



November 17, 2009

File: 50360-20/BDL

Greg D'Avignon
Brewers' Distributor Ltd.
c/o Canada's National Brewers
1106-750 West Pender Street
Vancouver, BC V6C 2T8

Dear Mr. D'Avignon:

Re: Brewers Distributor Limited Product's (BDL) Product Stewardship Plan

Thank you for the copy of the BDL Beverage Container Stewardship Plan, as required by section 4 of the Recycling Regulation.

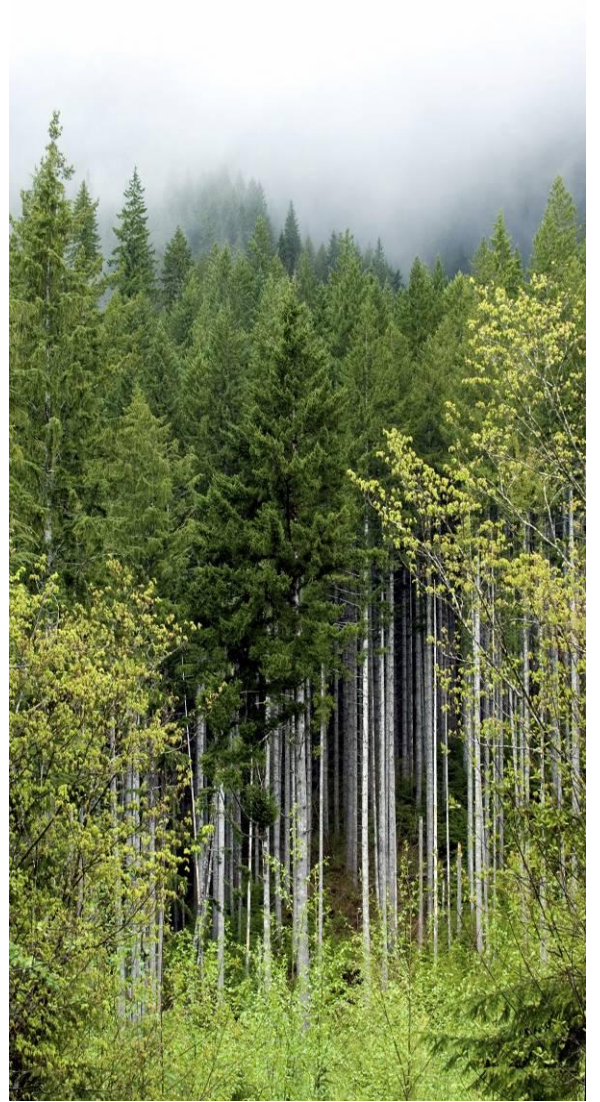
I have completed my review of the BDL stewardship plan submitted on November 9, 2009, for refillable and non-refillable beer, cider and cooler containers. I am satisfied that the plan meets the requirements of the Recycling Regulation and I approve the BDL stewardship plan. Please be advised that this approval does not extend to any materials or content contained in the plan that are extraneous to the requirements of section 5 of the Recycling Regulation.

I would like to take this opportunity to thank you for your efforts in developing the BDL stewardship plan to meet the new requirements under the Recycling Regulation. I look forward to receiving future annual reports detailing the targets and key milestones reached during the implementation of this plan, as required under section 8 of the Recycling Regulation.

Yours truly,

David Ranson
Director, Environmental Equality Branch

cc: David Lawes, EQB



**Brewers Distributor Ltd.
Product Stewardship Plan
2009-2014**

BDL PRODUCT STEWARDSHIP PLAN: Fiscal 2009 - 2014

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I. INTRODUCTION

Brewers Distributor Limited (BDL) distributes beer, cider and coolers and collects related empty containers for Labatt and Molson and a number of other breweries and liquor suppliers throughout British Columbia. Its customers include pubs, hotels, restaurants, clubs, cabarets, government liquor stores, agency stores,¹ and licensee retail stores.

BDL's mission is to provide a quality, cost-effective distribution and container return service for its customers and the public.

BDL and its predecessors has been managing beer containers in British Columbia in an environmentally responsible manner for over 60 years. In the last five years, BDL collected **91.92 %** of brand owner containers sold, exceeding its product stewardship target of **85 %** and the provincial minimum of **75 %** established in regulations. During this period BDL achieved the highest beverage container return rates in the province.

BDL producers also place a strong emphasis on the use of refillable containers and, with 100% of their containers either re-used or recycled, BDL's system supports the pollution prevention hierarchy with significant energy and pollution reduction benefits. BDL's closed-loop container recovery system also provides manufacturers and retailers with a cost efficient system for the return or recycling of their containers.

Looking forward, BDL anticipates building on the strength of its environmentally effective, consumer friendly, low cost, container management system. It will implement new initiatives to improve consumer awareness and enhance consumer convenience and continue to work with collection partners to maintain cost effectiveness and system efficiencies with broad consumer access.

In short, BDL will strive to meet targets in excess of the provincial standard and endeavour to maintain its leadership with respect to container collection in British Columbia and the transparent operation and communication of its environmental and system benefits.

¹ Rural agency stores are small general stores in rural areas authorized by the BC Liquor Distribution Branch to sell beer, cider, coolers, wine and spirits with other goods.

II. BDL STEWARDSHIP PLAN HIGHLIGHTS: FISCAL 2009 - 2014

a. Brand Owners Represented

- BDL acts as product steward for 23 brewers, ciders manufacturers and brewery agents with most based in British Columbia. BDL product steward brand owners account for almost all of the domestic beer sold in British Columbia.²

Table 1 -- Brand-Owners Represented By BDL

Bear Brewing	Labatt Breweries	Pacific Western Brewing
Big Rock Brewery	Mark Anthony Group	Sleeman Breweries Ltd.
Brick Brewing Co.	McAuslan Brewing	Tree Brewing
Chilkoot Brewing	Molson Breweries	Unibroue Inc.
Columbia Brewery	Moosehead	Vancouver Island Brewing
Granville Island Brewing	Nelson Brewing	Vincor International
Great Western Brewing	Okanagan Spring	Whistler Brewing
Kamloops Brewery Ltd.	Oland Specialty Products	

The Liquor Distribution Branch previously was the steward for all aluminum beer cans in BC. They have transferred this responsibility to BDL and entered into an agreement regarding payment of funds, collection and recycling of these containers in compliance with all regulation.

Authorization of brand owners to elect BDL as steward for beer cans is undertaken by the LDB at the time of listing by nomination of BDL as part of the listing application. All products listed with the LDB packaged in cans prior to this plan coming into force have been transferred by the LDB to BDL in keeping with other transition requirements undertaken between the LDB and Encorp.

This is intended to create consumer convenience, reduce cost and duplication and to ease financial accounting and transactions related to these container types...

b. Recovery Targets

- BDL will target a minimum 85 % recovery rate for all categories of beverage containers included in B.C. regulation (995/04) for the period fiscal 2009 through to fiscal 2014. This exceeds the provincial target of 75 %.
- In addition, BDL will, in its annual reporting process, benchmark and set recovery targets for secondary packaging materials related to its containers, such as cardboard packaging. This is being undertaken to provide a more complete account of the environmental benefits of BDL's stewardship system outside of regulatory requirements.

² For a selected list of brands represented by BDL see page 22.
BDL Product Stewardship Plan F2009-2014

c. Container Collection System

- BDL containers are currently available for sale at Liquor Distribution Branch (LDB) stores, licensee retail stores, LDB rural agency stores and licensed establishments.
- Consumers will continue to return BDL containers to Liquor Distribution Branch stores, licensee retail stores, LDB rural agency stores and selected bottle depots - in all there are more than 1000 total return locations where consumers can return BDL containers.
- BDL or their agents will pick up containers at retail locations, licensees and selected bottle depots.
- Refillable containers will be returned to brewers for re-use and BDL will arrange for the recycling of returned cans and glass containers that are not re-used.³

d. 2009-2014 Plan Highlights

- To improve consumer awareness related to deposits and full-deposit return locations, BDL will launch a new website: "www.beerbottlerfund.com" and a new consumer information program communicating the location of full-deposit return locations.
- Special events and other media communications opportunities will be developed and implemented where necessary to augment consumer awareness.
- BDL will utilize GIS mapping technologies to assess and improve consumer access in relation to return locations - currently 78 % of British Columbians are within 2 kilometers of a full deposit return location.
- To improve system efficiencies and maintain comprehensive geographic collection coverage, BDL will:
 - contract with additional bottle depots to accept full-deposit returns where there are gaps in consumer collection opportunities and a sound business rationale exists for both the depot and BDL;
 - expand the number of licensee retail stores that it has under contract related to sorting containers and accepting unlimited returns.
- Beginning in fiscal 2009, BDL will expand its annual report to the Ministry of the Environment to include more information on consumer education strategies and program support for reduced environmental impacts and the pollution prevention hierarchy. The new annual report will also be published on BDL's website and its new consumer website "www.beerbottlerfund.com".

³ Typically refillable beer bottles can be utilized an average of 14 times before they are recycled.
BDL Product Stewardship Plan F2009-2014

- BDL will, as part of its annual reporting process, benchmark and report on collection of secondary packaging materials related to its product stewardship containers. It will work with its collection partners to improve return rates on all secondary packaging associated with beer containers.

Changing Partnership Roles:

LDB Transition from Steward:

The changes associated with the Brewers' Distributor Ltd (BDL) assuming formal product stewardship responsibility for imported beer cans is complete and there have been no material changes to collection or consumer convenience as a result. BDL currently processes all domestic and import beer containers for which it has assumed formal product stewardship responsibility. The change has allowed for more efficient collection and higher returns given.s service locations have expanded due to the larger number under contract to BDL such as licensee retail stores (LRS), licensees or rural agency stores where a large volume of these containers are returned.

BDL is also able to commingle these container types with domestic aluminum beer cans to expedite handling, storage and sorting, thereby reducing cost and time for the return location. BDL and its partners have been performing product stewardship functions for these containers for a number of years.

The public will benefit as BDL is in a position to expand the number of unlimited retail and container return partners in its system. Over the course of the plan therefore, there will be a larger number of return locations (i.e. licensee retail stores and return depots) that accept an unlimited number of BDL containers at full refund. The expansion of the BDL collection system will formally include import aluminum beer containers that BDL assumes responsibility for, so that the public will have better return options with respect to these containers.

III. PROGRAM PERFORMANCE: FISCAL 2002-2008

a. Recovery Rates

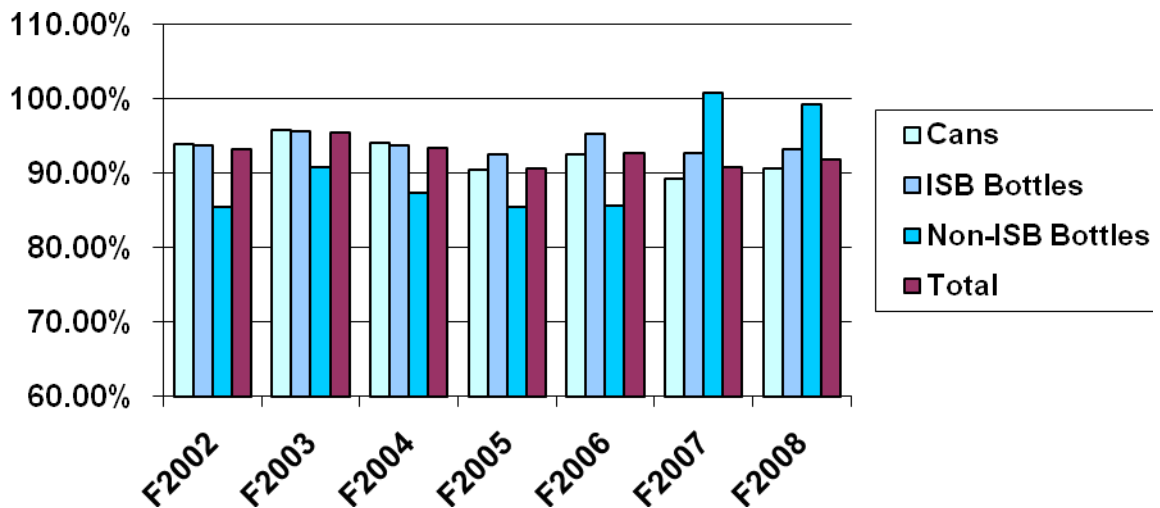
Excluding kegs, BDL and its partners collected an average of 537.4 million containers annually in the period 2001 to 2008. BDL container categories are cans, the refillable industry standard glass, 341ml bottles (ISB) and other non-standard refillable glass bottles. From fiscal 2002 to fiscal 2008, BDL **exceeded its 85% return** rate target in each container category and its overall collection rate was **93.2% for the five year period** ending f2008- the highest of any beverage container product steward in the province.

As can be seen from Chart 1, between fiscal 2003 and fiscal 2005, BDL return rates as a percentage of sales, while above targets, declined slightly before increasing again in fiscal 2006. One of the factors affecting container return rates during this period was the expansion of the licensee retail store (LRS) system. Between 2003 and 2005, 207 new licensee retail stores opened in B.C.

