



Reference: 416279

November 26, 2025

Brewers' Recycled Container Collection Council  
1711 Kingsway Avenue  
Port Coquitlam, BC  
V3C 0B6

Dear Jo-Anne St. Godard:

Thank you for submitting proposed amendments to the Brewers' Recycled Container Collection Council (BRCCC) Schedule 5 Packaging and Paper Extended Producer Responsibility (EPR) Plan (the "plan") initially on August 6, 2021, in fulfillment of the requirements of Part 2, Section 6 of the [Recycling Regulation](#) (the "regulation") made under the [Environmental Management Act](#). Further, the most recent revision of the plan was submitted on November 6, 2025, and enclosed to this letter.

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

Under the regulation, the director, otherwise known as the Statutory Decision Maker (SDM), has the ability to approve an EPR plan submitted under section 4. Prior to issuance of this decision letter, BRCCC was provided with feedback on the proposed plan amendments and has had the opportunity to propose further amendments or provide additional information for consideration.

I have completed my review of the submitted plan, and BRCCC's revisions of the plan in response to the proposed amendments as outlined in my preliminary decision letter of July 28, 2025. While BRCCC has addressed several of the identified deficiencies, there are matters that I do not consider to be effectively addressed, which are listed below. Please be advised that in addition to the amendments proposed by BRCCC in the most recent revision of the plan submitted on November 6, 2025, and hereby approved by me in this letter, I am further amending the plan, pursuant to Section 5(5) of the regulation concerning the areas identified below.

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**Ministry of Environment  
and Parks**

Extended Producer Responsibility, Program  
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## 1. Appointment of EPR Agency

The plan states that the producers that BRCCC represents will be updated on BRCCC's website as the renewed plan is implemented. However, no link to this list of producers BRCCC represents to collect and manage obligated packaging and paper products under Schedule 5 is included in the plan. While I acknowledge the list is available on the BRCCC website, the plan should also include a webpage link to the full list of producers BRCCC represents, and ensure the list is updated regularly. I am amending page 5 of the plan to:

- i. Remove the sentence

“The producers for whom BRCCC is the product EPR agency under Schedule 5 is listed and will be updated on BRCCC's website as the renewed plan is implemented.”

And replace with

“For a list of all producers BRCCC represents to collect and manage obligated packaging and paper products under Schedule 5, please visit <https://envirobeerbc.ca/about-brccc/>.”

## 2. Products Covered Under the Plan

I acknowledge that BRCCC updated the description of the products covered under the plan to align with the product categories outlined in Schedule 5 of the regulation. However, as BRCCC's Schedule 1 and Schedule 5 plans work in tandem, this description should also align with BRCCC's Schedule 1 plan. I am amending the following sentence on page 5 of the plan to read:

- i. “This EPR plan covers packaging and paper products regulated under Schedule 5 of the Recycling Regulation sold with refillable glass **bottles** and aluminum alcoholic cans (hereafter collectively referred to as “beer secondary packaging”).”

The plan states that Recycle BC is the other EPR agency for residential secondary packaging that operates under a separate EPR plan in B.C. “Secondary packaging” is a product description specific to BRCCC's EPR plan. Recycle BC operates an EPR program for all residential packaging and paper products in B.C. Therefore, reference to the products Recycle BC collects should be residential packaging and paper products, and not secondary packaging. I am amending the following sentence on page 6 of the plan to read:

- ii. “Recycle BC is the other EPR program for residential **packaging and paper products** that operates under a separate EPR plan in B.C.”

### 3. Collection System and Consumer Accessibility

Pursuant to Section 5(1)(c)(iii) of the regulation, a plan must adequately provide for reasonable and free consumer access to collection facilities or collection services. In addition, pursuant to Sections 5(2)(c), (h), (i), and (k) of the regulation, the plan must clearly describe the collection system for the producer’s product, while considering the population and geographical area, the size of the population intended to be serviced by the producer’s collection facilities or collection services and the provision of convenient options for the collection of products in urban centres and small, isolated communities, and for persons with disabilities or who have no access to transportation.

The plan states that “*BRCCC will coincide consumer accessibility targets with its Schedule 1 plan which targets adding 8 collection sites to its network tallying 1189 collection sites by 2025.*” The plan should specify that BRCCC will be coinciding its Schedule 5 consumer accessibility with its Schedule 1 plan. I am amending this sentence to read:

- i. “BRCCC will coincide **Schedule 5** consumer accessibility targets with its Schedule 1 plan which targets adding 8 collection sites to its network tallying 1189 collection sites by 2025.”

The target number of collection locations outlined in *Section 11 Performance Monitoring and Reporting Commitments* of the plan do not align with the collection location targets proposed in BRCCC’s Schedule 1 plan. I am amending the Accessibility Targets row in the table in *Section 11* to read:

- ii.

Accessibility Targets	Year 1	Year 2	Year 3	Year 4	Year 5
	1181 locations	1182 locations	1185 locations	1186 locations	1189 locations

I acknowledge that the plan has been updated describing how underserved, remote, and non-urban areas are identified and how access for these areas is addressed. The plan should also commit to report annually on the new strategies that are developed to encourage people in remote areas to bring BRCCC’s Schedule 5 materials to collection locations for recycling. I am amending page 9 and *Section 11 Performance Monitoring and Reporting Commitments* of the plan to include the following reporting commitment:

- iii. “BRCCC commits to report, each year in annual reports, on new strategies that are developed to encourage people in underserved, remote and non-urban areas to return beer secondary packaging to BRCCC collection locations.”

The plan states that “*BRCCC will engage with FNRI to investigate partnership opportunities*” however it does not commit to report on activities undertaken with the First Nations Recycling Initiative (FNRI). I am amending page 9 and *Section 11 Performance Monitoring and Reporting Commitments* of the plan to include the following reporting commitment:

- iv. “BRCCC is a partner with the First Nations Recycling Initiative (FNRI) and commits to report out annually on the activities undertaken with the FNRI, which support First Nations communities in the removal of BRCCC Schedule 5 materials, starting with the 2025 annual report.”

The plan references BRCCC’s support of waste composition studies as a member of SABC; however, the plan does not include a commitment to participate in waste composition studies. I am amending *Section 11 Performance Monitoring and Reporting Commitments* of the plan to include the following reporting commitment:

- v. “BRCCC commits to participate in waste audits and BRCCC will commit to report on the results of the waste audits with respect to BRCCC Schedule 5 materials in annual reports.”

#### 4. Assessing the Performance of the Program

The plan describes BRCCC’s methodology for calculating the recovery rate of packaging and paper, however inconsistencies in how it is described in the plan result in a lack of clarity regarding the methodology used. I am amending the following sentences on page 14 of the plan by removing the crossed-out words and incorporating the bolded, underlined changes:

- i. “Pallets of beer bottle cases (for both refillable and non-refillable bottles) are collected from ~~each of the four~~ streams set out above.”
- ii. “Ultimately, other beer secondary packaging collected through these streams will be processed either:
  - by BDL on behalf of BRCCC (and is captured in the weight of processed materials at POCO)
  - through BRCCC’s collection channels **(contracted depots, BC Liquor Stores, private retail stores)** and is captured in the processed weight of materials from ~~that~~ **these** channels ~~(curbside, multi-family and depot)~~

- through RBC's curbside program which is quantified through audits or
- materials sent directly for recycling by a collector.

iii. "For the total recovered packaging, this **is calculated through** data submitted by: brewers, POCO's recycler, LDB, **BC Liquor Stores, private retail stores,** Recycle BC for purchased tonnes, and depots for additional purchased tonnes."

## 5. Consumer Awareness

Pursuant to Sections 5(1)(c)(iv) and 5(2)(j) of the regulation, the plan must include a description of how the producer will ensure consumers are informed about the program, including the materials accepted, the locations where they can be returned, and the environmental and economic benefits of participating in the program.

The plan sets a target of 80% consumer awareness by year 5 of the plan; however, it remains unclear what specific awareness metrics are being measured. The plan does not clarify whether BRCCC is measuring awareness of the program, awareness of the products included in the program, the return locations, or how to access information. Ensuring that consumers are aware of the program, the products collected, and available collection facilities is necessary to help reduce consumer confusion and enhance consumer awareness of available recycling options, which would ultimately lead to an increase in recovery of BRCCC's packaging and paper products. BRCCC's website has made progress towards this aim, and I encourage highlighting the various types of packaging and paper that are covered under the plan to further enhance awareness. I am amending the following sentence on page 16 of the plan to read:

- i. "BRCCC has set the performance target of 80% for consumer awareness **by year 5 of the plan that** beer-related secondary packaging **can be returned to BRCCC collection locations.**"

## 6. Management of Environmental Impacts

Pursuant to Sections 5(1)(c)(v), (vii), (viii), a plan must adequately provide for assessing the management of environmental impacts of the program, eliminating or reducing the environmental impacts of a product throughout the product's life cycle, and the management of the product in adherence to the order of preference of the pollution prevention hierarchy (PPH).

It is acknowledged that elements of the PPH are reported on in the plan and BRCCC has committed to report annually a description of how packaging and paper products will be managed in accordance with the PPH. However, each element of the PPH must be described in the plan itself, as well as in annual reports. Any level of the PPH that is not

met must be justified in the plan and annual report. The plan describes elements of the PPH (e.g., BRCCC places an emphasis on reuse and recycling), however not all hierarchy levels are discussed.

- i. I am amending the plan to require BRCCC to complete and submit to the director within 45 days after the date of this letter, the following PPH table to address how the product management accommodates the PPH, pursuant to Section 5(3)(a)-(g) in descending order of preference, providing justification for any levels that cannot be met.

“Pursuant to Section 5(3)(a)-(g) in descending order of preference, BRCCC manages its products as follows. For any levels that cannot be met, justification is provided.”

PPH Levels		Management Activities
a.	Reduce the environmental impact of producing the product by eliminating toxic components and increasing energy and resource efficiency;	
b.	Redesign the product to improve reusability or recyclability;	
c.	Eliminate or reduce the generation of unused portions of a product that is consumable;	
d.	Reuse the product;	
e.	Recycle the product;	
f.	Recover material or energy from the product;	
g.	Otherwise, dispose of the waste from the product in compliance with the Act.	

- ii. I am amending *Section 11 Performance Monitoring and Reporting Commitments* of the plan to include the following reporting commitment:

“Each level of the PPH, regardless of whether or not materials are managed at each level, will be reported on annually.”

## 7. Housekeeping Updates to the Plan

In order to ensure that reference to the ministry is current, I am amending the sentence *“This plan reinforces existing consumer practices that has underpinned its success for decades, resulting in BRCCC recovering the majority of its packaging and printed paper (PPP) before the regulation came into force and is an amendment to the approved EPR plan approved by the BC Ministry of the Environment and Climate Change Strategy (the “Ministry”) on July 31, 2016, in adherence with the regulatory 5-year review cycle as per section 6(a)”* to read:

- i. “This plan reinforces existing consumer practices that has underpinned its success for decades, resulting in BRCCC recovering the majority of its packaging and printed paper (PPP) before the regulation came into force and is an amendment to the approved EPR plan approved by the **BC Ministry of the Environment and Parks** (the “Ministry”) on July 31, 2016, in adherence with the regulatory 5-year review cycle as per section 6(a).”

## **Ministry Expectations:**

I note further opportunities for continuous improvement across all future plans and amendments submitted by BRCCC. The following expectations are provided for BRCCC's consideration for future amendments to the plan:

### **A. Consultation**

Moving forward with consultation, BRCCC is expected to include efforts towards informing Indigenous communities and governments of BRCCC's Schedule 5 program and impacts, including informing the Indigenous Zero Waste Technical Advisory Group (IZWTAG) as a method to reach a broad Indigenous audience.

### **B. Recovery Rate**

I acknowledge that BRCCC has included updated recovery rate targets that increase annually over the five-year period of the plan. However, BRCCC has failed to meet its recovery targets in six of the past eight years, with a declining trend over the last three years. Given that approximately 95% of packaging and paper covered by the plan is cardboard/boxboard cases, materials that British Columbians are accustomed to recycling, BRCCC must demonstrate measurable progress in meeting its recovery targets and show continuous improvement throughout the next plan cycle.

### **C. End-of-Life Management of Products Not Managed by the Program**

Each year, over 20% of residential packaging and paper products covered under BRCCC's Schedule 5 plan are not accounted for. While BRCCC has identified some destinations for this unaccounted-for material (e.g., packaging and paper returned to unauthorized locations or returned through Recycle BC's collection channels), there remains a need for a more thorough understanding of where these materials are going to support improved collection strategies and enhance overall recovery outcomes. For BRCCC's next plan, efforts should be directed towards analyzing the materials not currently accounted for by the program. It is the ministry's expectation that the analysis will then be used by BRCCC to develop a strategy outlining recommended activities or program enhancements to support increased recovery performance.

### **D. Accessibility Target**

As the ministry expects continuous improvements in ensuring consumers have reasonable and free access to collection services, to increase the population within the 10-minute drive time of a BRCCC authorized collection facility, BRCCC should consider year-over-year improvements in the accessibility target.

In addition, BRCCC should consider distinguishing accessibility targets between community types with different population densities. The current target combines these

differing population densities which can make it challenging to determine the accessibility level for small populations. BRCCC should consider including an accessibility target for consumers in both urban and rural communities.

E. Accessibility for First Nations Communities

To enhance both accessibility and convenience of recycling for First Nations communities in British Columbia, BRCCC should consider liaising and collaborating with IZWTAG. Through this partnership, IZWTAG could assist BRCCC in identifying First Nations communities interested in participating in BRCCC's Schedule 5 EPR program. Increased participation by First Nations in the BRCCC program would contribute to higher recovery rates, while also improving awareness, accessibility, and convenience in these communities for the collection of BRCCC program materials.

F. Reporting Collected Product in Each Regional District

BRCCC's next plan should commit to report annually the total amount of packaging and paper collected in each regional district based on actual amounts collected in each regional district and use the data to calculate per capita amounts in each regional district. As per Section 8(2)(e.1) of the regulation, the total amount of the producer's product collected in each regional district must be reported annually. I acknowledge that BRCCC reports annually regional district estimates based on per capita distribution for each district. However, reporting the total amount of product collected in each regional district is a regulatory requirement, and should not be estimated based on per capita distribution for each district. Actual regional data can help determine service gaps and target areas for increasing consumer awareness.

G. Consumer Awareness

BRCCC's failure to meet its consumer awareness targets, achieving only 52% awareness in 2021, highlights the need for more robust and targeted efforts to engage residents and promote participation in the program. This gap in awareness also directly impacts recovery rate performance and tonnage of BRCCC Schedule 5 materials entering Recycle BC's collection channels. Moving forward, BRCCC is expected to demonstrate measurable progress toward its awareness targets and show continuous improvement throughout the next plan cycle. This includes making stronger commitments to consumer education and outreach, with a particular focus on promoting awareness of BRCCC's collection locations. By integrating awareness of BRCCC collection locations into its existing awareness metrics, BRCCC will be better positioned to improve participation and material recovery outcomes.

#### H. Paying the Cost

EPR plans must include a general methodology or basis of compensation to adequately demonstrate producers are paying the costs for collection services rendered. Please note that the ministry has updated guidance documents for producers paying the cost, [Paying the Costs under Recycling Regulation Section 5\(1\)\(c\)\(i\) and Dispute Resolution Guidance 2024](#). For future plan reviews, it is expected that BRCCC follows the updated guidance to ensure the compensation rate methodology for all collection streams (depots, BC Liquor Stores, private liquor retail stores, etc.) for the collection, sorting and handling of packaging and paper products is provided. Prior to submitting the producer paying the cost methodology, satisfactory consultation must be undertaken with all interested parties. The producer paying the cost methodology should be presented as the steps taken/methods used (e.g., how costs were calculated, step-by-step process for negotiating costs, what happens at each step of the process, what variables are included in the compensation rate methodology, etc.) which will allow interested parties to determine implications to their interests.

#### I. End Fate

When reviewing BRCCC's non-financial assurance report, the evaluation criteria to assure that 100% of collected materials are directed for reuse or to recycling commodity markets appear to provide minimal assurance that packaging is being recycled. It is recommended BRCCC engage with their third-party auditor to develop improved non-financial assurance evaluation criteria to demonstrate recovered packaging and paper is managed in accordance with the PPH (e.g., consider similar evaluation criteria described in BRCCC's 2024 non-financial assurance report that is used to assess whether aluminum cans are managed in accordance with the PPH).

### **Reporting Expectations**

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

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

### **Third Party Assurance for Non-Financial Information in Annual Reports**

Third party assurance for non-financial information in Annual Reports is required through Section 8(2)(h) of the regulation. The assurance report should be completed in accordance with the document entitled, “Third party assurance for non-financial information in annual reports” dated November 2024 and revised from time to time, which is enclosed.

