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TO RETURN YOUR DRINK  
CONTAINERS.

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# Encorp Pacific (Canada)

## Draft Beverage Stewardship Plan 2020 – 2024

Full Consultation Summary Report

October 13, 2020



Prepared by:



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## OVERVIEW

### Background

Encorp Pacific (Canada) (“Encorp”), better known as Return-It, is the not-for-profit stewardship agency appointed by producers of packaged ready-to-drink beverages to fulfill their obligations under the Recycling Regulation, Schedule 1, Beverage Container Product Category (BC Reg. 449/2004). It operates a province-wide collection system to manage most used beverage containers for ready-to-drink beverages sold in British Columbia (“BC”).

### Public Consultations

#### Previous Consultations

Encorp’s latest five-year Stewardship Plan<sup>1</sup> was approved by the BC Ministry of Environment and Climate Change Strategy (MOECCS). In 2017, Encorp applied to the Director and was approved to continue operating under the current plan with no changes except to update program performance targets and to address certain policy items that have been introduced since the approval of the 2017 Stewardship Plan.

The initial public consultation on those proposed targets was conducted between May 8, 2018, and June 22, 2018. As a result of the consultation process and discussions with the MOECCS, Encorp further revised and expanded the categories of the proposed recovery rates. A second round of consultations on these proposed amendments to the Stewardship Plan performance targets was conducted between March 15 and April 30, 2019.

#### 2020 Consultations

In November 2019, Encorp increased the deposit for all beverage containers carrying a 5-cent deposit to 10 cents. Encorp undertook a comprehensive consultation process on the performance targets for the five (5) year period starting 2019. During this time, the MOECCS also initiated its CleanBC Plastics Action Consultation Plan which would result in upcoming regulatory changes. The CleanBC Plastics Action Plan outlined new policy opportunities and proposed amendments to the Recycling Regulation of the Environmental Management Act, including expanding the deposit-refund system to cover all beverage containers.

The complete CleanBC Plastics Action Plan document can be found here: [https://engage.gov.bc.ca/app/uploads/sites/121/2019/07/CleanBC\\_PlasticsActionPlan\\_ConsultationPaper.pdf](https://engage.gov.bc.ca/app/uploads/sites/121/2019/07/CleanBC_PlasticsActionPlan_ConsultationPaper.pdf)

As a result, the MOECCS informed Encorp the changes to the regulation would affect Encorp Pacific’s Beverage Container Stewardship Plan. In light of this information and as suggested by the MOECCS, Encorp did not submit the 2019 plan for approval and has updated its Stewardship Plan to reflect the regulatory changes and will conduct a full public consultation in 2020/2021.

Encorp extended the required 45-day consultation period for this new Draft Beverage Stewardship Plan 2020 – 2024 (“Draft Stewardship Plan”) to 62 days. The consultation period took place between July 15th, 2020 and September 15th, 2020.

The following seven web-based consultation sessions took place during this consultation period:

- Consultation Session 1:** A webinar with the general public on July 16, 2020.
- Consultation Session 2:** A webinar with retailers on July 23, 2020.
- Consultation Session 3:** A webinar with the BC Product Stewardship Council (BCPSC) on July 28, 2020.
- Consultation Session 4:** A webinar with Regional Engineers Advisory Council (REAC) on July 30, 2020.
- Consultation Session 5:** A webinar with members of the Coast Waste Management Association (CMWA)<sup>2</sup> on August 19, 2020.
- Consultation Session 6:** A webinar with depots on August 19<sup>th</sup>, 2020.

<sup>1</sup> The Stewardship Plan covers all containers for ready-to-drink beverages sold in BC, except refillable beer bottles and beer aluminum cans. This includes soft drinks, juice, water, wine, coolers and spirits among other drink categories.

<sup>2</sup> This session was organized in collaboration with the CMWA.

**Consultation Session 7:** A webinar with depots on August 20<sup>th</sup>, 2020.

Please refer to **Appendix IV. Webinar Registrants, Attendees, and Transcriptions** for details on each webinar's registrants and attendees, as well as a summary of the question and answer portion of each consultation session.

Feedback was also collected through:

- Written feedback through a direct email address ([beverageplan2020@returnit.ca](mailto:beverageplan2020@returnit.ca)). For the input received by Encorp through email as well as statistics related to all reference materials pertaining to the consultation process posted to the dedicated website (<https://www.return-it.ca/beverageplan2020>), please refer to **Appendix V. Written Feedback**.
- A Survey of Express registered users. Please refer to **Appendix VII. Express Registered Users Survey Results** for a summary of survey findings.

## Consultation Reporting

Encorp commissioned MNP<sub>LLP</sub> ("MNP"), a major Canadian accounting and consulting firm, to assist in the Draft Stewardship Plan consultations to compile and organize the related commentary. In preparing this report, MNP also carried out the following activities:

- Organized and implemented the seven web-based consultation sessions.
- Collected, compiled and sorted the comments along with correspondence resulting from the sessions and written feedback.
- Prepared a report that includes webinar participants' consolidated observations regarding the new Draft Stewardship Plan, allowing for Encorp's input and feedback.

This report presents the consultation process and findings of the Draft Stewardship Plan consultations.

## Limitations

MNP has relied upon the completeness, accuracy and fair presentation of all information and data obtained through the various stakeholder consultations. The accuracy and reliability of the findings and opinions expressed in this report are conditional upon the quality of this same information. As a result, MNP cautions readers regarding their reliance on the findings and disclaims any associated liability. Additionally, the findings and expressed opinions constitute judgments as of the date of the report and are subject to change without notice. MNP is under no obligation to advise of any such change brought to its attention which would alter those findings or opinions.

## DRAFT BEVERAGE STEWARDSHIP PLAN 2020 – 2024 CONSULTATION SUMMARY

### Webinar Consultations and Attendees<sup>3</sup>

The following section lists the groups represented within the web-based consultation sessions:

#### 1. Consultation Session 1: This session was with the general public. It represented:

- Aquaterra Corporation
- BC Ministry of Environment and Climate Change Strategy
- BC Public Service
- Binners' Project
- Brewers Distributors Limited
- Carton Council Canada
- CGS Ltd.
- City of Salmon Arm
- City of Surrey
- City of Vancouver
- Georgia Main Food Group
- Haney Bottle Depot
- Interior Recycling
- JTL Squared Consulting Inc.
- Loblaw
- Metro Vancouver
- Regional District of Nanaimo
- Regional Recycling
- Revelstoke Bottle Depot
- SunRype Products Ltd.

#### 2. Consultation Session 2: This session was with retailers. It represented:

- BC Ministry of Environment and Climate Change Strategy
- British Columbia Liquor Distribution Branch
- Costco Wholesale Canada Ltd.
- Federated Co-operatives Limited
- Georgia Main Food Group
- Loblaws Inc.
- London Drugs
- Retail Council of Canada
- Safeway BC
- Save On Foods
- Thrifty Foods

#### 3. Consultation Session 3: This session was with the BC Product Stewardship Council. It represented:

- BC Ministry of Environment and Climate Change Strategy
- Columbia Shuswap Regional District
- Cowichan Valley Regional District
- Fraser Valley Regional District
- Let's Talk Trash
- Regional District of Fraser-Fort George
- Regional District of North Okanagan
- Sunshine Coast Regional District
- The British Columbia Product Stewardship Council

<sup>3</sup> For a full listing for all registrants and attendees for the sessions, please see Appendix IV Webinar Registrants, Attendees, and Transcriptions.

**4. Consultation Session 4: This session was with Regional Engineers Advisory Council. It represented:**

- BC Ministry of Environment and Climate Change Strategy
- City of Burnaby
- City of Coquitlam
- City of Richmond via Metro Vancouver
- City of Vancouver
- Metro Vancouver

**5. Consultation Session 5: This session was with members of the Coast Waste Management Association. It represented:**

- |  |                                      |
|--|--------------------------------------|
| • Abbotsford Mission Recycling                           | • Morrison Hershfield                |
| • Alberni-Clayoquot Regional District                    | • Pender Island Recycling Depot      |
| • BC Ministry of Environment and Climate Change Strategy | • Product Care Recycling             |
| • Brewers Distributor Ltd                                | • Recycle BC                         |
| • Capital Regional District                              | • Regional District of Nanaimo       |
| • Carton Council of Canada                               | • Ridge Meadows Recycling            |
| • City of Nanaimo  | • Rollins Machinery                  |
| • City of Victoria                                       | • Salt Spring Island Recycling Depot |
| • Coast Waste Management Association                     | • The Bottle Depot                   |
| • District of Sechelt                                    | • Waste Connections of Canada        |
| • Ecoinspire   | • Waste Management                   |
| • The Major Appliance Recycling Roundtable               | • Waste Management Association of BC |

**6. Consultation Session 6: This session was with BC Return-It depots. It represented:**

- |  |                                    |
|--|------------------------------------|
| • Barriere Return-It Depot                               | • Hart Return-It Centre            |
| • BC Ministry of Environment and Climate Change Strategy | • Island Foods                     |
| • Blundell Return-It Centre                              | • Island Return-It Depot           |
| • Burns Lake Return-It Recycling Depot                   | • Ladner Bottle Depot Co Ltd.      |
| • Chase & Sorrento Bottle Depot                          | • Metrotown Return-It Centre       |
| • Collingwood Bottle Depot                               | • Moe's Bottle Depot               |
| • Encorp Pacific (Canada)                                | • Mount Pleasant Return-It Depot   |
| • Fort St James Bottle Depot                             | • OK Bottle Depot                  |
| • Go Green Bottle Depot & Recycling                      | • Panorama Village Return It Depot |
| • Gold Trail Recycling Ltd.                              | • Richmond Return-It Depot         |
|  | • Sapperton Return-It Depot        |

## 7. Consultation Session 7: A second session with BC Return-It depots. It represented:

- Aldergrove Bottle Depot
- BC Ministry of Environment and Climate Change Strategy
- Boucherie Bottle Depot
- Bridgeview Bottle Depot
- Clearwater Bottle Depot
- Denman Island Residents Association - Waste Management
- Encorp Pacific (Canada)
- Fernie Bottle Depot
- GFL Environmental
- Mountain Valley Station
- Nelson Leafs Recycling Center
- North Vancouver Bottle Depot
- Salmo Return-It Depot
- Sardis Bottle Depot
- Vancouver Central Bottle Depot
- Vernon and District Association for Community Living
- Willowbrook Recycling

## Written Feedback

The following section lists the organizations represented within the written feedback received during the consultation period:

### 1. 37 written submissions via [beverageplan2020@returnit.ca](mailto:beverageplan2020@returnit.ca), which were received between July 5, 2020 and September 15, 2020, from:

- Organizations, listed based on five categories of stakeholders:
  - **Depots and Transporters**
    - Agassiz Bottle Depot
    - Ashcroft and Logan Lake Depot
    - BC Bottle and Recycling Depot Association
    - Bridgeview Bottle Depot
    - Columbia Shuswap Regional District
    - Gold Trail Recycling Ltd.
    - Island Return-It
    - Kensington Return-It
    - Metro Vancouver
    - Moe's Bottle Depot
    - Salmo Valumart and Bottle Depot
    - Scotch Creek Bottle Depot
    - Sorrento Bottle Depot and North Shuswap Bottle Depot
    - Vancouver Central Bottle Depot
  - **Municipal Government**
    - City of Vancouver
    - Fraser Valley Regional District
  - **NGO's and Other Stakeholders**
    - Binners' Project
    - Climate Smart
    - Recycle BC
    - Simon Fraser University

- **Processors and Suppliers**
  - TOMRA Canada Inc.
- **Public**
- **Retailers and Brandowners**
  - Georgia Main Food Group

In addition to written feedback received via e-mail, several letters of support were also submitted and are included in Appendix VIII. Draft Stewardship Plan Support Letters.