Packaged beer sales in the province increased by 5.9% between F2003 and F2005. In F2006, new openings slowed somewhat with 58 new stores opening and overall beer sales growth dropping to 0.6%. Part of the increase in beer sales during this period was associated with increased inventory requirements for new LRS locations. The requirement to stock stores with product created a one-time sales lift as the new stores needed to keep replenishing their inventory as sales were made. Sales associated with the initial inventory requirement effectively act to lower the return rate for beer containers as more beer containers are required for inventory requirements (i.e. the initial inventory sales volume does not come back as returns but is locked in the system).

After the decline in returns in fiscal 2004 and 2005, return rates bounced back to levels more consistent with historical norms in fiscal 2006-08. BDL anticipates that return rates will continue to improve as the inventory effect associated with increased LRS locations lessens. In real terms, however, the total number of containers returned has continued to increase from 528 million containers in F2002 to 542 million containers in F2008.

Chart 1: BDL Container Return Rates by Category



b. Consumer Convenience

The over 92 % return rate associated with BDL containers during F2002 to F2008 is evidence that consumer awareness related to BDL return locations is very good and consumers are acting on this awareness.

During our recent public consultation with 1,265 British Columbians the vast majority - 98% know there is a deposit paid to consumers for their used beer containers and a significant majority of those British Columbians – 74% – say they save or collect beer cans and bottles for refund. This is up a statistically significant 8 percentage points from a similar question posed to the public in 2004 (66%).

With the expansion of the licensee retail store system, the number of locations where consumers receive a full deposit for containers increased significantly between fiscal 2001 and fiscal 2006. As Table 2 indicates the number of full deposit return locations has increased by 49 % in this five year periods.

Table 2: Locations Where Consumers Receive a Full Deposit

Type of Outlet	Locations in 2001	Current Locations ⁴	Percent Change
Government Liquor Stores	223	199	- 10.7 %
Licensee Retail Stores	285	654	+ 129.5 %
Agency Stores (stores in rural areas that sell beer)	143	228	+59.4%
Contracted Container Depots	19	30	+ 57.9%
Total Outlets	670	1141	+70.3%

⁴ Note numbers for store locations were current for the original submission of the plan in September 2006. Updated numbers can be found on page 28. For licensee retail stores and rural agency stores represent the number of locations that BDL delivers to. These numbers are slightly lower than the numbers reported by the LDB in its fiscal 2006 Annual Report for license retail stores (592) and rural agency stores (230).

With new retail stores being added each week to the marketplace there will be over 1,100 locations where consumers can return BDL containers for a full deposit by the end of 2008. Return to retail represented a key component in BDL's successful recovery rates as 97% of return locations are also locations where consumers purchase beer products.

During the period of the last fiscal plan BDL also increased the number of bottle depots that form part of its product stewardship plan from 19 to 30. Contracted bottle depots provide an important role in BDL's collection system by sorting containers picked at other locations and supplementing return to retail by providing additional unlimited full deposit return locations in selected areas where volumes and consumer convenience require this service.

In addition to arrangements with bottle depots, BDL entered into contractual arrangements with 151 licensee retail stores during the last plan to sort and return BDL containers. These licensee retail stores, as part of their contract with BDL, agree to accept unlimited returns at their locations. This total is expected to increase by over 175 locations within the last quarter of 2010.

As part of preparation for its Fiscal 2009-Fiscal 2014 product stewardship plan, BDL undertook GIS mapping to assess the current collection system. Currently, 78% of the provincial population lives within 2 km of a container return location. The results of this analysis are discussed in further detail below.

Service in Urban Areas:

As with the province generally, consumer convenience regarding container return locations has increased significantly in the last five years. As can be seen from Table 3, the number of container return points in all urban areas has increased and population per depot, has dropped in every B.C. community with a population over 50,000.

Table 3: Retail Outlets or Authorized Bottle Depots in Cities Over 50,000⁵

Community	Redemption Locations 2001	Redemption Locations 2006	2006 Population Estimate	Population per Location 2001	Population per Location 2006	Percent Change
Greater Vancouver	155	215	2,139,870	12,879	9,953	- 22.7 %
Greater Victoria	33	56	309,425	9,459	5,525	- 41.6 %
Abbotsford	7	8	127,490	16,447	15,929	- 3.1 %
Kelowna	15	27	109,490	6,696	4,055	- 39.4 %
Nanaimo	12	21	83,495	6,387	3,976	- 37.7 %
Kamloops	13	25	82,714	6,372	3,309	- 48.1 %
Prince George	16	26	77,148	5,083	2,967	- 41.6 %
Chilliwack	7	13	70,522	9,346	5,425	- 42%

⁵ Source for population figures: Government of British Columbia, Ministry of Labour and Citizens' Services, Population Section, BC Stats.

Return to retail locations have been a significant convenience for consumers in denser urban areas where property values often make the operation of traditional depot locations more costly or economically prohibitive. As noted earlier, BDL has also entered into contractual arrangements with several licensee retail stores to accept unlimited returns. A number of these locations have been in urban areas, with 17 operating in the greater Vancouver area, meaning that at least 88 return locations accept full deposit returns in the Vancouver area.

As mentioned above, the consumer convenience benefits of return-to-retail are clearly demonstrated when comparing the proximity of populations to bottle return facilities in a system comprised solely of bottle depots versus the current multi-channel (depots plus return-to-retail) system for recovering beer containers. The table below provides the summary of such a comparison as undertaken through GIS based analysis which plots the proximity of BC populations (using 2001 census data⁶ plotted by postal code) to the current beer container return system network.

From the analysis the benefits of a return-to-retail system are clear - over 2.4 times the BC population living within 2 kilometers of a beer container return location under the current multi-channel return system as one which would be comprised solely of ENCORP bottle depots.

	ENCORP depots only		All BC beer return locations	
	2001 Population		2001 Population	
< 500M	159,698	4.00%	1,025,097	25.65%
< 1 km	484,187	12.12%	2,003,013	50.13%
< 2 km	1,285,053	32.16%	3,105,981	77.73%
< 5 km	2,808,465	70.28%	3,693,450	92.43%
> 5 km	1,187,559	29.72%	302,574	7.57%
Total BC population 2001	3,996,024			

BDL will continue to use GIS technology to ensure it minimizes any gaps in consumer convenience related to collection locations. The GIS analytical methodology is discussed in Appendix II.

Service in Smaller Communities and Rural Areas

Smaller B.C. communities generally have at least one government liquor store, licensee retail store and / or agency store where BDL containers can be returned for full refund. During the course of the last product stewardship plan the number of agency store locations authorized by the LDB increased from 143 to 228. In addition, the number of licensee retail stores in unincorporated areas also increased from 17 to in excess of 80. This improvement in beverage alcohol retail access has also improved container return convenience in areas of the province with smaller populations. BDL could not identify any

⁶ The most recent census data available in a format geocoded by postal code was for 2001. The absolute population counts are of less importance than are the percentages of the BC population that fall within the service radii. The percentage results are directly translatable to understanding the levels of service and customer convenience in 2006.

communities in British Columbia without at least one full deposit return location within 15 kilometres (please refer to Appendix - B.C. Municipal and Regional Population Estimates for 2006 and BDL Container Return Locations).

c. Support for the Pollution Prevention Hierarchy

Consistent with the requirements of B.C. regulation (995/04), all of the containers included in the BDL product stewardship plan are either re-useable or recyclable. In addition BDL recycles all packaging associated with containers under its product stewardship plan that is returned.

The BDL product stewardship plan implements the important principle of a user pay system. The costs associated with the management of BDL containers are borne by producers and their consumers (i.e they are built into the price of the product). BDL deposit levels are set at rates that are higher than for comparable containers in other beverage sectors (**10 cents versus 5 cents**). Current deposit levels are generating return rates well above the provincial target set by regulation and higher than like containers in the non beer stream. The plan is delivering on a number of objectives identified by B.C. regulation (995/04).

Reduced Container Requirements: Emphasis on Refillable Containers



***The ISB Bottle
averages 14 trips***

BDL container collection system places a strong emphasis on refillable containers. Manufacturers have a cost efficient system for getting refillable containers back. Currently, BDL is the only B.C. product steward that maintains a significant percentage of refillable containers.

Over the course of the F2002-2008 product stewardship plan refillable bottles represented 39.3 % of BDL containers collected. Given that refillable bottles can be utilized approximately 14 times and that the return rate for refillable bottles averaged 92.7 %, over the last five years, the emphasis on refillable bottles reduced overall container requirements by 47 % during the course of the plan. Over 5 years, **BDL producers utilized 920 million fewer containers** than they would have needed if all of their volume was sold in one-way containers.

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

Landfill Diversion

The BDL product stewardship plan has generated enormous benefits in terms of diversion from landfill. Annually over 5,000,000 kg of aluminum are diverted from landfill sites
BDL Product Stewardship Plan F2009-2014

by the BDL collection system with 5,284,478 being diverted in Fiscal 2006. With respect to glass bottles BDL's product stewardship system diverts an additional 45,000 tonnes of containers on an annual basis⁷. Not including secondary packaging, the plan **diverted over 250,000 tonnes of materials from provincial landfill** sites over a five year period.

Given typical tipping fees, this diversion of waste from landfill saves municipal taxpayers in British Columbia approximately \$3,000,000 on an annual basis excluding substantial savings from secondary packaging which is also managed by BDL and recycled.

Reduced Energy Consumption

Re-using glass bottles in comparison to making new ones saves considerable energy and reduces CO2 emissions associated with container requirements. Energy requirements associated with washing and cleaning refillable bottles are less than those associated with producing new glass bottles.

Similarly, recycling aluminum cans also generates significant energy savings and greenhouse gas reductions as the energy required to make aluminum cans from recycled



Manufacturing aluminum from recycled cans requires 95% less energy than virgin production.

aluminum is 95 % less than energy utilized in creating virgin aluminum. A study by the Container Recycling Institute in the U.S., found that while aluminum typically accounted for only 1.4 % of landfill materials by weight, it represented 14.2 % of the energy required to replace a typical ton of landfill virgin material.⁸

Utilizing federal government estimates of greenhouse gas and energy savings associated with the production of various types of materials, BDL has calculated the greenhouse gas reductions and energy savings associated with its product stewardship plan in Table 4 below.

Table 4: Summary of Energy and Greenhouse Gas Savings F2002-2006⁹

	Glass Re-use	Aluminum Recycling	Total
Tonnes Diverted	227,203	25,560	252,763
Avoided GHG Emissions (MTCO2E)	86,337	166,396	252,733
Avoided Energy (Gigajoules)	1,362,218	2,232,922	3,596,140

⁷ This figure represents the weight of glass containers collected annually.

⁸ See *Trashed Cans: The Global Environmental Impacts of Aluminum Can Wasting in America*, CRI, 2002 Report.

⁹ Source for avoided energy and emission multipliers: *Determination of the Impact of Waste Management activities on Greenhouse Gas Emissions: 2005 Update Final Report*, Environment Canada & Natural Resources Canada, October 2005

The annual greenhouse gas reductions associated with the plan are equivalent to removing 10,900 automobiles from BC roadways or about .9 % of the vehicles operating in the Greater Vancouver Regional District.¹⁰

Annual **energy savings** associated with the plan are equivalent to the annual heating requirements of **7,800 homes** or about 12 % of the homes in a community the size of Nanaimo.¹¹

BDL's closed loop distribution system also reduces energy requirements associated with the distribution of containers. As BDL picks up empties when it delivers full goods to retail locations, container pickup is fully integrated into its existing distribution system reducing the need for one-way distribution trips.

Pollution Prevention

In addition to generating significant energy savings, the BDL product stewardship plan also reduces pollution associated with packaging materials.

While comparisons of pollution associated with different packaging types are complicated and dependent upon return rates and other factors, most life cycle analysis suggest that refillable glass bottles generate less pollution and require less water use than recycled cans.¹²

Studies, however, are more unequivocal that the pollution benefits of both re-using bottles in comparison to utilization of one-way glass and recycling cans in comparison to virgin production are significant.

US EPA's life cycle analysis measures the inputs and outputs of all stages of aluminum can and glass bottle production. The data enables BDL to determine the avoided nitrogen dioxide, sulfur dioxide, particulate matter and related industrial solid waste from resource extraction and production.

Nitrogen dioxide (NO_x) is one of the main ingredients involved in the formation of ground-level ozone, which can trigger serious respiratory problems. It reacts to form nitrate particles, acid aerosols, as well as NO₂, which also cause respiratory problems. NO_x also contributes to formation of acid rain; contributes to nutrient overload that deteriorates water quality; contributes to atmospheric particles; reacts to form toxic chemicals; and contributes to global warming.

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

¹⁰ The average car emits about 4.62 tonnes of GHG emissions in a year. Source US Climate Technology Cooperation Gateway: Greenhouse Gas Equivalencies Calculator. Assumes approximately 1.2 million vehicles operating in the Greater Vancouver Regional District.

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

¹² See *Environmental Benefits of Refillable Beverage Containers*, Institute for Local Self-Reliance, 2002. Saphire, David *Case Reopened: Reassessing Refillable Bottles*, New York, INFORM, Inc. 1994.

Particle matter contains microscopic solids or liquid droplets that are so small that they can get deep into the lungs and cause serious health problems. Particulate matter exposure is linked to a variety of health problems, including: increased respiratory symptoms, decreased lung function; aggravated asthma; development of chronic bronchitis; and premature death in people with heart or lung disease.