### **Next Plan Review Due Date**

Section 6 of the regulation requires a plan review every five years. As per this requirement, BRCCC must review its approved plan, consult on the plan, and submit proposed amendments to the director, or notify the director in writing that no amendments to the plan are necessary, by **July 31, 2026**. Guidance on this process can be found on the Extended Producer Responsibility webpage at: [Extended Producer Responsibility - Province of British Columbia \(gov.bc.ca\)](https://www2.gov.bc.ca/gov/content/industry/extended-producer-responsibility).

### **Right to appeal**

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

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

Sincerely,



Andreas Wins-Purdy, P.Ag.  
Director, Recycling and Pesticide Authorizations  
Authorizations and Remediation Branch  
Environmental Protection Division

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

- Brewers' Recycled Container Collection Council (BRCCC) Schedule 5 Packing and Paper Extended Producer Responsibility Plan, submitted November 6, 2025.
- Third party assurance for non-financial information in annual reports, November 2024



## Brewers Recycled Container Collection Council (BRCCC)

### Schedule 5 Packaging and Paper Extended Producer Responsibility Plan



Submitted to: Authorizations and Remediation Branch  
BC Ministry of Environment and Parks

Prepared by: Brewers Recycled Container Collection  
Council (BRCCC)  
1711 Kingsway Avenue  
Port Coquitlam, BC V3C 0B6  
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## **Table of Contents**

1. INTRODUCTION
2. DUTY OF PRODUCER
3. APPOINTMENT OF EPR AGENCY
4. PRODUCTS COVERED UNDER THE EPR PLAN
5. STAKEHOLDER CONSULTATION
6. COLLECTION SYSTEM AND CONSUMER ACCESSIBILITY
7. CONSUMER AWARENESS
8. MANAGEMENT OF PROGRAM COSTS
9. MANAGEMENT OF ENVIRONMENTAL IMPACTS
10. DISPUTE RESOLUTION
11. PERFORMANCE MONITORING & REPORTING COMMITMENTS

## Glossary of Terms

Term	Abbreviation, if applicable	Definition
Authorized Return Locations	-	Government liquor store, licensee retail store, rural agency store or contracted depot by BDL or BRCCC
Boxboard	-	Fiber-based packaging that is lightweight, thin paperboard
Brewers Distributors Ltd	BDL	Service provider for BRCCC and the company responsible for distributing beer to over 4,000 provincial liquor stores, private licensee retail stores, bars, restaurants and other licensed establishments
Brewers Recycled Container Collection Council	BRCCC	Not-for-profit society under the BC Societies Act established by the brewing sector to transparently administer the financial and logistical requirements of the industry's EPR in BC
Collection facilities	-	Any facility that collects packaging and paper products from customers for recycling, whether or not beverage containers are included.
Extended Producer Responsibility	EPR	Policy approach where producers are responsible for the environmental impacts of their products through its lifecycle and requirement under the <i>Recycling Regulation</i> in BC
Industrial, Commercial & Institutional	IC&I	Generally refers to business or public services sector (i.e., hospitals, schools) rather than residential
Industry Standard Bottle	ISB	341ml long-neck brown refillable glass bottle that is shared among numerous brewers across Canada
Liquor Distribution Branch	LDB	Branch of BC government responsible for the wholesale distribution and retail sale of beverage alcohol
Licensee(s)	-	Premises that sell or serve liquor to the public for on-site consumption (e.g., bars, restaurants)
Licensee retail store(s)	LRS	Premises that primarily sell liquor to the public for home consumption
Old corrugated cardboard	OCC	Fiber-based packaging material is commonly known as "cardboard" that has multi-layer structure to give strength to carry products.
Packaging and paper products	PPP	Refers to product category consisting of packaging and paper
Recycle BC	RBC	Other EPR agency responsible for residential PPP in BC Return
Factor	-	Average amount of secondary packaging that is recovered for each bottle recovered through multiple collection streams
Secondary Packaging	-	Packaging that group a certain amount of products or containers together into a cohesive unit
Stock keeping unit	SKU	Unit of measure in which the stocks of a material are managed

## 1. INTRODUCTION

The Brewers Recycled Container Collection Council (BRCCC) is a not-for-profit society registered in British Columbia, created to steward and administer the collection of used beverage alcohol cans and refillable bottles in British Columbia and all ancillary functions to this purpose, including the EPR of the associated secondary packaging in compliance with the *Recycling Regulation*. In BC, the *Recycling Regulation* under the *Environmental Management Act* sets out the requirements for Extended Producer Responsibility (EPR), including the requirement for packaging and paper products extended producer responsibility plans.

This EPR plan works in conjunction with BRCCC's Schedule 1 EPR plan – a program that has been in place since the end of Prohibition (1927) and which has attained a recovery rate approximately 90% year over year. This plan reinforces existing consumer practices that has underpinned its success for decades, resulting in BRCCC recovering the majority of its packaging and printed paper (PPP) before the regulation came into force and is an amendment to the approved EPR plan approved by the BC Ministry of the Environment and Climate Change Strategy (the "Ministry") on July 31, 2016, in adherence with the regulatory 5-year review cycle as per section 6(a).

## 2. DUTY OF PRODUCER

Under Section 2 of the *Recycling Regulation*, a producer must have an approved plan under Part 2 [Extended Producer Responsibility Plans] and comply with the approved plan with respect to a product in order to use in a commercial enterprise, sell, offer for sale or distribute the product in British Columbia.

## 3. APPOINTMENT OF EPR AGENCY

The *Recycling Regulation* indicates the following:

- *Before the agency begins to carry out the duties of the producer under Part 2 of the Recycling Regulation the producer must notify the agency in writing of the appointment, specifying the duties under Part 2 the agency will perform on behalf of the producer – Section 2(2)*
- *A copy of any notification the agency received from the producer is available upon the request of a director – Section 2(4)(b)*
- *The EPR plan confirms the duties that the agency will perform on behalf of each producer that has joined the agency; or alternatively, state how written confirmation will be provided to a director under the Regulation – Section 2(3)(a)*

All of the brewers for whom BRCCC acts as the product steward under Schedule 1 of the *Recycling Regulation* were invited to join BRCCC's Schedule 5 program when it was implemented. BRCCC makes efforts to provide producer outreach to inform regulatory obligations under Schedule 5.

The producers for whom BRCCC is the product EPR agency under Schedule 5 is listed and will be updated on BRCCC's website as the renewed plan is implemented.

BRCCC is a not-for-profit society under the BC Societies Act established by the brewing sector to transparently administer the financial and logistical requirements of the industry's EPR in BC. The BRCCC Board of Directors is composed of members representing Brewers' Distributor Ltd. (BDL), Labatt Breweries Ltd., Molson Coors Canada, Sleeman Breweries Ltd., the BC Craft Brewers Guild and Beer Canada. Board members collectively represent over 95 percent of the beer volume sold in the province, with a cross section of brand owners from local, national and international companies. The names and affiliations of the members of the BRCCC's Board of Directors and bylaws are posted on BRCCC's [website and updated as needed](#). Should there be any changes to agency structure and governance, and board members or affiliations, it will be noted in BRCCC's annual report.

BRCCC is the appointed product EPR agency for the majority of beer secondary packaging generated in the BC marketplace to carry out the duties of the producer under Part 2 on their behalf with respect to regulated packaging and paper products. [Producers](#) appoint BRCCC to act as an agent on their behalf by written agreement to confirm the duties that BRCCC will perform on behalf of each registered producer. BRCCC acts an agent for beer secondary packaging for both the domestic and imported brands represented by each of these brewers, cider manufacturers and brewery agents. As a result, BRCCC brand owners account for the vast majority, but not necessarily all, of the beer sold in BC. A copy of any notification the agency received from the producer appointing the agency and specifying the duties the agency will perform on their behalf are available upon request by the Director.

Brewers Distributor Limited (BDL), a privately-owned distribution and logistics company operating in the western Canadian provinces of British Columbia, Alberta, Saskatchewan and Manitoba, acts as BRCCC's service provider in discharging these EPR objectives. BDL's operations in BC comprise of two primary elements: the warehousing and distribution of beer, cider and coolers for a number of breweries and liquor suppliers to retail locations and licensed establishments throughout BC<sup>1</sup>, for sale to the public ("full goods"); and the collection of certain beer, cider and beverage alcohol containers (i.e., refillable glass bottles and aluminum beverage alcohol cans) and related packaging as the sub-contractor acting on behalf of BRCCC, the product EPR agency representing the majority of brewers and cider manufacturers ("product EPR").

#### **4. PRODUCTS COVERED UNDER THE EPR PLAN**

This EPR plan covers packaging and paper products regulated under Schedule 5 of the Recycling Regulation sold with refillable glass beer, cider and cooler beverage containers and aluminum alcoholic cans (hereafter collectively referred to as "beer secondary packaging") under Schedule 5 of the *Recycling Regulation*. Through this EPR plan, BRCCC enables producers to comply with Part 2, and more

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<sup>1</sup> BDL's customers include pubs, hotels, restaurants, clubs, cabarets, government liquor stores, agency stores (rural agency stores are small general stores in rural areas authorized by the BC Liquor Distribution Branch to sell beer, cider, coolers, wine and spirits with other goods) and licensee retail stores.

specifically s. 2(3), of the *Recycling Regulation*. BRCCC manages the collection of beer secondary packaging returned with its designated program containers and through a variety of collection channels for recycling.

The products covered under this plan include:

- Cardboard/boxboard cases for bottles and cans
- Plastic ring carriers
- Plastic shrink wrap (not including shipping materials)
- Other (seasonal packaging, promotional materials, etc.)

Noted that cardboard/boxboard cases for bottles and cans include cartons and trays respectively comprised of paper, specifically, old corrugated cardboard (OCC) and boxboard materials used as cases for the sale of multi-packs of beer cans or bottles (e.g., 6-packs, 12-packs, 24-packs, etc.), caps, and plastic associated with beer and cider containers (e.g., flexible plastic overwrap and plastic ring carriers used on smaller multi-packs of beer cans). More information about what products are accepted through BRCCC's program can be found on its [website](#).

Of note, the sale of beer and cider to licensed establishments (bars and restaurants) occurs in the same packaging as home consumer sales, and beer and cider container returns occur through the same channels (i.e., government liquor retail stores, private retail liquor stores and selected bottle depots) as home consumer (residential) returns. As an example, a small restaurant or café may purchase a small number of cases of beer each week from a private retail liquor store, rather than receive delivery directly from a distributor and have restaurant staff return empty containers of all types and PPP to a local bottle depot during off hours.

This plan addresses the collection and recycling of all beer secondary packaging irrespective of sales channel. However, this plan will attempt to differentiate both secondary packaging supply and secondary packaging recovery between the residential and industrial, commercial and institutional (IC&I) sectors consistent with the Schedule 5 designation of residential PPP wherever possible. Recycle BC is the other EPR program for residential secondary packaging that operates under a separate EPR plan in BC. Note that combining product delivery with container pickup increases efficiencies both environmentally and economically, making BRCCC the only beverage container EPR program that provides take-back services from the commercial sector.

In addition to the Schedule 1 and Schedule 5 materials noted above, BRCCC also uses and voluntarily collects and recycles a number of other materials that are not covered under the *Recycling Regulation*. To the extent possible, BRCCC reports on the recovery and recycling of these materials in its annual reports to the Ministry.

#### *Refillable Kegs*

- Refillable kegs of various sizes are sold by BRCCC brand owners, primarily to licensed establishments. BDL uses its reverse logistics to collect refillable kegs and arrange for their return to breweries where they are inspected, washed and refilled. Steel beer kegs have an expected service life of over 30 years and require no additional packaging.

### *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 processor. It should be noted that BDL also uses plastic wrap on the delivery of its products. However, as this plastic wrap is removed by the vendor and thus not part of what is sold to the consumer, it will not be accounted for in the EPR plan at this time. That being said, BDL frequently collects used plastic wrap when collecting empty containers from retail and commercial establishments.

### *Pallets*

- Pallets used to transport beer are made of wood and are reused, repaired, and ultimately recycled into local markets.

### *Can Bins*

- Can bins can hold 180 dozen cans, and are used in high volume locations, reducing storage and transportation costs. The bins are reused an average of 20 times and when they reach the end of their useful life, they are recycled.

## **5. STAKEHOLDER CONSULTATION**

BRCCC will continue to ensure all valued stakeholders have opportunities to provide their feedback into this plan. BRCCC is in regular contact with key program stakeholders, including the network of depot owners, private retail liquor store owners, the Liquor Distribution Branch, regional districts and municipalities. Any impacted party will have opportunity to provide ongoing input into the implementation and operation of the Program by email, phone or mail. Details are provided on BRCCC's [website](#).

BRCCC engaged with stakeholders to review and gather feedback on the draft plan during the consultation process which was posted publicly for comment on [www.envirobeerbc.ca](http://www.envirobeerbc.ca) from June 11, 2021 to July 26, 2021 (a total of 45 days).

A complete list of stakeholders from whom specific feedback was sought, as well as a table outlining feedback received from stakeholders throughout the consultation process (with the general category of stakeholder providing this feedback identified) and how this feedback has been addressed in this plan is included in the appendix. BRCCC has also taken comments made pertaining to secondary packaging from the Schedule 1 plan consultation into consideration.

### **Ongoing Stakeholder Consultation**

#### Feedback from Local Governments

BRCCC intends to maintain continued dialogue with all local governments to stay informed and ahead of any potential program cross over issues or feedback that may serve to improve the program and its performance.

BRCCC will invite local governments to meet on an annual basis to provide an opportunity for feedback and actively work with them to provide better education to their residents. BRCCC will

track and monitor any inquiries from local governments and provide a description of any new program developments as a result in its annual report.

### Feedback from Consumers

Consumer inquiries or complaints are directed to the appropriate manager for follow-up and resolution. Through BRCCC's refreshed website, consumers have access to information on BRCCC's EPR plans and annual reports and it is continuously updated to provide the latest information as needed. The website provides an e-mail link for consumers who have any questions or complaints regarding either BRCCC's container return or its beer secondary packaging return programs. The website includes an e-mail address, contact phone number and a mailing address for public comments on BRCCC product EPR activities. Consumer concerns are generally addressed in writing (for example, e-mail questions are responded to via e-mail).

### Coordination and Cooperation with Other EPR Programs

There may be some volumes of BRCCC secondary packaging (primarily boxboard) entering other Schedule 5 collection systems. BRCCC actively works with Recycle BC to audit common return channels to identify flows of beer secondary packaging. BRCCC coordinates with EPR programs as necessary, including financially, to ensure overall recovery performance and efficiency. BRCCC ensures any issues between EPR programs does not negatively impact the recovery and recycling of relevant secondary packaging. No recovered packaging is double- counted between the various EPR programs.

## **6. COLLECTION SYSTEM AND CONSUMER ACCESSIBILITY**

Section 5(1) of *Recycling Regulation* requires:

*the plan adequately provides for*

- *(i) the producer collecting and paying the costs of collecting and managing products within the product category covered by the plan, whether the products are currently or previously used in a commercial enterprise, sold, offered for sale or distributed in British Columbia,*
- *(iii) reasonable and free consumer access to collection facilities or collection services*

BRCCC's EPR plan places its focus on making it easy, convenient and practical for the consumer to return beer secondary packaging. As mentioned, beer secondary packaging includes:

- Cardboard/boxboard cases for bottles and cans
- Plastic ring carriers
- Plastic shrink wrap (not including shipping materials)
- Other (seasonal packaging, etc.)

BRCCC's collection system for all packaging and paper covered under the BRCCC Schedule 5 plan includes the following authorized collection locations: all BC Liquor Stores, all private retail stores, all rural agency stores and contracted bottle depots. Consumers can return all packaging and paper (even in the absence of beverage containers) covered under this plan to all authorized BRCCC collection

locations stated above. A complete list of all collection locations is found on BRCCC's website at <https://envirobeerbc.ca/locations/>

Consumers have open and easy access to return beer secondary packaging at the authorized locations where they can return their empty beer and cider containers (for example, private retail liquor stores and selected private bottle depots).<sup>2</sup> The estimated volume of secondary packaging diverted by weight (tonnes) in each of the regional districts is reported annually.

With extensive return locations available across the province, BRCCC will continue to ensure consumer accessibility is improved including rural/remote areas and current high recovery rates are maintained. BRCCC will coincide consumer accessibility targets with its Schedule 1 plan which targets adding 8 collection sites to its network tallying 1189 collection sites by 2025. The 8 collection sites BRCCC is targeting to add represents signing up existing private retail liquor stores as unlimited return locations (i.e. retailers contracted to collect more than 24 containers per day per customer.) It also commits to a target of 80% of population within a 10-minute drive of BRCCC authorized return location.

Through its annual coverage review BRCCC will identify specific remote and underservice areas and develop strategies and partnerships to ensure reasonable and fee consumer access. These strategies may include partnering with local municipalities or services groups, other producer responsibility organizations and/or individual First Nations to expand collection. Each scenario and opportunity will be reviewed on a case by case basis. Specifically BRCCC will engage with FNRI to investigate partnership opportunities to ensure First Nation communities are well serviced and will report on these activities in its annual report.