## Consultation Participants' Questions and Comments and Encorp's Responses

The table titled *Encorp Responses to Questions and Comments from Consultations* (beginning on page 11) presents all the questions and comments obtained through the consultations, as well as Encorp's responses. It has been organized according to themes that emerged from the stakeholder feedback. The table also references the relevant sections of the Draft Stewardship Plan, as required under the MOECCS guidelines.

A summary of the themes, related Draft Stewardship Plan sections, and the number of questions and comments received are as follows:

Themes (Related Draft Stewardship Plan Section)	Number of Comments/ Questions
<b>1. Recovery Rates and Targets</b> (Section 5C Recovery Rate; Section 10 Performance Measurement Summary Table)	<b>13</b>
<b>2. Operations</b> (Section 5A Collection Systems, Section 5B Consumer Accessibility; Section 6 Consumer Awareness)	
2.1 Deposit Amounts	<b>19</b>
2.2 Retailer Collection	<b>12</b>
2.3 Depot Collection	<b>7</b>
2.3.1 Depot Coverage	<b>2</b>
2.3.2 Funding	<b>3</b>
2.4 Automation	<b>13</b>
2.5 Collection Containers/Bags	<b>2</b>
2.6 Management of Environmental Impacts (Section 7: Management of Environmental Impacts)	<b>14</b>
2.7 Capabilities	<b>2</b>
2.8 Producers Paying the Costs of Obligated Material (Section 9B: Producers Paying the Cost of Obligated Material)	<b>2</b>
2.9 Dispute Resolution (Section 9A: Dispute Resolution)	<b>2</b>
<b>3. Products Covered</b> (Section 3: Products Covered Under the Plan)	
3.1 Aluminum Alcohol Containers	<b>25</b>
3.1.1 Appreciation for Pilot Program	<b>20</b>
3.2 Milk and Milk Substitute Containers	<b>10</b>
3.3 Ancillary Packaging	<b>10</b>
3.4 Textiles	<b>2</b>
<b>4. Other</b> (Various Sections)	
4.1 Other Questions/Comments	<b>6</b>
4.2 Consultation Process (Section 4: Stakeholder Consultation)	<b>7</b>
4.3 COVID-19	<b>4</b>
4.4 Thanks/Appreciation	<b>16</b>
4.5 Out of Scope	<b>5</b>
<b>Total:</b>	<b>196</b>

### MNP Summary of Consultation Feedback

Many of the questions and comments received during the consultation period were related to the collection of aluminum alcohol containers (25 comments/questions) and appreciation for the newly introduced

aluminum can pilot program (20 comments/questions). Overall, feedback indicated substantial support for expanding the products covered under the plan to include aluminum alcohol containers. Many questions and comments were also received related to the proposed deposit amount changes (19 comments/questions). Stakeholders' generally asked questions to clarify which containers the deposit decrease applied to. Some stakeholders (approximately 30% of the 19 comments/questions relating to deposit amounts) shared the opinion that a deposit of \$.10 may be too low. Questions and comments relating to recovery rates and targets (13 comments/questions), automation (13 comments/questions), and management of environmental impacts (14 comments/questions) were generally clarifications to enable stakeholders' understanding of the related figures and initiatives along with suggestions for how to build on the current work being done. Questions and comments were also brought forward relating to the current and potential future changes to retailer collection processes (12 comments/questions). Finally, there were also many comments expressing thanks for the work carried out by Encorp (16 comments/questions).

## Encorp Responses to Questions and Comments from Consultations

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<b>1. Recovery Rates and Targets</b> (Section 5C Recovery Rate; Section 10 Performance Measurement Summary Table)			
On slide 16, it seems that recovery rate targets are based (in part) on the prior year's performance. In the last Plan (2014? 2015?), Encorp used a 5-year rolling average to set recovery rate targets. Is Encorp proposing to use a different methodology to set performance targets? Can you share further details on the new methodology?	Andrew Doi (Metro Vancouver)	We used the prior year recovery rate as a base to calculate and forecast recovery rates into the future. We believe it is the most progressive way to calculate only because the recovery rate for each individual container categories in the past had much softer recovery rates, so therefore we are not using a 5 year rolling average. Otherwise we would come up with lower performance targets than we have proposed. We are targeting a year over year increase in recovery rates exceeding 1% for each year. We are coming up with a different methodology and using the prior year targets as a base to be exceeded in every subsequent year.	Consultation Session 1: Webinar with the General Public – July 16, 2020
Are the targets unit-based (as opposed to weight-based)?	Isabelle Faucher (Carton Council Canada)	Yes, they are because that is what is called for in the Regulation and the Schedule.	Consultation Session 1: Webinar with the General Public – July 16, 2020
Are you planning on deploying specific actions to grow the recovery rate of container types that have typically lagged in the past, in order to get them to the targets you have set?	Isabelle Faucher (Carton Council Canada)	Yes. For some of the container types that have been struggling, particularly when we look at the gable top and tetra pack – we're going to have to address this with a specific strategy. We are going to be adding a significant number of gable top containers. We are hoping to leverage the fact that all gable top beverage containers will be a part of the system now. We will not be asking consumers to differentiate between juice and milk. So, we will have to develop strategies to leverage that development and ensure consumers know they are eligible to get a deposit refund for these containers and understand that. From here we can increase the recovery rate for these containers. We'll work with other jurisdictions that have added milk containers to see if there are things we can leverage in terms of increasing the recovery rate, particularly of polycoat containers: gable top and tetra pack.	Consultation Session 1: Webinar with the General Public – July 16, 2020
When is monthly and/or annual regional per capita returns available?	Meghan Ebueza	We do regional breakdowns of recovery of containers in our annual reports. This has been a feature of our annual reports for a number of years now. I would direct Meghan to that report. We just published our 2019 report a	Consultation Session 1: Webinar with the General Public – July 16, 2020

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
	<i>(Regional District of Nanaimo)</i>	couple of weeks ago. If there are any questions on this, please follow up with me and I can answer those questions offline.	
As it relates to Schedule 5 packaging collected at Return-It depots, will it ultimately be Encorp or Recycle BC which reports the tonnage?	Andrew Doi <i>(Metro Vancouver)</i>	We have no intention of reporting the tonnage, and no intention of having our brand owners report the tons that they supply to the marketplace. We think there is a functioning system out there already. Our intention is to collect the material, ensure that it meets the standards required for the third party assessment process to ensure it was actually recycled, and if at all possible, we would like to see the material recycled into new ancillary packaging for beverage containers. Whatever tons are collected, we would portion out certificates of recycling to our brand owners, and they would be able to use them in meeting their obligations under Schedule 5. They could provide those to Recycle BC and those tonnages could be included in Recycle BC's annual report.	Consultation Session 1: Webinar with the General Public – July 16, 2020
What is the plastic recovery rate vs recycling rate?	Luc Lortie <i>(Costco Wholesale Canada Ltd.)</i>	<p>In the regulation, the way the recovery rate/collection rate is defined is containers collected vs. containers distributed.</p> <p>We don't publish any sort of plastic recycling recovery rates, but our partner Merlin Plastics recycles both the caps and the bottles. And we are dealing with extremely clean material. The material you get through a deposit program is much cleaner and more high-quality. We get a very clean stream of material, there is very little loss of material through the recycling process.</p> <p>It's not information we're required to publish under the regulation, so it is not information that we track.</p>	Consultation Session 2: Webinar with Retailers – July 23, 2020
You have set a target of 3% from scope 1. Encorp's scope 1 emission is from heat alone from the facilities you are in. Do you have specific strategies in mind to tackle heating emissions from the buildings you currently occupy?	Taspia Raka <i>(Climate Smart)</i>	We have revisited the activities that can be directly controlled by Encorp and designated as Scope 1 GHG emissions and determined that most of the GHG emission inventories reported by Encorp are indirect emissions resulting from assets not owned or controlled by Encorp. Therefore, we are going to adjust our set targets to focus on reduction in Scope 3 GHG emissions.	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
Wanted to confirm that Encorp is setting a target of 10% from scope 3 by 2024?	Taspia Raka (Climate Smart)	All targets are set to be achieved by the end of 2024 from the base line reported in 2019.	Written Feedback
<p><i>“RecycleBC partnership –Beverage containers collected within the curbside blue box system accounted for and are included in the total units collected and used to calculate Encorp’s recovery rate.”</i></p> <p>At rural transfer stations and landfills there are a high amount of beverage containers that are dropped off. Some of these containers are brought to depots by site attendants, while others remain in the Recycle BC system. Encorp could look at expanding the curbside bluebox program to also include beverage containers collected at transfer stations and landfills that end up in Recycle BC supersacks.</p>	Graham Casselman (Columbia Shuswap Regional District)	Encorp has a partnership with Recycle BC to ensure that beverage containers within the Return-It system which are collected by the curbside programs are recycled and accounted for in our program.	Written Feedback
<p>5. Commit to higher return targets and to more transparent reporting on the contribution of the system to a circular economy.</p> <p><i>(Note: For supporting points submitted relating to this recommendation, please see the full letter submitted in Appendix V. Written Feedback of this report.)</i></p>	Jay Aarsen (BC Bottle and Recycling Depot Association)	<p>While ambitious, the recovery rate performance targets set out in this plan have been determined based on a comparison of the previous year’s actual recovery rates and then used as a starting point from the 2019 results which showed an increase of .7% from 2018. Encorp also compiles comparable statistics from other jurisdictions in Canada to assess the expected performance levels. The inclusion of milk containers in 2022 will likely result in an initial decrease in the recovery for some categories, however we are optimistic that the target results can be achieved.</p> <p>The end-of-fate for each material type is included in each annual report published. Encorp and brand owners have developed stable and sustainable markets to recycle obligated beverage containers in accordance with the requirements of the recycling regulation. All beverage containers covered under Encorp’s stewardship plan are made from non-toxic, inert</p>	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		materials and all container types have established secondary markets, most of which fit into the circular economy.	
<p>Recovery target: We recommend changing the 2024 target from 83.7% to 86.1%. The proposed 83.7% is only 1.7% more than the final target approved by the ministry for the previous plan, which was 82% for 2018. Encorp's proposed target was calculated based on the actual increased recovery of 0.7% between 2018-2019. However, if Encorp applied the actual 1.6% increase achieved between 2017-2018, then the 2024 target could be 86.1%. This bolder target would demonstrate a stronger commitment to address the climate emergency, eliminate plastic pollution, and conserve resources by pursuing zero waste.</p>	<p>Monica Kosmak (City of Vancouver)</p>	<p>While ambitious, the recovery rate performance targets set out in this plan have been determined based on a comparison of the previous year's actual recovery rates and then used as a starting point from the 2019 results which showed an increase of .7% from 2018. Encorp also compiles comparable statistics from other jurisdictions in Canada to assess the expected performance levels. The inclusion of milk containers in 2022 will likely result in an initial decrease in the recovery for some categories, however we are optimistic that the target results can be achieved.</p>	<p>Written Feedback</p>
<p>Recovery Targets and Data for Reporting</p> <p>We support and commend Encorp for setting and achieving recovery targets that are higher than the 75% rate stipulated in the Regulation, as well as demonstrating year over year continued improvements: 78.9% in 2020, 80% in 2021, 81.2% in 2022, 82.5% in 2023, and 83.7% in 2024. This commitment shows confidence in the system and illustrates that increasing rates of collection are indeed possible when they are clearly outlined and are accompanied by a robust system.</p>	<p>Charles W. Riegle Jr. (TOMRA Canada Inc.)</p>	<p>Thank you for your support.</p>	<p>Written Feedback</p>
<p>Recovery Rate Target</p> <p>In the 2014-2018 Stewardship Plan, Encorp developed a 5-year weighted average in</p>	<p>Paul Henderson (Metro Vancouver)</p>	<p>The same methodology – blended average - was used to set the overall recovery rate targets for 2020-2024 while the individual recovery rates for</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>setting performance targets. During consultations in 2018, 2019, and 2020, Encorp representatives stated that a 5-year weighted average was not used in setting new performance targets. The Stewardship Plan did not identify the reasons why Encorp is changing methodologies and further clarity would be helpful for stakeholders to understand the underlying factors in the new methodology for setting performance targets. Perhaps it would be possible for Encorp to demonstrate both methodologies used to determine performance targets, and then conduct a comparison.</p>		<p>each container category were set in comparison with the 2019 recovery rates as a baseline.</p>	
<p><b>2. Operations</b> (Section 5A Collection Systems, Section 5B Consumer Accessibility; Section 6 Consumer Awareness)</p>			
<p><b>2.1 Deposit Amounts</b></p>			
<p>To confirm, deposit amounts are not changing further from the current 10 cent / 20 cent, correct?</p>	<p>Isabelle Faucher (Carton Council Canada)</p>	<p>That is not correct. It is our intention to lower the 20 cent deposit to 10 cents this fall. We should have more information on the specific timing shortly, but we are planning to move to a unified flat deposit. With the recent changes by the government to include milk, one of the other changes was to establish a flat 10 cent deposit in the regulation, so it is our intent to drop the 20 cent rate down to 10 cents, so that all containers have a 10 cent deposit. We feel that this will make for a much more efficient system for operators in terms of being able to sort and count these containers, but it will also provide for more transparency for consumers. They will be able to more easily calculate the amount that they should be owed. It is a much simpler, more transparent system for everyone involved.</p>	<p>Consultation Session 1: Webinar with the General Public – July 16, 2020</p>
<p>Under the new regulations, is it minimum 10 cents for all containers or can the deposit amount still be higher -- such as 30 cents on larger containers?</p>	<p>Suzanne Bycraft (City of Richmond via Metro Vancouver)</p>	<p>Yes, that's correct. The minimum is 10 cents but it can be higher. Two things: intention in October is to reduce the deposit on large containers from 20 cents to 10 cents so that all containers in the program carry a 10 cent deposit. We think this will greatly increase efficiency of our program for our operators, but also provide some transparency and simplification for our</p>	<p>Consultation Session 4: Webinar with Regional Engineers Advisory Council on July 30, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		consumers – it'll be easy for them to understand how much is due back to them when everything is 10 cents. There are some containers, one way kegs, large one way water bottles (15L), those are some that we have to have another look at. Right now their deposit is 20 cents - I'm not sure if 20 cents really captures the impact of having those products in our program so that's something we have to look at in the future.	
Rather than moving straight to reducing the 20 cent deposit to 10 cents, would Encorp consider changing this to a pilot and adopt it if successful, or keep 20 cents if not successful?	Chris Underwood (City of Vancouver)	The desire to shift to 10 cents is really based on experience we had visiting Oregon. We were there over a year and a half ago, and seeing the advantages that having a single deposit provided them, I think we are already committed to transitioning to 10 cents. We don't think it will have a significant impact, if any impact at all, on the recovery rate and we think it will be received well by consumers because: (A) Consumers are looking for any opportunity to have some costs deducted from them given the financial and economic impacts of the pandemic, but also, (B) I think just the added simplicity and making it easier for people to understand how much of a refund they should get – I don't think we should underestimate the benefit of that simplicity or the increased transparency it provides to consumers.	Consultation Session 4: Webinar with Regional Engineers Advisory Council on July 30, 2020
There have been separate fees charged as a recycling fee to consumers on containers in the past -- extra fee that was labeled by industry as a government fee.	Suzanne Bycraft (City of Richmond via Metro Vancouver)	Yes, so, we will continue to have container recycling fees –they are not labelled by Encorp as government fees. Ultimately, I don't have control over, say, how retailers or other organizations may position that fee, but we do have container recycling fees in our program, we do publish those, and it is made public how much those fees are per container. Some containers, such as aluminum cans don't have a container recycling fee at all, other containers may have recycling fees in excess of 10 cents – usually those are glass. So that process will continue as before, and again, from our perspective we are clear that this is an industry fee and it's a container recycling fee and we provide lots of background and context for those fees on our website. How they're communicated by retailers or other organizations is not within the purview of our direct control. If there are issues you can always raise those with us, and if we find that there are players in the market who are inappropriately describing those as government fees, we can follow up with them and make sure that they are aware that there are broader contexts around the fees and the rationale for it and make sure that they are aware that it is an industry-based	Consultation Session 4: Webinar with Regional Engineers Advisory Council on July 30, 2020