Judged by this standard, the BDL system has generated significant pollution prevention benefits. BDL can recycling during the course of the last product stewardship plan reduced sulfur oxide emissions by approximately 2,155 tonnes; nitrogen oxide emissions by 743 tonnes; particulate matter by 691 tonnes, and associated industrial sold waste by 101,722 tonnes.

¹³

Similarly, glass reuse also reduces pollutions associated with virgin glass production. The reduced glass requirements associated with BDL refillable containers over 5 years generated a reduction in sulfur oxides emissions of approximately 1,375 tonnes; nitrogen oxides by approximately 390 tonnes; and particulate matter by 1,531 tonnes.¹⁴

Combined, these reductions in NO_x and SO₂ represent 0.4% and 1.9% of the forecasted emissions from British Columbia in 2005.¹⁵

IV. STAKEHOLDER CONSULTATION SUMMARY

BDL posted the plan on the RCBC website and solicited comments over a 45 day period in June and July 2008. Despite heavy traffic to the RCBC site no comments were received.

BDL also met with a number of stakeholders and the recycling public during the development of this plan to review proposed container collection strategies and get feedback on both current container management performance and new proposed initiatives. Through consultation BDL improved its knowledge of stakeholder and public awareness about its system and was able to identify a few areas or practices that need to be monitored as part of the new plan.

BDL consultation included providing stakeholders and the public with an overview of existing container management performance and an outline of initiatives planned for the Fiscal 2009 to Fiscal 2014 period. BDL also undertook a web based survey to improve its knowledge of consumer awareness and attitudes to the current collection practices.

BDL met with a number of key stakeholders during the development of this plan including: the Liquor Distribution Branch, Brand Owners, the B.C. Union of Municipalities; the B.C. Ministry of the Environment; the Alliance of Beverage Licensees of BC (ABLEBC); Contracted Collection Depots; and consulted with the general public.

¹³ Note, the data provided by the US EPA is based on US production. Weitz, Keith A. et al. 2003. *Life-Cycle Inventory Data Sets for Materials Production of Aluminum, Glass, Paper, Plastic, and Steel in North America*. Report prepared by RTI International for the U.S. EPA, Office of Research and Development. EPA-600/Q-03-001. Research Triangle Park, NC.

¹⁴ Ibid.

¹⁵ 2003 Annual Progress Report – *The Canada-Wide Acid Rain Strategy on Post-2000*, Federal/Provincial/Territorial Ministers of Energy and Environment.

Consultation continues and further updates will include comments from environmental groups such as SPEC and the Recycling Council of British Columbia.

In general, stakeholder response to BDL's plan was very positive.

"I was impressed with the plan and extended reporting" was typical of comments BDL received during the review process. Consultation confirmed that BDL's general approach to product stewardship had a broad range of support.

Ministry of Environment

Consultation with the Ministry of the Environment emphasized the need to ensure public input and comment into the stewardship planning process and ensuring consumer awareness of full deposit return locations. This was achieved through the RCBC posting of the plan and consultation with 1,265 British Columbians through an invitation to participate in a web based survey consultation. Key comments and actions to address issues raised are identified below.

Public Consultation

The RCBC posting provided the public with significant opportunity to review the plan in detail, coupled with the proactive approach of BDL's comprehensive public consultation with 1,265 BC citizens. The consultation was undertaken using a web based public survey format during the month of September 2006.

British Columbians are fairly clear in their evaluation of which beverage containers are the most and least troublesome for the environment. Most single out water and juice containers as the most troublesome. Significantly fewer people identify beer containers as being particularly troublesome.

Over the past 9 years, there is relatively little change in British Columbians' perceptions of beer containers as an environmental issue. This contrasts quite dramatically with views of water and juice containers, both of which are considered troublesome by a significantly larger proportion of the BC population.

"Most Troublesome" Containers for Environment			
	1997	2000	2006
Soft drink cans and bottles	30%	37%	30%
Other cans and bottles (water, juice)	13%	30%	48%
Beer cans and bottles	19%	17%	15%
Wine bottles	25%	11%	7%

Overall, of the public consulted 74 percent indicated that they recycle containers in BDL's stewardship plan. This is a significant increase since the last consultation up from 66 percent. Of those who do not return their beer containers for deposit (26 percent) half

indicated that they leave them for bottle collectors to return, while one quarter put them in the blue box.

Awareness of a deposit being paid for empty beer containers is growing. In 2006, the vast majority of British Columbians – 98% – know there is a deposit paid to consumers for their used beer containers. This is up a statistically significant 5 percentage points from 2000.

Aware of Deposit Paid for Empty Beer Containers			
	1997	2000	2006
Yes	92%	93%	98%
No	8%	7%	2%

While this awareness is significant the public is also satisfied with the system. 93 percent of consumers are pleased with the level of service and access to return locations. This is largely unchanged over the last 10 years with no statistically significant differences in the level of satisfaction between the different locations. Consumers also continue to support and use a combination of return options citing convenience, service, professionalism, quick transactions and cleanliness as decision drivers.

Overall, over a third of British Columbians consulted are aware that in some locations they may not get their full 10 cent deposit back on their beer containers. This is up a statistically significant 9 points since a previous public consultation in 2000 and supports efforts to educate the consumer on the fact some depots of their own volition do not provide full deposit. This is not a practice supported in any way by our stewardship plan.

As part of building this increasing awareness for consumers as noted within this plan, BDL will be undertaking a branding program at point of sale, return locations and through the web site to communicate to consumers locations that provide full deposit return.

Among those who used a bottle depot the last time they returned their empty beer containers, most say they received their full 10 cent refund for each bottle. This has not changed significantly since 1997.

Type of Deposit Received at Bottle Depot During Last Visit			
	1997	2000	2006
Full Deposit	57%	58%	61%
Discounted Deposit	29%	17%	17%
Don't know	14%	25%	22%

The small number of respondents who received a discounted deposit during their last visit to the bottle depot makes it difficult to draw any definitive conclusions. Nonetheless,

directional comments suggests British Columbians would be inclined to go to a location where they'd get full deposit if it were close to their home. This has been consistent over the past 9 years.

Would Choose a Location Closer to Home to Get Full Deposit			
	1997	2000	2006
Yes	100%	50%	51%
No	0%	50%	35%*
Don't know	0%	0%	14%
<i>* Small cell size. Interpret with caution</i>			

The small number of respondents who would continue to go to the bottle depot (n=24 in 2006) is far too small to draw even directional conclusions as to whether or not these British Columbians consciously choose locations where they know they'll get a full deposit for their empty beer containers. Also, the reasons for them still going to the bottle depot cannot be confidently projected to the general population.

BDL is addressing the issue of location awareness through its branding and web site which will provide nearby return locations when a consumer inserts their postal code.

Brand Owners

Brand owners are completely supportive of the plan as described herein and regardless of container type are committed to BDL continuing to act as the steward for all domestic beer, cider and cooler brands.

Private Retailers

Private retailers are supportive of BDL's intent to expand the number of retail stores it is under contract with related to container sorts and collection. BDL's approach to pay retailers a handling fee is unique within the regulation given that the vast majority of non-beer containers pay retailers no fees for their regulatory obligation. Concerns raised by some revolved around the need for convenience of pickup and logistics of managing empty inventories and the need for as little disruption as possible to retail operations.

BDL has addressed this issue with increased pickups at GLS and LRS stores, electronic ordering of supplies and increased return locations in identified areas as necessary to manage volume and convenience in trading areas through the use of GIS modeling discussed elsewhere in this plan.

Environmental Stakeholders

The consultation with this stakeholder group has been appended to the report below. In initial conversation about the plan there was limited concern and significant support for return location convenience, extended reporting as the refillable bottle.

Liquor Distribution Branch

The LDB has transferred product stewardship responsibilities to other parties including BDL and is contemplating a number of changes to its container management practices.

The primary focus of consultation with the LDB therefore related to operational and financial changes associated with this LDB review and the need to enter into a service agreement with BDL as is the case with other return locations. This service agreement is now complete and spans the length of this stewardship plan.

NGO Stakeholder Consultation

Two consultation meetings were held with members of a steering committee of the Board of the Recycling Council of British Columbia (RCBC) facilitated by Helen Spiegelman of SPEC with the committee comprised of Brock Macdonald of RCBC, Sue Maxwell of Vancouver Coastal Health Authority and Carol Suhan of the Regional District of Central Okanagan.

The first meeting was via conference call and reviewed the plan through a power point presentation with a report from the committee provided to all Board members of RCBC for comment and reply to BDL. The subsequent consultation meeting with the parties was done to review the actual plan. Upon review Helen drafted comments of the plan on behalf of the committee and forwarded them to the Board for review and comment.

The Board is a cross section of corporate, government and environmental NGO's with a particular expertise in recycling and broad provincial representation.

As a result of this additional consultation, the information provided in its plan regarding consultation, has been augmented with this further work which was received on October 15, 2007. These written comments from the RCBC Board committee on the submitted BDL Product Stewardship Plan have been subsequently forwarded to the Ministry in confidence.

The result of this additional consultation, were several "fairly minor" comments, suggestions and questions of clarification associated with the plan. BDL has prepared a short written response to the RCBC steering committee comments which it will share with the Ministry should you require it. BDL is not considering any material or substantive changes to the plan based on these consultations and subsequent comments.

In addition to this consultation, the posting of the plan on the RCBC website and the public consultation noted above with Ipsos Reid, BDL also undertook consultation as noted in our original submission with liquor retailers, the LDB, UBCM and other stakeholders, contracted depots in the BDL stewardship plan and other stakeholders in the brewing industry.

V. STEWARDSHIP PLAN OBJECTIVES

Our primary objective under this stewardship plan is to preserve and improve one of the most effective container return systems in North America that continues to be used more successfully than any other B.C. stewardship plan. Specific objectives are listed below.

a. Sustain High Recovery Rates

Over the last five years, the brewing industry in British Columbia averaged return rates of 92 %. We have been able to maintain this high rate of return through an efficient low cost system of return-to-retail that is convenient and popular with consumers, supported by collection depots where volume demand and logistics require their location.

b. Excellent Customer Convenience

Consumer consultation indicates the public is satisfied with the existing return-to-retail system for beverage container recovery with a satisfaction rate of 93 percent. BDL will implement new consumer awareness initiatives, during its plan, to improve information about full-refund deposit return locations, including branding, point of sale and return-location advertising and use of electronic information.

c. Support for Refillable Containers

Brewers have limited space to inventory empty bottles. BDL's container management system will support refillables by providing reliable just-in-time delivery of refillable containers. The key imperative to continue support will be retained high return rates at the lowest possible cost. Outside cost factors imposed by regulators or retail agents could imperil refillable containers.

d. Maintain Coordination with the Delivery of Full Goods

The recovery of empty containers is closely integrated with the delivery of full-goods.¹⁶ Empties are generally picked up as full goods are delivered. This makes sense from both a cost and an environmental perspective because the trucks are always full. Resources are not wasted driving around empty trucks or making multiple stops to the same retail locations.

e. Cost Effective Container Collection

BDL recognizes that it is the consumer who ultimately bears the cost of recovering empty containers. Accordingly, we will continue to work with our product stewardship partners to maintain a cost-effective system that does not result in an undue cost increase to the end consumer by means of redundant return locations, or driving system costs above market conditions or service charged but not provided for by return agents.

¹⁶ Full-goods refer to full bottles, cans, and kegs ready for sale.
BDL Product Stewardship Plan F2009-2014

VI: STEWARDSHIP PLAN DETAILS

a. Contact Information

Beverage Container Agency's Name and Address For Service:

Brewers Distributor Limited
 109 Braid Street
 New Westminster, British Columbia V3L 5T3

Name and Title of the Contact Person at the Beverage Container Agency:

Beau Pyatt, Manager of B.C. Operations, Brewers Distributor Limited

b. Brand Owners and Brands Covered by the Plan:

Table 5 -- Brand Owners Represented By BDL

Name	Address	
Bear Brewing	965 McGill Road, Kamloops, BC,	V2C 6N9
Big Rock Brewery	5555 - 76 th Avenue SE, Calgary, AB	T2C 4L8
Brick Brewing Co.	181 King St. South, Waterloo, Ont.,	N2J 1P7
Chilkoot Brewing	102 Copper Road, Whitehorse, YT	Y1A 2A8
Columbia Brewery	1220 Erickson Street, Creston, BC	V0B 1G0
Granville Island Brewing	1000 1200 73 West, Vancouver, BC	V6P 6G5
Great Western Brewing	519 Second Avenue North Saskatoon, SK	S7K 2C6
Kamloops Brewery Ltd.	965 McGill Place, Kamloops, B.C.,	V2C 6N9
Labatt Breweries British Columbia	Box 580, 210 Brunette Avenue, New Westminster, BC	V3L 4Z2
Mark Anthony Group	210 1750 West 75 th Vancouver, BC	V6P 6G2
McAuslan Brewing	5080 St. Abroise, Montreal, Que.,	H4C 2G1
Molson Breweries Western Division	#1100-601 West Broadway, Vancouver, BC	V5Z 4C2
Moosehead	89 Main St. West, Saint John, N.B.,	E2M 3H2
Nelson Brewing	512 Latimer Street, Nelson, BC	V1L 4T9
Okanagan Spring/Sleeman	551 Clair Road West, Guelph, Ontario	N1H 6H9
Oland Specialty Products	#402, 1148 Homer Street, Vancouver BC	V6B 2X6
Pacific Western Brewing	7972 Enterprise Street, Burnaby, BC	V5A 1V7
Sleeman Brewing Co.	551 Clair Road West, Guelph, Ont.	N1L 1E9
Tree Brewing	1083 Richter Street, Kelowna, BC	V1X 2K6
Unibroue Inc.	80 Des Carrieres, Chambly, Que.,	J3L 2H6
Vancouver Island Brewing	2330 Government Street, Victoria, BC	V8T 5G5
Vincor International	441 Courtenaypark Drive, Mississauga, Ont	L5T 2V3
Whistler Brewing	965 McGill Road, Kamloops, BC,	V2C 6N

Due to the number of canned brands and frequency in which canned brands are added and deleted, a full list of brand names has not been included. However, the brand families represented under the BDL product stewardship plan are listed below in Table 6. In addition as a requirement of LDB legislative listing policy canned brand owners are required to nominate BDL as part of the listing process. This listing requirement is administered on behalf of BDL by the LDB. A complete list of brewer brands is available from the Liquor Distribution Branch on an as needed basis.