BRCCC commits to share the results of its annual coverage review and geographic information system (GIS) study against suggested primary factor population targets by community type in the recent "Enhancing Consumer Access to Recycling Services Under EPR" study commissioned by the MOEP. As this policy approach is still in development, BRCCC commits to revisit the aforementioned target once finalized.

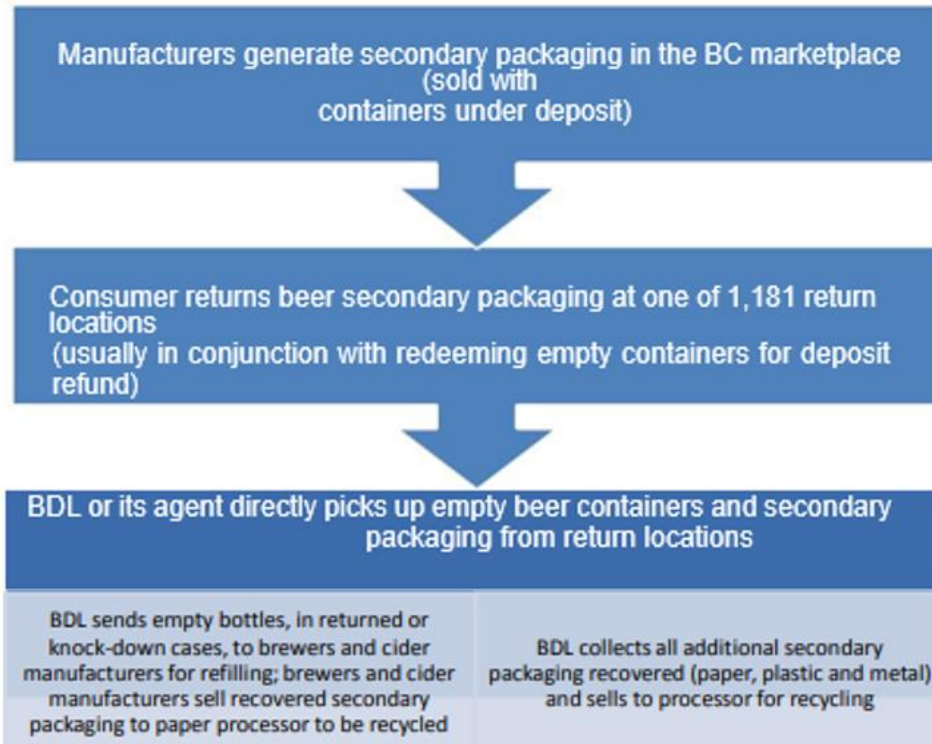
BRCCC will also explore options that would improve consumers' return experience and work with relevant stakeholders to engage in pilot projects throughout the duration of this plan. This includes seeking alternative drop off sites should the need arise and providing details in annual report accordingly. These sites may provide an opportunity to facilitate unique partnerships including but not limited to service groups, mobile collection options and legions.

Below and on the next page are graphic depictions of the current beer secondary packaging streams from both a consumer (residential sector) and a licensee (IC&I sector) perspective.

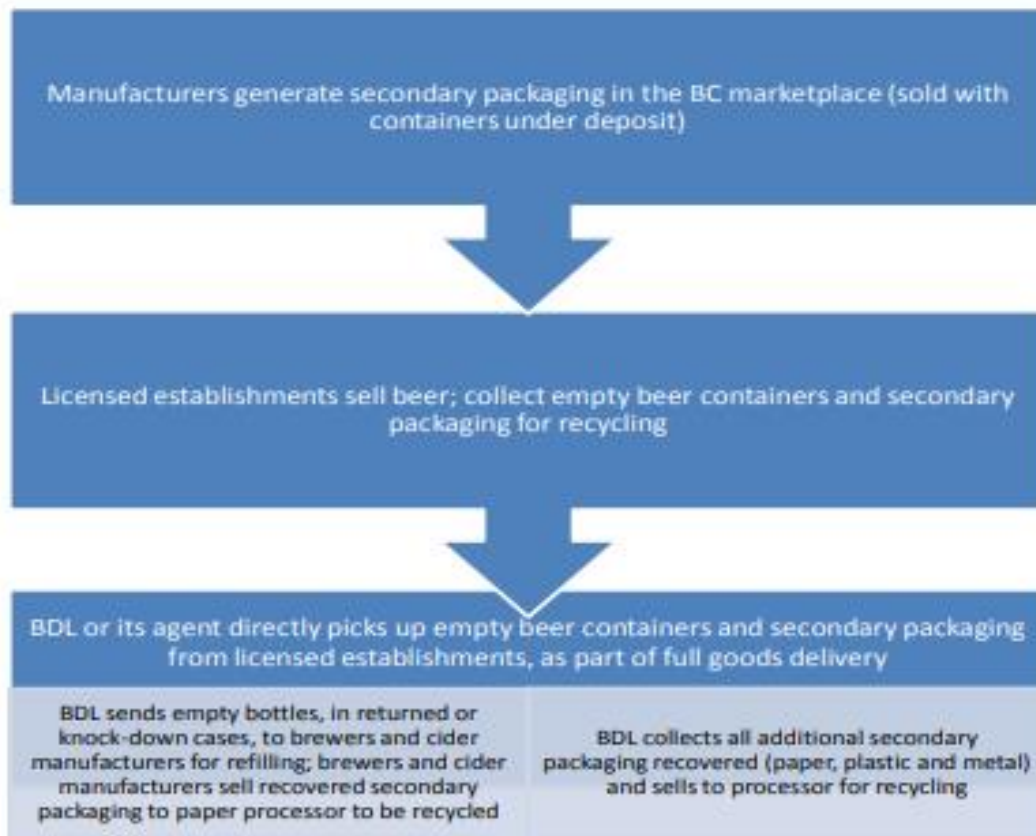
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<sup>2</sup> To be clear, the denominator in calculating BRCCC's recovery rate will include the tonnage for all relevant PPP sold in BC. The numerator in calculating BRCCC's recovery rate will only include beer secondary packaging collected through authorized locations. BRCCC understands that nearly all depots will gladly collect beer secondary packaging, as this packaging has a positive commodity value and thus means greater commodity revenue for the collector. That being said, BRCCC will be unable to track this secondary packaging collected at an unauthorized location, since BRCCC does not have an existing commercial relationship with those locations. In other words, beer secondary packaging returned to unauthorized locations is likely to be diverted from landfill but will not count toward BRCCC's recovery rate.

Beer Secondary Packaging Flow: Residential Stream



## Beer Secondary Packaging Flow: IC&I Stream



## **Beer Secondary Packaging Performance Metrics and Targets**

### Single-Use Plastic Reduction Plan

BRCCC recognizes that reduction and reuse are the most impactful actions within the pollution prevention hierarchy. It also acknowledges, the global focus on reducing single-use plastics in particular. Plastic ring carriers, commonly referred to as six pack rings, are the most notable plastic packaging type managed by BRCCC, which are currently recycled with pallet stretch wrap used to deliver full goods product. Although plastic packaging only accounts for less than 2% of total packaging for beer and cider products sold in BC by weight,<sup>3</sup> BRCCC will undertake a concerted effort to coordinate an approach with its members as plastic ring carriers are phased out under the federal ban. As such, BRCCC will develop a specific plan in the first year of this EPR plan and commit to track and report progress on plastics reduction measures in its annual report. This means identifying opportunities to expand materials collected and to encourage innovative packaging solutions since there are a variety of alternatives that exist in the marketplace (e.g., rigid multi-pack handles, poly-coated paperboard, molded fiber/pulp, glue). This also means

<sup>3</sup> Based on generated metric tonnes reported in 2020

supporting its members in their process of identifying, sourcing, installing, and training on alternative packaging equipment and supplies. As the brewers have long demonstrated the value of moving up the pollution prevention model through its reuse model, BRCCC believes the introduction of a reduction target over the course of this five-year plan will serve as an exemplary model for other PPP EPR programs looking forward.

### Packaging Recovery Rate

BRCCC will target a minimum 80% recovery rate for the residential PPP under its program.

Over 95% of the PPP covered by this EPR plan are cardboard cases sold with glass bottles and boxboard cartons sold with metal cans.

- By weight, cardboard cases sold with glass bottles represents a small volume of the PPP covered by this EPR plan where most of this packaging is returned by consumers when they redeem the deposit on those empty refillable glass bottles (and then recycled by the brewers re-using the bottles).
- The majority of the PPP covered by this EPR plan is boxboard cartons and cardboard can flats; a sizeable amount of which are returned by consumers when redeeming the deposit on those empty cans.
- Relevant PPP is primarily recovered through two streams: other retail locations and private bottle depots. Under this EPR plan, BRCCC will work with our partners to track and account for this PPP.

The concept of “Design for the Environment” (DfE) is evident in the secondary packaging used by the brand owners represented by the BRCCC. First, beer producers utilize a limited number of types of secondary packaging, each of which is recyclable or re-usable. Beer cases sold with bottles are designed from the start to serve multiple functions throughout their lifecycle.<sup>4</sup>

The beer secondary packaging recovery rate is calculated on the basis of beer secondary packaging collected/beer secondary packaging generated. Only packaging from residential streams is counted toward our recovery rate.

The specific methodologies used to make this calculation are:

### Beer Secondary Packaging Generation

The total weight of all beer residential secondary packaging generated by the brand owners (all import and domestic brands) is calculated by multiplying the secondary packaging weight for each stock keeping unit (SKU)<sup>5</sup> sold in BC by the number of units of each SKU sold to home consumers in BC in the calendar year..

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<sup>4</sup> A beer case sold as the secondary packaging for beer bottles may serve up to six functions before it is processed and recycled: 1) the receptacle in which the bottles are shipped to a retail location; 2) the receptacle in which the bottles are taken from the retail store to a private home; 3) the receptacle in which bottles are stored for return, once empty; 4) the receptacle in which the consumer transports the empty bottles to their return location; 5) the receptacle in which the empty bottles are stacked/palletized at the return location in preparation for pick-up; and 6) the receptacle in which the empty bottles are transported back to brewers for re-filling. It is necessary that bottles sent to brewers for refilling are transported in a case to avoid the risk of breakage during transportation. These cases are generally cut off and processed on the bottling line, just before the bottles enter the washer.

<sup>5</sup> Each brand and each of the pack sizes in which it is offered for sale has a separate SKU

For example (sample only – weights not necessarily accurate):

SKU: 12-pack bottles has secondary packaging weight of:  
Cardboard (case): 200 grams  
Sales: 1 million units  
Secondary Packaging Weight for this SKU: 200,000 kgs.

SKU: 6-pack cans have secondary packaging weight of:  
Plastic (plastic ring carriers): 8 grams  
Sales: 800,000 units  
Secondary Packaging Weight for this SKU: 6,400 kgs.

BRCCC and/or its brand owners weigh all of the beer secondary packaging associated with all relevant SKUs in BC. Based on sales data for the calendar year and these secondary packaging weights, a total beer secondary packaging weight generated in the calendar year is calculated. To the extent possible, this beer secondary packaging generation data is broken down into retail sales (i.e., residential stream) and licensee sales (i.e., IC&I stream).<sup>6</sup>

To verify the accuracy of the beer secondary packaging generation calculation, BRCCC also requests brand owners to provide additional data on the beer secondary packaging they have generated associated with sales of their brands.

To the extent that the manufacturers represented by BRCCC produce any promotional materials or other PPP, this will also be accounted for and added to the total amount of PPP generated.

### Beer Secondary Packaging Collection

The streams through which beer secondary packaging is collected includes:

- 1) Brewer operations (Residential & ICI stream)
- 2) Licensees (IC&I stream)
- 3) POCO's (BDL's Port Coquitlam Warehouse)
- 4) LDB
- 5) Depots (both residential and IC&I streams)
- 6) BC Liquor Stores (GLS) (mostly residential stream)
- 7) Private retail stores (LRS) (mostly residential stream)
- 8) Other sources (e.g. Recycle B.C.)

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<sup>6</sup> As indicated above, beer secondary packaging returned to unauthorized locations will not be part of the collection data (numerator in calculating BRCCC's recovery rate). However, the generation number (the denominator in calculating BRCCC's recovery rate) is based on sales data (rather than where returned), so all relevant packaging will be included in this number

In general, recovered beer secondary packaging can be divided into two categories:

- Returned cardboard/paper beer bottle cases (“beer bottle cases”)
  - o In most cases, these are stacked on pallets, used for transporting bottles to breweries or bottle wash stations<sup>7</sup> for refilling
  - o Pallets of beer bottle cases (for both refillable and non-refillable bottles) are collected from each of the four streams set out above
  
- All other beer secondary packaging (“other beer secondary packaging”)
  - o This secondary packaging consists of paper (e.g., returned boxboard cases from cans) and plastic (e.g., plastic ring carriers)
  - o Ultimately, other beer secondary packaging collected through these streams will be processed either:
    - by BDL on behalf of BRCCC (and is captured in the weight of processed materials at POCO )
    - through BRCCC’s collection channels (and is captured in the processed weight of materials from that channel (curbside, multi-family and depot)
    - through RBC’s curbside program which is quantified through audits or
    - materials sent directly for recycling by a collector.

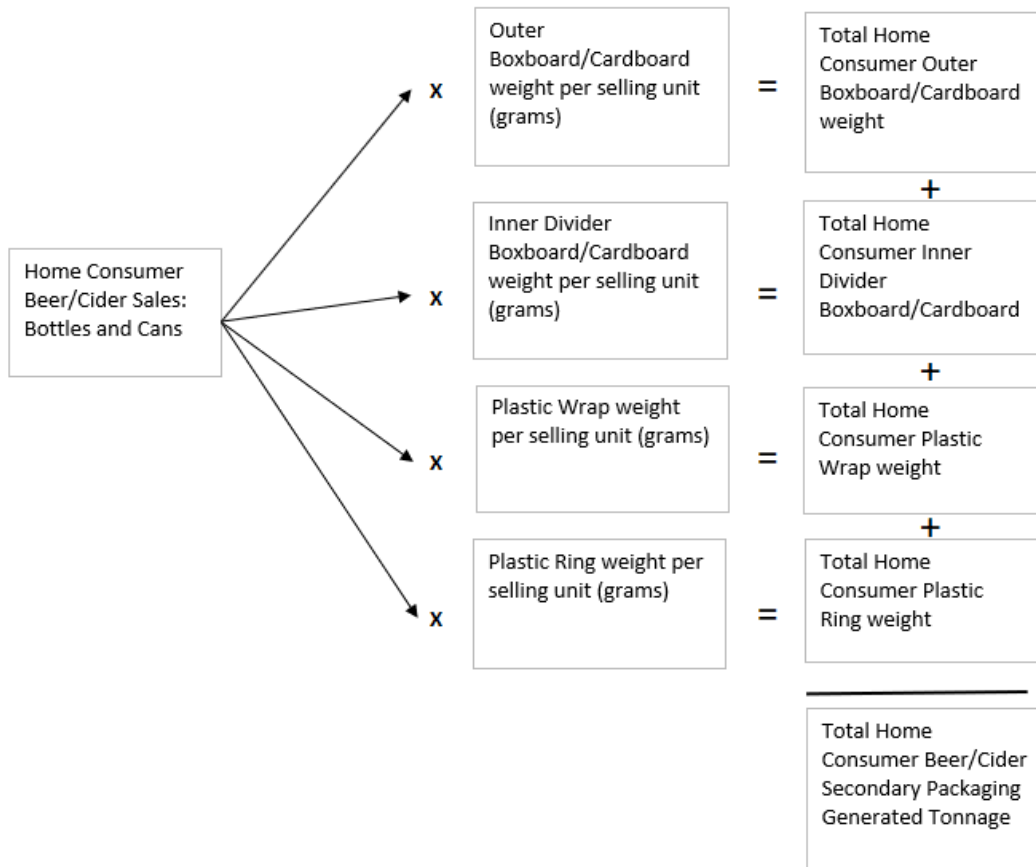
For beer bottle cases, BRCCC will obtain data on the weight of beer secondary packaging that has been recycled by the breweries in BC, bottle wash stations and BRCCC’s contracted depots.

To calculate total amounts supplied into the BC market, BRCCC disaggregates total packaged beer and cider sales by container type and calculates the total amount of secondary beer/cider packaging based on sales and corresponding packaging weights (see Figure 1). For total recovered packaging, this data is submitted by: brewers, POCO’s recycler, LDB, Recycle BC for purchased tonnes, and depots for additional purchased tonnes. The recovery rate is calculated by the total recovered tonnage divided by the total generated tonnage. (see Figure 2).

