416-960-3424  
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 Email: [info@canadianbeverage.ca](mailto:info@canadianbeverage.ca)  
 Updated Plan Website: <https://www.canadianbeverage.ca/industry-consultation/extended-prod>  
 Original Stewardship Plan Approval: December 27, 2012

Stewardship  
<https://www.canadianbeverage.ca>

2

**CBA** Canadian Beverage Association 1,275 followers View Profile + Follow



CBA Newsletter

## Canadian Beverage Association Stewardship Plan Consultation

The Canadian Beverage Association is undergoing a consultation period for its stewardship plan starting March 6, 2023 with the deadline for comments on April 20, 2023.

The updated stewardship plan is [available here](#).

For further information, click [here](#) for the Canadian Beverage Association stewardship webpage.

Contact information for the consultation:

Name: Alex Greco, Senior Director, Policy and Government Affairs, Canadian Beverage Association

E-mail: [alex@canadianbeverage.ca](mailto:alex@canadianbeverage.ca)

From: Coast Waste Management Association <[sheila@cwma-bc.ca](mailto:sheila@cwma-bc.ca)> on behalf of Coast Waste Management Association <[info@cwma.ca](mailto:info@cwma.ca)>  
Sent: Wednesday, March 8, 2023 1:00 PM

To: Sandy Sigmund <[ssigmund@returnit.ca](mailto:ssigmund@returnit.ca)>  
Subject: CWMA Information Update

# COAST

WASTE MANAGEMENT ASSOCIATION

---

INFORMATION

UPDATE

Consultations

- Canadian Beverage Association stewardship plan consultation.

The 45-day consultation period started March 6, 2023. Link to the updated plan:  
<https://www.canadianbeverage.ca/industry-initiative/ils-stewardship/> All comments and input on the plan

From: Recycling Council of BC <>

Sent: Monday, March 6, 2023 1:05 PM

To: Sandy Sigmund <[ssigmund@returnit.ca](mailto:ssigmund@returnit.ca)>  
Subject: • RCBC Recap - March 2023



## Canadian Beverage Association Stewardship Plan Consultation

The Canadian Beverage Association is undergoing a consultation period for its stewardship plan starting March 6, 2023 with the deadline for comments on April 20, 2023.

The updated stewardship plan is available [here](#).

For further information, click [here](#) for the Canadian Beverage Association stewardship webpage.

Contact information for the consultation:

Name: Alex Greco, Senior Director, Policy and Government Affairs, Canadian Beverage Association

E-mail: [alex@canadianbeverage.ca](mailto:alex@canadianbeverage.ca)



*Appendix C: Stakeholder Submissions*

**Maggie McInnes**

---

**From:** Andrew Doi <Andrew.Do@metrovancover.org>  
**Sent:** April 11, 2023 10:33 AM  
**To:** Alex Greco  
**Cc:** 'ENV Extended Producer Responsibility ENV:EX'  
**Subject:** 2023 B.C. Refrigeration Units Stewardship Plan Consultation

Hi Alex,

Thank you for the opportunity to provide comments on the 2023 BC Refrigeration Units Stewardship Plan. I had a comment about the collection rate calculation, specifically related to units sold to third parties. The Plan explains that a small number of units may be sold to third parties, and are counted in the amount of "Units Collected" because they exit the CBA system. Further, the Plan states that third party units may be later returned to CBA members at EOL. I suggest some additional language in the Plan which explains the procedures for how these units are not also included in the 'units sent for EOL management' amounts as part of the "Units Collected" number, otherwise these units would be counted twice in the collection rate calculation.

Regards,

Andrew.





April 18, 2023

Canadian Beverage Association Program Plan Feedback

**Canadian Beverage Association**  
20 Bay Street

Water Park Place, 11th Floor  
Toronto, ON M5J 2N8  
alex@canadianbeverage.ca

Dear Alex Greco,

Thank you for the opportunity to comment on the draft plan. Zero Waste BC is a non-profit association dedicated to driving systemic change towards Zero Waste in BC. Zero Waste is the conservation of all resources by means of responsible production, consumption, reuse, and recovery of products, packaging, and materials without burning and with no discharges to land, water, or air that threaten the environment or human health. Our current resource consumption systems of linear take-make-waste not only create waste but also generate a huge amount of greenhouse gases which constitute some of the discharges that threaten the environment and human health. EPR programs can play a key role in changing these consumption systems. For more information on Zero Waste, please see the Zero Waste

We are pleased that CBA will be submitting its plan which includes some improvements to its existing system but hope for many more. We submit these comments expecting that the program will show leadership in the realm of EPR to move it beyond mere recycling to actually changing the nature of the products and how the service is delivered, as envisioned in the Canadian Council of Ministers of Environment Canada-wide Action Plan for EPR. We also look forward to the program addressing the gaps noted in the Canadian Council of Academies circular economy study commissioned by Environment and Climate Change Canada.<sup>2</sup>

Please see our comments by section below:

#### [Program Costs](#)

We appreciate that the members are fully paying for their own costs.