Table 6 -- Brands Represented By BDL

Name	Selected Products
Bear Brewing	Black Bear Ale, Brown Bear Ale, Polar Bear Ale
Big Rock Brewery	Warthog Ale, Grasshopper Wheat Ale, Traditional Ale, Kold Lager
Brick Brewing Co.	Red Cap Ale
Chilkoot Brewing	Arctic Red, Yukon Gold
Columbia Brewery	Kokanee, Kootenay True Ale
Granville Island	Island Lager, English Bay Pale Ale, Gastown Amber Ale, Kitsilano Light
Great Western Brewing	Great Western Gold
Kamloops Brewery Ltd.	Imperial Lager, Original Ale, Honey Brown
Labatt Breweries	Labatt Blue, Labatt Genuine Draft, John Labatt Classic, Lucky, Carlsberg, Budweiser
Mark Anthony Group	Okanagan Cider, Sting, California Cooler, Mike's Hard Lemonade, Extra Cider
McAuslan Brewing	St. Ambroise Oatmeal, Apricot Wheat Ale, St. Ambroise Oatmeal Pale Ale
Molson Breweries	Rickards Red, Black Label, Canadian, Carling, Coors, Foster's, Miller, Heineken
Moosehead	Ultra, Moosehead Lager
Nelson Brewing	Nelson After Dark Ale, Old Brewery Ale, Paddywack, Blackheart Oatmeal Stout
Okanagan Spring	Extra Special Pale Ale,
Oland Specialty Products	Kootenay Mountain Ale, Dos Equis, Stella Artois, Bellevue Kriek, Bass, Boddingtons, Tennent's, Steinlager
Pacific Western Brewing	Amber Ale, Ironhorse, Canterbury, T.N.T., Pacific, Natureland Organic, Traditional
Sleeman Brewing Co.	Sleeman Cream Ale, Honey Brown Lager, Silver Creek Lager
Tree Brewing	Spy Dark Lager, Tree Amber Ale, Red Ale, Midwinter Spiced Ale
Unibroue Inc.	Blanche des Chambly
Vancouver Island Brewing	Piper's Pale Ale, Blonde Ale, Victoria Lager, Hermann's, Wolf's Scottish Cream Ale
Vincor International	Grower's Cider, Canada Cooler, Vibe, Vex
Whistler Brewing	Black Tusk Ale, Mother's Pale Ale, Premium Lager, Bowen Island

c. Markets Served By Brand Owners

i. The Population and Geographical Area of the Markets Served by the Brand Owner

Brand owners serve the entire the province. Beer can be purchased at any one of 199 government liquor stores, 654 licensee retail stores, and 228 rural agency stores. Beer is also sold for consumption on the premises of over 7,000 licensed establishments including: pubs, restaurants, cabarets, clubs and hotels.

ii. The Projected Number of Beverage Containers

From Fiscal 2002 to 2008, BDL brand owners sold approximately 578 million containers annually. BDL anticipates that represented brand owners will sell between 575 and 625 million containers annually during the course of the fiscal 2009 to 2014 plan and generate return rates over 85 %.

iii. The Size of the Population Served By Government Liquor stores, Rural Agency Stores and Licensee Retail Stores.

Appendix 1 lists cities, towns, villages and district municipalities in British Columbia, their respective populations and the number of government liquor stores, agency stores, licensee retail stores and depots in each of those locations.

d. Collection System

i. Collected Materials

Container Types:

BDL recovers several types of beverage containers on behalf of brand-owners in British Columbia.

Refillable Bottles

Producers representing over 95% of domestic beer sales are members of a pool that uses the industry standard bottle (ISB). The industry standard brown glass bottle is 341 ml in size and averages 14 trips per container. The ISB represents 79% of the BDL refillable containers sold in B.C.

In addition to the ISB, some brand owners, including Sleeman Breweries Ltd. sell product in non-standard brewer or brand specific refillable bottles. These bottles represent 21% of refillable bottles sold.

All refillable bottles account for 28.4% of BDL beer containers sold in B.C..

Aluminum Cans

Several brand owners sell product in aluminum cans of various sizes, the most common of which is 355 ml. Product sold in cans represents 65% of BDL packaged beer sales in B.C.¹⁷ Can sales have been growing as a total percentage of sales and volume of containers returned.

At the request of the LDB in the fall of 2006, BDL is currently assuming product stewardship responsibilities in relation to import beer cans collected by the LDB.

Other Materials

¹⁷ Bottle and can percentages are based on the annual average for the five-year period F2002 to F2006.
BDL Product Stewardship Plan F2009-2014

Although, not part of BDL's product stewardship plan, BDL also collects a number of other materials related to brand owner sales. BDL intends to benchmark and report on the collection rates of these containers and materials as part on its annual reporting process for Fiscal 2009.

Refillable Kegs

Refillable kegs of various sizes are sold by BDL brand owners primarily to licensed establishments. They are shipped back to the brewers where they are inspected, washed and refilled. In fiscal 2008 kegs of various sizes ranging from 18 litres to 58 litres had return rates of 99.9 % and numbered approximately 560,000.

Cardboard Cases and Can Flats

Cardboard cases used for bottle sales are reused a number of times. First, they are used to deliver retail full goods. Second, the consumer uses them to return the empties to the point-of-sale. Third, they are used to transport the empties from the point-of-sale to sorting facilities. Finally, the cases are used to ship the bottles back to brewers. After unloading containers for filling, the cases are recycled.

Can flats have a similar life cycle, except that they are sent for recycling either from their collection point or from sorting facilities.

Shrink-wrap

Pallets of beer are often wrapped in plastic shrink-wrap for stability during shipping. Used shrink-wrap is baled and sold to a recycler. Recycled shrink-wrap may be used to manufacture plastic shopping bags.

Pallets

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

Can Bins



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

ii. Consumer Redemption Locations

BDL containers are returnable for full deposits at all beverage alcohol retail outlets which sell BDL brand owner products. This includes 199 government Liquor Distribution Branch stores, 654 licensee retail stores and 228 agency stores servicing smaller communities. Consumers can also return containers to 30 bottle depots under contract with BDL to remit full deposits for redemption of its containers.

A licensee retail store is a retail beverage alcohol outlet affiliated with a licensed establishment. These are private sector retail outlets that, like Liquor Distribution Branch (LDB) stores, only sell beverage alcohol products. They compete with LDB outlets and are located in larger rural centres, urban and suburban areas and larger communities. Licensee retail stores receive products from the LDB and BDL, but are free to price products differently than the LDB.

Agency stores are agents commissioned by the LDB to sell beverage alcohol products in remote and smaller communities. These agents run another business (i.e. grocery store) in the community which they combine with beverage alcohol sales. LDB agent pricing is controlled by the LDB and they sell products for the same price as the LDB. These agents operate in communities or resort areas that are too small to justify an LDB outlet.

In BDL's view, return-to-retail remains a vital component of the existing container collection system and one which is highly supported by consumers and stakeholders. BDL will continue to endeavour to maintain cost effective, consumer friendly collection in light of whatever changes are implemented at the LDB with respect to container management.

BDL will also work with other retail partners such as licensee retail stores to improve system efficiencies by contracting with collection agents to sort containers at the point of retail collection. BDL currently contracts with 151 licensee retail stores to sort containers. In 2007 BDL added 65 licensee retail stores to its contracted collection system and is targeting a total of 320 over the course of its plan. These stores also agree to accept an unlimited number of BDL containers and provide full deposit to consumers as part of their agreement.

As noted from BDL polling, consumer awareness of beer container deposits is high and the perception of problems with beer container deposits is relatively low. These results suggest that consumer awareness of full deposit return locations is relatively good. Nevertheless, through its new website and POS materials distributed through contracted container partners BDL will endeavour to improve public awareness of full refund locations. With respect to information provided to consumers at collection locations, that are not under contract with BDL, there is little BDL can do to influence the type of information provided to the public at these locations.

As noted in its plan, BDL utilizes GIS technology to identify potential service gaps in container return locations. If a particular area of the province appears to be under serviced BDL will, where there is a reasonable business case, enter into a service arrangement with a licensee retail store or container depot as appropriate.

With respect to very small communities, it should be noted that the retailer in such communities is often an LDB agent. As such BDL, a contracted depot or other BDL agent can arrange for container returns at these locations as part of its agency store contract. Currently, the LDB requires all of its agency store operators to accept beverage alcohol containers back at full deposit rates.

BDL does not enter into contractual relations with any redemption location depot, retail or otherwise that doesn't offer full deposit. Full deposit is a condition of our agreement with contracted licensee retail stores and container depots. It would be pure speculation on our behalf to suggest who does or does not offer full deposit outside of our system.

<i>Return Locations</i>	<i>Total (As of August 31, 2008: Totals subject to change)</i>	<i>Locations under Contract with BDL - commitment to unlimited returns (As of December 31, 2008)</i>	<i>Locations with no BDL contract commitment re: unlimited returns</i>	<i>2014 Target for BDL contracts which include commitment to unlimited returns</i>
Depots	170	30	140(2)	42
Licensee Retail Stores	654	151(1)	503(2)	305
Government Liquor Stores	199	0	199	0
Rural Agency Stores	228	0	230(4)	0
Total	1251	181	1070	347

(1) BDL numbers include two types of contractual return locations. The first is an agreement that predates the current stewardship plan whereby BDL pays selected LRS stores \$.05/container for collection and sorting services. This arrangement has been grandfathered by BDL and is being updated. Although these stores are not under an explicit contractual arrangement consistent with our new LRS contract they do accept unlimited returns. There are currently 95 stores in this category and they will be converted over the coming months to the new contract which requires unlimited returns at the location with handling fees paid that will increase from the current \$0.05 to \$0.18 per dozen containers.

The second arrangement is a new BDL-LRS product stewardship contract that was established in conjunction with the LDB's changing product stewardship role. This new contractual arrangement includes an explicit commitment from LRS product stewardship partners to accept unlimited returns. All of the depots and LRS stores added to the product stewardship plan over the course of the plan will fall into this second category. As of December 31, 2007, there were 54 LRS stores signed to these contracts.

(2) Depots and LRS stores that are not under contract with BDL may accept unlimited returns, but BDL cannot confirm the return policies at return locations that it has no formal contractual relationship with these outlets nor any statutory or legal provision to ensure full deposit or unlimited returns is provided by these private businesses.

(3) BDL has a contractual agreement with LDB regarding the collection of containers. Although many LDB stores have historically accepted unlimited returns, the LDB has notified BDL that the amount of returns at government stores will not be unlimited. BDL is aware that some LDB stores in Vancouver area currently restrict returns to 24 per person.

(4) Return policy at rural agency stores is set by the LDB. BDL has been informed by the LDB that returns at agency stores will not be unlimited.

iii. Transportation of Containers

As noted earlier, BDL picks up empty containers from retail locations and licensed establishments when it delivers full goods. Containers are delivered to either contracted bottle depots for sorting or to one of five BDL warehouses (located in New Westminister, Victoria, Nanaimo, Kelowna or Prince George) for sorting. Bottles sorted at authorized bottle depots are subsequently distributed to the nearest BDL warehouse or brewery. Cans that are sorted and crushed at bottle depots are delivered directly to aluminum recycling facilities.

From BDL warehouses, refillable containers are returned to brewers for re-use. Bottles which are too damaged or worn for re-use are shipped by brewers to glass recycling facilities.¹⁸ BDL warehouses also ship crushed aluminum to an aluminum recycler.

BDL operates its own trucking fleet for the distribution of full goods and collection of containers and also contracts with common carriers, where appropriate, to distribute full-goods and empties between cities and towns. BDL carriers are insured and subjected to contracted pickup schedules.

iv. Re-use and Recycling Locations

Containers destined for re-use are returned by BDL to the brewery locations identified in Table 5 (page 13). The intent of logistics is to return these refillable containers to the closest brewery in order to minimize the environmental impacts of transportation

Aluminum is delivered to ALCOA Alcoa, TN 37701-3141 United States .via rail for recycling into new cans

Recycled glass is delivered by breweries and BDL to Pacific Metals Recycling International 8360 Ontario Street, Vancouver

e. Consumer Awareness

BDL's 93.2% return rate for containers, is evidence that consumer awareness related to container redemption locations is relatively good. This is further supported by our public consultation that showed 98 percent awareness of deposit on beer and 93 percent satisfaction with the system

As noted earlier, BDL will implement a number of new consumer initiatives as part of this product stewardship plan to improve consumer awareness related to full-deposit retail locations.