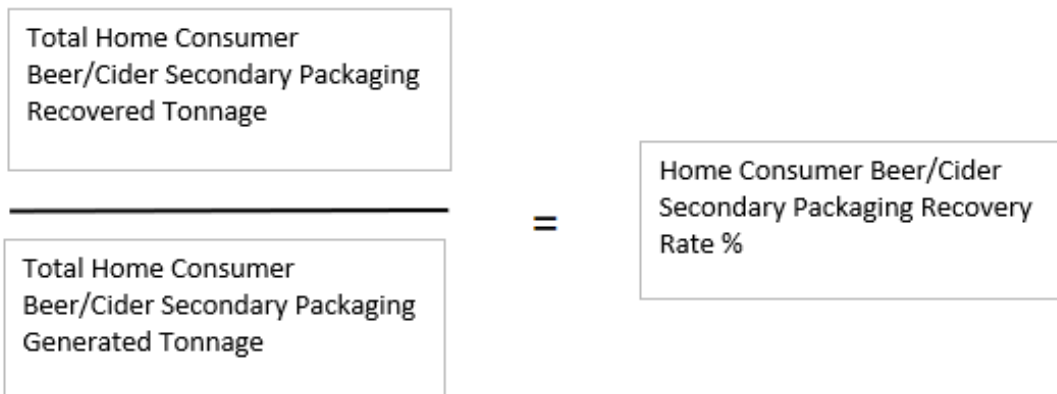
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<sup>7</sup> Before they can be filled with beer, all bottles (whether new or ones that are being re-used) have to be washed. Many breweries have their own bottle washer that is part of their bottling line. Some breweries, however, do not have a bottle washer. These breweries generally have a commercial arrangement with a bottle wash station – an independent business that offers bottle wash services – to perform this cleaning.

**Figure 1 – Method of calculating beer secondary packaging sales**



**Figure 2 – Calculation of Residential Recovery Rate**



Through its investment in membership of the EPR Agencies of British Columbia (SABC) BRCCC also supports waste composition studies with an aim to monitoring the level program materials being collected by municipal partners and make available the results of that report to the Ministry.

## 7. CONSUMER AWARENESS

In December 2019, BRCCC undertook a consumer survey that included questions on consumer awareness and consumer behavior regarding the return of beer secondary packaging. 1,200 BC residents completed the survey. Based on survey responses, consumer awareness of the ability to return beer secondary packaging is approximately 61%, while consumer participation in the program is over 68%.<sup>8</sup> This was a significant increase from 42% consumer awareness that was indicated in the 2016 EPR plan. For this reason, **BRCCC has set the performance target of 80% for consumer awareness of beer related secondary packaging return.**

BRCCC will continue to make consumers even more aware of the beer secondary packaging that they can return and how this beer secondary packaging is handled. With greater consumer education and awareness, BRCCC believes that even higher levels of diversion can be achieved. For this reason, BRCCC commits to undertake **two net new public awareness and education campaign initiatives over the period of this EPR plan.**

The first campaign will remind consumers to return their refillable bottles and beverage alcohol cans in the cases in which they purchased them, rather than emphasizing any particular return location. The campaign will include more extensive signage at authorized return locations and targeted social media messaging. The second campaign will promote the Canadian beer industry's sustainability efforts to phase out plastic ring carriers through BRCCC's website and social media channels with content specific to British Columbia. This will ensure plastic ring carrier alternatives can be properly managed.

BRCCC is a member of the EPR Agencies of British Columbia (SABC) and in this capacity, and in partnership with the Recycling Council of British Columbia's (RCBC), participates in various consumer information vehicles, such as the Recycling Hotline, the RCBC website and the Recyclepedia tool. In addition to its revamped website, BRCCC will direct consumers to the "BC Recycles" portal as a one-stop location for information on recycling in BC. BRCCC will regularly update program details with RCBC to ensure these consumer education tools are up to date for its program. BRCCC also actively participates and sponsors EPR and recycling related events, such as the annual conferences of RCBC and Coast Waste Management Association (CWMA). BRCCC also plans to provide more educational resources for local communities and to coordinate efforts with community clean-up events. New promotional items with BRCCC's logo and website will continue to be distributed at these events. BRCCC will also seek opportunities with other cooperative EPR programs in consumer education efforts to help increase overall awareness of BC product EPR.

BRCCC commits to performing a biennial consumer awareness study to be able to measure against the consumer awareness target and to align with change in target over five-year period of this EPR plan. It is expected that consumer awareness will increase from the previous survey, as a result of consumer awareness and education initiatives undertaken by BRCCC.

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<sup>8</sup> 61% of respondents indicated they were aware they could return beer secondary packaging when returning their empty beer and cider containers. However, 68% of respondents indicated they already return their beer secondary packaging when returning their empty beer and cider containers.

To the extent possible, BRCCC will include more information on consumer education strategies and program support for reduced environmental impacts and the pollution prevention hierarchy in its annual report. BRCCC will also continue to produce a combined annual report to the Ministry on program performance, recognizing that there needs to be separate reporting of performance measures for the Schedule 1 and Schedule 5 programs.

## **8. MANAGEMENT OF PROGRAM COSTS**

Similar to its product EPR activities with respect to beer and cider containers, BDL operates the program on a day-to-day basis, while BRCCC, a not-for-profit society established by the brewing sector to administer the financial and logistical requirements of EPR, provides governance with respect to the program funding. The BRCCC represents the majority of the volume of beer and cider sold in the province of BC, with directors from brand owners (both large and small brewers), BDL and Beer Canada.

### Producers Paying the Cost

BRCCC commits to paying the costs of collecting and managing products within the product category covered by the plan. BC brewers pay the full costs of managing of all packaging sold in BC whether generated in the residential or ICI sectors. This means costs associated with managing and collecting BRCCC packaging are paid directly and internalized by the brewers. The rate to cover secondary packaging costs is reviewed by the BRCCC Board of Directors on an annual basis to determine the fee charged to brewers by metric tonne based on amount of secondary packaging sold into the BC market. These fees are reported as brand owners fees in BRCCC's audited financial statements which are submitted in its annual report. Consumers are not subject to additional handling or eco fees at the point of sale. BRCCC will continue to work with brewers and material management partners to coordinate the collection and processing of packaging and containers in the most cost efficient and environmentally responsible practices. BRCCC's annual budgets, including secondary packaging fees charged to brewers and its operational reserve management strategy, are reviewed and approved annually by the BRCCC Board of Directors.

BRCCC has recognized that the current pay-in methodology does not recognize nor reward producers that have transitioned their packaging to more readily recyclable materials. BRCCC will also explore cost recovery options to help create an important incentive for producer members to make secondary packaging choices that are in preference to the order of the pollution prevention hierarchy. This aligns with the core principles of extended producer responsibility to account for costs associated throughout a product's life cycle.

### Partnerships with other EPR Agencies

BRCCC currently has agreements in place with both the LDB and Recycle BC which account for residential secondary packaging collected through BC Liquor Stores and Recycle BC's collection channels (curbside and multi-family collection or their contracted depot sites) respectively. BRCCC's agreement with the LDB is currently in place until 2023. BRCCC compensates the LDB annually for the sorting and handling services of secondary packaging returned to BC Liquor Stores by customers. The amount of secondary packaging that the LDB has recovered is determined based

on the rate of beer packaging material as a percentage of total packaging material recovered by the LDB. BRCCC's agreement with Recycle BC was recently renewed in 2020 and is based on an annual tonnage allotment at a flat per tonnage rate for beer and cider PPP managed by Recycle BC. In 2019, BRCCC began sourcing beer and cider secondary packaging from additional select depots that are not committed to any other PPP EPR agency. This applies to five depots based on their residential beer secondary packaging availability and is reviewed annually.

## **9. MANAGEMENT OF ENVIRONMENTAL IMPACTS**

### Compliance with Pollution Prevention Hierarchy

Brand owners make decisions about what type of secondary packaging they wish to use for the sale of their products. The BRCCC EPR plan then facilitates environmentally friendly life-cycle management of that packaging by providing a cost-effective method to collect and recycle products while supporting the circular economy.

Brewers utilize two types of secondary packaging: paper and plastic. Each of these material types has a viable commodity market. These markets help to ensure that beer secondary packaging will be diverted from landfill and finally disposed of in compliance with the pollution prevention hierarchy. BRCCC targets to direct 100% of collected materials to re-use or recycling commodity markets and to track the end fate of these materials.

BRCCC's EPR plan places an emphasis on re-use and recycling. As previously noted, cardboard cases returned with empty refillable glass bottles for re-use are recovered and then recycled. All other packaging is managed through recycling. Where possible, BRCCC quantifies the pollution prevention benefits associated with its EPR plan as part of its annual reporting process, including estimates of greenhouse gas emission reductions, reduced energy requirements and reduced pollutants. Additionally, with renewed focus on exploring alternatives to plastic ring carriers, BRCCC will report on any additional environmental benefits as it pertains to the pollution prevention hierarchy as brewers phase out single-use plastic packaging.

Through existing and renewed commercial agreements, BRCCC works with its collection partners to ensure that beer secondary packaging that is collected is handled properly in accordance with the pollution prevention hierarchy. BRCCC ensures that 100% of collected beer secondary packaging is directed to recycling commodity markets where the end fate of these materials can be verified by receiving confirmation in writing. These materials are then sent to a recycler and eventually make their way into a variety of products including cereal boxes and drywall components. BRCCC reports annually on the percentage of material reported as collected and sent to a recycler for recycling and these results are reviewed by an external auditor.

BRCCC expects that this level of compliance with the pollution prevention hierarchy will continue under this EPR plan. To the extent possible, BRCCC will strive to continuously improve its pollution prevention hierarchy performance. BRCCC will confirm the proper handling and management of beer secondary packaging in its annual EPR report to the Ministry.

## 10. DISPUTE RESOLUTION

### Disputes between BRCCC and its Service Provider

The relationship between BRCCC and its service provider (currently BDL) is a commercial relationship that is governed through a service agreement. This service agreement sets out dispute resolution procedures and all disputes will be handled according to those provisions.

### Disputes between Depots/Return Locations

If the issue involves a return location under contract, BRCCC will investigate the issue and try to resolve the issue with the return location. If a return location is found to be in violation of its contractual commitments or legal obligations, BRCCC will take appropriate measures to ensure compliance.

BRCCC service providers have agreed in their written contracts to use reasonable commercial efforts to settle any disputes related to the contract or the performance of obligations under the contract. Authorized depots are provided with an Operating Guidebook that sets out detailed service requirements with specific guidance and contact persons to assist return locations in determining and executing applicable service requirements. This direct attempt at resolution between the parties serves as the initial means for the resolution of disputes that may arise out of the contract(s). If the parties are unable to resolve a dispute, the matter will be directed to a dispute resolution procedure as set forth in the written contact, which includes a formal notice of dispute, a period of negotiation between the parties, followed by mediation and finally binding arbitration, if necessary. For as long as BRCCC/BDL has been the EPR agency for aluminum alcohol cans, refillable bottles and associated packaging, BRCCC has not had to engage in any mediation or arbitration to settle any disputes.

Dispute resolution procedures	
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Level 1	Notification and discussion with BRCCC Chair and/or BDL senior management
Level 2	Facilitation to prevent further escalation and to explore solutions or remedies
Level 3	Mediation to be used if facilitation is unsuccessful. Process to be specified in contractual agreements regarding selection of mediator, roles of parties, time and place of mediation, conduct of mediation, length, responsibility for costs, confidentiality, conclusion of mediation by agreed settlement or final settlement proposal by the mediator.
Level 4	Arbitration to be used if mediation is unsuccessful. Process to be specified in contractual agreements regarding notice of arbitration, submission of written statements, place and conduct of meetings and hearings, the process for rendering and delivering decisions, jurisdiction and powers of the arbitrator, allocation of costs, application of the B.C. <i>Arbitration Act</i> .

## **Disputes between BRCCC and brewers/manufacturers that use the BRCCC system**

Producer compliance issues are anticipated to be minimal under BRCCC's EPR plan because BRCCC's beer secondary packaging is so closely linked to BRCCC's container recovery system. BRCCC's container recovery system is subject to the listing and product approval process related to beer sales in the province which is regulated under the *Liquor Distribution Act*. As a result of this listing and approval process, most brand owners designate BRCCC as their product steward for containers prior to selling their products in BC. BRCCC anticipates that, as a result of the cost-effective nature and administrative efficiency of BRCCC's EPR plan, many of these brand owners will choose to designate BRCCC as their product steward for beer secondary packaging as well providing the producer membership a seamless one stop system. Ongoing compliance is monitored through tracking within our accounts receivable and our brand registry systems.

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

In the event that BRCCC does not receive a signed agency appointment agreement from the brand owner within the prescribed timeframe, BRCCC may utilize the following notifications to underscore the importance of compliance with the *Recycling Regulation*:

- 1<sup>st</sup> contact (60 days prior): Letter is sent to brand owner obligated under the *Recycling Regulation*, informing them of their responsibilities
- 2<sup>nd</sup> contact (if no response received within 30 days): A second letter is sent to the brand owner for lack of reply from the previous correspondence. In this letter, BRCCC will point out that the brand owner is liable if their company contravenes the Act.
- 3<sup>rd</sup> contact (if no response received 30 days after 2<sup>nd</sup> contact): A final letter with a deadline for submitting membership documents is sent by BRCCC. At this stage, BRCCC will consider each brand owner on a case-by-case basis to decide whether to proceed to the final stage.
- 4<sup>th</sup> contact (if no response received by deadline stipulated in 3<sup>rd</sup> contact): A request for non-compliance actions will be sent to the Ministry, with a copy to the brand owner.

## 11. PERFORMANCE MONITORING & REPORTING COMMITMENTS

Beer secondary packaging recovery rates will be the core performance target for BRCCC’s EPR plan. As the plan’s environmental benefits all flow from beer secondary packaging that is recovered, this recovery rate is strongly indicative of the program’s performance. As consumer awareness will be a main driver of the recovery rate, BRCCC will also set targets for this performance measure. The performance measures and reporting commitments indicated below are subject to a non-financial audit and posted in annual report. These targets will be maintained moving forward until such a time that new targets are approved.

In addition to reporting its environmental performance targets, BRCCC will commit to notifying the Ministry regarding any changes to its agency structure and/or governance. These updates will also be posted on the Program website.

Measures	Year 1	Year 2	Year 3	Year 4	Year 5
<ul style="list-style-type: none"> <li><b>Total amount of packaging and paper sold and collected during the reporting year</b></li> </ul>					
<b>Recovery/Collection Targets</b>	76%	77%	78%	79%	80%
<b>Plastic Reduction Target</b>	<ul style="list-style-type: none"> <li>Report progress of plastics reduction over the 5-year period</li> </ul>				
<b>Accessibility Targets</b>	1,181 locations	1,182 locations	1,185 locations	1,186 locations	1,189 locations
	<ul style="list-style-type: none"> <li>The number and locations of collection facilities and any changes to same</li> <li>The total amount of packaging and paper collected in each regional district</li> <li>80% of population within 10 min. drive of BRCCC authorized return location*</li> </ul>				
<b>Consumer Awareness Targets**</b>	75%	75%	77%	77%	80%
	<ul style="list-style-type: none"> <li>2 net new consumer promotion/education initiatives</li> <li>The education and awareness materials and activities executed within the calendar year</li> </ul>				
<b>Pollution Prevention Hierarchy/Product Life Cycle Targets</b>	<ul style="list-style-type: none"> <li>Target to direct 100% of collected PPP to recycling commodity markets.</li> <li>Report in accordance with the PPH</li> <li>Track and report end fate of materials in annual EPR audit</li> <li>Efforts taken by or on behalf of producers to reduce environmental impacts throughout the product life cycle including increasing reuse and recyclability.</li> </ul>				
Special projects	<ul style="list-style-type: none"> <li>Report any special projects related to any aspect of its program as well as the findings of those projects to relevant stakeholders</li> </ul>				

Financial	<ul style="list-style-type: none"><li>• Make available audited financial statement</li></ul>
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\* BRCCC also commits to share the results of its annual coverage review and GIS study against suggested primary factor population targets by community type in recent “Enhancing Consumer Access to Recycling Services Under EPR” study commissioned by the MOECCS. As this policy approach is still in development, BRCCC commits to revisit the accessibility target once finalized.

\*\* As committed to in the EPR plan, BRCCC undertook a consumer awareness survey in 2019 and again in 2021. BRCCC commits to performing a biennial consumer awareness study to be able to measure against the consumer awareness target and to align with change in target.. It is expected that consumer awareness will increase from the previous survey, as a result of consumer awareness and education initiatives undertaken by BRCCC.

## APPENDIX

### Stakeholder Consultations Summary

#### BRCCC Schedule 5 Plan Renewal Consultation Process and Timeline

BRCCC's Schedule 5 Container EPR Plan was posted publicly for comment on [www.envirobeerbc.ca](http://www.envirobeerbc.ca) from June 11, 2021 to July 26, 2021 (a total of 45 days). BRCCC invited the public and other valued stakeholders to provide feedback on ways to improve BRCCC's existing system and to achieve greater environmental performance. Comments were submitted to [EPR@BDL.ca](mailto:EPR@BDL.ca). BRCCC also provided an option for the public to participate in one of three webinar sessions to provide feedback via a live Q&A session.