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		organization that develops and charges these fees to make sure that this material is responsibly recycled.	
Just some clarification on the status of – I understand these changes for the minimum 10 cent deposit were effective as of June 29 – so I just wonder if everything has been implemented? And would you mind talking about the change in the electronic payments too, as to what's the status? Is everything in place or still being implemented?	Suzanne Bycraft (City of Richmond via Metro Vancouver)	So electronic payments – we've already been doing that for a while through the Express program – that is and has been live pretty much for the past year. The people that already use our Express & GO system including the system at Metro Vancouver's North Shore transfer station, they are able to get their deposit refund through an e-Transfer. They go into their online account, they hit redeem, and then we'll email money transfer their refund to them. Of course, through that system we don't take in any of their banking information, that's simply done through the Interac platform, so we send the email and it's really up to the consumer to direct it to what account. So that system works great for us, it's efficient for consumers and means we don't have to take any banking information. As to the deposit, we are currently working on the strategy and communication plan around changing the deposit value – that's going to take place October 1 <sup>st</sup> , so you can expect that we'll be in market in September with information about the change coming, and we can provide that information – an overview of the changes that are going to take place – to REAC through Andrew, and then I'm happy to take any questions about the process. But the idea is that those changes will be made October 1 <sup>st</sup> – there will be a grace period, probably around 10 days, where people will be able to bring back their containers and get 20 cents, but after that grace period there will be the expectation that everyone will be charged 10 cents and also get 10 cents back when they bring back those containers. We should highlight that the change will impact roughly 6 percent of our containers. So when we raised the deposit value last November, that change impacted about 80 percent of the containers managed in our program, so pretty significant, whereas this change really just addresses a small minority of the containers in our program.	Consultation Session 4: Webinar with Regional Engineers Advisory Council on July 30, 2020
Is there any talk of the container deposit being raised again? 10 cents is low compared to world market?	Savannah Paine (Depot)	I think most of you know that we're planning to actually lower the deposit from 20 cents to 10 cents. Our plan is to get to a unified deposit. A unified deposit opens up, or unlocks, a range of possibilities to manage our system more efficiently. I think what we've learned through the increased deposit is that it's had some impact, but at the end of the day the depots that have benefitted the most from the increased deposit are ones that have Express.	Consultation Session 7: Webinar with Depots– August 20th, 2020