¹⁸ Culled bottles represent about 3% of the total volume of bottles sent to the breweries.
BDL Product Stewardship Plan F2009-2014

BDL launched a new website: "www.beerbottlerefund.com" during fiscal 2007 that provides consumers with information on where they can return BDL containers for a full refund. The site will enable consumers to find the location of the nearest full-deposit return locations, so that any consumer can easily find out where containers can be returned for full refunds.



BDL's new website "www.beerbottlerefund.com" will provide consumers with information about full refund return locations.

and provide BDL with a better understanding of consumer attitudes and issues related to its deposit return system.

In addition to the new website launch, BDL is also implementing a consumer awareness initiative at retail locations through the distribution of new point of sale information for consumers about full deposit refund locations. This initiative will include in-store posters and consumer brochures that will refer consumers to the new BDL website and highlight the abundance of full deposit return locations throughout the province.



Store signage at BDL partner retailers will emphasize full deposit refunds at retail.

Consumer Awareness

BDL's primary emphasis will be to provide consumers with clear information about full deposit refunds and unlimited returns at contracted collection outlets. It can also provide information on container collection policy at LDB outlets to consumers, subject to the LDB's concurrence. Consumers will understand that branded collection outlets accept unlimited returns at full deposit rates and by inference will hopefully recognize that unbranded container collection outlets may have different redemption policies in place. BDL, however, cannot provide consumers with information about specific container collection facilities that it has no formal relationship with (i.e. provide a list of outlets with a policy of discounted refund rates).

F2009:

- Approval of product stewardship plan
- Consumer survey re: deposit return issues
- Update of new consumer website and point of sale materials
- Complete negotiation of new product stewardship responsibilities/cost structure with LDB.

F2010:

- Rollout of POS full refund branding to all collection partners
- Review of community and municipal partnerships/initiatives to enhance full refund deposit return awareness
- Advertise in recycling calendars
- Target addition of 124 new full refund licensee retail store collection partners and additional depots as required in F2011 to bring the total to 275.

F2011/F2012/F2013:

- Monitoring of consumer feedback re deposit return operations
- Continued assessment of collection coverage utilizing GIS technologies
- Implementation of community and municipal partnership/initiatives that enhance full refund deposit awareness
- Continued rollout of deposit return advertising in targeted consumer recycling information
- Addition of 72 new full refund collection locations during the last three years of the plan.

f. Program Performance Measures

Container recovery rates remain the core performance plan target which drive many of the plan's environmental benefits. In addition to reporting on container recovery rates for its product stewardship categories (cans, ISB refillables and non-ISB refillables), BDL will rely of the following performance measures to assess its system:

- return rates for secondary packaging associated with containers;
- quantification, where possible, of pollution prevention benefits associated with the product stewardship plan (i.e. reduced GHG emissions, etc.);
- polling of consumer attitudes and awareness of BDL container collection system;
- stakeholder consultation and feedback on its plan and annual report process.

Program Performance Measures

1. Consumer Accessibility

Goal/Target: Improve consumer access to full refund unlimited return locations from the current 181 to 347 by 2014.

Rationale: Current return rates indicate existing consumer accessibility is good, but there are some concerns regarding the number of full refund, unlimited return locations and related consumer awareness in some smaller communities should the LDB pursue its stated intention of limiting returns. Therefore the stewardship plan is working to ensure continued and unparalleled access to unlimited return locations through the course of the plan.

Initiatives developed to support the goal/target: BDL has utilized GIS technology to develop any gaps in its current return location coverage. In conjunction with GIS analysis, BDL has developed new contractual policies for licensee retail stores and depots which include a commitment from these contracted stewardship partners to accept unlimited returns at full deposit. The provisions also provide for the first time in the province the payment of handling fees to private retailers that contractually sign on to the full refund program described in the original plan submission. The expansion of contracted BDL return location partners over the course of the stewardship plan will create a broader coverage of return locations where full refunds and unlimited returns are guaranteed for BDL containers.

Key performance measures for 2010/11/12/13:

F2011: Target of 124 additional licensee retail store collection partners.

F2012/F2013/F2014: Target of 72 additional licensee retail store collection partners.

Reporting: Progress with respect to performance targets will be included in annual product stewardship reports filed under the plan.

2. Consumer Awareness

Goal/Target: Improve consumer awareness with respect to the number and location of full refund, unlimited return locations.

Rationale: Current return rates and polling indicate existing consumer awareness about BDL containers and return locations is high at in excess of 98 percent. BDL intends to sustain high consumer awareness by improving information in relation to the location and convenience of full refund, unlimited return locations.

Initiatives developed to support the goal/target: BDL has developed a number of initiatives to improve consumer information about its product stewardship plan. These include:

- New consumer website www.beerbottlerefund.com:
 - is a program website that includes in all branding and promotional materials posted at full refund locations,
 - provides consumers with information on benefits of refillable bottles and information on return locations near them that provide full refunds.
- Point of Purchase Material:
 - All retailers who enroll in the full refund program receive a package which includes posters, shelf talkers, door clings and counter mats to raise awareness among their consumers that they can return their beer containers for a full refund at their location.
- Advertising in targeted consumer/industry recycling publications:
 - Full Refund program ad in the 2007 Hospitality Industry Membership Directory (includes BC & Yukon Hotels Association (BCYHA) and Alliance of Beverage Licensees (ABLE));
 - Published article In the Summer 2007 edition of The Publican about the full refund program and its environmental benefits as well as the benefits to the retailers for enrolling as a full refund return location;
 - In November 2007, will promote enrollment into the Full Refund program at the 2007 Hospitality Industry conference which includes members of BCYHA, ABLE and the BC Restaurant and Foodservices Association; this will be done with brochures and poster boards.
- May 2007 Recycling Council of British Columbia Annual Conference
 - Canada's National Brewers had a booth at the tradeshow to promote the environmental achievements of the ISB and the expansion of full refund locations through the new full refund retailer program
 - Booth included three large poster boards promoting the full refund program and the closed loop system of the ISB demonstrating the environmental benefits.
 - Also acted as a Gold level sponsor for the Annual Conference
- Review of community and municipal partnerships/initiatives to enhance full refund deposit initiatives.
 - Meetings with civic officials to educate them on the new stewardship plan through personal meetings and participation in UBCM meetings.
- Canada's National Brewers are currently a sponsor of the RCBC and one of the remaining funders of its information hotline where consumers can obtain

information about beer container recycling. We will provide beer container consumer information to the RCBC as it is developed and explore opportunities for enhanced dissemination of consumer information. The success of this work will be measured through regular consumer research

- See Consumer Education & Awareness section for details on planned activities.

Key performance measures for 2010/11/12/13:

- The success of this work will be measured through regular consumer research to monitor consumer feedback re deposit return operations.
- Expansion of retail partners with full refund branding information (see Consumer Accessibility above)
- Maintain a high consumer awareness of 85 per cent in any of the 2 or 3 anticipated consumer surveys conducted by BDL during the course of this plan.

Reporting: Progress with respect to performance targets will be included in annual product stewardship reports filed under the plan. In addition the following year's consumer awareness initiatives will be reported in detail in next annual report.

g. Dispute Resolution

Dispute resolution procedure (Contractual agreement)

If the issue involves a return location under contract with BDL, the return location will be made aware of the issue which may also be investigated by BDL staff. If a return location is found to be in violation of its contract commitments, BDL will take appropriate measures to ensure compliance (including potential dispute resolution procedures outlined in the contract).

Dispute resolution procedure (Non contractual agreement)

Potential disputes where no written contract exists between BDL and another party related to its product stewardship plan are handled in a manner similar to BDL's public complaints process. Issues are directed to the appropriate BDL manager and may be forwarded to BDL's Manager of B.C. Operations for review. Failing to achieve resolution the party would be directed to the Board of the BCRCCC to provide in writing their concerns and have the Board ultimately resolve the matter or provide a decision specific to the issue at hand.

It is unlikely that any such dispute could occur given the nature of our stewardship and the fact that all service providers and organizations with which BDL operates with have in place contractual undertakings.

If an issue involves a return location that is not under contract with BDL, BDL provides the return location with information regarding the complaint. If the issue is related to a return location not complying with the return to retail requirements of MOE Recycling Regulation, BDL will contact the location in writing to provide them with notification of the complaint and a copy of the Recycling Regulation outlining their obligations. In such

cases, BDL correspondence will also be copied to the Ministry of Environment for their information.

Complaints Process

Consumer complaints are directed to the appropriate BDL manager for follow up and resolution. Through the website www.beerbottlerefund.com consumers have access to information on BDL's stewardship plan and the location of full refund deposit locations in their area simply by inputting their postal code. The website also provides an email link for consumers who have any questions or complaints regarding the bottle return system. BDL's new website www.beerbottlerefund.com will include an email address, contact phone number and mailing address for public comments on BDL product stewardship activities.

Consumer concerns are generally addressed in writing (email questions are responded to via email). If the complaint involves a return location under contract with BDL, the return location will be made aware of the complaint which may also be investigated by BDL staff. If a return location is found to be in violation of its contract commitments, BDL will take appropriate measures to ensure compliance (including potential dispute resolution procedures).

BDL contracts with container depots and retail return partners include audit and compliance provisions. BDL can audit partners related to container counts and compliance with full refund and unlimited return requirements as a condition of their operating agreement. The contracts include a process for resolving violations of contractual requirements and BDL can eventually terminate the contract if a container collection partner is repeatedly in violation of contractual terms.

If a consumer complaint involves a return location that is not under contract with BDL, BDL provides the return location with information regarding the complaint. If the complaint is related to a return location not complying with the return to retail requirements of MOE Recycling Regulation, BDL will contact the location in writing to provide them with notification of the complaint and a copy of the Recycling Regulation outlining their obligations. In such cases, BDL correspondence will also be copied to the Ministry of Environment for their information.

Producer Compliance

Producer compliance issues are anticipated to be minimal under Brewers' Distributor Ltd's (BDL's) product stewardship plan because of the listing and product approval process related to beer sales in the Province under the Liquor Distribution Act. All domestic brewers and import brewers or their agents that sell in cans must designate BDL as their product steward as part of the process for obtaining a listing (and approval to sell their brands in BC) from the Liquor Distribution Branch. All brewers selling in bottles must designate BDL or Encorp Pacific (Canada) as their brand owner as part of that same process. Brand owners therefore designate BDL as product steward prior to selling their domestic glass refillable and all aluminum can products. BDL producer container fees are also agreed to as part of this process and, in the case of many producers, flow through the

LDB. Ongoing compliance is monitored through tracking within our accounts receivable and our brand registry systems, but problems with compliance are unlikely.

In the event that BDL does encounter a problem with producer compliance, for the purposes of initiating actions with the British Columbia Ministry of Environment (MOE); non-compliance is defined as a lack of responsiveness from a brand-owner after more than two notices on producers' responsibilities have been sent from BDL.

Exceptions can be made if BDL determines that the producer/brand-owner is not covered by the regulations (excluded products) or fees are paid by a third party.

In the event that BDL does not receive a financial contribution from stewards within the prescribed timeframe(s), BDL may utilize the following notifications to underscore the importance of timely submission:

- 1st contact (60 days prior): Letter is sent to brand-owner obligated under the Recycling Regulation informing them of their responsibilities.
- 2nd contact (30 days): A second letter is sent to a brand-owner for lack of reply from the previous correspondence. At this point in time, BDL will point out that they are liable if their company contravenes the Act.
- 3rd contact (30 days): A final letter with a deadline for submitting membership documents and payments toward the plan is sent by BDL. At this point, BDL will consider each brand-owner on a case-by-case basis to approve final step.
- 4th contact: A request for non-compliance actions is sent to the MOE with a copy to the brand-owner.

h. Product Life Cycle Management

As per the requirements of B.C. regulation (995/04) all of the containers covered in the BDL product stewardship plan are re-used or recycled. Brand owners make decisions about what type of container, recyclable or refillable, they wish to sell their products in.

The BDL product stewardship plan facilitates environmentally friendly life cycle management by providing a cost effective method of collecting and returning containers for either re-use or recycling.

With respect to refillable bottles, BDL provides brewers with a cost effective return process for both ISB containers and non-standard refillable bottles. BDL will continue to manage its fee and cost structure to ensure that the refillable option remains viable and cost effective for any brand owner wishing to sell products in refillable packaging.

In addition, BDL will continue to work with brewers and collection partners to coordinate the distribution, storage and delivery of goods and containers in ways that promote cost efficient, environmentally responsible practices. Currently, BDL provides just-in-time delivery of ISB containers which reduces storage costs for brewers will refillable production.

i. Pollution Prevention Hierarchy

BDL brand owners utilize two types of containers under the product stewardship plan. Re-useable glass bottles and recyclable aluminum cans.