Action	Timeframe
Post plan publicly and send to key stakeholders for consultation	June 2021
Three (3) public consultation webinar sessions	June/July 2021
Hold one-on-one virtual stakeholder meetings	June/July 2021
Chart feedback, revise plan and present to board	July 2021

Direct e-mail notifications were sent to the following:

1. Union of BC Municipalities (UBCM)
2. Coast Waste Management Association (CWMA)
3. EPR Agencies of BC (SABC)
4. Recycling Council of BC (RCBC)
5. BC Product EPR Council (BCPSC)
6. BC Bottle & Recycling Depot Association
7. ABLE BC
8. Liquor Distribution Branch
9. Ocean Legacy
10. Greenpeace
11. David Suzuki Foundation
12. Ocean Wise
13. Environmental Defense
14. GLOBE Foundation/Delphi Group
15. Metro Vancouver
16. City of Vancouver
17. Municipality of Richmond
18. All B.C. Regional Districts

Written comments were received from the following stakeholders:

- Laura Zapotichny, Regional District of Fraser-Fort George
- Andrew Doi, Metro Vancouver
- Karen Wirsig, Environmental Defence
- Sue Maxwell, Zero Waste BC
- Jeff Guignard, ABLE BC

**Summary of Key Topics:**

<b>Topic</b>	<b>Comment</b>	<b>Response</b>
<b>Overall</b>	- BRCCC recognized as a positive example for other industries to reduce packaging including single-use plastics	- We appreciate continued support of BRCCC’s program
<b>Performance Target</b>	- BRCCC is encouraged to set more ambitious recovery rate target	- BRCCC is committed to continually improve our recovery where our mission is <i>“To continue to lead the way in environmental EPR to achieve the highest return rate for alcoholic beverage containers and related packaging.”</i> - Increased target to 80%
<b>Consumer Awareness</b>	- Program recognized for high accessibility but more consumer awareness on return network is needed - Strive for higher target awareness target	- BRCCC is committed to two net new public awareness and education campaign initiatives over the period of this EPR plan and will be measuring the success of these campaigns - Commits to biennial consumer awareness study to identify opportunities for improvement
<b>Plastics Reduction</b>	- Include more details, including a timeline, on the phase out of six-pack rings in the plan - Include shrink wrap when considering phasing out single-use plastic packaging	- BRCCC commits to developing a specific plan on plastics reduction in the first year of this EPR plan. This will allow for a proper assessment to establish targets, timeline and other commitments as appropriate. The details of the plan will be reported with

		progress tracked in BRCCC's annual report.
<b>Product Design and Reuse</b>	- Expand and promote refillable containers; consider reusable secondary packaging options	- Details of BRCCC's container program and initiatives are part of our Schedule 1 plan - BRCCC is currently working to increase awareness of refillable bottles to consumers as well as producers.
<b>Producer Paying the Cost</b>	- Elaborate on financial incentive options considered to encourage packaging choices that are in preference to the pollution prevention hierarchy - Provide date for this goal	- BRCCC's development of a plastics reduction plan in the first year will include assessment of financial incentives and fees. The details and timeline of goals in the plan will be reported with progress tracked in BRCCC's annual report.

## Public Consultations

Please refer to attachments that follow this section for the presentation slides that were used during consultation sessions. Note that despite offering several consultation webinar dates, attendance was low. Individual phone calls were accommodated for stakeholders who could not attend the webinars.

*Webinar Sessions – June 18, 24 & July 6*

<b>Attendee Name</b>	<b>Organization</b>
Maria Lo	Metro Vancouver
Travis Barrington	Regional District of Central Kootenay
Jay Illingworth	EPRA
Jillian Kittson ( <i>Observer</i> )	BC Ministry of Environment
Roberto Melfi ( <i>Observer</i> )	BC Ministry of Environment
Timothy O'Rourke ( <i>Observer</i> )	BC Ministry of Environment

Feedback received at consultation:

- Overall pleased with BRCCC's program and proposed goals set in the plan
- Question asking if all locations take both containers and packaging
- Comment to provide more information on return locations on BRCCC's website, if possible (e.g., container limits, hours of operation)
- Question about the cost of authorizing all depot locations and increasing awareness of return-to-retail to bring system operational costs down

*BC Product EPR Council Webinar Session – July 8, 2021*

<b>Attendee Name</b>	<b>Organization</b>
Tera Grady	Cariboo Regional District
Aldo Nicmans	BC Product EPR Council
Laura Zapotichny	Regional District of Fraser-Fort George
Jim Schubert	Regional District of North Okanagan
Graham Casselman	Columbia Shuswap Regional District
Tim Dueck	Regional District of Kootenay Boundary
Jennifer Ivan	Comox Valley Regional District
Tim Des Champ	North Coast Regional District
Nathan Hartnett	Regional District of Fraser-Fort George
Janice Johnson	Regional District of Okanagan-Similkameen
Abby McLennan	qathet Regional District
Janette Derksen	Regional District of Bulkley Nechako
Martin Dickson	Thompson-Nicola Regional District
Andrew Doi	Metro Vancouver
Mario Lo	Metro Vancouver

Summarized questions and answers at consultation:

- Q: Can BRCCC explain how it achieved a significant increase in the secondary packaging recovery rate since the inception of the Schedule 5 plan?
  - A: BRCCC was able to increase the recovery rate through increased awareness of the program with stakeholders.
- Q: How does BRCCC account for ICI packaging? How it is reported?
  - A: This is outlined in section 6 of the plan. BDL or its agent directly picks up empty beer containers and secondary packaging from licensed establishments. All secondary packaging is sold to processor for recycling.
- Q: How do six-pack rings get recycled?
  - A: Six pack rings are currently recycled with pallet stretch wrap used to deliver full goods product. There has not been any negative feedback from the recycler on the plastic bales to date.
- Q: Does BRCCC's agreement with Recycle BC include six-pack rings?
  - A: No. Note that both alcoholic and non-alcoholic cans use the same plastic ring carriers, so it is difficult to determine portion of returns directly linked to BRCCC program
- Q: Does the target of 18 new return locations include sites that were contracted this year?
  - A: No, this accessibility target will occur for the 5-year duration of this plan which starts in 2022
- Q: Did the depots that recently contracted with BRCCC ask for a license?
  - A: BRCCC proactively seeks out depot partners where system coverage should be augmented while remaining efficient.
- Q: How does BRCCC manage biodegradable and/or photodegradable six-pack rings?
  - A: We have not received negative feedback from the recycler to date as there is likely not enough volume of these materials to significantly impact current system.

BRCCC will look to assess current market of alternative materials while developing the reduction strategy in the first year of the plan.

- Q: What are the financial incentives that BRCCC is proposing for producers to incentivize packaging changes?
  - A: This will be developed and reviewed by the BRCCC Board of Directors as part the reduction strategy in the first year of the plan and reported accordingly.
- Q: Are bottles reused in BC?
  - A: This depends on the brewer and the type of refillable bottle that they use. BDL ships refillable bottles to Mission Bottle Wash in Summerland, BC to be washed and refilled by local brewers.
- Q: Are there producer incentives to sign up for refillable bottles?
  - A: BRCCC is currently working to increase awareness of refillable bottles to consumers as well as producers. Note that aluminum alcoholic cans also play an important role in supporting refillable bottle by providing efficiencies in a higher performing system.
- Comment which encourages BRCCC to set more ambitious recovery rate target
- Q: Does BRCCC report recovered tonnes by source?
  - A: No, the *Recycling Regulation* requires BRCCC to report the total amount of secondary packaging produced and collected and the recovery rate. This is included in BRCCC's annual report.
- Q: Could you boost recovery rate with collaboration with Encorp Pacific?
  - A: Encorp Pacific does not manage secondary packaging and has a lower recovery rate than BRCCC. In order to collaborate there must be a clear distinction between the two programs and there must also be shared interests that are mutually beneficial. Encorp's operations currently does not support the refillable bottle system.
- Q: How many depots contracted by Encorp are also are contracted with BRCCC?
  - A: BRCCC currently has over 80 contracted depots. Note that depots that are not currently contracted with BRCCC tend to be smaller volume depots with a return-to-retail location nearby. BRCCC values providing consumers with choice by having a diversified collection system to allow for returns to liquor retail sites so that consumers can return containers at the same location where they purchased them in addition to strategically located depots throughout the province. Licensing more depots with a diversified system will make the system less efficient by decreasing the need for backhauling empty containers.
- Comment that BRCCC has lots of return locations but the average person typically thinks of depots and is not aware of other return locations. It would be helpful to ramp up consumer awareness efforts especially in rural regions. Local government supports BRCCC's diversified return network as long as consumer has a choice and the knowledge of where to make returns.

Note that BRCCC has also taken comments pertaining to secondary packaging into consideration from the Schedule 1 plan consultation during fall 2019. This includes the following:

- Comment that six-pack rings are not currently accepted for curbside recycling – not all return locations may be aware to take back six-pack rings.
  - BRCCC commits to two net new public awareness and education campaign initiatives over the period of this EPR plan which includes greater

awareness among collection partners with regards to managing secondary packaging.

- Questions regarding the handling and collection of six-pack rings and the subsequent recycling of this plastic
  - Plastic bales produced by BDL’s Port Coquitlam warehouse are mainly pallet stretch wrap used on the full goods product with only a small amount comprising of returned packaging, including six-pack rings. There has not been any negative feedback from the recycler on the plastic bales to date. Note that no materials are directly sent to landfill, incinerated or turned into road aggregate.

The following table provides a high-level summary of feedback received on the draft EPR plan renewal, the stakeholder type that provided the feedback, and how the feedback has been addressed in the revised version of the plan. All stakeholders that provided feedback were contacted by e-mail to confirm that comments were received and will be provided follow-up responses.

<b>Stakeholder Group</b>	<b>Comment/Questions</b>	<b>How Addressed</b>
<i>Environmental NGO, Beverage Licensee Industry</i>	- Recognition that BRCCC serves as a positive example for environmental leadership and for other industries to reduce packaging including single-use plastics	- Thanks and appreciation for continued support of BRCCC’s program
<i>Environmental NGO</i>	- Supports phasing out plastic carrier rings	- Thanks for support of BRCCC’s program
<i>Beverage Licensee Industry</i>	- Supports being part of BRCCC’s extensive and diversified collection network to offer BC consumers many convenient options for redeeming their refillable bottles and alcohol cans along with their associated packaging throughout BC	- Thanks and appreciation for continued support of BRCCC’s program and its diversified collection network
<i>Environmental NGO</i>	- Notes positive aspect of consumer access, particularly regarding return-to-retail, with stores having hours that would allow easy access for most residents; many of these locations are accessible via transit and may also be accessible to those with disabilities	- Thanks and appreciation for continued support of BRCCC’s program and its diversified collection network
<i>Regional district government,</i>	- Encourages BRCCC to set more ambitious performance targets	- BRCCC is committed to continually improve our recovery where our mission is “ <i>To continue to lead the way</i> ”

<i>local government, Environmental NGO</i>	for recovery rate, preferably closer to 85%	<i>in environmental EPR to achieve the highest return rate for alcoholic beverage containers and related packaging.”</i> - Increased target to 80%
<i>Regional district government</i>	- Suggestion to partner with RCBC to increase consumer awareness as there is no differentiation between BRCCC packaging and Recycle BC packaging	- BRCCC is a member of RCBC and will seek further partnership opportunities for provide improved education to BC consumers
<i>Environmental NGO</i>	- Consumer awareness target of 80% is a good target; suggestion that the target date be sooner and then escalate to 95% by the end of 2025	- BRCCC will be measuring the success of the two net new public awareness and education campaign initiatives over the period of this EPR plan
<i>Environmental NGO</i>	- Recommends surveys happen at least every two years to be able to correct any problems sooner and measure overall effectiveness; studies should be done to determine why materials are not returned	- Commits to biennial consumer awareness study to identify opportunities for improvement
<i>Environmental NGO</i>	- Urges BRCCC to include more details, including a timeline, on phase out of six-pack rings in the plan, as well as a commitment to seek to replace with a reusable product instead of continuing single-use carriers	- BRCCC commits to developing a specific plan on plastics reduction in the first year of this EPR plan. This timing will allow for proper assessment to establish targets, timeline and other commitments as appropriate. The details of the plan will be reported with progress tracked in BRCCC’s annual report.
<i>Environmental NGO</i>	- Request to include shrink wrap in the plastic reduction plan to phase out its use	- BRCCC will assess plastic packaging reduction opportunities and report details of its plastics reduction plan in the first year of this EPR plan.
<i>Environmental NGO</i>	- Encourages BRCCC to focus on the use of refillables and expand reuse model to other container types (e.g., wine bottles) and packaging	- BRCCC will assess plastic packaging reduction opportunities, including reusable packaging, and report details of its plastics reduction plan in the first year of this EPR plan. - Details of BRCCC’s container program and initiatives are part of our Schedule 1 plan

<i>Environmental NGO</i>	<ul style="list-style-type: none"> <li>- Recommend second campaign is not just about the phase out of plastic rings but also about a switch to mainly refillables or reusable secondary packaging</li> </ul>	<ul style="list-style-type: none"> <li>- Details of BRCCC's container program and initiatives are part of our Schedule 1 plan</li> <li>- Promoting reuse/refill is part of our consumer awareness strategy</li> </ul>
<i>Environmental NGO</i>	<ul style="list-style-type: none"> <li>- Pallets and can bins, likewise should be used as long as possible and purchased with durability in mind.</li> </ul>	<ul style="list-style-type: none"> <li>- Yes, BRCCC follows the pollution prevention hierarchy where purchased supplies are only made as needed; this also provides cost savings.</li> </ul>
<i>Local government, Environmental NGO</i>	<ul style="list-style-type: none"> <li>- Suggestion that BRCCC explores using unit count instead of weight of packaging sold and collected for recycling in the calculation of the recovery rate for packaging</li> </ul>	<ul style="list-style-type: none"> <li>- BRCCC can explore this. Note that the current waste audit methodology to determine BRCCC packaging would make this challenging and there are measures in place to ensure accuracy of the reported recovery rate.</li> </ul>
<i>Local government</i>	<ul style="list-style-type: none"> <li>- Can BRCCC elaborate on the incentive options considered to make packaging choices that are in preference to the pollution prevention hierarchy? Will BRCCC use financial incentives to encourage the adoption and implementation of reusable secondary packaging?</li> </ul>	<ul style="list-style-type: none"> <li>- BRCCC's development of a plastics reduction plan in the first year will include assessment of financial incentives and fees. The details of the plan will be reported with progress tracked in BRCCC's annual report.</li> </ul>
<i>Environmental NGO</i>	<ul style="list-style-type: none"> <li>- Comment that the goal to set fees to encourage the use of sustainable packaging should be set and the outcomes should be public and transparent. The fees should encourage reduction first then reuse</li> </ul>	<ul style="list-style-type: none"> <li>- BRCCC's development of a plastics reduction plan in the first year will include assessment of financial incentives and fees. The details of the plan will be reported with progress tracked in BRCCC's annual report.</li> </ul>
<i>Environmental NGO</i>	<ul style="list-style-type: none"> <li>- Comment that all depots receiving material should be compensated as this might help to raise the recovery rates as depots would encourage returns. Recovery rate targets should be set for and reported by packaging type</li> </ul>	<ul style="list-style-type: none"> <li>- Select depots that are not committed to any other PPP EPR agency are compensated at a competitive rate that is reviewed annually.</li> <li>- Since the focus will be on reducing single-use plastics, BRCCC's development of a plastics reduction plan in the first year will assess how best to report performance for this type of packaging.</li> </ul>
<i>Environmental NGO</i>	<ul style="list-style-type: none"> <li>- Recommendation that the program ask the Ministry for ICI materials to be added to the</li> </ul>	<ul style="list-style-type: none"> <li>- The Ministry has undergone that appropriate public consultation process</li> </ul>

	regulation to ensure a level playing field	that will determine amendments to the <i>Recycling Regulation</i> - Note the BRCCC’s mission is to continue to lead the way in environmental EPR where the program predates regulation. BRCCC will continue to manage ICI materials even if outside the current scope of the regulation.
<i>Environmental NGO</i>	- Supports the BRCCC program collaborating with Recycle BC	- Appreciation of this feedback and support.
<i>Environmental NGO</i>	- BRCCC should encourage and provide research and incentives to explore a redesign of the system so most containers are refillable/reusable and with reusable secondary packaging. BRCCC should be actively promoting reuse and the refillable containers over the merely recyclable ones.	- BRCCC follows the pollution prevention hierarchy and prioritizes reduction and reuse - Details of BRCCC’s container program and initiatives are part of our Schedule 1 plan - BRCCC is currently working to increase awareness of refillable bottles to consumers as well as producers. Note that aluminum alcoholic cans also play an important role in supporting refillable bottle by providing efficiencies in a higher performing system.
<i>Environmental NGO</i>	- Waste to energy should not be used as this shows a failure in design to make the product reusable (or recyclable). Landfilling should also be avoided.	- No materials managed by BRCCC are sent directly to landfill, road aggregate or incineration. BRCCC ensures that all material recycled is through high-value streams.
<i>Regional district government</i>	- Request for more information on Dispute Resolution Process	- Added to page 18 and 19
<i>Regional district government</i>	- Comment that not all regional districts participate with waste composition audits with SABC. What does ‘support’ mean and what does it entail? Financial and educational support needed to reduce number of materials being collected by municipal partners and ensure people know where to take back materials.	- Through BRCCC’s financial investment in membership with SABC, BRCCC supports waste composition studies to monitor program materials being collected by municipal partners. Additionally, BRCCC will invite local governments to meet on an annual basis to provide an opportunity to address any concerns and actively work with them to provide better education to their residents.