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		<p>And what that said to us is that it isn't necessarily the deposit value alone as much as the convenience. I think the first thing is to get us to a unified deposit and then from there begin to plan out how to maximize the convenience of the system. Once we're there we can look at whether this needs to increase. I think it's hard to look at comparisons across jurisdictions. Clearly we felt we needed to make the increase from 5 cents to 10 cents, but whether we want to go to more than that, particularly during a pandemic when so many people have had their livelihoods impacted – it's definitely not the right time. We'd look at it in the future but our focus right now is getting to a unified deposit and then integrating alcohol aluminum containers and milk containers into our system – that's really the focus for the next 3 to 5 years.</p>	
<p>I just wanted to follow up – there was a question on the minimum deposit and the increase – I just wanted to add for clarity for this group. The government did set that minimum at 10 in the recent regulatory amendment after the research into other jurisdictions, but there is a commitment there to look at that 10 cent minimum in 2 years' time to see if we're seeing that increased recovery that we're hoping for across the province. So that's sort of the government's feedback on that one.</p>	<p>Teresa Conner (BC Government)</p>	<p>Thanks, Teresa.</p>	<p>Consultation Session 7: Webinar with Depots– August 20th, 2020</p>
<p>Uniform 10-cent deposit: We applaud Encorp for raising the minimum deposit from 5 cents to 10 cents to improve recovery rates. However, the proposal to reduce the 20 cent deposit on certain containers to 10 cents is a concern. Encorp's hypothesis is that the simple message of 10 cents for all containers will mitigate the risk of declining recovery rates for these containers. To our knowledge, this hasn't been proven. It would be prudent for</p>	<p>Monica Kosmak (City of Vancouver)</p>	<p>The Ministry of Environment has already committed to a review of the 10 cent minimum deposit within two years and indicated that they will make further changes if the performance of the program does not meet their expectations.</p> <p>The desire to shift to 10 cents is really based on the experience we had visiting Oregon. We were there over a year and a half ago, and seeing the advantages of having a single deposit provided them, I think we are already committed to transitioning to 10 cents. We don't think it will have a significant impact, if any impact at all, on the recovery rate and we think it</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>Encorp to pilot the reduction from 20 cents to 10 cents, then formally adopt 10 cents if the recovery rates hold. Alternatively, Encorp could simply add a commitment in the plan to change the deposit back to 20 cents if the recovery rates for these containers do fall. Both options would still align with the Province's changes to the Recycling Regulation on June 29, 2020, which require a <i>minimum</i> 10-cent deposit, not a universal one.</p>		<p>will be received well by consumers because consumers are looking for any opportunity to have some costs deducted from them given the financial and economic impacts of the pandemic, the added simplicity and making it easier for people to understand how much of a refund they should get increases transparency for consumers.</p>	
<p>Decreasing 20 cent deposit on containers over 1L</p> <p>Binnners have expressed concern over the lowering of the refund on containers over 1L from 20 cents to 10 cents. Not only will this decrease their income overall, they recognize that due to the size and weight of these containers, this change will de-incentivize them from collecting these containers, therefore leaving them from being collected and in many cases from being recycled. In-stead, they would likely save room in their bags and carts for more, smaller containers. However, we are hopeful that making it easier for customers to return beverage containers due to the standardized refund rate will allow binnners to be more efficient in their work.</p>	<p>Brianne De Man (Binnners' Project)</p>	<p>Thank you for providing this insight from the binning community.</p> <p>In November 2019 the 5-cent deposit was raised to 10- cents, doubling the deposit and the refund level for all containers under 1 litre which make up over 90% of the total volume of containers in BC. In October 2020, to harmonize the deposits and make recycling simpler the deposit and refund on containers over 1 litre changes to 10 cents as well. These containers, over 1 litre in size contribute about 6% of the total volume with BC. We do not expect any reduction in the collection or recycling of these beverage container as a result of simplifying the system.</p>	<p>Written Feedback</p>
<p>Recommendations</p> <p>Encorp Pacific reported a 78% return rate in 2019. We are grateful for Encorp Pacific's quick work in increasing 5-cent refunds to 10-cents in November of 2019, before it was provincially mandated. We encourage Encorp</p>	<p>Brianne De Man (Binnners' Project)</p>	<p>Thank you for your support and recommendations.</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>Pacific to consider additional ways to engage the binning community to ensure that containers over 1L are still being returned, even with the lower refund rate. We also encourage Encorp to consider engaging binners in their public education campaigns through storytelling and acknowledgment of the work of binners, which would further Binners' Project's mission in destigmatizing the work of binners while encouraging higher return rates on all refundable materials.</p>			
<p>Please do not lower the Return-it pricing on all bottles and cans to 10 cents. If anything, increase the price to 25 cents each (when bought and returned). This hit financially motivates people to return their cans. It also encourages people not to litter (abandoned cans) and those who come across them, to pick them up and return them themselves.</p> <p>As a family we do a lot of recycling. It is discouraging when we go fishing to have to pick up dozens of cans along the river bank.</p> <p>We believe that setting the can/bottle price at 10 cents will have a negative effect on recycling.</p>	George and Connie Gaspar	<p>Thank you for your input regarding the deposit change. In November 2019 the 5 cent deposit was raised to 10 cents, doubling the deposit and the refund level for all containers under 1 litre which make up over 90% of the total volume of containers in BC. In October 2020, to harmonize the deposits and make recycling simpler the deposit and refund on containers over 1 litre changes to 10 cents as well. These containers, over 1 litre in size contribute about 6% of the total volume in BC. This will greatly increase efficiency of our program for our operators, and provide transparency and simplification for our consumers – it'll be easy for them to understand how much is due back to them when everything is 10 cents. We do not expect any reduction in the collection or recycling of these beverage containers as a result of simplifying the system.</p> <p>The change in the deposit to 10 cents will be effective October 1, at which time there will be a 10 day grace period where people will be able to bring back their containers and get a 20 cent refund. This means from Oct 1 – Oct 11, consumers will be charged 10 cents and refunded 20 cents when they bring back those containers for recycling. After that grace period and on Oct 12, everyone will be charged 10 cents and also get 10 cents back when they bring back those containers.</p>	Written Feedback
<p>I agree with the unified price for containers but I defiantly do not agree that with lowering the amount.</p> <p>I feel all returns should be 20 cents not the 10 cents we have had for years.</p>	Lee Nielsen		Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
My justification for this is that if ALL containers paid 20 cents it would be a further incentive to return used containers.			
<p>New deposit Change in put:</p> <p>Will we still be paying higher deposits in the stores for the Purchase of products?</p> <p>Ex wine bottles 2 L Pop Etc..</p> <p>If we're paying for the higher deposit Price It should be returned to the customer.</p>	Linda Mckay		Written Feedback
<p>Why would anyone want to bother returning their larger beverage containers to get half of what they were charged for deposit paid on the containers at time of purchase. Unless deposit rates on beverage containers are lowered to match the return value it is not worth it to take in empties. Not to mention the loss of "income" for non-profit organizations who rely on bottle drives to function.</p>	Bill Henderson		Written Feedback
<p>In order to encourage people to recycle and to provide a better income for people that rely on bottle recycling, I suggest you raise the bottle return fee to \$.25 on all containers. Make recycling a worthwhile task.</p>	William Langley		Written Feedback
<p>Are stores going to still charge us \$.20 for over 1 litre size beverage containers? If so this is not fair to the returnee.</p>	Mary-Lynn White		Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>It was just a short time ago that you increased the deposit to 10 cents for grocery cans and bottles, this was to promote better recycling now your going to reduce the 20 cent bottles to 10 cents, how does this promote more recycling? For the street people that rely on bottles for income all your doing is robbing them for recycling the larger heavier bottles, totally unfair, if anything the liquor store glass should be increased to 20 cents, this would truly increase the recycling.</p>	Gerard		Written Feedback
<p>As a regular and frequent Return-It customer for many years, here are my comments and one question:</p> <p>1) Most of the people I meet at the recycling depots I use in Vancouver are unaware of the upcoming 20¢ to 10¢ drop for containers &gt;1L.</p> <ul style="list-style-type: none"> <li>- more marketing studies, public interaction and advertising are required to inform people.</li> <li>- many of your customers don't have easy access to go online so more direct means of communication are required at the recycling depots.</li> </ul> <p>2) There is less incentive for people to return &gt;1L bottles that currently fetch 20¢ when they soon will only get 10¢. Homeowners just won't be bothered to bring in the &gt;1L containers for 10¢. Bidders and pickers would rather get 40¢ for four smaller cans at 10¢ each than only 10¢ for a single &gt;1L container when the volume is roughly the same. The incentive just isn't there.</p>	Randy Forsythe	This comment was received prior to the public launch and public notification of the change hence the low awareness level.	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>Plus, binners /pickers don't like hauling around the bigger containers' volume.</p> <p>3) Will the deposit and recycle fee at point of purchase for the &gt;1L containers be reduced?</p>			
<p>You state in your Return-It Blog that a \$.10 rate of return is for all beverage containers. Does that include beer containers-it's not clearly stated. Please clarify this.</p>	William Langley	<p>While beer containers do have a 10 cent deposit, they are not a part of the Return-It system - any deposit rates listed on our website do not apply to these container types. Beer cans and bottles are the responsibility of Brewers Distributor Ltd., who currently has agreements with a limited number of Return-It depots.</p>	Written Feedback
<p><b>2.2 Retailer Collection</b></p>			
<p>On side 9, Return to Retail is listed at 5%. Does this rate of utilization of Return to Retail also apply in Metro Vancouver?</p>	<p>Andrew Doi (Metro Vancouver)</p>	<p>We don't have the specific breakdown, but I would assume that we don't see a huge deviation in Metro Vancouver compared to other parts of the province. If we dive into the numbers deeper, probably 60%, of that, 5% is coming from grocery retail and less than 40% from government liquor stores.</p> <p>We can do further research if there's anything that shows there is a huge deviation from that 5%. We can include that in the consultation report and reply back with a written answer to Andrew.</p> <p><i>Added clarification: Retailers in Metro Vancouver collected 3% of all containers collected while 1% is represented by the retailers located in the City of Vancouver.</i></p>	<p>Consultation Session 1: Webinar with the General Public – July 16, 2020</p>
<p>If Return-It collects from roughly 200 grocery stores, who collects from the other 1400+ grocery stores?</p>	<p>Greg Wilson (Retail Council of Canada)</p>	<p>In many cases, those other retail locations will have negotiated pick up arrangements with a local depot. In some cases, it may be that other stores are not collecting containers at all. We know a challenge with mandatory Return-to-Retail is that the government has limited compliance resources to actually enforce. We do get queries and questions from consumers from time to time on this.</p>	<p>Consultation Session 2: Webinar with Retailers – July 23, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
Is there any barrier to grocers collecting Express bags from consumers?	Greg Wilson (Retail Council of Canada)	<p>We'd certainly be open to it. We haven't engaged in discussions, but if it made sense, we think it's certainly a possibility. Whether it's by locating an Express &amp; GO station in a parking lot of a grocery store, or having people bring in Express bags, we could pick them up currently as we do. But then it wouldn't involve staff at grocery stores counting the containers or providing the cash refund.</p> <p>We know once consumers switch over to Express, it's by far their preferred method. So I'm definitely interested in exploring opportunities to have Express locations managed through retail locations as well.</p>	Consultation Session 2: Webinar with Retailers – July 23, 2020
Why are Costco supercenters not mandated to collect any empties?	Shabbir Beawerwala (Loblaws Inc.)	<p>Costco supercenters would fall under the same requirements as every other retailer. As far as I'm aware, because we've been involved in some of these discussions, they are collecting containers on a regular basis.</p> <p>From the information we have as of today, Costco is not out of compliance and is collecting containers at their retail locations.</p>	Consultation Session 2: Webinar with Retailers – July 23, 2020
Has anyone studied the costs to retailers of return-to-retail?	Greg Wilson (Retail Council of Canada)	<p>Encorp itself has not. We are cognisant that there are costs to retailers. From our perspective, the challenge inherent in the current system is trying to manage the tension between the desire to have a province-wide depot system and to also manage a dwindling number of containers through retail. When you add on the health and safety implications of adding milk containers, we're conscious that—I think from our perspective, it's not just so much cost, it's whether it's sustainable to continue to operate the system as it is today.</p> <p>What we're proposing is to find other solutions. From a policy perspective, I think we'd support Return-to-Retail on a voluntary basis, if people believe there is a business case to be made. But for the most part, we just think that it would result in pretty marginal returns in terms of numbers of containers.</p> <p>We were at 10% containers coming back from Return-to-Retail 10 years ago, we're now down to 5%. It could be in the next 5 years that we are down to 2.5% particularly if things like Express become more and more popular, which right now is up to 85,000 subscribers.</p>	Consultation Session 2: Webinar with Retailers – July 23, 2020