The re-useable glass bottle has a long history of use and its track record as an environmentally friendly container is well established. As noted earlier, the container generates significant pollution benefits in comparison to production of one-way glass containers.

Production in recyclable aluminum cans also generates significant environmental benefits if the cans are collected and recycled (i.e. do not end up in landfill). BDL's return rate for cans of 93.4% over the last five years is one of the highest in the world. Making aluminum from recycled aluminum generates significant pollution reduction benefits in comparison to making virgin aluminum.

Where possible, BDL will quantify the pollution benefits associated with its product stewardship plan as part of its annual reporting process including estimates of greenhouse gas reductions, reduced energy requirements and reduced pollutants.

In addition to providing a more thorough assessment of the pollution benefits of its product stewardship plan, BDL will begin to benchmark secondary packaging associated with containers and, where appropriate, review options for improving the recovery of these materials.

j. Financial Summary

BDL will continue to provide audited reports annually on the revenues associated with its deposit return system. Its summary deposit information for the previous plan is outlined in Table 5 below:

Table 5: BDL Deposits Received and Redeemed F2002 - F2008

Fiscal Year	Deposits Received	Refunds Paid	Return Rate
F2002	\$56,590,718	\$52,802,276	93.3%
F2003	\$56,289,694	\$53,752,752	95.5 %
F2004	\$58,223,284	\$54,433,098	93.5 %
F2005	\$58,955,880	\$53,462,038	90.7 %
F2006	\$58,479,727	\$54,253,837	92.8 %
F2007	\$59,649,312	\$54,225,381	90.9 %
F2008	\$60,101,182	\$55,172,432	91.8 %
5-YR Average	\$59,081,877	\$54,309,357	91.92 %

Program Funding

Product stewardship activities related to the Brewers' Distributors Ltd (BDL) containers are funded through a combination of container recycling fees determined on a regular basis by the British Columbia Brewers Recycled Container Council (the Council) a not-for-profit society established by the brewing sector to transparently administer the financial and logistical requirements of BDL's stewardship.

The Society is comprised of members representing BDL, Molson Canada, Sleeman Breweries, Labatt Breweries, the BC Craft Brewers and Canada's National Brewers. As a result the Board is made up of representatives of each of these companies or organizations that together represent over 95 percent of the beer volume sold in the province and is a representative cross section of brand owners that are local, national and international and that own or are the agents for brands in each category of stewardship such as cans or refillable containers.

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

The Society was formed to provide a transparent governance structure to effectively steward beer and refillable containers in the province. The members were selected to ensure that both small and large brewers have a voice on the operations and management of the stewardship plan and the financial decisions inherent within. This vehicle also services to inform and resolve concerns brought by the members related to stewardship and/or facets of the operations to ensure compliance, continual improvement and excellence within the plan.

In the case of cans a Container Recycling fee is established by the Council and applied to the pricing structure established under regulations by the Liquor Distribution Branch (LDB). In the case of refillable bottles the Council established net rates based on projected and audited costs and offsetting revenues. These net rates are then charged by BDL to the manufacturer in return for access to those refillable containers. BDL container fees are reviewed periodically and can be adjusted annually as required. The LDB has also removed their container recycling fee which they previously used to cover internal stewardship costs. Rather an agreement in principle has been undertaken between BDL/Council and the LDB to pay the LDB directly for each container returned through their stores. This agreement is five years in duration and has built in inflation escalators.

With respect to domestic beer can containers, BDL, on behalf of the Council, collects container fees from brand owners, retains unredeemed deposits with respect to can sales (forwarded to BDL from the LDB) and retains material revenues from aluminum material sales. From these revenues, the Council through BDL pays container collection partners for collection of beer cans and arranges for the transportation and preparation of cans for recycling. With respect to import beer cans that BDL will assume product stewardship responsibility for, the Council will retain unredeemed deposits and material revenues from can sales to cover the costs of collecting and making arrangements for recycling.

With respect to refillable bottles handled under the BDL product stewardship plan, the BDL, on behalf of the Council, collects container recycling fees from brand owners for the collection, sorting and return of these containers. The Council through BDL pays collection partners fees for the collection and sorting and transportation of refillable containers. In the case of refillable bottles, producers retain unredeemed deposits. Costs associated with cleaning and reusing refillable bottles are covered by producers. Producers also arrange for the recycling of worn or damaged refillable bottles.

In the case of cans, the program covers the recycling costs up to the point of the sale of aluminum for recycling. In the case of refillable bottles, producers are responsible for the costs associated with reuse and recycling of older containers as required.

As part of its 2009 to 2014 product stewardship plan, BDL has created a separate container management council known as the BC Brewers Recycled Container Council (the Council) a not for profit society registered in BC. The Council will monitor and manage the costs associated with container collection and recycling in a cost effective manner and ensure they are separated from the other business activities that BDL is responsible for.

The BDL product stewardship Council will create two contingency funds to ensure stable financing for its operations over the long term. A \$1 million contingency fund will be established with respect to can operations to help offset fluctuations in aluminum and currency values and provide a buffer in respect of potential windup costs. With respect to bottles, a \$500,000 contingency fund will be created to provide a buffer against potential liabilities and unexpected events associated with program operations.

As noted above, the BDL product stewardship Council operates on a cost recovery basis with contingency funds set in accordance with generally accepted accounting principles. BDL is responsible under a service agreement to the Council for financial oversight of

operations and fees will be reviewed at least once annually to ensure they are consistent with the principles of cost recovery.

Appendix 1

B.C. Municipal and Regional Population Estimates for 2006 and BDL Container Return Locations¹⁹

Note that population figures for individuals over 19 years of age by municipality are not readily available. Consequently, total population figures were used. Provincially, individuals over the age of 19 account for approximately 77% of the total population.

¹⁹ Population Estimates from Government of British Columbia, Ministry of Labour & Citizens' Services, Population Section, BC Stats, March 2006

Community	Population	LDB	LRS	RAS	Depots	Total	Pop/Location
Alberni-Clayoquot							
Port Alberni	18,688	1	8	0		9	2,076
Tofino	1,846	1	1			2	923
Ucluelet	1,900	1				1	1,900
Bulkley-Nechako							
Burns Lake	2,005	1	2			3	668
Fort St. James	2,003	1	2			3	668
Fraser Lake	1,367	1	0			1	1,367
Granisle	353			1		1	353
Houston	3,733	1	2			3	1,244
Smithers	5,509	1	3	1		5	1,102
Telkwa	1,439		1	0		1	1,439
Vanderhoof	4,727	1	3	1		5	945
Capital							
Greater Victoria	309,425	15	40		1	56	5,525
Cariboo							
Quesnel	10,487	1	7	4		12	874
Wells	248			1		1	248
Williams Lake	11,872	1	4	2	1	8	1,484
100 Mile House	1,826	1	1			2	913
Central Kootenay							
Castlegar	7,821	1	3		1	5	1,564
Creston	5,097	1	2	1	1	5	1,019
Kaslo	1,075	1	1			2	538
Nakusp	1,779	1	1	0		2	890
Nelson	9,797	1	4	3		8	1,225
New Denver, Silverton	549	1				1	549
Salmo	1,133	1	2			3	378
Slocan	357			3		3	119

Community	Population	LDB	LRS	RAS	Depots	Total	Pop/Location
Central Okanagan							
Kelowna	109,490	3	23		1	27	4,055
Lake Country	10,367	1	1			2	5,184
Peachland	5,230		3	1		4	1,308
Columbia-Shuswap							
Golden	4,399	1	3			4	1,100
Revelstoke	7,964	1	4		1	6	1,327
Salmon Arm	16,800	1	5	2	1	9	1,867
Sicamous	3,043	1	2	1		4	761
Comox-Strathcona							
Campbell River	30,810	1	11		1	13	2,370
Comox	12,835	1	3			4	3,209
Courtenay	21,801	1	4	1	1	7	3,114
Cumberland	2,817	1	1			2	1,409
Gold River	1,357	1				1	1,357
Sayward	407		1	2		3	136
Tahsis	577	1	1			2	289
Zeballos	228		0	1		1	228
Cowichan Valley							
Duncan, North Cowichan	33,477	1	6	1		8	4,185
Ladysmith Lake	7,292	1	2			3	2,431
Cowichan	3,029	1	1			2	1,515
East Kootenay							
Cranbrook	19,774	1	4	1	1	7	2,825
Elkford	2,670	1	1			2	1,335
Fernie	5,126	1	2	1		4	1,282
Invermere	3,256	1		1		2	1,628

Community	Population	LDB	LRS	RAS	Depots	Total	Pop/Location
Kimberley	7,049	1	1			2	3,525
Radium Hot Springs	813	1	2			3	271
Sparwood	3,973	1	1			2	1,987
Fraser Valley							
Abbotsford	127,434	2	5		1	8	15,929
Chilliwack	70,522	2	7	3	1	13	5,425
Harrison Hot Springs	1,585		2			2	793
Hope	6,591	1	3		1	5	1,318
Kent	5,680	1	2			3	1,893
Mission	34,742	1	5			6	5,790
Fraser-Fort George							
Mackenzie	5,454	1	1			2	2,727
McBride	752	1				1	752
Prince George	77,148	4	19	2	1	26	2,967
Valemount	1,250	1	1			2	625
Greater Vancouver							
Bowen Island	3,424		1	1		2	1,712
Burnaby	204,324	6	7			13	15,717
Coquitlam	121,973	2	10		1	13	9,383
Delta	102,655	2	9		1	12	8,555
Langley	122,841	5	10			15	8,189
Maple Ridge	73,280	2	7			9	8,142
New Westminister North	57,480	2	11			13	4,422
Vancouver	133,842	5	13		1	19	7,044
Pitt Meadows	16,673	1	2			3	5,558
Port Coquitlam	57,563	3	5			8	7,195
Port Moody, Anmore, Belcarra	30,854	1	5			6	5,142
Richmond	173,430	4	13			17	10,202
Surrey	393,137	8	23		1	32	12,286

Community	Population	LDB	LRS	RAS	Depots	Total	Pop/Location
Vancouver West	583,267	21	22		1	44	13,256
Vancouver, Lions Bay	45,550	3	3			6	7,592
White Rock	19,577	1	2			3	6,526
Kitimat-Stikine							
Hazelton	342	1	0			1	342
Kitimat	10,587	1	4			5	2,117
New Hazelton	758		1			1	758
Stewart	695	1				1	695
Terrace	12,556	1	4		1	6	2,093
Kootenay-Boundary							
Fruitvale	2,083	1	1			2	1,042
Grand Forks	4,200	1	2			3	1,400
Greenwood	668	1	1			2	334
Midway	630			1		1	630
Rossland	3,725	1	1			2	1,863
Trail, Montrose, Warfield	10,726	1	2			3	3,575
Mount Waddington							
Alert Bay	607	1	2			3	202
Port Alice	1,128	1				1	1,128
Port Hardy	4,597	1	3			4	1,149
Port McNeill	2,928	1	2			3	976
Nanaimo							
Nanaimo	83,495	3	15	1	2	21	3,976
Parksville	11,709	2	2			4	2,927
Qualicum Beach	8,807		2			2	4,404

Community	Population	LDB	LRS	RAS	Depots	Total	Pop/Location
North Okanagan							
Armstrong, Spallumcheen	10,233	1	2			3	3,411
Enderby	3,073	1	2	2		5	615
Lumby	1,738	1	1	1		3	579
Vernon, Coldstream	46,334	2	12	1	2	17	2,726
Northern Rockies							
Fort Nelson	4,823	1	3			4	1,206
Okanagan-Similkameen							
Keremeos	1,306	1	1			2	653
Oliver	4,379	1	2			3	1,460
Osoyoos	4,801	1	2			3	1,600
Penticton	33,061	1	8	1	1	11	3,006
Princeton	2,688	1	1	0		2	1,344
Summerland	11,405	1	2			3	3,802
Peace River							
Chetwynd	2,770	1	2	0	0	3	923
Dawson Creek, Pouce Coupe	12,281	1	3		1	5	2,456
Fort St. John	17,781	1	6			7	2,540
Hudson's Hope	1,157	1	2			3	386
Taylor	1,346		1			1	1,346
Tumbler Ridge	2,526	1	1			2	1,263
Powell River							
Powell River	13,831	1	7	2		10	1,383
Skeena-Queen Charlotte							
Masset	967	1	1			2	484
Port Clements	533			1	1	2	267
Prince Rupert, Port Edward	15,627	1	4			5	3,125