---

<sup>1</sup> Zero Waste Hierarchy: <https://zerowastecanada.ca/zero-waste-hierarchy/>.

<sup>2</sup> Canadian Council of Academies, (2021), Turning Point. <https://cca-reports.ca/reports/the-circular-economy-in-canada/>

## Stewardship Agency

The plan notes the four members of the plan but does not note if there are other non-participating companies and what it is doing to address that.

## Public Education Materials and Strategies

This section addresses the needs for an internal collection system-based program, but given that collection is still not 100%, this, along with a better tracking system, should be strengthened. The program should conduct research to determine what the gaps are and then implement a program to address them. This plan could come with setting a target for internal awareness within the member companies if this is determined to be a factor in the missing units.

## Governance

It would also be good to broaden the perspectives at the board to go beyond only industry members to include local government, environmental, Indigenous, design and recycling perspectives. The Board should be made up of at least 50% British Columbians, up from the current 0%.

## Product Life Cycle Management

Better tracking should be done to understand where all the units go. Care should be taken when exporting units from the region that these units are still viable (and so the question is why they are being sold) rather than a way to offload costs. It is also unclear if units sold to third parties (removed from program counts) that are returned to the program members for recycling are counted as collected (but not part of the program) or if there are procedures to correct for this.

The program plan does not explain why there are no collection facilities outside of the Lower Mainland (whether that is because all units from the member companies are sent internally to the Lower Mainland before going to be processed or if units elsewhere in BC are landfilled). The plan should be clear that all units in BC will go to a qualified processor.

The process for collecting ozone depleting substances appears sound and it is appreciated that the program reuses or recycles parts, oil and light bulbs.

The program should develop environmental standards and ensure that all of their processors meet these standards.

Third party verification of data should be provided wherever possible and not just for the elements required by the Ministry.

### Program Performance Measurement

The collection rate target should be 100%. The BC Recycling Regulation aims for a recovery rate of 75% “or another recovery rate established by the director”. In a case of closed-loop recovery of large expensive units, there is no reason why this of all programs should not have a target of 100%. The program should prove there is a collection system for 100% of the units.

Continuous improvement targets should include increased lifespan, design changes and increases in the percentage of materials recycled per unit. A target of 100% tracking should be one of them. Aiming for 95% of material content recycled by the end of the five year plan is recommended. Additional targets could be a 2% increase in lifespan over the next five years for each type of product, a target set for reuse of parts and a suitable target for disassembly to assist in meeting the recycling target.

### Product Environmental Impact Reduction, Reusability and Recyclability

The program members are commended for their intent to increase lifespans of the products and to use the old parts. The members are also commended for the work to reduce the use of HFCs. The program seems to have good systems to manage refrigerants.

The program should work to change the design of the refrigeration units in order to extend the lifespans, increase repairability and increase recyclability of all components. Members could aim to minimize the number of types of units used in order to be better able to keep and reuse parts to maintain the units.

Minimizing shredder fluff and increasing recycling should also be achieved by dismantling the units before processing to set aside the glass, rubber, plastic and other non-metal components. The program should develop a system to collect and process the insulating foam in a way that minimizes GHGs released; shredding should not be used on this material.

## In conclusion

The program plan needs stronger targets and more ambition in achieving the outcomes intended by the CCME Canada-wide Action Plan for EPR. This plan renewal, at a time when BC is planning to develop a Circular Economy Strategy and the recent UN Biodiversity agreement emphasizes the need to minimize our collective impact, is an opportunity to strengthen governance, reduce environmental impacts and the efforts and initiatives in this area should be strengthened, alongside the creation of related targets for redesign, reduction, reuse and disassembly. That said, we look forward to continued improvement of this program.

Sincerely,

Sue

Maxwell

Board

Chair,

Zero Waste BC