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		<p>One of the hallmarks of the BC system has been the flexibility it has provided to innovate and provide new solutions for meeting consumer expectations.</p> <p>What we are looking for is some engagement with the government on providing some added flexibility, so that we can innovate and provide accessibility and convenience to consumers in new ways that make sense and maybe address the unsustainability in terms of the cost of the current system, as well as some of the health and safety concerns that have been raised with the introduction of milk.</p> <p>For milk containers, both of the other two jurisdictions in Western Canada to introduce milk operate depot-only systems. Last year we had a better recovery rate than Saskatchewan, the previous years both Alberta and Saskatchewan had a high recovery rate, while at the same time not having or using a Return-to-Retail collection system for containers.</p> <p>It seems clear we can achieve the target recovery rates and get our recovery rate up into the 80 percent plus without having to rely on Return-to-Retail, and we've got examples from nearby jurisdictions that it works.</p>	
<p>With the growing concern from customers and employees, for handling the bottles in particular, you've proposed a couple of different ideas on how we can do things without having to handle them personally. What I'm wondering is: what is a realistic timeline for the rollout, or, either for some of these pilots, so, going beyond the pilot and going to rollout, or potentially for decisions being made on the collection of the Express bags at retail?</p>	<p>Christal Hazard (Thrifty Foods and Safeway BC)</p>	<p>Some of that will be government. We have been piloting Express &amp; GO since October. It works. We know it, and we're trying to roll out as many as we can this year.</p> <p>We have nine additional stations we want to roll out. If the retailers are interested, we can't put enough in the field fast enough.</p> <p>For both Express &amp; GO stations in retail, and Express bags coming in, we want some assurance from the government that this will meet the Return-to-Retail requirements. We think it should, but that's where we really need direction from government. If they do that, then I think we're off to the races.</p> <p>My only concern with that also comes down to the aluminum alcohol containers. Those really need to be in our system, because if we start accepting these bags at retail, we won't know what kind of containers are in there, and it's quite likely that we're going to get alcohol aluminum containers. So, we can't after the fact tell the consumer that "oh, those aren't allowed in the system," it doesn't make any sense. This is where we</p>	<p>Consultation Session 2: Webinar with Retailers – July 23, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		<p>really need engagement from the province. From our perspective, we should have solutions in place before the end of the year, and we should be able to adapt the system next year, so that we have made the changes and have a functioning system prior to milk joining the system in 2022.</p> <p>We have time; decisions need to be made this year before the end of the year, which would be in accordance with the timeline that we've worked out for our Stewardship Plan, and then we can begin some of the roll out next year. But the sooner we know we can get the approvals we need, the faster we can do the roll out in 2021. And we would like to make these changes as quickly as possible.</p>	
<p>Is there information on what portion of depot containers originate as Return-to-Retail containers?</p>	<p>Greg Wilson (Retail Council of Canada)</p>	<p>Unfortunately, there is not. We don't get information from our depots about the containers they are picking up from retail. We don't even know how many of their containers come in from commercial. All they have to report to us is the number of containers collected, and then they ship them to us.</p> <p>We don't have information on the break down on how many are coming in as walk-in customers and how many are coming in as commercial accounts, be it retail, restaurants, or other pick up locations.</p> <p>Unfortunately, depot operators haven't wanted to share that information.</p> <p>In some cases, they may not have the systems in place to track that type of information. I don't want it to seem like somehow they're refusing. It just may be that it's beyond the scope of what they're capable of doing.</p>	<p>Consultation Session 2: Webinar with Retailers – July 23, 2020</p>
<p>You mentioned that the cost for R2R is increasing on a per unit basis. Do you compensate retailers for their units accepted in the same way that you compensate depots, if you don't, how are costs increasing?</p>	<p>Sarah Willie (Comox Valley Regional District)</p>	<p>It's not the exact same, but there is some compensation for those that we're collecting from for sure.</p> <p>I think the way that costs are increasing is we're picking up less and less material, but the retailers still wish to be picked up as frequently as they were before. So all our retailers have challenges with their "back-of-house" storage area. All of them are trying to manage that small area efficiently and try and keep most of their square footage available for selling product. And so they're challenged to continue to manage containers. And honestly, as you know, we just had a webinar last week, and there were at least one or two retailers that don't even bother putting out their products, they pay the</p>	<p>Consultation Session 3: Webinar with the BC Product Stewardship Council – July 28, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		<p>deposit out. And then it isn't actually worth it for them to keep the container separate. They're just putting them through mixed recycling, and maybe we're getting them and maybe we're not, we don't know. But that just points to some of the challenges of running retail operations and trying to be this mandated return for containers.</p> <p>So I think, really, the costs are—less and less people are taking advantage of Return to Retail. But it costs us the same to try and service these locations on this at the same schedule, picking up less. So that's just leading to year over year increases in costs. And our concern is, as more and more of those containers diminish, we don't think it's appropriate to try and just wait until Return to Retail is totally broken down. We think there's some fundamental issues at play, in that the government doesn't have the capacity to properly oversee Return to Retail and make sure that everyone is compliant in providing that service. But also that it may not make sense to mandate retailers to accept this when there are other options that might be better for the consumer. And I think at the end of the day there's now options available to address some of the issues around rural communities. We think it's really the time to start thinking about how we can manage the system in a more efficient and modern way, and not just wait for it to collapse and then have to step in at the last minute and figure out how to fix it.</p> <p>(Note of Clarification: Encorp is not opposed to servicing retailers on a more frequent basis. Our primary issue is that we would never be able to service all return-to-retail locations in the province and this creates inequities for both retailers and depots, particularly in smaller communities.)</p>	
<p>Is Encorp considering a hybrid return to retail/Express &amp; GO option, where space is available at grocery retail locations (e.g. parking lots, etc)</p>	<p>Chris Underwood (City of Vancouver)</p>	<p>Yes absolutely – I think we are talking about a number of solutions with retailers who are concerned about having to manage used beverage containers on their premises. In part, because of the strong reaction that we got from staff, many of whom have been working long hours under very difficult conditions over the past few months, and for whom the addition of managing beverage containers may just be too much. Right now we are finalizing one contract on Vancouver Island in the District of Saanich – we are just waiting for the contract to be finalized with the local government, and then we also have 2 active locations that we are discussing with</p>	<p>Consultation Session 4: Webinar with Regional Engineers Advisory Council on July 30, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		retailers and shopping malls in Metro Vancouver. In the future we think there are lots of opportunities to locate these Express locations strategically with retailers and we think it makes a lot of sense for both Encorp and the retailer. It keeps the containers out of the retail environment, where there is concern about the health and safety impact of those containers, but it also provides the kind of convenience that consumers expect. I would say that for most, if not all, of the containers that we have in Tofino, North Vancouver, Burnaby, and SFU, have been very successful and we have had nothing but positive feedback from consumers about using the containers.	
What percent of containers are collected through return to retail in the Lower Mainland, particularly in Vancouver?	Chris Underwood (City of Vancouver)	<p>We don't have those breakouts right now, but we can do some investigation. Like I said it's about 5 percent province wide, but there may be some slight uptick in the City of Vancouver, but my expectation is probably the same in those areas where we are having problems locating depots. We may see more containers picked up by the informal binner network, as well as more containers ending up in the blue box and people forfeiting their deposit as there is no convenient location for them to bring their containers.</p> <p><i>Added clarification: Retailers in Metro Vancouver collected 3% of all containers collected while 1% is represented by the retailers located in the City of Vancouver.</i></p>	Consultation Session 4: Webinar with Regional Engineers Advisory Council on July 30, 2020
Volume of containers collected through return-to-retail: The plan states that 5% of containers are collected through return-to-retail across the province. To provide more context for stakeholders, please provide the percent of containers collected through return-to-retail in urban settings and include this in the next version of the plan.	Monica Kosmak (City of Vancouver)	Retailers in Metro Vancouver collected 3% of all containers collected while 1% is represented by the retailers located in the City of Vancouver.	Written Feedback
Return-to-Retail The Stewardship Plan identifies 455 return-to-retail locations within the province, directly	Paul Henderson (Metro Vancouver)	Retailer locations in Metro Vancouver collected 3% of total container collected in 2019 of which 1% is collected by retailers in the City of Vancouver.	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>serviced by Encorp, together contributing 5% of the amount of beverage containers collected. Please provide an analysis of the rate of utilization of return-to-retail in urban areas, like Metro Vancouver. In addition, further details on the number and type of return-to-retail locations would be helpful for stakeholders.</p>			
<b>2.3 Depot Collection</b>			
<p>Would glass containers also be collected through the Express &amp; GO? Or would both alcoholic and non-alcoholic containers still need to be taken to a depot?</p>	<p>Christal Hazard <i>(Thrifty Foods and Safeway BC)</i></p>	<p>Alcoholic containers are already collected through our Express system, be it at the depot, Return-It Express Plus or Return-It Express &amp; GO. We've had to publish guidelines and recommended to consumers and said "don't put more than 12 wine bottles in a bag, as it can be quite heavy for depots to manage," but we've had no issue in managing alcoholic containers, alcoholic glass containers, through the Express system. It seems to work quite well.</p>	<p>Consultation Session 2: Webinar with Retailers – July 23, 2020</p>
<p>To reduce space constraints, are depots incentivized or even allowed to bale materials under your current system?</p>	<p>Sarah Willie <i>(Comox Valley Regional District)</i></p>	<p>Yes, good question.</p> <p>We don't have any compaction or densification within depots. From our perspective, what we're more interested in is compacting the material en-route; that's part of the reason we've done the compaction pilot. We think that combining en-route compaction, along with more frequent pickups, we can address, from our perspective, the challenges around beverage containers. Because beverage containers are a consumable material, we do regular pickups, either every two days or every day with our depots.</p> <p>The challenge becomes with material from other structural programs that are left there for a number of days, if not a number of weeks. And that becomes the challenge.</p> <p>We think that we're going to be able to address space constraints on the beverage container side. The next step will be: how do we address it on the other side, with the other materials that were made, and how it's currently</p>	<p>Consultation Session 3: Webinar with the BC Product Stewardship Council – July 28, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		<p>constructed. It may not make sense to do pickups on as frequent a basis as we would like to see. And we need to think through how we manage that.</p> <p>That's one of the ongoing challenges for us: is putting so much time and effort into managing infrastructure and supporting our depots. And then having programs that take advantage of that without working collaboratively with us to try and look at how we can make it work better for depots, and certainly we try to engage in those discussions. But to date, they have not been fruitful. Where we have programs working directly with us, or even where we've been hired as a contractor, especially electronics, it's been great, because we have shared objectives in terms of customer service and wanting to ensure the program is successful. It's not to say that other programs don't want to be successful or don't care about the customers. But we haven't had the same level of collaboration you'd like to see.</p>	
<p>Also I would like to ask that Encorp develop more detailed instructions or education for Express users on pros and cons and guidelines. For example, they put multiple labels on the bags for secure their bags which is a waste of depots cost and paper. So please give some guidelines that there are some risks and they can't get paid all the items in their bags if they are not registered. Some customers showed up with rude attitude. They treat us like robberies.</p>	<p>Soo jin (Theresa) Lee (Blundell Return-It)</p>	<p>Thank you for your feedback. We regularly engage with customers on how to use Express and will continue to educate them, especially as new customers come on board and may not be as familiar with the system.</p>	<p>Consultation Session 6: Webinar with Depots – August 19th, 2020</p>
<p>I just moved back to B.C. from Alberta. I was very shocked to see the many "rules" required to return empties! In B.C. the user is required to spend time sorting the returned items into the various categories.</p>	<p>Larry Key</p>	<p>Thank you for taking the time to share your experience with the deposit refund system here in BC.</p> <p>As part of our initiative to make recycling easier and more convenient for consumers, we expanded our <a href="#">Return-It Express program</a> in 2019. This easy and convenient recycling system requires no sorting, takes less than a minute with deposit refunds uploaded directly onto a customers' account. Our priority is to model convenience for the customer and we will continue to evolve our system to drive beverage container recovery rates in BC.</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>Not only is this very time consuming and confusing, but it is awkward with cans falling all over the place.</p> <p>In Alberta, the user takes the returns to a depot and the workers very quickly do all the sorting.</p> <p>I didn't do a manual account of employees, but I am guessing there is no reduction in employees in B.C. despite the consumer doing all the sorting.</p> <p>So why must the consumer do all the work?</p>		Please do not hesitate to contact us if you have any further questions.	
<p>The recycling system is not working. You are not interested in recycling as a whole. I drove by the Vance Road depot over a period of about a month at different times only to see long lines of people with impressive amounts of beverage containers. Finally I went just before it opened only to be confronted with another long line up. I took all my various items to the dump. Which is where all non-curb pickup recycling is going. All your promotion and efforts are in the field of beverage containers with little to no help for the other recyclables. Please don't give me the covid line.</p>	David Probst	This comment was sent to the Beverage Stewardship Plan's dedicated email address, however, with follow up it was determined that it was meant for our Customer Relations Team who responded specifically to all customers comments and provided any necessary clarification.	Written Feedback
<p>1. Make a clear commitment in the stewardship plan to maintaining a strong, province-wide network of Depots and reporting on the value that the Depot system provides to BC.</p>	Jay Aarsen (BC Bottle and Recycling Depot Association)	<p>The collection system and consumer accessibility performance target is set at 97%</p> <p>Return-It's collection system and consumer access is measured annually by using GIS mapping of all collection locations and matching the location to the population base and drive time radius. In Urban areas the drive time radius is set at 30 minutes, however most locations are within a 15-minute drive time and in rural areas 45 minutes. Coverage results are reported in</p>	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<i>(Note: For supporting points submitted relating to this recommendation, please see the full letter submitted in Appendix V. Written Feedback of this report.)</i>		<p>each Annual Report and available on the Return-It website.  <a href="http://www.returnit.ca/locations">www.returnit.ca/locations</a></p> <p>With respect to depots in particular, we are confident that they will remain the backbone of the system for many years to come. However, we must continue to evolve the collection system and introduce new methods of collection to ensure that we can continue to improve consumer accessibility and convenience.</p>	
<p>3. Commit to ending anti-competitive practices aimed at the systematic devaluation of 50 years of Depots' investments.</p> <p><i>(Note: For supporting points submitted relating to this recommendation, please see the full letter submitted in Appendix V. Written Feedback of this report.)</i></p>	<p>Jay Aarsen  <i>(BC Bottle and Recycling Depot Association)</i></p>	<p>Encorp is in the middle of a three-year program to invest over \$1 million in depots through our Stars program. This program builds on two previous Stars programs all of which have provided funds to upgrade depots and improve the customer experience.</p> <p>In addition, we have launched an automation pilot that will provide interest-free loans to depots to cover the installation and start-up costs that will enable them to introduce automated sorting equipment and reverse vending machines (RVMs) into their depots.</p> <p>Finally, the launch of our aluminum can pilot, which includes the participation of over 70 depots, was developed to correct inequities within the system that benefited some depots over others.</p> <p>These are three of the many examples we could provide of changes and investments that Encorp has made to improve our collection system that have directly benefited the depots in our system.</p>	Written Feedback
<b>2.3.1 Depot Coverage</b>			
<p>What is being done to redress geographic gaps in depot service (West Side and West End of the City of Vancouver, parts of City of Victoria and West Vancouver)?</p>	<p>Greg Wilson  <i>(Retail Council of Canada)</i></p>	<p>For all three areas, we are actively looking at establishing depots, establishing corporate Return-It Express Plus locations and establishing Express &amp; GO locations.</p> <p>We have a proposal right now for West Vancouver; we have a call with the City of Vancouver later this week around options in that community. We're actively working on a site in Victoria.</p>	<p>Consultation Session 2:  Webinar with Retailers – July 23, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		Within those communities, there are obviously gaps, and we are looking at a variety of options available to us to try and fill those gaps in the most efficient manner possible.	
If return to retail was eliminated as an option, how would you address the needs of communities that currently do not have depot coverage.	Michael Zarbl <i>(Major Appliance Recycling Roundtable)</i>	Two things: 1) We are conscious that we are able to roll out these Express & GO stations in locations that would have otherwise not been able to support a conventional depot but also 2) Working with retail partners – I think what’s wanted is a shift away from mandatory return to retail. In a lot of locations, there are sufficient collection facilities that having retailers collect it is not required. I think what’s desired by everyone and retailers as well, is a move to voluntary return to retail. It may be that in some cases it may make sense to have return to retail – that’s certainly the approach for other products (e.g. paint) under the recycling regulation and we’re trying to do something similar. Most brand owners and retailers want to keep their customers happy and want to ensure that they can service them and continue to do so. What they don’t want is to be mandated to take back containers from people that may not be customers. I think that can take place in a variety of circumstances. But I think the shift we’re looking for is voluntary return to retail and enhanced Express & GO services across the province.	Consultation Session 5: Webinar with Coast Waste Management Association – Aug 19, 2020
<b>2.3.2 Funding</b>			
In terms of depot improvements will any funding go towards depot expansion. I realize that a lot are privately owned but their operational footprints already looked squeezed. By adding additional materials will this not add further pressure for space and/or systems management.	Jamie Benton <i>(Fraser Valley Regional District)</i>	Yeah, that's a great question. So, you know, these are independent businesses. We definitely have provided funds to upgrade the appearance, but when it comes to expanding the depot envelope or having their own location, you know, expanding the location, or changing the location, those are really costs that the independent operators need to take on. I do think that we are focused on ways to manage the material more efficiently. So again, you know, things like the aluminum can pilots, where we can have everything managed through one system, we think will increase the efficiencies and eliminate some challenges and having to have separate products stored for pickup on separate days.  But it probably needs a broader look at all the materials being managed through the depots. It's probably not appropriate to have as many programs	Consultation Session 3: Webinar with the BC Product Stewardship Council – July 28, 2020