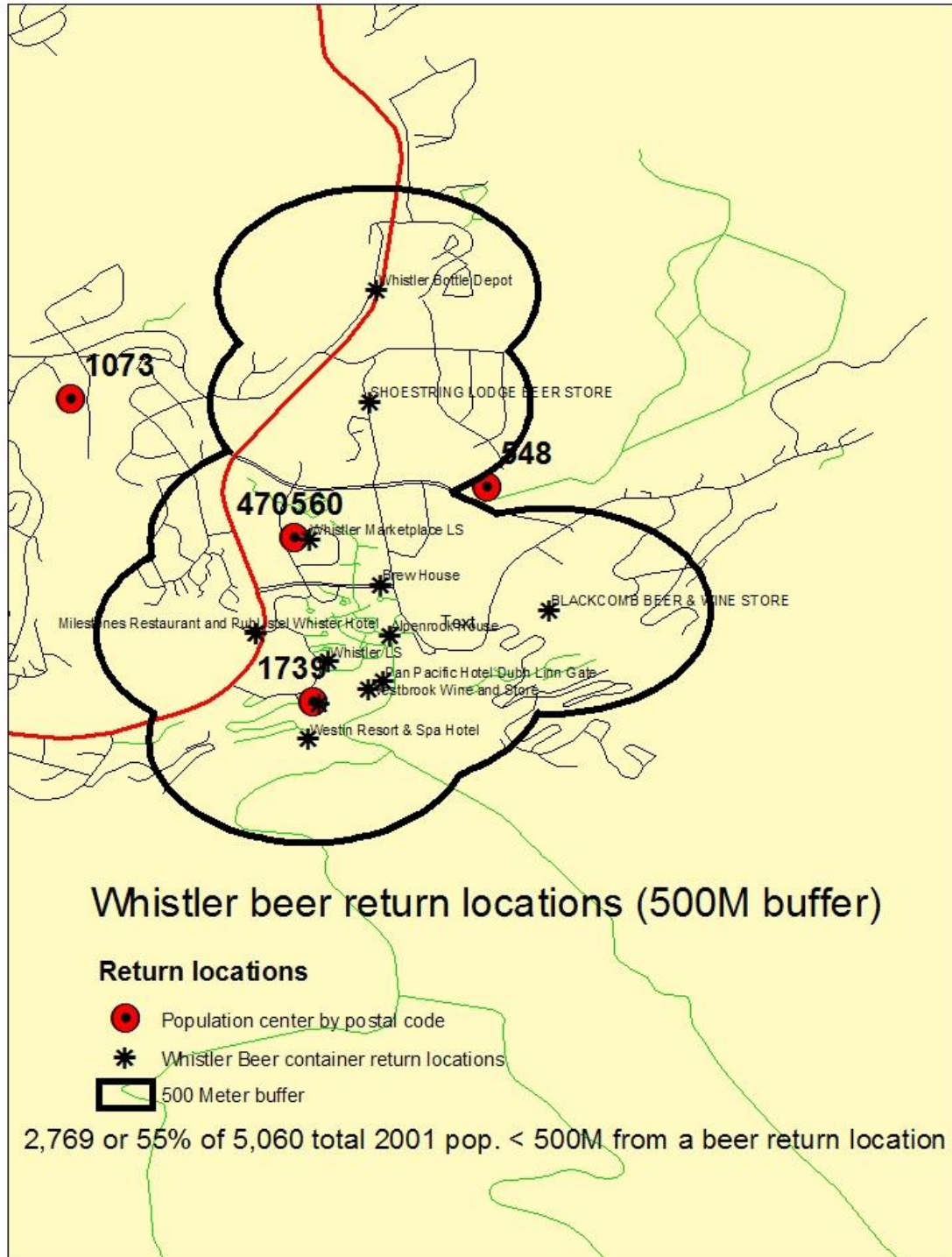
Community	Population	LDB	LRS	RAS	Depots	Total	Pop/Location
Squamish-Lillooet							
Lillooet	2,755	1	2			3	918
Pemberton	2,517	1	1			2	1,259
Squamish	15,726	1	3			4	3,932
Whistler	9,775	3	3			6	1,629
Stikine							
Sunshine Coast							
Gibsons	4,349	1	2			3	1,450
Sechelt, and Sechelt IGD	9,751	1	2	1		4	2,438
Thompson-Nicola							
Ashcroft	1,836	1				1	1,836
Cache Creek	1,134	1	1			2	567
Chase	2,568	1	1	2		4	642
Clinton	654	1	2			3	218
Kamloops	82,714	4	18	2	1	25	3,309
Logan Lake	2,314	1	2			3	771
Lytton	334	1				1	334
Merritt	7,561	1	2		1	4	1,890
Unincorporated Areas	566,985	13	58	152		223	2,543
British Columbia	4,254,522	208	559	202	29	998	4,263

Appendix 2 GIS analysis procedure

To determine the portions of BC population within varying proximity to locations accepting returns of beer containers the following was undertaken:

1. Geo-coding of all BC government liquor retail stores, Rural Agency Stores, Liquor Retail Stores, BDL Depots and ENCORP depot locations in a geographic information system (GIS) by street address and/or postal code with manual verification and correction;
2. Creation of proximity buffers of 500M, 1km, 2 km, 5km and >5km around each location accepting beer returns (see 500M for Whistler B.C. in attached figure below)
3. Plotting of Canadian 2001 census data by postal code
4. Generation of population totals within the distance thresholds.

Sample statistics and mapping results for the GIS analysis described above for beer return locations in Whistler, British Columbia are provided below for example.



Note: The 500M buffers appear oval due to the geographic projection of the map.

Appendix 3

Licensee Retail Stores Under Contract with BDL (As of December 31, 2008)

<u>Cust#</u>	<u>Name</u>	<u>Address1</u>	<u>City</u>	<u>Pcode</u>
71123	ALFREDO'S PUB BEER STORE	4182 15 AVE	PRINCE GEORGE	V2M 1V8
72329	ARCTIC COLD BEER & WINE STORE	9830 100 AVE	FORT ST JOHN	V1J 1Y5
72220	BARCLAY BEER STORE	4277 STAMP AVE	PORT ALBERNI	V9Y 7X8
74796	BARNET MOTOR INN BEER STORE	2025 ST JOHNS ST	PORT MOODY	V3H 2A3
73426	BEACH GARDENS BEER STORE	7074 WESTMINSTER AVE	POWELL RIVER	V8A 1C5
72949	BEST WESTERN RAINBOW BEER STR	43971 INDUSTRIAL WAY	CHILLIWACK	V2R 1A9
73202	BILLY BARKER INN BEER STORE	308 MCLEAN ST	QUESNEL	V2J 2N9
71693	BLACK SWAN BEER STORE	PO BOX 65	SHAWNIGAN LAKE	V0R 2W0
73442	BX NEIGHBOURHOOD PUB BEER STORE	433 CARNEY ST	PRINCE GEORGE	V2M 2K4
73293	BY BAILEY'S PUB BEER STORE	11232 DARTFORD ST	MAPLE RIDGE	V2X 1V1
73285	CANADIAN INN BEER STORE	339 ST PAUL ST	KAMLOOPS	V2C 2J5
71552	CARIBOO HOTEL BEER STORE	254 FRONT ST	QUESNEL	V2J 2K2
71701	COMER STATION PUB BEER STORE	3015 MACKENZIE AVE N	WILLIAMS LAKE	V2G 3N9
72014	CREEKSIDE PUB BEER STORE	3929 LAKESHORE RD	KELOWNA	V1W 1V3
72188	CROWN POINT HOTEL BEER STORE	1377 BAY AVE	TRAIL	V1R 4A7
71479	DAN'S N PUB BEER STORE	4204 50 AVE	FORT NELSON	V0C 1R0
74812	DAYS HOTEL - SURREY CENTRE BEER STO	9850 KING GEORGE HWY	SURREY	V3T 4Y3
72816	DEWDNEY INN BEER STORE	8793 RIVER RD S	DEWDNEY	V0M 1H0
72741	DISCOVERY INN BEER STORE	975 SHOPPERS ROW	CAMPBELL RIVER	V9N 2C5
71438	FIRST LITRE PUB BEER STORE	1724 STRATHCONA AVE	PRINCE GEORGE	V2L 4E8
72030	FORT INN BEER STORE	PO BOX 69	FORT ST JAMES	V0J 1P0
72451	FOX & HOUNDS PUB BEER STORE	26444 32 AVE	ALDERGROVE	V4W 3E8
71537	FROG & NIGHTGOWN BEER STORE	1125 FALCON DR	PORT COQUITLAM	V3E 2G2
71685	GILLNETTER PUB BEER STORE	1864 ARGUE ST	PORT COQUITLAM	V3C 5K4
71644	GOLDEN SPIKE PUB BEER STORE	3224 ST JOHNS ST	PORT MOODY	V3H 2C9
71099	GRAMMA'S MARINE BEER STORE	412 MARINE DR	GIBSONS	V0N 1V0
71800	GREEN TIMBERS PUB BEER STORE	9167 148 ST	SURREY	V3R 3W7
73301	GUILDFORD STATION PUB BEER STORE	10176 154 ST	SURREY	V3R 4J6
74135	HAIDA INN BEER STORE	1342 ISLAND HWY	CAMPBELL RIVER	V9W 2E1
72659	HIGH COUNTRY INN BEER STORE	5000 ACCESS RD	CHETWYND	V0C 1J0
72915	HOSPITALITY BEER STORE	3835 REDFORD ST	PORT ALBERNI	V9Y 3S2
72899	IAN'S BAR & GRILL LIQUOR STORE	889 HOTSPRINGS RD	HARRISON HOT SPRINGS	V0M 1K0

Cust#	Name	Address1	City	Pcode
72204	INN OF THE WEST BEER STORE	4620 LAKELSE AVE	TERRACE	V8G 1R1
71115	J J'S BEER STORE - LIQUOR EXPRESS	2348 WESTWOOD DR	PRINCE GEORGE	V2N 4H3
72568	JOHN B PUB BEER STORE	1000 AUSTIN AVE	COQUITLAM	V3K 3P1
74177	KITIMAT HOTEL BEER STORE	506 ENTERPRISE AVE	KITIMAT	V8C 2E2
73343	LEEWARD INN BEER STORE	649 ANDERTON AVE	COMOX	V9N 5B7
72725	LIQUOR EXPRESS ON YATES	759 YATES ST	VICTORIA	V8W 1L6
71339	MONKEY TREE PUB BEER STORE	4025 BORDEN STREET	VICTORIA	V8X 2E8
72592	MULVANEY'S PUB BEER STORE	PO BOX 604	BURNS LAKE	V0J 1E0
72527	MURPHY'S PUB BEER STORE	2330 HYDRAULIC RD	QUESNEL	V2J 4H2
73434	NESTERS LIQUOR STORE	7017 NESTERS RD	WHISTLER	V0N 1B7
71388	NORTHERN MOTOR INN BEER STORE	3086 HWY 16 E	TERRACE	V8G 3N5
72378	NORTHGATE MOTOR INN BEER STORE	10419 ALASKA RD	FORT ST JOHN	V1J 1B1
71198	NORTHWOOD MOTOR INN BEER STORE	2280 HART HWY	PRINCE GEORGE	V2K 2X8
72246	OCEAN PORT HOTEL BEER STORE	37991 2 AVE	SQUAMISH	V0N 3G0
71602	OFFICE BAR & GRILL BEER STORE	21525 DEWDNEY TRUNK RD	MAPLE RIDGE	V2X 3G5
71958	OVERLANDER MOTOR INN BEER STORE	1118 LAKEVIEW CRES	WILLIAMS LAKE	V2G 1A3
72881	PACKING HOUSE BEER STORE	663 FINNS RD	KELOWNA	V1X 5B7
73319	PHEASANT AND QUAIL PUB BEER STORE	3110 LAKESHORE RD	KELOWNA	V1N 3T1
73913	PHOENIX STATION BEER STORE	360 DUNCAN ST	DUNCAN	V9L 3W4
74721	PRINCE GEORGE HOTEL BEER STORE	487 GEORGE ST	PRINCE GEORGE	V2L 1R5
72394	PRINCE RUPERT HOTEL BEER & WINE	118 6 ST	PRINCE RUPERT	V8J 3L7
73269	QUEENS CROSS PUB BEER STORE	2989 LONSDALE AVE	NORTH VANCOUVER	V7N 3J3
72766	QUEENS MOTOR HOTEL BEER STORE	1110 EWEN AVE	NEW WESTMINSTER	V3M 5E4
71107	RAVEN INN BEER STORE	1060 DEEP COVE RD	NORTH VANCOUVER	V7G 1S3
71032	RENDEZVOUS BEER STORE	20620 56 AVE	LANGLEY	V3A 3Z1
71990	RHINO'S BEER STORE	541 CLARKE RD	COQUITLAM	V3J 3X4
71065	RILEY'S BEER STORE	1751 ROSS RD	KELOWNA	V1Z 1B1
71735	ROBIN HOOD BEER STORE	13468 72 AVE	SURREY	V3W 2N8
73228	ROYAL ANNE HOTEL BEER STORE	C/O O'FLANNIGANS B & W	KELOWNA	V1Y 6N5
71016	SILVER CHALICE PUB BEER STORE	19974 SILVERVIEW RD	HOPE	V0X 1L2
71875	SOLLY'S BEER STORE	2209 SEAL COVE RD	PRINCE RUPERT	V8J 4H6
71818	STEAMERS PUB BEER STORE	2595 QUEENSWAY ST	PRINCE GEORGE	V2L 1N1
71230	SUNSHINE HILLS LIQUOR STORE	6439 120 ST	DELTA	V4E 3G3
71172	TABOR ARMS PUB BEER STORE	100 SOUTH TABOR BLVD	PRINCE GEORGE	V2M 5T4
72238	TALLY HO BEER STORE	1 TERMINAL AVE	NANAIMO	V9R 5R4