<i>Local government</i>	- Note minor typos	- Corrected
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ALLIANCE OF BEVERAGE LICENSEES  
FOR A RESPONSIBLE LIQUOR INDUSTRY

July 20, 2021

Brewers Recycled Container Collection Council (BRCCC)  
1711 Kingsway Avenue  
Port Coquitlam, BC  
V3C 0B6

To whom it may concern:

British Columbia's Alliance of Beverage Licensees ("ABLE BC") is the voice for all Liquor Primary & Licensee Retail Stores ("LRS") in BC.

As retailers of beverage alcohol, ABLE BC's LRS members are subject to Section 6(1) of Schedule 1 of the BC Recycling Regulation whereby they must accept up to 24 containers person per day and provide a full refund of the deposit to the person redeeming those containers. The containers are often returned in their original packaging and used to be shipped back to BDL through their reverse logistics system.

ABLE BC members are pleased to be part of BRCCC's extensive and diversified collection network, which offers BC consumers many convenient options for redeeming their refillable bottles and alcohol cans along with their associated packaging throughout the province.

ABLE BC is pleased to partner with BRCCC through their collection service agent, BDL, to ensure that BC consumers have convenient access to redemption facilities and that private retail liquor store owners are properly remunerated for their redemption of beverage alcohol containers from the public while also being provided with pick-up services. This is critically important to our members, as other beverage alcohol container stewards provide retail liquor store owners with neither a handling fee for redemption of relevant containers from consumers nor a collection service to transport stewarded products for recycling.

.../2

ABLE BC has reviewed BRCCC's draft Schedule 5 EPR plan for secondary packaging and supports the goals and targets set in the plan. BRCCC continues to set a strong example of environmental leadership that is performance driven which benefits BC consumers and BRCCC's collection agents.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Guignard". The signature is fluid and cursive, with the first name "Jeff" written in a larger, more prominent script than the last name "Guignard".

**Jeff Guignard**  
Executive Director

## Morier, Rachel

---

**From:** Karen Wirsig <kwirsig@environmentaldefence.ca>  
**Sent:** Monday, July 26, 2021 5:48 PM  
**To:** EPR  
**Subject:** BRCCC Schedule 5 Plan Renewal Consultation

**[CAUTION]** This email originated from outside the organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern:

Thank you for the opportunity to provide comment on the BRCCC's draft Secondary Packaging EPR Plan. [Environmental Defence](#) is a leading Canadian environmental NGO with expertise in plastic pollution and waste issues.

We are pleased that BRCCC is proposing to phase out plastic six-pack carrier rings. In its [Proposed Integrated Management Approach to Plastic Products](#), the federal government has identified these single-use items as a priority to ban given the harmful impact they have on the environment and the fact that it is possible to replace them with an alternative. We expect draft regulations to ban six-pack rings across Canada in the fall of 2021.

We would urge the BRCCC to include more details, including a timeline, on the phase out of six-pack rings in the BRCCC plan, as well as a commitment to seek to replace this single-use item with a reusable product instead of continuing single-use carriers using other materials. Beer carriers are an excellent candidate for reusability as they could be added to the existing, highly successful, deposit-return system for beer containers.

We would also like to see a commitment in the plan to eliminate single-use plastic packaging, including shrink wrap, altogether.

Given that Recycle BC is [reporting high recovery rates for printed paper and packaging materials](#), reaching nearly 86 per cent in 2020, we urge the BRCCC to raise its recovery target for secondary packaging during the four-year plan from 78 per cent to at least 85 per cent by 2026.

Finally, in the calculation of the recovery rate for packaging, we suggest that BRCCC explore using unit count instead of weight of packaging sold and collected for recycling. As Reloop and Eunomia have noted (see *"Getting the numbers right: a discussion paper on calculating and reporting separate collection of plastic beverage bottles," published by Reloop Platform, February 2020*), when calculating recovery and recycling rates for beverage containers, using weights rather than units can lead to overcounting or overestimation of collection rates due to moisture and other contaminants in the collected material. Given that unit counts for beer cases and cartons are available, and indeed are used as the basis of the weight calculations, we suggest unit counts would more accurately identify recovery rates than weight counts, which must be adjusted for moisture and contamination.

We note that BRCCC, and brewers across Canada, have led the way on recovery and reuse of containers and packaging materials. BRCCC serves as a positive example for other industries currently under pressure from the public, governments and consumers to reduce packaging,

and, urgently, single-use plastics. We believe that BRCCC can lead the way on a progressive and effective approach to eliminating single-use plastics from its packaging, including six-pack rings, to promote an expansion of reuse systems and to ensure full transparency for recovery rates of packaging materials.

Thank you again for the opportunity to comment on the plan. Please do not hesitate to contact me if you have any questions about the above.

Sincerely,

Karen Wirsig

Plastics Program Manager *Pronouns: she/her*



Cell: 647-482-1651 | [environmentaldefence.ca](http://environmentaldefence.ca)

TW: [@envirodefence](https://twitter.com/envirodefence) | FB: [EnvironmentalDefenceCanada](https://www.facebook.com/EnvironmentalDefenceCanada) | IG: [@envirodefence](https://www.instagram.com/envirodefence)

33 Cecil Street, 1st Floor, Toronto, Ontario, M5T 1N1

*Traditional territories of the Mississauga of the New Credit, the Anishinaabe, the Iroquois-Haudenosaunee, and the Huron-Wendat.*

*Please see full acknowledgement [here](#).*

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**Our work would not be possible without you. Please [donate](#) today.**

## Morier, Rachel

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**From:** EPR  
**Sent:** Wednesday, July 21, 2021 5:37 PM  
**To:** Morier, Rachel  
**Subject:** FW: BRCCC Secondary Packaging EPR Plan 2022-2026  
**Attachments:** BRCCC-Schedule-5-Plan-Renewal-June-2021-MV Comments.pdf

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**From:** Andrew Doi <Andrew.Doi@metrovancover.org>  
**Sent:** Monday, July 19, 2021 12:36 PM  
**To:** EPR <EPR@bdl.ca>  
**Cc:** Andrew Marr <Andrew.Marr@metrovancover.org>; Maria Lo <Maria.Lo@metrovancover.org>; Teresa Conner <Teresa.Conner@gov.bc.ca>  
**Subject:** BRCCC Secondary Packaging EPR Plan 2022-2026

**[CAUTION]** This email originated from outside the organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Thank you for the opportunity to submit feedback on the BRCCC Schedule 5 Secondary Packaging EPR Plan 2022-2026. The Metro Vancouver staff submission includes the questions and comment below, as well as the notes included in the attached PDF document.

- Pg. 17, Producers Paying The Costs: Can BRCCC elaborate on the incentive options considered to make packaging choices that are in preference to the pollution prevention hierarchy? Will BRCCC use financial incentives to encourage the adoption and implementation of reusable secondary packaging?
- Pg. 20, Performance Monitoring & Reporting Commitments: Recognizing that BRCCC can't move too far ahead of Recycle BC's targets as BRCCC relies on Recycle BC for part of the collection network, BRCCC is encouraged to set more ambitious performance targets for recovery rate.

Regards,

Andrew.

Andrew Doi, MCIP, RPP  
Environmental Planner, Solid Waste Planning  
Solid Waste Services  
t. 604.436.6825  
c. 604.790.0947





# REGIONAL DISTRICT of Fraser-Fort George

Head Office:  
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(250) 960-4400  
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<http://www.rdffg.bc.ca>

*Municipalities:  
Mackenzie  
Prince George  
Valemount*

**Electoral Areas:**  
*Chifako River-Nechilk  
Crooked River-Parsnip  
Robson Valley-Canoe  
Salmon River-Lakes  
Tabor Lake-Srone Creek  
Wipow River-Upper Fraser  
Woodpecker-Hixon*

July 20, 2021

RECY 1.11

Rachel Morier, Chair & Secretary of the Board  
BC Brewers Recycled Container Collection Council  
1711 Kingsway  
Port Coquitlam, BC V3C 0B6  
VIA Email: [Rachel.morier@thebeerstore.ca](mailto:Rachel.morier@thebeerstore.ca)

To Ms. Morier.

**Re: RDIFFG Response to Brewers Recycled Container Collection Council (BRCCC) Schedule 5 Secondary Packaging EPR Plan DRAFT**

Please accept the following response as a formal submission from the Regional District of Fraser-Fort George (RDIFFG) to provide feedback for the Brewers Recycled Container Collection Council (BRCCC) Schedule 5 Secondary Packaging EPR Plan DRAFT.

**6. Collection System and Consumer Accessibility (Page 15)**

*"Through its investment in membership of the EPR Agencies of British Columbia (SABC) BRCCC also supports waste composition studies with an aim to monitoring the level program materials being collected by municipal partners."*

Not all Regional Districts participate in the waste composition audits with SABC. The data from these waste audits is only available to the participating Regional Districts. Most Regional Districts only conduct a waste audit every five years so this isn't a great metric to monitor program participation in all areas of the province.

There is also ambiguity around the term 'support' and what this means and entails. Is this merely financial support? What does BRCCC mean by the term support? To ensure the plans success, financial, and educational support should be provided to reduce the number of materials being collected by the municipal partners and ensure the broadest amount of people know about the Plan and established take back locations.

**7. Consumer Awareness (Page 16)**

Having multiple EPR programs for similar products can be confusing and determining take back locations for beverage packaging can be difficult for the general public. Partnering with the Recycling Council of British Columbia (RCBC) may help promote awareness of take back locations. Consumers want the ease of returning their beverage containers for the full refund, and their packaging recycled just as easily. Currently when looking up packaging on the RCBC website, there is no differentiation between BRCCC packaging and Recycle BC packaging.

**10. Dispute Resolution (Page 19)**

***"Disputes between BRCCC and Its Service Provider***

*The relationship between BRCCC and its service provider (currently BDL) is a commercial relationship that is governed through a service agreement. This service agreement sets out dispute resolution procedures and all disputes will be handled according to those provisions.*

***Complaints from Depots/Return Locations***

*If the issue involves a return location under contract, BRCCC will investigate the issue and try to resolve the issue with the return location. If a return location is found to be in violation of its*

*contractual commitments or legal obligations, BRCCC will take appropriate measures to ensure compliance (including potential dispute resolution procedures outlined in written contracts)."*

From the Ministry of Environment and Parks Strategy Producers Paying the Cost of Managing Obligated Materials and Dispute Resolution Guide 2018 document, *"The plan should describe the procedure that will be used, so that the Director can be satisfied that an adequate dispute resolution procedure is in place."*

BRCCC should include the description of the procedures for dispute resolution in the Plan, as the above mentioned Guide requires it. With the current wording, there is no accountability for the program to follow correct dispute resolution if contracts change in the future with inadequate dispute resolution.

11. Performance Monitoring & Reporting Commitments (Page 20)

From the last annual report, the target recovery rate for 2019 was 75% and a 78.32% was attained for collection. The proposed target recovery rate of 76% for 2022 has already been achieved in 2019 and should be increased for 2022. The Ministry of Environment and Parks Strategy discusses Plans demonstrating continuous improvement. The plan should be striving for more and set a more ambitious target, especially if the consumer awareness is going to increase, which, should also lead to more product collected.

Yours truly,

The signature consists of the lowercase letters 'rg1' in a blue, sans-serif font, followed by a blue square box, and then the lowercase letters 'dint' in a blue, italicized, sans-serif font.

Manager of Waste Diversion Programs

Telephone: 250-960-4400

Facsimile: 250-562-8676

Email: lzapotichny@rdffg.bc.ca

**LZ:NH**

July 26, 2021

## Brewers Recycled Container Collection Council

### Draft Schedule 5 Secondary Packaging EPR Plan Feedback

To Whom It May Concern:

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

We are pleased that BC has regulated these products and packaging. We submit these comments in hope that the program will not just *meet requirements* but really show leadership in the realm of EPR to move it beyond mere recycling to actually changing the nature of the packaging and how the service is delivered, as envisioned in the Canadian Council of Ministers of Environment Canada-wide Action Plan for EPR.

Please see our comments by section below:

#### Section 4. Products Covered

BRCCC is to be commended for shipping back from retail and for collecting both ICI and residential packaging as well as other materials not covered in the Recycling Regulation. We recommend that the program ask that these materials be added to the regulation to ensure a level playing field.

Though the shrink-wrap is not covered, we recommend that the stewards look for other ways to achieve the stability of the loads without this single use plastic, possibly with some form of reusable container. Pallets and can bins, likewise should be used as long as possible and purchased with durability in mind.

With the success of the refillable beer bottles, we encourage BRCCC to expand to wine bottles as well and to work with the BC wine producers.

## Section 6. Collection Accessibility and Collection System

While many cans and bottles are likely to come back in the cardboard boxes, it is less likely that consumers are returning the ring carriers and other forms of packaging. Much of this is likely not recycled (waste) or being returned through the Recycle BC program so it is good that the program is collaborating with Recycle BC.

The number of access points and geographic accessibility is commendable, as is the goal to continue to improve this. Though not noted, another positive aspect is that those types of stores usually have hours that would allow easy access for most residents. Also not noted, is that many of these locations will be accessible via transit and may also be accessible to those with disabilities (two areas flagged for attention in the Recycling Regulation).

### Single Use Plastic Reduction Plan

Ideally the program would look at ways to redesign the packaging so that as much as possible, the packaging was reusable or unnecessary.<sup>1</sup> We fully support phasing out plastic carrier rings and hope that the alternative approach will eliminate the many problems associated with them and not be another form of single use item. This program, in particular, is well-suited to this due to the close ties with the producers. Although this plan is about the secondary packaging and not the beverage containers, given that it is centred around return to retail, a redesign of the product delivery system to focus on the use of refillables, and then perhaps a reusable container (like the milk crate system) could make this a much more sustainable system, negate the need for any form of rings, and conform to the Recycling Regulation that notes the hierarchy should be followed.

### Packaging Recovery Rate

The target of 78% should be higher (more like 90%), especially if the switch to a reusable and refillable system was to occur. The success rate of the kegs shows that a high recovery rate is possible when a reusable system is used. A key point of contention is the program not compensating some types of depots for collection of this material. All depots receiving the material should be compensated and then this might help to raise the recovery rates as the depots would encourage returns. Recovery rate targets should be set for and reported by packaging type, rather than an amalgamation that could have one type (such as cardboard) doing well with another (plastic rings) doing poorly. Once this data is properly tracked and reported, the appropriate costs can be assigned to the material.

### Beer Secondary Packaging Collection

The fifth relevant stream is the Recycle BC curbside program (unless this is counted under the depot aspect). A sixth may be the depots that collect other beverage containers and gather the secondary packaging when items are returned there.

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<sup>1</sup> When the word "reusable" is noted in this feedback, it is not a cardboard container that may transport beverages in one or two directions but a hard container designed for hundreds or thousands of uses.



## Section 7 Consumer Awareness

BRCCC has done well to increase its consumer awareness level and 80% is a good target but the date for this should be sooner (2022) and then escalating to 95% by the end of 2025. To do otherwise is to continue to externalize costs to the public and the environment. The program could also pursue disposal bans with local governments as a way to ensure consumers do the right thing but also that they are aware that throwing the secondary packaging away is not appropriate.

Metrics for these specific campaigns should be measured and used to adjust the communications or other aspects that are shown to be barriers. We recommend the second campaign is not just about the phase out of plastic rings but also about a switch to mainly refillables with no or reusable secondary packaging. We also recommend the broad surveys happen at least every two years to be able to correct any problems sooner as well as to measure the overall effectiveness of the communications.

It is also good to approach this from a behaviour change perspective, so not only about raising awareness but also seeing if this results in an increase in recovery rates. Studies should be done to determine why materials are not returned and then make changes based on that. It could mean more education is needed or it could mean a design shift but more detailed information on who is not returning materials and why will be the key starting point, rather than more mass marketing.

## Section 8 Management of Program Costs

The lack of visible fees to the consumer is a positive as is the intention to set fees to encourage the use of sustainable packaging. A date for this goal should be set and the outcomes should be public and transparent. The fees need to be set to strongly encourage first, reduction of packaging and then, reusable packaging (with recyclable packaging paying the most and non- or hard-to-recycle packaging disallowed).

## Section 9 Management of Environmental Impacts

### **Pollution Prevention Hierarchy**

As noted above BRCCC should encourage and provide research and incentives to explore a redesign of the system to the majority of containers are refillable and come in reusable containers or with reusable secondary packaging. BRCCC should be actively promoting reuse and the refillable containers over the merely recyclable ones. Waste to energy should not be used as this shows a failure in design to make the product reusable (or recyclable) and is harmful to the environment as well as delaying progress towards Zero Waste. Landfilling should also be avoided.



## Section 11 Performance Monitoring & Reporting Commitments

The recommendations to strengthen these targets are included in the above sections.