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		<p>as we have managing material through the depots. That doesn't mean that we can't manage the same amount of material. It just questions whether we need separate programs for every category of material. Because the challenge with having so many separate programs is they all have their own supplies, their own pallets, and that puts strain on the depots.</p> <p>I think one of the other things I can also see are challenges with the recycled PPP material. So I know depots are concerned, particularly when it comes to styrofoam is the amount of space it's taking up. And so as depots get more material and we have things like milk come into the system, I am concerned that some of the depots may not have the space to manage materials like styrofoam, because there's just limits to what they can do and the space they have. So I think that's something that probably begs some dialogue in the future and probably needs both Return-It as the operator of the depots and licencing of the depots, as well as local government, as well as Recycle BC at the table to figure out how can we develop an integrated plan for recycling materials such as styrofoam, where you may not be able to recycle that at every depot.</p>	
<p>Will Encorp help depots financially with grants rather than loans for the high expense of automation? Or engage with government to provide grants?</p>	<p>Savannah Paine (Depot)</p>	<p>I think at the end of the day, we're conscious and respectful of the role of our depots as independent operators. You folks are business people, you take pride in that, and so we want to ensure that we have a system that's fair and equitable but also that these are independently run businesses. So I think we're definitely interested in facilitating loans to help get the start-up cost of automation, and then it's our hope that the automation pays for itself in terms of reduced labor and ultimately I think in managing the containers in a much more efficient way. We've looked at automation for a couple years now, and I think we're convinced that the benefits of automation will pay for themselves. That's where we've determined we need to play a role – providing interest free loans on the start-up costs. We think that's a way we can facilitate the introduction of automation and help get it in. I think once automation is in the system the benefits will become clearly evident in terms of the increased efficiency for our depots.</p>	<p>Consultation Session 7: Webinar with Depots– August 20th, 2020</p>
<p>In going through the plan I was unable to calculate how much more Encorp will have to</p>	<p>Jamie Benton</p>	<p>The deposit change from 20 cents to 10 cents represents 6% of containers in the Return-It system.</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>pay out in deposits as a result of the changes from 5 cents to 10 cents, and the eventual reduction of 20 cents to 10 cents from over 1 litre containers. Based on the Container Recycling Fee for each container type, the 2019 costs have risen presumably due to the commodity price devaluation. Is Encorp confident that it will not lose money in the long run with the change in the deposit values?</p>	<p>(Fraser Valley Regional District)</p>	<p>Encorp is a not for profit organization that ensures it operates a cost effective system that is sustainable in the long term. As it relates to container recycling fees, when the revenue from unclaimed deposits and from sales of collected material are insufficient to cover the cost of recovering and recycling a specific container type, a Container Recycling Fee (CRF) is charged on the specific container to make up the shortfall. The CRF is remitted to Encorp upon the distribution and sale of new products in the Province. The CRF, which is paid once in the supply chain, is not a tax or a refundable deposit. The CRF's are set annually at a level which covers the costs of administration, collection, transportation and responsible recycling of obligated products covered by the program.</p> <p>CRFs are reviewed regularly to ensure that they are no more than is necessary to cover the ongoing cost of operating the program and maintaining the appropriate reserves, consistent with Encorp's not-for-profit mandate.</p>	
<b>2.4 Automation</b>			
<p>Is there automation available to help grocers, particularly to help manage unsanitary milk containers?</p>	<p>Greg Wilson (Retail Council of Canada)</p>	<p>We spent a lot of time looking at RVMs. We've done a lot of investigation for our automation pilot; proposing RVMs in depot locations. We do have RVMs in one of the depot locations (the Kensington location in Burnaby, East Hastings, operates RVMs currently). There are limitations to those devices, and one is around the size. So things like 4L milk jugs would not be compatible, and could not be managed through that system. When we're looking at depots, it's primarily to handle plastic bottles, glass bottles, and aluminum cans—cylindrical items. It can handle cartons, but in particular drink boxes prove to be a challenge, because often they don't include a bar code. And they may not be picked up through the system.</p> <p>RVMs are a complimentary tool, but they wouldn't—at least as they are designed right now—be a tool for managing milk containers, particularly large milk jugs.</p> <p>That wouldn't really be an option for managing those containers.</p>	<p>Consultation Session 2: Webinar with Retailers – July 23, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>Will adoption of machines be mandatory? How many machines were tested and who will maintain the machines when they break and materials are left beside the machine?</p>	<p>Luc Lortie (Costco Wholesale Canada Ltd.)</p>	<p>I'm going to assume the question is around retail. We have no plans at this point to introduce automation at retail.</p> <p>All of the automation that we are discussing is for 8 depot locations. We've had a test site in our network operating for somewhere in the neighbourhood of 3–4 years. We've learned a lot about how automation works and how it can be leveraged to improve the efficiency of our depot operations.</p> <p>While we'll be helping facilitate the introduction of automation, the contracts for those systems will be between the independent operators and the company supplying the machines. There will be service contracts associated with those, and that will be dealt with in terms of providing the ongoing maintenance. All of that is part-and-parcel of the contract service offered to people who service the system.</p> <p>We've got experience in that. We also use some of that technology in our own count centre in New Westminster. We've found that to be a reasonable way to go, and effective.</p> <p>Just to clarify, it isn't our intention to introduce automation at retail, unless of course someone were to approach us, and we've discussed some limitations.</p> <p>But even on the depot side, it isn't mandatory. What we're trying to do is partner with depots that have large volume, where we think automation would make the most sense. Automation will not make sense for every depot in our program, but when depots have a certain volume, of say more than 7 million units/year, then it could address the challenges they face in terms of manually sorting that many containers—10 million or 15 million containers. At that point it seems like automation makes a lot of sense.</p>	<p>Consultation Session 2: Webinar with Retailers – July 23, 2020</p>
<p>Will the machines take milk products and are they designed to handle bacteria growth?</p>	<p>Luc Lortie (Costco Wholesale Canada Ltd.)</p>	<p>Yes, they can handle—potentially—the cartons. In terms of bacteria growth, would have to talk to the operator. I know they used them in Alberta for a number of years. Milk cartons there have been sorted through these systems.</p>	<p>Consultation Session 2: Webinar with Retailers – July 23, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		<p>The maintenance required is constant cleaning, so it needs to be cleaned really every day. Part of the issue in addressing that is the constant cleaning.</p> <p>As I said before, the challenge is large plastic milk jugs really can't be managed through reverse vending machines at this point.</p>	
Can you confirm the RVMs can take all containers, including cartons?	Isabelle Faucher ( <i>Carton Council Canada</i> )	Reverse Vending Machines (RVMs) can't take all containers, we do believe that they will be able to take cartons. There may be some challenges with drink boxes that do not have the UPC code. We will need to have conversations about how we will address those issues. There will be some containers – especially large milk jugs – that may be a challenge for RVMs. At the end of the day, we think the RVMs will be able to take the majority of the containers and will just provide another solution for depots in terms of addressing some of the labour challenges, particularly at large depots. We do have RVMs in one depot. We do see a sizeable number of the customers using that depot do use the RVMs and do have a satisfactory experience.	Consultation Session 1: Webinar with the General Public – July 16, 2020
Can you—just for the folks on the line—talk about what kind of infrastructure requirements are required to support the Express & GO stations?	Sarah Willie ( <i>Comox Valley Regional District</i> )	<p>Yes, that's great. So, really the only thing we need is access to power to access the internet. And I should point out that one of the benefits so you know, our first local government trial with this was in North Vancouver, and Metro Vancouver just came back to us and said they would be interested in partnering at two more sites.</p> <p>I think what makes the Express &amp; GO such a good fit with local governments is it's really a self-contained unit. We pay for the installation costs of the electricity and internet, we pay the ongoing operating costs of that; it really doesn't require much interaction with the attendant, especially once we get through some issues. With PIN questions, people wondering where their PIN is, we're working on that. But other than that, people come up, they punch in their PIN code, they drop off their bag and go. We come in, we collect the containers, we empty it out—in the case of the North Vancouver transfer station, every day. We have cameras in the containers, so we're aware if it's becoming too full, and can send a truck out in an expedited manner to pick up containers.</p>	Consultation Session 3: Webinar with the BC Product Stewardship Council – July 28, 2020