Cust#	Name	Address1	City	Pcode
71289	TIME & PLACE BEER STORE	1770 3 HWY	CHRISTINA LAKE	V0H 1E3
71511	TUDOR HOUSE SPORTS PUB LRS	1265 ESQUIMALT RD	VICTORIA	V9A 3P4
72683	TUMBLER RIDGE INN BEER STORE	110 FOUNDERS PLACE	TUMBLER RIDGE	V0C 2W0
72774	URBAN LIQUOR	100 3328 15 AVE	PRINCE GEORGE	V2M 0A1
72303	VILLAGE GREEN BEER STORE	141 TRANS CANADA HWY	DUNCAN	V9L 3P8
71412	WALDORF PUB BEER STORE	1489 HASTINGS ST E	VANCOUVER	V5L 1S4
72576	WEE GEORDIE'S PUB BEER STORE	178 NECHAKO CTR	KITIMAT	V8C 1M8
71156	WELLINGTON BEER STORE	3956 VICTORIA AVE	NANAIMO	V9T 2A2
74671	WEST WIND PUB BEER STORE	4940 CHERRY CREEK RD	PORT ALBERNI	V9Y 7M2
72501	WESTSYDER INN BEER STORE	3369 WESTSYDE RD	KAMLOOPS	V2B 7X5
73046	WESTVIEW BEER WINE & SPIRITS	4675 ONTARIO ST	POWELL RIVER	V8A 5B9
72089	WHEELHOUSE PUB BEER STORE	12911 96 AVE	SURREY	V3V 6V9
72477	WILLOWS PUB BEER STORE	521 ROCKLAND RD	CAMPBELL RIVER	V9W 7E9
71453	WITCH OF ENDOR BEER STORE	22648 DEWDNEY TRUNK RD	MAPLE RIDGE	V2X 3J9
72154	WOODY'S ON BRUNETTE BEER STORE	933 BRUNETTE AVE	COQUITLAM	V3K 1C8
72998	ZODIAC PUB BEER STORE	155 RUTLAND RD S	KELOWNA	V1X 2Z3
74853	28 INN/ROADHOUSE PUB	4545 YELLOWHEAD HWY 16	NEW HAZELTON	V0J 2J0
72072	ABBOTSFORD LIQUOR BARN	2520 MONTVUE AVE	ABBOTSFORD	V2S 3T9
73012	ARLINGTON LIQUOR BARN	5022 JOHNSTON RD	PORT ALBERNI	V9Y 5L7
71776	BELMONT HOTEL BEER STORE	725 3 AVE W	PRINCE RUPERT	V8J 3P9
75428	BEVERLY CORNERS LIQUOR STORE	102 2755 BEVERLY ST	DUNCAN	V9L 6X2
75092	BRANDT'S CREEK BEER STORE	101 437 GLENMORE RD	KELOWNA	V1V 1Y5
75173	BUFFY'S LICENSED LIQUOR STORE	6858 WESTCOAST RD	SOOKE	V0S 1N0
72675	BURNABY LIQUOR BARN	4125 HASTINGS ST E	BURNABY	V5G 2J3
75364	CAMBIE LIQUOR BARN	3415 CAMBIE ST	VANCOUVER	V5Z 2W7
75280	CLEARBROOK LIQUOR BARN	30 31940 S FRASER WAY	CLEARBROOK	V2T 1V6
73095	DAYS INN LIQUOR BARN	123 GORGE RD E	VICTORIA	V9A 1L1
71933	DONEGAL'S LIQUOR BARN	12050 96 AVE	SURREY	V3V 1W3
72006	DUFFY'S LIQUOR BARN	1380 HILLSIDE DR	KAMLOOPS	V2E 2N1
72097	FLEETWOOD ARMS LIQUOR BARN	8410 160 ST	SURREY	V3S 3T8
72758	FOUR MILE HOUSE PUB BEER STORE	ATTN: CHERYL	VICTORIA	V9B 1G1
73103	HAREWOOD ARMS PUB BEER STORE	508 8 ST	NANAIMO	V9R 1B4
71529	HOOK & LADDER PUB BEER STORE	8593 132 ST	SURREY	V3W 4N8
71362	JOLLY COACHMAN PUB BEER STORE	19167 FORD RD	PITT MEADOWS	V0M 1P0
71883	JOLLY MINER LIQUOR BARN	514 HALIBURTON ST	NANAIMO	V9R 4W2
72261	KELOWNA LIQUOR BARN	15 590 HWY 33	KELOWNA	V1X 6A8

Cust#	Name	Address1	City	Pcode
74267	LADYSMITH LIQUOR BARN	1010 1 AVE	LADYSMITH	V9G 1A5
71180	LANTZVILLE LIQUOR BARN	7197 LANTZVILLE RD	LANTZVILLE	V0R 2H0
72733	LAST SPIKE PUB BEER STORE	3 AVE & CORPORATION ST	FORT FRASER	V0J 1N0
73707	LIGHTHOUSE BEER & WINE STORE	5764 WHARF ST	SEHELDT	V0N 3A0
75287	LIQUOR DEPOT - CHILLIWACK	10 45850 YALE RD	CHILLIWACK	V2P 2N9
75361	LIQUOR DEPOT - KAMLOOPS	1430 SUMMIT DR	KAMLOOPS	V2C 6B8
75362	LIQUOR DEPOT - RICHMOND	868 5300 NO 3 RD	RICHMOND	V6X 2X9
75295	LIQUOR DEPOT - WESTBANK	100 3645 GOSSET RD	WESTBANK	V4T 2N8
75442	LIQUOR DEPOT COQUITLAM	24 2773 BARNET HWY	COQUITLAM	V3B 1C2
75445	LIQUOR DEPOT CROSSROADS	6950 OLD ISLAND HWY	NANAIMO	V9R 4V8
75172	LIQUOR DEPOT DILWORTH LTD	D220 2339 HWY 97	KELOWNA	V1X 4H9
71982	LIQUOR DEPOT PRINCE GEORGE	1315 NORANDA RD	PRINCE GEORGE	V2K 4M5
75255	LIQUOR DEPOT SAANICH	104 3510 BLANSHARD ST	VICTORIA	V8X 1W3
75461	LIQUOR DEPOT VERNON	200 2401 58 AVE	VERNON	V1H 2A1
75228	LIQUOR PLUS	2915 DOUGLAS ST	VICTORIA	V8T 4M8
75322	LIQUOR PLUS	4468 WEST SAANICH RD	VICTORIA	V8Z 3E9
75171	MA MILLERS LICENSE LIQUOR STORE	2903 SOOKE LAKE RD	VICTORIA	V9B 4R4
72600	MOONRAKERS PUB BEER STORE	525 7 ST	NEW WESTMINSTER	V3M 3L6
73335	OAK & CARRIAGE LIQUOR BARN	3287 LAKE COWICHAN RD	DUNCAN	V9L 4C1
75303	OYSTER RIVER LIQUOR STORE	2207B GLENMORE RD	CAMPBELL RIVER	V9H 1E5
75242	ROD & GUN LIQUOR BARN	163 ALBERNI HWY	PARKSVILLE	V9P 2H2
72196	ROYAL COACHMAN BEER STORE	84 DOGWOOD ST	CAMPBELL RIVER	V9W 2X7
75305	SAANICH CENTRE LIQUOR PLUS	603 3991 QUADRA ST	VICTORIA	V8X 1J8
71891	SAILOR HAGAR'S PUB BEER STORE	86 SEMISCH AVE	NORTH VANCOUVER	V7M 3H8
71750	SAWBUCKS LIQUOR BARN	1640 152 ST	SURREY	V4A 4N2
73244	SKEENA HOTEL BEER STORE	4519 GREIG ST	TERRACE	V8G 1M6
72253	SOOKE RIVER HOTEL BEER STORE	SOOKE RIVER RD	SOOKE	V0S 1N0
72436	STATION HOUSE LIQUOR BARN	2835 BYM MAUR RD	VICTORIA	V9B 3X5
75153	THE LOCAL LICENSED LIQUOR STORE	108 149 FULFORD GANGES RD	SALT SPRING ISLAND	V8K 2T9
73236	THE WESTERLY HOTEL BEER STORE	1590 CLIFF AVE	COURTENAY	V9N 2K4
71636	VALLEYVIEW LIQUOR BARN	8 2101 E TRANS CANADA HWY	KAMLOOPS	V2C 4A6
75331	VICTORIA'S PRIVATE LIQUOR STORE	667 MAIN ST	LILLOOET	V0K 1V0
72493	VILLAGE LIQUOR BARN	1 160 CORFEILD ST	PARKSVILLE	V9P 2G5
73004	WINDWARD PUB BEER STORE	BEAUFORD CENTRE MALL	NANAIMO	V9S 5K8
75249	14TH AVENUE PUB BEER & WINE LIQUOR	32516 14 AVE	MISSION	V2V 2N7
75351	6 MILE LIQUOR STORE	498 ISLAND HWY	VICTORIA	V9B 1N5

Container Depots Under Contract with BDL

Cust#	Name	Address1	City	Pcode
61869	ANN C.A. KIM & H.J.CHO	PO BOX 754	UCLUELET	V0R 3A0
87085	BILL'S BOTTLE DEPOT LTD	PO BOX 816	SALMON ARM	V1E 4N9
86519	CHARLOTTE BUILDING SUPPLIES	PO BOX 549	QUEEN CHARLOTTE	V0T 1S0
34405	CHASER'S BOTTLE DEPOT	4612 27 ST	VERNON	V1T 4Y6
54267	CHILLIWACK BOTTLE DEPOT LTD	2 45934 TRETHERWAY AVE	CHILLIWACK	V2P 1K5
1236	COLUMBIA BOTTLE CRESTON	1 1420 NORTHWEST BLVD	CRESTON	V0B 1G6
1237	COLUMBIA BOTTLE KELOWNA	680 DEASE RD	KELOWNA	V1X 4A5
49227	COLUMBIA ETHEL	635 DEASE RD	KELOWNA	V1X 4A4
86300	COURTENAY RETURN CENTRE	1255 MCPHEE AVE	COURTENAY	V9N 3A3
975	DAWSON CREEK WAREHOUSING	C/O TIM THOMPSON	BLIND BAY	V0E 1H1
46430	DOLLARS & CENTS BOTTLE DEPOT	UNIT B 425 MADSEN RD	NANAIMO	V9S 5V3
60533	FORT ST JOHN BOTTLE DEPOT	10104 93 AVE	FORT ST JOHN	V1J 1E2
86663	GEORGE HALE TRANSFER	PO BOX 363	MERRITT	V1K 1B8
46649	GOVERNMENT STREET BOTTLE RETURN	2111 GOVERNMENT ST	VICTORIA	V8T 4P2
43441	HOPE BOTTLE DEPOT	PO BOX 694	HOPE	V0X 1L0
73	HUSTON AGENCIES LIMITED	405 MACKENZIE AVE S	WILLIAMS LAKE	V2G 1C8
86720	INTERIOR FREIGHT BOTTLE DEPOT	3610 26 AVE	VERNON	V1T 1P7
86845	J & C (PENTICTON) BOTTLE DEPOT	200 ROSETOWN AVE	PENTICTON	V2A 3J4
64	JORD ASH HOLDINGS LTD.	3550 RIVER DR	TERRACE	V8G 3P1
63850	JUNCTION BOTTLE DEPOT	149 OYSTER BAY DR	LADYSMITH	V9G 1A3
60494	KAMLOOPS RECYCLING CENTRE	1302 D SALISH RD	KAMLOOPS	V2C 6B7
86860	LORNE ST BOTTLE DEPOT	1302 D SALISH RD	KAMLOOPS	V2C 6B7
87080	MARPOLE CONTAINERS LTD	C/O QUEADE HOLDINGS	DELTA	V3M 6J8
44	MILLENNIUM BOTTLE DEPOT LTD	14745 107A AVE	SURREY	V3R 1V2
61812	MILLENNIUM BOTTLE DEPOT LTD	8478 171 ST	SURREY	V4M 0B1
48169	MOSTAR DEPOT LTD	4 4151 MOSTAR RD	NANAIMO	V9T 6A6
38381	NECHAKO BOTTLE DEPOT - #88 HOLDINGS	1922 1 AVE	PRINCE GEORGE	V2L 2Y9
55701	NORTH ISLAND BOTTLE DEPOT	1393C MAPLE ST	CAMPBELL RIVER	V9W 5E3
54723	NORTH VANCOUVER RECYCLING LTD	310 BROOKSBANK AVE	NORTH VANCOUVER	V7J 2C1
48376	REGIONAL RECYCLING	750 RIVERSIDE RD	ABBOTSFORD	V2S 7P6
87391	REVELSTOKE BOTTLERS LTD	PO BOX 40	REVELSTOKE	V0E 2S0
87650	REX'S RECYCLING - MT	BOX 848	VALEMONT	V0E 2Z0
87074	SKYWAY DISTRIBUTORS LIMITED	304 SLATER RD NW	CRANBROOK	V1C 4K5
21	SKYWAY DISTRIBUTORS LIMITED	2324 6 AVE	CASTLEGAR	V1N 3L1
61868	UCLUELET BOTTLE DEPOT	2390 PACIFIC RIM HWY	UCLUELET	V0R 3A0
87605	UNITED WE CAN	39 E HASTINGS ST	VANCOUVER	V6A 1M9
87647	VANGUARD BOTTLE DEPOT	88 FAWCETT RD	COQUITLAM	V3K 6V5