We hope that this information is helpful in crafting the renewed plan.

Sincerely,  
Sue Maxwell  
On behalf of Zero Waste BC

## Morier, Rachel

---

**From:** Morier, Rachel  
**Sent:** Tuesday, June 15, 2021 10:33 AM  
**Subject:** BRCCC's Schedule 5 Plan - Draft for Consultation

Dear valued BRCCC stakeholder,

BRCCC is the EPR program in BC that is responsible for alcohol beverage cans and refillable bottles. BRCCC also collects secondary packaging returned with its designated program containers and its Schedule 5 Plan for secondary packaging is due for renewal this year.

For over 90 years – long before regulatory requirements - the Beer Industry has managed a deposit return system for its containers in BC and BRCCC is proud of achieving a container recovery rate of over 90% for more than a decade. BRCCC remains the only container program that offers reuse through the refillable bottle which continues to be a gold standard of sustainable packaging and an exemplary model of a circular economy. BRCCC's unique collection system utilizes the brewers' distribution and retail networks, which maximizes efficiencies through empty returns trips coordinated with full goods deliveries thereby significantly reducing greenhouse gas emissions! BRCCC has also long-practiced crushing cans before shipping to optimize transportation routes and reduce the need for trucks on the road.

BRCCC's Schedule 5 plan reflects its mission is to continue leading the way in environmental EPR to achieve the highest return rate for alcoholic beverage containers and related packaging. BRCCC will be making a concerted effort to coordinate an approach with its members to phase out plastic ring carriers and report progress during the five-year period of the plan.

The draft plan has been posted on BRCCC's website [here](#). Comments are to be submitted to [EPR@BDL.ca](mailto:EPR@BDL.ca) by **Monday, July 26<sup>th</sup>, 2021**.

To learn more about the BRCCC's Schedule 5 Plan and to participate in a live Q&A session, we welcome you to join one of BRCCC's interactive webinars on **June 18<sup>th</sup>**, **June 24<sup>th</sup>** or **July 6<sup>th</sup>** at 12pm Pacific. Please email [EPR@BDL.ca](mailto:EPR@BDL.ca) with your selected date in the subject line to register. More details are available on our website: <https://envirobeerbc.ca/reports-links/>.

Best regards,  
Rachel



Rachel Morier | Chair & Secretary of the Board

☎ Direct: 416-200-6759

## Morier, Rachel

---

**From:** Morier, Rachel  
**Sent:** Tuesday, June 15, 2021 10:43 AM  
**To:** O'Melinn, Kathleen LDB:EX  
**Subject:** BRCCC's Schedule 5 Plan - Draft for Consultation

Hi Kathleen,

Hope you're doing well!

BRCCC's Schedule 5 Plan for secondary packaging is due for renewal this year. Since the BC LDB is a valued partner of BRCCC, we welcome your feedback.

As you may know, the Beer Industry has managed a deposit return system for its containers in BC for over 90 years and BRCCC is proud of achieving a container recovery rate of over 90% for more than a decade. BRCCC remains the only container program that offers reuse through the refillable bottle which continues to be a gold standard of sustainable packaging. BRCCC's unique collection system utilizes the brewers' distribution and retail networks, which maximizes efficiencies through empty returns trips coordinated with full goods deliveries thereby significantly reducing greenhouse gas emissions!

BRCCC's Schedule 5 plan reflects its mission to continue leading the way in environmental EPR to achieve the highest return rate for alcoholic beverage containers and related packaging. The draft plan has been posted on BRCCC's website [here](#). Comments are to be submitted to [EPR@BDL.ca](mailto:EPR@BDL.ca) by **Monday, July 26<sup>th</sup>, 2021**. Of course, I'd be happy to arrange a call with you if you prefer to discuss in greater detail. We will also be providing an option to participate in a webinar to share the key highlights of the plan and to provide a live Q&A session. More details are available on our website: <https://envirobeerbc.ca/reports-links/>.

Best regards,  
Rachel



Rachel Morier | Chair & Secretary of the Board

☎ Direct: 416-200-6759

## Morier, Rachel

---

**From:** Morier, Rachel  
**Sent:** Thursday, July 22, 2021 12:52 PM  
**To:** Tamara Burns  
**Cc:** David Lefebvre  
**Subject:** RE: BRCCC's draft Schedule 5 plan renewal

Hi Tamara,

Thanks for taking the time to review and for providing clarity and consistency to BRCCC's draft Schedule 5 program plan. I have no issues or concerns with your suggested changes and will be sure to make these edits in our revised plan. As such, there is no need to formally submit these edit suggestions as consultation feedback but I certainly appreciate you asking.

I will keep you posted once we have a revised version of the plan ready to share.

Best regards,  
Rachel

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**From:** Tamara Burns <tburns@recyclebc.ca>  
**Sent:** Wednesday, July 21, 2021 7:36 PM  
**To:** Morier, Rachel <Rachel.Morier@thebeerstore.ca>  
**Cc:** David Lefebvre <dlefebvre@cssalliance.ca>  
**Subject:** RE: BRCCC's draft Schedule 5 plan renewal

**[CAUTION]** This email originated from outside the organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello Rachel,

Thanks again for the opportunity to review your draft Schedule 5 program plan. Unless you feel otherwise, I believe our comments, accompanied by suggested wording tweaks, are for clarity, accuracy and consistency rather than consultation feedback that would go through the formal submission process. If you do wish me to formally submit, I am happy to, just let me know.

We looked at the plan's mentions of Recycle BC and recommend the following edits inserted **in red** or as ~~strikeouts~~, with explanation for you in [\[brackets\]](#):

Page 9:

"Coordination and Cooperation with other EPR programs

There may be some volumes of BRCCC secondary packaging (primarily boxboard) entering other Schedule 5 collection systems. BRCCC actively works with Recycle BC to audit common return ~~locations~~ **channels** to identify flows of beer secondary packaging. BRCCC coordinates with EPR programs as necessary, including financially, to ensure overall recovery performance and efficiency. BRCCC ensures any issues between EPR programs does not negatively impact the recovery and recycling of relevant secondary packaging. No recovered packaging is double-counted between the various EPR programs." [\[Recycle BC audits curbside, multi-family and depot PPP collection and records the quantity of BRCCC PPP recovered\]](#)

Page 12

“Relevant PPP is also **primarily** recovered through two other streams: other retail locations and private bottle depots. Under this EPR plan, BRCCC will work with our partners to track and account for this PPP where feasible.” [Recycle BC recovers BRCCC PPP from curbside, multi-family and depot locations; edit makes allowance for information on page 17]

Page 14

“Ultimately, other beer secondary packaging collected through these streams will be processed either: i) by BDL on behalf of BRCCC (and is captured in the weight of processed materials at BDL’s Port Coquitlam warehouse); ii) through a EPR ~~depot~~ **channel** (and is captured in the processed weight of materials from that **channel (curbside, multi-family and depot)** and will be captured through audits BRCCC conducts with Recycle BC); or iii) is sent directly for recycling by a collector.”

“For other beer secondary packaging, the total amount to be reported will be based on the amount of secondary packaging processed from the BDL warehouse in Port Coquitlam, the amount of beer secondary packaging processed by EPR ~~depots~~ **channels** and the amount of beer secondary packaging recycled by BC Liquor Stores reported to BRCCC. To calculate the amount of ~~beer~~ **BRCCC** secondary packaging processed by EPR ~~depots~~ **channels**, periodic audits of secondary packaging ~~bales~~ **collection** will be conducted, in conjunction with Recycle BC, to determine what percentage of an average ~~secondary packaging bale~~ **PPP audit sample** is comprised of ~~beer~~ secondary packaging. This percentage will then be applied to the total amount of ~~secondary packaging~~ **PPP** processed by EPR ~~depots~~ **channels** to arrive at a **the total tonnage for this stream of BRCCC secondary packaging processed by EPR channels**. [Recycle BC audits include cider and coolers secondary packaging in addition to beer; audit process edited for accuracy]

“Recovery of secondary packaging directly from retail liquor stores (both government and private) as well as volumes collected through Recycle BC’s channels (i.e., curbside, multi-family, depot) will be deemed to be residential returns and added to the residential total (see Figure 2).” [no change suggested]

Page 17

#### “Partnerships with other EPR Agencies

BRCCC currently has agreements in place with both the LDB and Recycle BC which account for residential secondary packaging collected through BC Liquor Stores and Recycle BC’s collection channels (curbside **and multi-family** collection or their contracted depot sites) respectively. BRCCC’s agreement with the LDB is currently in place until 2023. BRCCC compensates the LDB annually for the sorting and handling services of secondary packaging returned to BC Liquor Stores by customers.

BRCCC’s agreement with Recycle BC was recently renewed in 2020 and is based on an annual tonnage allotment at a flat per tonnage rate for beer and cider PPP managed by Recycle BC. In 2019, BRCCC began sourcing beer and cider secondary packaging from additional select depots that are not committed to any other PPP EPR agency.”

I hope all of this works for you.

Please let me know if you wish me to formally submit by Monday, otherwise, I will leave it in your hands to make these edits for clarity, accuracy and consistency, or to let me know that you disagree.

Happy to chat if you wish.

With thanks,

Tamara

**TAMARA BURNS**

Executive Director, Western Canada  
Recycle BC & MMSW

---

**From:** Morier, Rachel <[Rachel.Morier@thebeerstore.ca](mailto:Rachel.Morier@thebeerstore.ca)>  
**Sent:** Friday, June 11, 2021 2:14 PM  
**To:** Tamara Burns <[tburns@recyclebc.ca](mailto:tburns@recyclebc.ca)>  
**Cc:** David Lefebvre <[dlefebvre@cssalliance.ca](mailto:dlefebvre@cssalliance.ca)>  
**Subject:** BRCCC's draft Schedule 5 plan renewal

**CAUTION:** This email originated from outside of the organization.

Hi Tamara,

Happy Friday!

I mentioned on our call this week that BRCCC's Schedule 5 EPR Plan is due for renewal this year. It has just been posted on BRCCC's website [here](#). BRCCC certainly appreciates our partnership with Recycle BC and welcomes your feedback. Comments are to be submitted to [EPR@BDL.ca](mailto:EPR@BDL.ca) by **Monday, July 26<sup>th</sup>, 2021**. Of course, I'd be happy to arrange a call with you if you prefer to discuss in greater detail. We will also be providing an option to participate in a webinar to share the key highlights of the plan and to provide a live Q&A session. More details are available on our website: <https://envirobeerbc.ca/reports-links/>.

Thanks and have a wonderful weekend,  
Rachel



**Rachel Morier** | Director, Sustainability  
Pronouns: she/her

The Beer Store and Brewers Distributor Ltd. 🌐  
5900 Explorer Dr., Mississauga, ON, L4W 5L2 🌍  
📞 M. 416.200.6759

## Morier, Rachel

---

**From:** Morier, Rachel  
**Sent:** Tuesday, June 15, 2021 5:27 PM  
**To:** Lyndsay Poaps  
**Subject:** RE: BRCCC's Schedule 5 Plan - Draft for Consultation

Hi Lyndsay,

Posting a notice in your membership newsletter would be so awesome! Here is updated copy that you can use below:

BRCCC is the EPR program in BC that is responsible for alcohol beverage cans, refillable bottles and associated packaging. Its Schedule 5 Plan for secondary packaging is due for renewal this year and your feedback is welcome.

For over 90 years – long before regulatory requirements – the Beer Industry has managed a deposit return system for its containers in BC and BRCCC is proud of achieving a container recovery rate of over 90% for more than a decade. BRCCC remains the only container program that offers reuse through the refillable bottle which continues to be a gold standard of sustainable packaging and an exemplary model of a circular economy. BRCCC also collects secondary packaging returned with its designated program containers. BRCCC's unique collection system utilizes the brewers' distribution and retail networks, which maximizes efficiencies through empty returns trips coordinated with full goods deliveries thereby significantly reducing greenhouse gas emissions! BRCCC has also long-practiced crushing cans before shipping to optimize transportation routes and reduce the need for trucks on the road.

BRCCC's Schedule 5 plan reflects its mission to continue leading the way in environmental EPR to achieve the highest return rate for alcoholic beverage containers and related packaging. BRCCC will be making a concerted effort to coordinate an approach with its members to phase out plastic ring carriers and report progress during the five-year period of the plan.

The draft plan has been posted on BRCCC's website [here](#). Comments are to be submitted to [EPR@BDL.ca](mailto:EPR@BDL.ca) by **Monday, July 26<sup>th</sup>, 2021**.

To learn more about the BRCCC's Schedule 5 Plan and to participate in a live Q&A session, we welcome you to join one of BRCCC's interactive webinars on **June 18<sup>th</sup>**, **June 24<sup>th</sup>** or **July 6<sup>th</sup>** at 12pm Pacific. Please email [EPR@BDL.ca](mailto:EPR@BDL.ca) with your selected date in the subject line to register. More details are available on our website: <https://envirobeerbc.ca/reports-links/>.

Thanks so much!  
Rachel

---

**From:** Lyndsay Poaps <lyndsay@rbc.ca>  
**Sent:** Tuesday, June 15, 2021 2:52 PM  
**To:** Morier, Rachel <Rachel.Morier@thebeerstore.ca>  
**Subject:** RE: BRCCC's Schedule 5 Plan - Draft for Consultation

**[CAUTION]** This email originated from outside the organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Rachel

Thanks for your note.

We can absolutely send something out to the membership in our newsletter. Should I just cut from what you have written below or do you have some copy you would like me to use?

Best  
Lyndsay

---

**From:** Morier, Rachel <[Rachel.Morier@thebeerstore.ca](mailto:Rachel.Morier@thebeerstore.ca)>  
**Sent:** June 11, 2021 4:18 PM  
**To:** Lyndsay Poaps <[lyndsay@rcbc.ca](mailto:lyndsay@rcbc.ca)>  
**Subject:** BRCCC's Schedule 5 Plan - Draft for Consultation

Hi Lyndsay,

Congrats on a successful conference! Much thanks again for the opportunity to sponsor.

As you likely know, BRCCC is the EPR program in BC that is responsible for alcohol beverage cans, refillable bottles and associated packaging. BRCCC is proud of our high container recovery rate of over 90% for more than a decade and is committed to continually achieve the highest container and packaging recovery rate possible. We remain the only container program that offers reuse through the refillable bottle which continues to be a gold standard of sustainable packaging and an exemplary model of a circular economy. BRCCC's unique collection system utilizes the brewers' distribution and retail networks, which maximizes efficiencies through return trips coordinated with full goods deliveries and thereby significantly reducing greenhouse gas emissions! BRCCC has also long-practiced crushing cans before shipping to optimize transportation routes and reduce the need for trucks on the road.

BRCCC collects secondary packaging returned with its designated program containers and its Schedule 5 Plan for secondary packaging is due for renewal this year. The plan has been posted on BRCCC's website [here](#). We would greatly appreciate if you can please share with the RCBC membership as we welcome all feedback. Comments are to be submitted to [EPR@BDL.ca](mailto:EPR@BDL.ca) by **Monday, July 26<sup>th</sup>, 2021**. More details and webinar session dates are available on our website: <https://envirobeerbc.ca/reports-links/>.

Please let me know if you have any questions.

Hope you enjoy a much deserved restful weekend!

Rachel



Rachel Morier | Chair & Secretary of the Board

☎ Direct: 416-200-6759

**Morier, Rachel**

---

**From:** Morier, Rachel  
**Sent:** Wednesday, June 16, 2021 5:20 PM  
**To:** info@cwma.ca  
**Subject:** RE: CWMA Information Update

Sheila,

You're awesome! Thank you again for sending the notice about BRCCC's plan! 🙌...