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		<p>The whole concept is that the container is self contained, and doesn't require a lot of ongoing interaction with the local government staff. And it can basically run on its own. There's a label printer that we now actually build into the station. So again, there's maintenance issues, but those are for us to solve. So we refill the label printer, although we provide printing labels on hand in case we don't have a transporter and it needs to be done right away. But as much as possible, the idea is that it's self contained, and we can manage it directly without any large-scale support, and all the costs associated are the operational costs, the ones that we take care of directly. So we have specific accounts to manage the internet and the electricity on our own, or, if we have to pilot somewhere else, then we pay whatever share for managing that.</p> <p>Really space, electricity, and internet are what we need. For the electricity, it's interesting; in Tofino, where you know, it doesn't have the most sun, we're averaging, because we have the solar panels, the draw on the electricity is very small. So I think we're using about \$5 a month worth of electricity. So not really a material amount. And so still, even an area like that, most of our needs for electricity are actually managed by the solar panels.</p>	
<p>For Express &amp; GO, do we have to worry about containers install within our territory when retailer request? Would like to clarify for that issue</p>	<p>Soo jin (Theresa) Lee (Blundell Return-It)</p>	<p>The purpose of Express &amp; GO is to fill gaps in the system. What we would like to do is have, in a perfect world, the mandatory return to retail should be removed, and we should see containers go back to depot and that would be the preference. Where we've had difficulties citing depots and where retailers may have no choice but to accept containers unless we put an Express &amp; GO station, that's really where our objective is in putting in these Express &amp; GO stations. In many cases, where we do put an Express &amp; GO station in, there may be opportunities for those containers to flow to the depot, and that won't be universal and won't happen every time. But in a certain number of cases, it would make more sense for the containers to go to the depot. So one example for that would be our Tofino Express &amp; GO – those containers are picked up by a truck and that truck drops them off at the Ucluelet depot on it's way down Island and those containers will be managed there, and the Ucluelet depot owner is quite happy with how that worked. Again, most of them are done on a case-by-case basis, but the</p>	<p>Consultation Session 6: Webinar with Depots – August 19th, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		objective with the Express & GO is to fill gaps in our system, and not to duplicate recycling infrastructure.	
How many Express & GO placements are planned for the next 5 years? How will it affect traditional contracted depots?	Savannah Paine (Depot)	The Express & GO program is really meant to provide access in underserved areas. Either in small, rural areas like Tofino where we didn't have a depot, or in places like SFU, Burnaby, or North Van where we simply did not have enough depots, and where we had partners willing to cite a container. Our expectation is that over time, we probably won't have a lot of new depots so it's our expectation that existing depots will continue to be the backbone, but Express & GO will continue to provide ancillary services. In rural communities, and those beverage containers, like in Tofino, may go to a nearby depot, so in the case of Tofino they go to Ucluelet, in the lower mainland sometimes they go to another depot, sometimes they may go to our count center depending on location and volume. Some of that still needs to be worked out – we really need to take into account increased volume by the alcohol aluminum containers and the milk containers.	Consultation Session 7: Webinar with Depots– August 20th, 2020
<p>14. Regarding Encorp's plan to modernizing processes through automation and compaction:</p> <ul style="list-style-type: none"> <li>The Depots support modernization and compaction as optional programs to improve business efficiency where it makes business sense for individual Depots.</li> <li>However, Depots must have autonomy in decision-making about how their Depot operates and especially how they serve other clients –i.e., decisions to modernize should not be dictated through 'take it or leave it' contracting.</li> </ul> <p>Encorp should commit to providing a compensation system that encourages (but</p>	Jay Aarsen (BC Bottle and Recycling Depot Association)	<p>As depots are independently owned and operated businesses, we will continue to collaborate with depots to ensure we have a system that supports British Columbians and protects the environment. We all agree that recycling is important, and the modernization initiatives we have launched this year are supporting British Columbians in safely and more conveniently recycling their empty beverage containers. By making it easier and more convenient for consumers to recycle their empty beverage containers, we can all work together to increase BC's recycling rates and divert more and more beverage containers from our landfills, oceans and waterways.</p> <p>Our customers are changing and so are their expectations. We will continue to examine all possible opportunities, including investing in initiatives that encourage the modernization of the depot system.</p> <p>Our shift to compaction and more energy efficient transportation are necessary to lower the GHG footprint for transporting our materials and are consistent with the objectives of the provincial government and its CleanBC Plan to reduce GHG emissions by 40% by the year 2030. By embracing</p>	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
doesn't require) Depot modernization. Depots will make investments that improve their business efficiency for Encorp if those decisions make financial sense.		new technologies, we can all be part of the solution to reduce climate pollution.	
<p>Technology and Automation Support A Convenient and Productive Redemption System</p> <p>A high-performing deposit-return system requires a user-friendly, widely accessible redemption experience that is also cost-efficient for the sponsoring producers. We appreciate that the Plan prioritizes these and believe that your stated objective to integrate the latest available technology will serve all those needs. During this time of COVID-19 reverse vending technology was considered by regulators as the safest way for consumers and workers to redeem quickly in a safe environment. The integrity of the accounting and fraud controls processes is also supported through technology as it improves accuracy, enhances data collection, and facilitates general transparency into how well the system is performing and where it needs improvement.</p>	Charles W. Riegler Jr. (TOMRA Canada Inc.)	<p>Reverse vending machines have been one of the contributing factors to enhanced customer convenience in certain situations and are currently used within Return-It's system. Where viable, the installation of these machines will be expanded.</p> <p>Encorp has spent a lot of time looking at RVMs and we have undertaken extensive evaluation for our automation pilot. There are limitations to these devices, one is around the size of beverage containers. 4L milk jugs would not be compatible and could not be managed through an RVM system. When we're looking at implementing RVM's at depots, it's primarily to handle cylindrical items such as plastic bottles, glass bottles, and aluminum cans. It can handle cartons, but in particular drink boxes prove to be a challenge, because often they don't include a bar code and may not be recognized by the machine.</p> <p>RVMs are a complimentary tool, but they wouldn't—at least as they are designed right now—be a tool for managing milk containers, particularly large milk jugs.</p>	Written Feedback
<p><u>Express &amp; Go station</u></p> <p>Simon Fraser University partnered with Encorp over the past year to pilot an Express &amp; GO unstaffed station at our Burnaby Mountain campus.</p> <p>Prior to COVID hitting in March, we believe the station was gaining traction with consumers and was starting to see regular usage. Since</p>	Mark McLaughlin (Simon Fraser University)	Thank you for your support.	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>the onset of COVID, our campus has been empty and we suspect that usage is down.</p> <p>We have no doubt that usage will bounce back once the campus returns to regular operations post-pandemic.</p> <p>This self-service bag drop-off unit provides tremendous convenience to consumers in what can ultimately be a 24/7 environment. Community groups can use the Express &amp; GO service to generate funds for their activities.</p> <p>We are very pleased with the installation and our dealings with Encorp during construction. Following consultations with internal SFU groups, Encorp were quick to modify the station to ensure it was fully accessible.</p> <p>This easy to use self-service station, running on solar power, is a great example of BC recycling innovation, and will only help increase beverage container return rates.</p> <p>We believe the unit would be more effective if the bag label printer was located close to the Express &amp; GO the station. In our particular circumstance, the label printer is located about 300m away and is only accessible during business store hours. A greater level of marketing of the station's presence and benefits to local population would also help increase awareness, and use.</p>		<p>We are currently testing bag label printer installations within the Express &amp; GO station in the North Vancouver location for ease of consumer access with the intention to install printers at every station.</p>	
<p><u>Reverse Vending Machines</u></p> <p>Unlike many other Canadian provinces, BC has not adopted Reverse Vending Machines</p>	<p>Mark McLaughlin (Simon Fraser University)</p>	<p>Reverse vending machines have been one of the contributing factors to enhanced customer convenience in certain areas and are currently used</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>as a way to promote beverage container recycling. Although there may be an initial upfront cost to procure the machine, these machines are popular with consumers and can provide a cashless recycling solution where retail space is limited. Return-It should pilot the use of these machines in various settings.</p>		<p>within Return-It's system. We continue to evaluate RVM's and where viable, the installation of these machines will be expanded.</p>	
<p>Return-It Express Binnars have shared that they are not frequent users of the Return-It Express stations, and find it a barrier that this option is cashless with \$50 as the minimum refund before a cheque can be issued. These concerns indicate the ongoing need for in-person and cash-based options for returning beverage containers, which we encourage Return-It to continue prioritizing as commercial locations become increasingly cashless.</p>	<p>Brianne De Man (<i>Binnars' Project</i>)</p>	<p>Many depots still provide cash deposit refunds when returning beverage containers for recycling. Return-It Express is in response to customer feedback for a fast, convenient, and cashless method to return their empty beverage containers. To drive recovery rates in BC, we need to continue to evolve our system to meet consumers' expectation.</p> <p>For clarification, the minimum redemption value is \$10 not \$50, through the e-transfer option.</p>	<p>Written Feedback</p>
<p>Return-It Express &amp; GO Return-It Express, which allows consumers to bundle beverage container returns and receive deposit refunds into their Return-It account, is an important innovation. The recent collaboration between Encorp and Metro Vancouver to initiate Return-It Express &amp; GO collection at the North Shore Transfer Station has been a notable success and accounts for over 150,000 beverage containers per month. Metro Vancouver is working with Encorp to expand the Express &amp; GO service to other Metro Vancouver transfer stations. Encorp is encouraged to continue to expand and</p>	<p>Paul Henderson (<i>Metro Vancouver</i>)</p>	<p>Thank you for your support.</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
enhance the Express and Express & GO program.			
<b>2.5 Collection Containers/Bags</b>			
I have another comment on the greenhouse gas emissions – the containers that Encorp provides depots to store beverage containers for transport - One pallet, two of these big bags, is 5600 containers. Whereas one pallet of the Brewers sacks only carries 3600, so were talking about a 30% increase per pallet, and that increase of containers per pallet saved on staff, labor changing bags, and creates a bunch of efficiencies that need to be taken into consideration. Obviously one trailer carrying a whole bunch of air is obviously not as good as one trailer carrying a whole bunch of containers, so it does make a greenhouse impact.	Vince Spronken ( <i>Island Return-It</i> )	Yes absolutely, and to that sorting issue, were not going to stop with aluminum cans. You're going to see us engage in a lot of work next year to try and reduce the number of sorts. Right now, to be honest, we've got a lot of sorts, and we want to reduce that as much as we can, maybe get it down to 3 or 4 sorts. It's clear that if we are going to make the system more sustainable and efficient for everyone, including our operators, that we need to make it simpler. So this is the first step but isn't the only step, we're going to look for other ways to streamline the system and make the whole sorting and collection system streamlined and more efficient in the future.	Consultation Session 6: Webinar with Depots – August 19th, 2020
When will I see larger bags for small depots for aluminum cans	Patrick Ashton ( <i>Mountain Valley Station</i> )	I don't think it's anything we have planned right now, but let me take that away. I am conscious that as we transition to the pilot, certainly there's a lot larger volume, but a lot of the alcohol cans will also be larger – I guess what you would call tallboys – so there's a lot more of those cans, so that creates a number of issues but we can definitely follow up on that in terms if larger bags are required or how we're going to manage that.	Consultation Session 7: Webinar with Depots– August 20th, 2020
<b>2.6 Management of Environmental Impacts</b> ( <i>Section 7: Management of Environmental Impacts</i> )			
How are pouches recycled as the regulation requires all beverage containers to be refilled or recycled? If they are hard to recycle, how is	Sue Maxwell ( <i>Ecoinspire</i> )	Right now we're testing a couple of options for use of those containers as material in plastic lumber. They are definitely hard to recycle and we have had conversations with the largest brand owner of that material to make them aware of these challenges. Right now there's really one large brand	Consultation Session 5: Webinar with Coast Waste Management Association – Aug 19, 2020

