



Reference: 182724

December 27, 2012

Jim Goetz
President
Canadian Beverage Association
20 Bay St Water Park Place, 11th Floor
Toronto ON
M5J 2N8

Dear Mr. Goetz:

Stewardship Plan Approval

Thank you for submitting the Canadian Beverage Association Product Stewardship Plan 2012-2017 on September 30, 2011, and the subsequent revised and finalized document on November 5, 2012, in fulfillment of the requirement under section 4 of the Recycling Regulation.

I have completed my review of the submission and hereby approve the Canadian Beverage Association Product Stewardship Plan 2012-2017. Please be advised that this approval applies only to materials or content contained in the plan that pertains to the requirements of section 5 of the Recycling Regulation.

Your plan includes a commitment to undertake study period to ensure industry-wide recovery process and record keeping protocols are fully implemented. It is my expectation that CBA will develop robust recovery rate targets following completion of the study, and will consult on these rates prior to submitting for Ministry approval on November 30, 2013.

Third Party Independent Assurance for of Non-financial Information in Annual Reports

Third party assurance for non-financial information in Annual Reports is required through Section 8(2)(h) of the Recycling Regulation. The assurance must be conducted in accordance with the procedure, "Third Party Assurance Requirements for Non-Financial Information in Annual Reports", dated July 31, 2012 (enclosed). This document replaces "Guiding Principles - Product Stewardship Agency Non-Financial Information Testing", dated November 15, 2010. The schedule for implementing the procedure is outlined in Table 1 at the end of this letter.

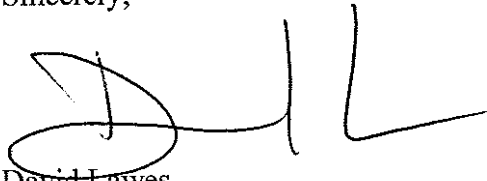
Ideally, audit opinions will not be qualified. To minimize or eliminate the potential for qualifications, stewardship programs must exercise due diligence, work closely with assurance providers to develop appropriate assurance criteria, provide their assurance providers with full

and timely access to all relevant records (including obtaining records from contractors) and if necessary make revisions to their Annual Reports. Assurance statements should only include qualifications in exceptional circumstances and when such qualification can be justified. Even in these circumstances, audit opinions must include as few qualifications as possible.

Please contact Christine Woodhouse at (250) 387-7950 if you have any questions about the third party assurance requirements.

I look forward to working with you to ensure your program is successfully implemented. If you have any questions about this approval or the implementation of your plan, please contact Julia Bates at (250) 356-9089 or Julia.Bates@gov.bc.ca.

Sincerely,

A handwritten signature in black ink, appearing to read 'DL', with a large loop on the left side.

David Lawes
Director, Waste Management
Executive Director, Environmental Standards Branch

cc: Meegan Armstrong, Unit Head, Industry Product Stewardship
Julia Bates, Senior Policy Analyst, Environmental Standards

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Table 1: Third party assurance implementation schedule

Data from reporting year	Deadline for submission	Content
2012	Auditor's report including audit opinion due July 1, 2013	Reasonable level of assurance on: <ul style="list-style-type: none"> • Collection facilities¹ • Product sold and collected²
2013	Auditor's report including audit opinion due July 1, 2014	
2012	<ul style="list-style-type: none"> • Plan for the pre-audit due September 28, 2012 • Progress update on pre-audit due November 30, 2012 • Pre-audit report due January 31, 2013 • Action plan statement on progress made in 2013 due July 1, 2014 	<p>Pre-audit of how recovered product was managed in accordance with the pollution prevention hierarchy under Section 8(2)(d) of the Recycling Regulation.</p> <p>The purpose of the pre-audit is to prepare the program to have a successful audit of product management end fate for 2014 data.</p> <p>The pre-audit will include:</p> <ul style="list-style-type: none"> • Identification of targets in the approved plan (to be reported against); • The development of appropriate assurance criteria by the stewardship agency and their assurance provider, with agreement to the assurance criteria by the assurance provider; • Identification of gaps in the stewardship program's ability to meet the criteria; and • Action plan including a timeline for the stewardship program to address the gaps. <p style="text-align: right;"><i>(continued next page)</i></p>

¹ Whether the location of collection facilities, and any changes in the number and location of collection facilities from the previous report are fairly stated in the Annual Report in accordance with Section 8(2)(b) of the Recycling Regulation

² Whether the description of how total amounts of the producer's product sold and collected and, if applicable, the producer's recovery rate has been calculated is fairly stated in the Annual Report in accordance with Section 8(2)(e) of the Recycling Regulation

2013	<ul style="list-style-type: none"> • Notification of intention due September 28, 2012 • Auditor's report including audit opinion due July 1, 2014 	Stewardship programs can choose to include product management in accordance with the pollution prevention hierarchy ³ in their audit of 2013 data. The pre-audit is not required if a full audit is conducted for 2013 data. However, stewardship programs may wish to engage an auditor in 2012 to conduct pre-audit work to prepare their data tracking systems for a successful audit of 2013 data.
2014 and future years	Auditor's report including audit opinion due July 1 of the year following the reporting year	Reasonable level of assurance on: <ul style="list-style-type: none"> • Collection facilities¹ • Product sold and collected² • Product management in accordance with the pollution prevention hierarchy³
<p>Auditor's reports including audit opinions are to be embedded in or attached to Annual Reports. Notifications of intention, as well as pre-audit plans, progress updates, reports and action plan statements, should be submitted to the Director, Waste Management, as separate documents in electronic or hard copy form. Third party assurance providers prepare the auditor's reports. Stewardship programs may prepare all other documents with input from their assurance provider. Notifications of intention, as well as the pre-audit plans, progress updates and action plan statements should be brief (for example, bullet format, 1 – 2 pages maximum).</p>		

³ Whether the description of how the recovered product was managed in accordance with the pollution prevention hierarchy under Section 8(2)(d) of the Recycling Regulation is fairly stated in the Annual Report