Rachel

---

**From:** Coast Waste Management Association <sheila@cwma-bc.ccsend.com> **On Behalf Of** Coast Waste Management Association  
**Sent:** Wednesday, June 16, 2021 4:02 PM  
**To:** Morier, Rachel <Rachel.Morier@thebeerstore.ca>  
**Subject:** CWMA Information Update

**[CAUTION]** This email originated from outside the organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe.



## INFORMATION UPDATE

Dear Rachel,

Please find attached 34 items for your interest:

### News

- ▶ CRD - [Treated sewage bound for dump until CRD upgrades processing to required standard \(pdf\)](#)
- ▶ CRD - RFP: [Hartland Landfill Bird Abatement Program 2021](#) (web only)

- ▶ CRD - [Saanich will soon say goodbye to single-use plastic bags \(pdf\)](#)
- ▶ CRD - [Refurbished electronics passed along to Victoria charities \(pdf\)](#)
- ▶ CVRD - [Odours from recycling centre draws complaints \(pdf\)](#)
- ▶ RDN - Career Opportunity: [Zero Waste Coordinator \(pdf\)](#)
- ▶ RDN - [City of Nanaimo commits to July 1 single-use plastic bag ban \(pdf\)](#)
- ▶ ACRD - [Glass: Not accepted in curbside recycling! \(pdf\)](#)
- ▶ ACRD - [Tofino moms turn mounds of organic waste into “Black Gold” \(pdf\)](#)
- ▶ ACRD - [Port Alberni Shelter Farm food processing course aims to reduce food waste \(pdf\)](#)
- ▶ Comox Valley RD / SRD - [Unstaffed Comox recycle depot closes permanently on July 1 \(pdf\)](#)
- ▶ RDKS - [Kitimat’s MStar Hotel brings out staff’s competitive clean-up side \(pdf\)](#)
- ▶ qRD - [Team studies waste stream in qathet region \(pdf\)](#)
- ▶ SCR D - [SCR D decides not to implement curbside recycling yet \(pdf\)](#)
- ▶ SCR D - [Sechelt man fined \\$900 for leaving bear attractants in yard \(pdf\)](#)
- ▶ Metro Van - [Burnaby company turns food waste into bioflakes \(video\)](#)
- ▶ Metro Van - [How SFU’s new biomass plant fuels our community \(pdf\)](#)
- ▶ Metro Van - [South Surrey charity keeps 158,000 kg of edible food out of landfill every year \(pdf\)](#)
- ▶ Cariboo RD - [Curbside Free Your Things Weekend Has Expanded To Other Communities \(pdf\)](#)
- ▶ PRRD - [Upgraded oil recycling centres arrive in Fort St. John \(pdf\)](#)
- ▶ R D F F G - [Illegal dumping a big issue in Prince George. \(pdf\)](#)
- ▶ CSR D - [Volunteers frustrated with Sicamous thrift shop being used as a dump \(pdf\)](#)
- ▶ RDCO - [Pilot project for cork recycling pops up in West Kelowna \(pdf\)](#)
- ▶ RDOS - [Town of Osoyoos receives upgraded used oil recycling infrastructure at their landfill \(pdf\)](#)
- ▶ RDCK - [LETTER: RDCK online survey set up to fail \(pdf\)](#)
- ▶ BC Wide - [B.C. refilleries provide low-waste solutions for our everyday grocery needs \(pdf\)](#)
- ▶ BC Wide - [COVID-19: B.C. tour operators stay afloat during pandemic cleaning up marine debris \(pdf\)](#)
- ▶ AB - [Cousins on First Nation say garbage just the start of path to rebuild community spirit \(pdf\)](#)
- ▶ Canada - [Zero waste initiative to help cities embrace a post-pandemic circular economy \(pdf\)](#)
- ▶ USA - [Plastics Pact Unveils National Strategy to Achieve 2025 Circular Economy Goals \(pdf\)](#)

## Report

- ▶ **National Zero Waste Council:** [Opportunities for Reusables in Retail Settings During the COVID-19 Pandemic in Canada: A Review of Guidance and Evidence](#)

## EPR Programs

- ▶ **Call2Recycle** collected and recycled 4.1 million kilograms of used consumer batteries in 2020 [Canadian Corporate Annual Report for 2020](#)
- ▶ **BRCCC’s** Schedule 5 Plan for secondary packaging is due for renewal this year. The draft plan has been posted on BRCCC’s website [here](#) and feedback is welcome. BRCCC will also be providing an option to participate in a webinar of key highlights and Q&A. [Webinar & Additional Details](#)

## Consultations

- ▶ BC Ministry of Environment and Parks Strategy has published a **Hazardous Waste Regulation Policy Intentions Paper**. The Ministry welcomes comments on the information and proposals outlined [Intentions Paper](#) | [Feedback Form](#) | [Webinar & Additional Details](#)

# Coming Events

June 18, 2021 12:00–1:00 PM PT | Greater Nanaimo Chamber of Commerce Nanaimo Circular Economy Virtual Event [LEARN MORE/REGISTER](#)

June 24, 2021 | 1:00 PM ET | Waste Dive ~ Live Panel Discussion: Using Data To Advance Single Use Plastic Legislation [LEARN MORE/REGISTER](#)

June 24, 2021 | 10:00–11:30 AM PT | NZWC: Recovering the Momentum of Reusables in Retail [LEARN MORE / REGISTER](#)

## Member Resources

**Affinity Partner Program**

DISCOUNTS & UNIQUE BENEFITS EXCLUSIVELY FOR CWMA MEMBERS

CWMA

**Business Directory**

JOB ADS / EDUCATION / BUY AND SELL

CWMA

## Stay Connected



Information Update is curated by  
**Sheila Molloy, Executive Director**  
Coast Waste Management Association  
Ph 250 733 2213 | TF 866 386 2962  
[www.cwma.ca](http://www.cwma.ca)

**CWMA**  
WASTE MANAGEMENT ASSOCIATION

*The information attached to and contained within this email is being sent to you solely for the purpose of increasing awareness of issues and opportunities affecting our industry. The Coast Waste Management Association does not necessarily endorse or warrant the information contained within and advises readers to verify with the original source before using.*

Coast Waste Management Association | Suite 109-1834C Oak Bay Avenue, Victoria, British Columbia  
V8R 0A4 Canada

[Unsubscribe rachel.morier@thebeerstore.ca](mailto:rachel.morier@thebeerstore.ca)

[Update Profile](#) | [Constant Contact Data Notice](#)

Sent by [info@cwma.ca](mailto:info@cwma.ca)



BREWERS RECYCLED CONTAINER  
COLLECTION COUNCIL

# Schedule 5 Secondary Packaging EPR Plan 2022-2026 Consultation Webinar

BCPSC Members  
July 8<sup>th</sup>, 2021



# Introduction

BC Brewers' Recycled Container Collection Council (BRCCC) is the EPR agency responsible for alcohol beverage cans, refillable bottles and associated packaging

For over 90 years – long before regulatory requirements – the Beer Industry has managed a deposit return system for its containers in BC

Only container EPR program that supports reuse through the refillable bottle – a model for a circular economy

BRCCC also collects secondary packaging returned with its designated program containers





# Who We Are

- Not-for-profit society under the BC *Societies Act*
- Members represent the majority of beer volume sold in the province
- Container Plan (Schedule 1) works in tandem with Packaging and Printed Paper (PPP) Plan (Schedule 5)
- BDL acts as the service provider to BRCCC for these EPR plans



BDL's Port Coquitlam warehouse

# Why BRCCC?

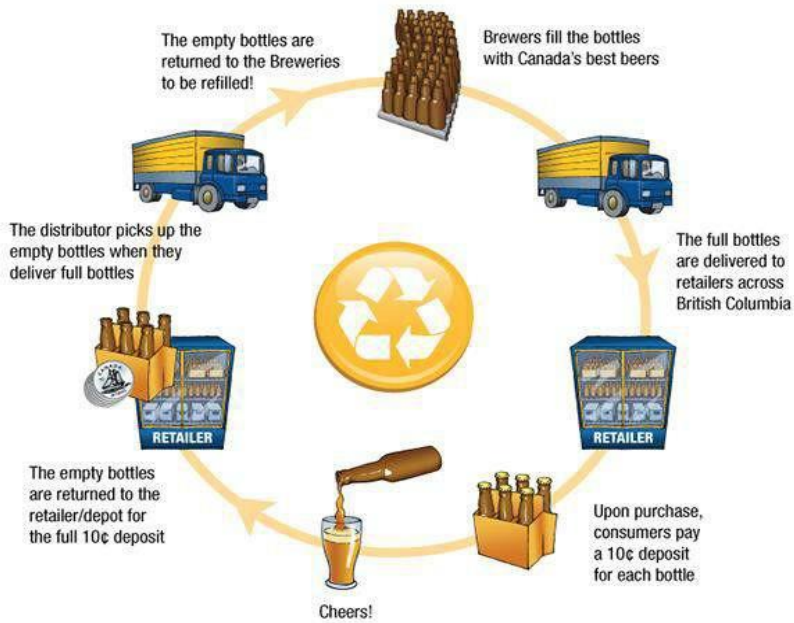
- Container recovery rate of over 90% for more than a decade
- Utilizes brewers' distribution and retail networks
  - Maximizes efficiencies through empty returns trips coordinated with full goods deliveries to significantly reducing greenhouse gas emissions
- Long-practiced crushing cans before shipping to optimize transportation routes and reduce the need for trucks on the road.



# How It Works

## The life of a beer bottle

### BREWERS CLOSED LOOP RETURN SYSTEM



### Learn about Can Recycling



### Learn about Bottle Recycling



**Bottles reused on average of 15 times before being recycled!**  
**Recycled cans are filled & ready to purchase again in about 6 weeks!**

# Our Mission

“ To continue to lead the way in environmental EPR to achieve the highest return rate for alcoholic beverage containers and related packaging ”



# Our Success

## Container Recovery Rate

	Target	Actual
2017	87.5%	<b>90.8%</b>
2018	87.5%	<b>89.2%</b>
2019	87.5%	<b>90.8%</b>

## Secondary Packaging Recovery Rate

	Target	Actual
2017	70%	<b>59.3%</b>
2018	72%	<b>71.1%</b>
2019	75%	<b>78.3%</b>



... of beer containers  
& packaging out of  
landfills in 2019

# Performance Targets Summary

Measures	2022	2023	2024	2025	2026
Recovery/Collection	76%	76%	77%	77%	78%
<b>Targets</b>					
<b>Plastic Reduction Target</b>	<ul style="list-style-type: none"> <li>Report progress of plastics reduction over the 5-year period</li> </ul>				
Accessibility Targets	1,163 locations	1,169 locations	1,174 locations	1,178 locations	1,178 locations
Consumer Awareness Targets**	75%	75%	75%	80%	80%
	2 net new consumer promotion/education initiatives				
<b>Pollution Prevention Hierarchy/Product Life Cycle Targets</b>	<ul style="list-style-type: none"> <li>Target to direct 100% of collected PPP to recycling commodity markets</li> <li>Report in accordance with the PPH</li> <li>Track end fate of materials in annual EPR audit</li> </ul>				

\*\*BRCCC will undertake a consumer awareness survey in 2025 to measure against the increased awareness target.

# Recovery Target

- Recovery target of **78%** by 2026

  - Increased from 75% in current plan

- Continue to achieve the highest return rate for related packaging possible



# Plastic Reduction Plan

- BRCCC recognizes reduction and reuse are most impactful actions within the pollution prevention hierarchy
- Coordinate an approach with its members to phase out plastic ring carriers and report progress during the five-year period of the plan
- Develop a specific plan in the first year of this EPR plan and commit to track and report progress on plastics reduction measures in its annual report
- Reduction target over the course of this five-year plan will serve as an exemplary model



# Accessibility Target

Accessibility target of **1,178 locations** by 2026

- ┆ Increase of 18 locations in current plan
- ┆ Aligned accessibility with Schedule 1 plan
- ┆ 92% of BC consumers (or over 4 million BC residents) are within a 15-minute drive of an authorized BRCCC return location

Return site coverage is continually monitored

BRCCC aims to balance number of sites to achieve performance and convenience while ensuring its services system remains cost effective

Explore short-term and long-term solutions

- ┆ Local community groups
- ┆ Seasonal pickups
- ┆ Bin placement
- ┆ Emerging technologies



# Consumer Awareness

Consumer awareness target of **80%** for beer related packaging by 2025

- Increased from 75% in current plan
- Note 93% awareness of deposit program for beers containers

Two net new public awareness and education campaign initiatives

- 1) Remind consumers to return their refillable bottles and beverage alcohol cans in the cases in which they purchased them through more extensive signage at authorized return locations and targeted social media messaging
- 2) Promote the Canadian beer industry's sustainability efforts to phase out plastic ring carriers



**YOU'RE IN THE RIGHT PLACE.**

**FULL DEPOSIT REFUND**

**On refillable alcohol bottles and alcohol cans.**

We also accept your related alcohol packaging.

BC has one of the highest beer container return rates in North America. Thanks to you, we're leading the way in environmental stewardship.

GET THE FULL STORY AT [www.EnviroBeerBC.com](http://www.EnviroBeerBC.com)

# Pollution Prevention Hierarchy

100% of BC's beer packaging is reusable or recyclable

- Target to direct 100% of collected PPP to recycling commodity markets.
- Report in accordance with the PPH
- Track end fate of materials in annual EPR audit

Report additional environmental benefits as it pertains to the PPH as brewers phase out single-use plastics



...based 23,427 tonnes recovered in 2019



# Program Cost Management

Costs associated with managing and collecting BRCCC packaging are paid directly and internalized by the brewers

- Consumers are not subject to additional handling or eco fees at the point of sale

- BRCCC compensates the LDB annually for the sorting and handling services of secondary packaging returned to BC Liquor Stores by customers

- Agreement with Recycle BC based on an annual tonnage allotment at a flat per tonnage rate for beer and cider PPP managed by Recycle BC.

- BRCCC's annual secondary packaging fees charged to brewers are reviewed and approved annually by the BRCCC Board of Directors

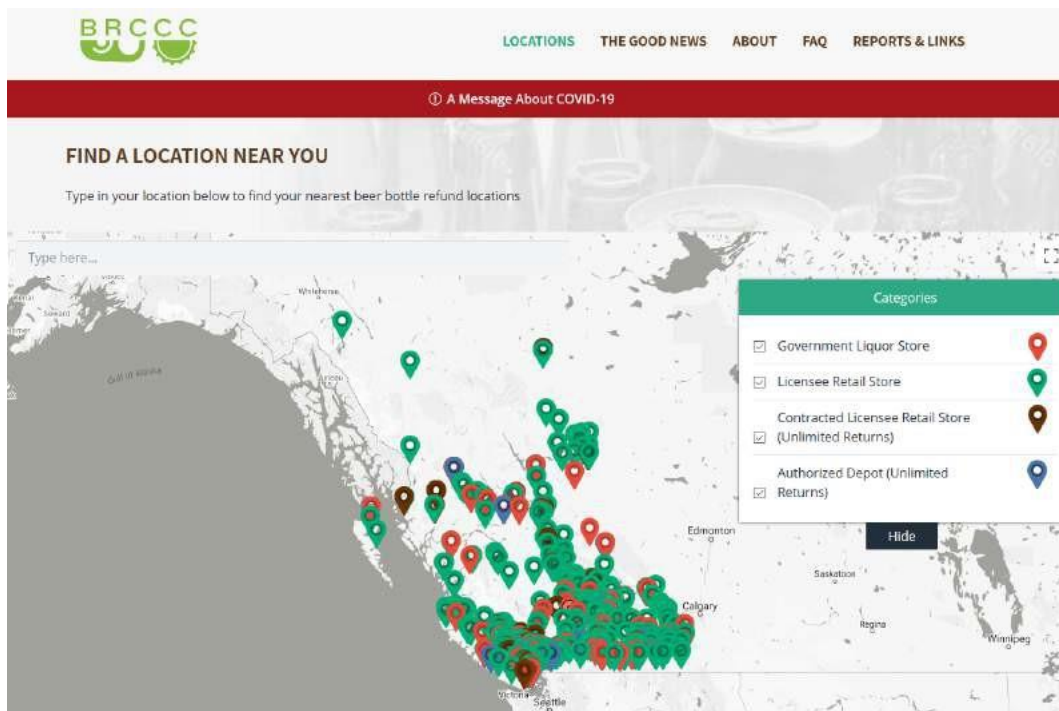


# Continuous Improvement

All performance targets areas improved

New Field Services Manager role to provide additional on-the-ground support and local engagement

Website improvements including location finder tool:  
<https://envirobeerbc.ca/locations/>

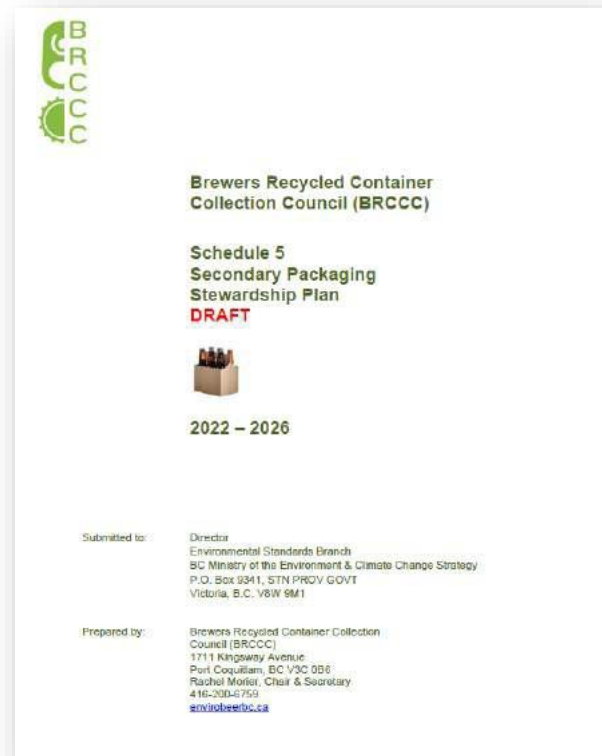




# Stakeholder Consultation

Please submit your comments to [EPR@bdl.ca](mailto:EPR@bdl.ca)

Deadline for submission is Monday, July 26<sup>th</sup>, 2021



# Questions?





BREWERS RECYCLED CONTAINER  
COLLECTION COUNCIL

# Thank you!

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