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
Encorp working to help producers move towards a better type of packaging?		owner and the rest of the companies/organizations using that material are basically operated offshore and their product is imported so it's really difficult to have any dialogue with them. The one thing I would add on this is that the one challenge for us is that there is an inequity in the Recycling Regulation that the other stewardship programs, such as Recycle BC, and no fault of their own, this is a regulatory issue not about their program, but under the Regulation they are allowed to direct this material to engineered fuel. We think that from an overall environmental impact, at least until we can get brand owners to move towards a more recyclable product, that might be the best way to manage the material. Certainly from a GHG footprint it would be a huge improvement from shipping it across the country to having it managed in the same way as similar material from other programs. Ultimately we know that there is a lot of work in this field to move to a single polymer pouch – there's one already in the marketplace and that's ultimately where we want to go but really we're just in the process of managing this material until that transition takes place.	
Encorp is doing some great work. Well done on all the progress! For products that are more difficult to recycle, is Encorp 'penalizing' the producers who use these products compared to producers using more recyclable materials?	Veronica Bartlett (Morrison Hershfield)	Our approach is not so much to penalize producers, but rather to find a way to work with them to move the product up the pollution prevention hierarchy. It would be great if we can get some of these products moving towards that, for example, single polymer pouch would be much more recyclable and could be managed with some of our other material. It is not always the easier transition to work towards especially if we are working with other companies importing from overseas. That's been our approach to date and really the volume we're talking about is pretty minor – less than half a percent of the containers in our program. We are conscious of trying to address this issue but also conscious that it is a very minor role in terms of the overall context of the program.	Consultation Session 5: Webinar with Coast Waste Management Association – Aug 19, 2020
I am curious to learn about the CO2 reduced (from landfill diversion) methodology stated in page 17. It states the energy used for material recovery is included in the consideration. Are you using average numbers or manufacture specific estimates? Are you assuming general	Taspia Raka (Climate Smart)	We are assuming general MSW landfill emissions for comparison and using average numbers to estimate the CO2 emission reductions.	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
MSW (Municipal Solid Waste) landfill emissions for comparison?			
Is the 25% reduction estimate from the conversion of the pickup fleet is that from the fuel-switching alone or the combination of reduced kilometers (due to materials being compacted as they are picked up) & fuel switching?	Taspia Raka (Climate Smart)	The reduction estimate is from both fuel-switching and reduction in kilometres driven due to compaction of material	Written Feedback
<p>11. Regarding Encorp's plan to add climate smart reporting:</p> <ul style="list-style-type: none"> <li>• Encorp must recognize Depots are at various states of transformation in terms of Climate Smart reporting. Some depots have been Climate Smart for years. Others do not have the capacity to understand what is needed to report.</li> <li>• Encorp should commit to not usurping the individual efforts of Depots for its own reporting purposes. Depots are independent businesses. Instead Encorp should commit to celebrating the successes of individual businesses in its network.</li> <li>• If Encorp collects Depot Climate Smart data, there must be clear privacy policies in place that dictate how that data will be used and protect Depots' proprietary information.</li> </ul> <p>If Encorp wishes to be a change agent and affect better climate results, then it should</p>	Jay Aarsen (BC Bottle and Recycling Depot Association)	In accordance with direction from the British Columbia Ministry of Environment & Climate Change Strategy (MOECC), Encorp has been calculating and reporting GHG emissions associated with the collection and recycling of used beverage containers in its Annual Report since 2007. To improve accuracy of the calculated emissions we require Encorp's collection network to report their use of electricity and natural gas to heat their facilities, square footage used for collection of beverage containers. We understand it may be challenging for small business operators to understand reporting requirements and therefore Encorp is going to release the guide for reporting GHG emissions before the end of 2020. We appreciate your feedback and will ensure that the privacy statement is included into the reporting guide.	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
ensure that it is providing the financial and intellectual capacity to help, especially small Depots, report accurately.			
Refillable bottles: We appreciate the statement in the draft plan that refillable bottles could be included in the program. However, the wording “if producers should choose those containers” falls short of the pollution prevention hierarchy in the Recycling Regulation, which requires producers to maximize higher levels of the hierarchy (reuse) before moving to lower levels of the hierarchy (recycling). We recommend Encorp introduce incentives and other opportunities to encourage producers to choose refillable containers.	Monica Kosmak (City of Vancouver)	Thank you for your feedback. We will continue to dialogue with producers regarding refillable options. With the addition of milk containers to our program, we will be helping to integrate an existing refillable program and should be able to derive learnings from that experience that we can use to support other brand owners interested in refillable options.	Written Feedback
Energy recovery for beverage containers: The table on page 19 shows that Encorp is testing thermal processes to manage stand-up pouches and the laminated plastic bags used inside bag-in-a-box containers. Also, during the webinar, Encorp suggested a need to level the playing field so that Encorp could use energy recovery like other EPR programs for certain materials. From our perspective, the Recycling Regulation requirement to only refill or recycle beverage containers should be maintained. This is because producers can readily choose container designs that are refillable or recyclable. Rather than pursue energy recovery, we encourage Encorp to develop local refillable or recycling markets and create incentives for brandowners to use refillable or recyclable containers. Doing so	Monica Kosmak (City of Vancouver)	Our comments during the webinar were making the case for a level-playing field with respect to this material. If engineered fuel is an acceptable approach for packaging under Schedule 5, then why is it not acceptable under Schedule 1?  However, we appreciate the issues raised and will commit to consulting brand owners using this type of packaging to determine a path forward to using either a recyclable or refillable option with the objective of reporting back on our progress by the end of 2022.	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
would fulfill the pollution prevention hierarchy requirement in the Recycling Regulation and support a circular economy.			
<p>Environmental Impact Assessment Boundaries Should Include the Full Lifecycle</p> <p>We appreciate and support that Encorp is measuring greenhouse gas (GHG) emissions and savings as well as setting environmental impact targets associated with its stewardship activities. This information is critical in tracking the overall impact of the program. To provide a broader understanding of the full system, we suggest that the environmental impact assessment boundary is expanded to include the full lifecycle of a container – not just when it enters and leaves Encorp’s DRS system. This will allow Encorp to more fully account for the GHG impact of different materials and system improvements throughout the process. Additionally, in order to provide further detail and transparency into the reporting of the metric weight of materials diverted from landfill required under the Plan, we suggest that the reporting includes a material flow analysis that illustrates which materials, in which quantities, are going to which processes. This information will allow a clear and better understanding of how exactly materials in the program are following the pollution prevention hierarchy described in Section 5(1) subsection (c) (page 16 in the Plan).</p>	Charles W. Riegle Jr. (TOMRA Canada Inc.)	Encorp and brand owners have developed stable and sustainable markets to recycle obligated beverage containers in accordance with the requirements of the recycling regulation. All beverage containers covered under Encorp’s stewardship plan are made from non-toxic, inert materials and all container types have established secondary markets. These markets and end-of-fate for materials are reported in each annual report.	Written Feedback
Page 13 Compaction pilot program to identify the viability of using a CNG hybrid solution with	Marianne Pemberton	Assuming this question is for Encorp and not Recycle BC.	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>a mobile compaction unit to transport compacted material from depots reducing the trips necessary and ultimately reducing the program's GHG emissions</p> <p><i>Question: Will this pilot help in building the business case for Recycle BC's vendor suppliers to implement similar programs? Consideration of where the largest areas of opportunity for such a program to make an impact, both within Recycle BC's Scope 1 and Scope 3 emissions sources, can ensure such a pilot paves a pathway for amplified reductions.</i></p>	(Climate Smart)	We are hopeful that many of our transporter partners will switch to the CNG powered fleet as Encorp will include the fuel type in the selection criteria for Request for Proposals (RFP) for transportation services.	
<p>Page 17:</p> <p><i>Comment: Energy savings and tonnes CO2e reduced should be listed relative to a baseline. Reader has no way to know if this is year over year, based on 2010 levels, or if the comparison baseline was an average high or low year, skewing results.</i></p>	Marianne Pemberton (Climate Smart)	We have now updated our targets for GHG emission reduction relative to the 2019 baseline emissions.	Written Feedback
<p>Page 19: Greenhouse gas emissions</p> <p><i>Comment: Given the end-of-life supply chains listed on pages 17 - 19, Recycle BC ought to consider prioritization guidelines when sourcing end of market vendors for recycled products which favour fewer kilometers travelled, and/or low carbon modes of transportation for goods in order to reduce emissions associated with total lifecycle.</i></p>	Marianne Pemberton (Climate Smart)	Where practically possible, Encorp chooses local end market for material collected by the Return-It collection network.	Written Feedback
<p>Page 23: Encorp pays for the collection, transportation and recycling of the beverage</p>	Marianne Pemberton	Assuming this question is for Encorp and not Recycle BC.	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>containers registered in its program. These services are provided through contracts with various suppliers. Transportation, consolidation and recycling services are typically awarded through a competitive bid process.</p> <p><i>Comment: With combined benefits of improved accuracy in data collection, pooling innovative solutions, and engaging supply chain, <b>Recycle BC ought to consider greenhouse gas implications of suppliers vis a vis transportation and consolidation services. This Scope 3 emissions source is a significant source of reduction opportunity within BC and for Recycle BC, and can be implemented transparently and with increasing expectations over time. These standards and audits ought to be implemented in addition to the financial audits and interviews already conducted by the independent third-party consultant.</b></i></p>	<p>(Climate Smart)</p>	<p>Where practical, Encorp will include the GHG emission criteria into the selection criteria for its RFP issued for collection, transportation, and processing services.</p>	
<p>Page 25: Reduce Scope 1 emissions by 3% annually Implement GHG reduction initiatives for Scope 3 emissions to yield no less than 10% reduction in the GHG emissions as a result of those initiatives</p> <p><i>Comment: Greenhouse gas reduction targets ought to include a baseline year and target completion year. For example, Recycle BC will reduce Scope 1 emissions by 3% annually based on 2018 levels but 2025. Recycle BC will reduce Scope 3 tCO2e by at least 10% by 2025, based on a 2018 baseline.</i></p>	<p>Marianne Pemberton (Climate Smart)</p>	<p><i>Assuming this question is for Encorp and not Recycle BC.</i></p> <p>We have revisited and set our GHG emissions reduction targets in relation to the 2019 baseline.</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p><b>Material Quality Enables Recycled Content</b></p> <p>The BC deposit program aggregates the data of containers collected through all collection programs into a single recovery rate. While this may provide a better understanding of the total number of recovered containers, we believe that if the redemption rate is tracked separately then Encorp and other stakeholders will be better able to identify opportunities to continuously improve areas including consumer access, material quality, accounting integrity, and operating costs.</p> <p>The market price for PET collected within a bottle deposit system is generally 40% higher than curbside PET with RecyclingMarkets.net reporting even higher rates (58%-93%) in 2020. This higher quality yield provides the feedstock needed for producers to meet their recycled content commitments.</p>	<p>Charles W. Riegle Jr. (TOMRA Canada Inc.)</p>	<p>Encorp continuously reviews and manages the commodity value received for materials collected to ensure the highest market prices attainable</p>	<p>Written Feedback</p>
<p><b>2.7 Capabilities</b></p>			
<p>Given Encorp's commitment to circular economy and the pollution prevention hierarchy in the Recycling Regulation, what would it take to move Encorp's brand owners to embrace refilling reusable containers like the brewers? Has Encorp explored life cycle analysis to make this case?</p>	<p>Chris Underwood (City of Vancouver)</p>	<p>I think we are very open. We have included refillable products as an option under our plan, and prior to the pandemic we were working with one of the local brand-owners to plan out a potential pilot. Of course, that has been put on hold by the pandemic. One thing I would point out in doing that research, one of the things we are uncomfortable with, is the lack of washing facilities in the lower mainland. So we are conscious that right now refillable beer bottles are collected mostly right here in the lower mainland, but in other parts, like Vancouver Island, and other parts of the province, all those empty bottles are transported to a facility in Summerland – which from the lower mainland is four hours away – and then cleaned and washed there and then brought back to the lower mainland or Vancouver Island to be refilled. So, the current infrastructure that stands for refillable bottles is not</p>	<p>Consultation Session 4: Webinar with Regional Engineers Advisory Council on July 30, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		great, and certainly the carbon footprint of driving a diesel truck with tens of thousands of empty bottles all over the province to Summerland and then back to the lower mainland or Vancouver Island for refill doesn't seem to us like a sound environmental initiative. So, we are conscious that as milk comes into the program that there will be some refillable containers there, and we are certainly looking forward to working with those producers and still looking to support the existing refillable containers available by those producers, and if there is interest from other brand-owners in piloting refillable projects, we will definitely be available for that. That's one of the reasons why we made that change in our Stewardship Plan to include refillable containers.	
I think earlier in your presentation you said that you would be working with manufacturers on potentially recycling plastic bottles back into plastic bottles, and I always thought you could not recycle plastic back into any kind of a food product, so I was just wondering if you could comment on that?	Suzanne Bycraft (City of Richmond via Metro Vancouver)	So I think there are challenges for sure, but there are opportunities. Whether that happens up here, or down in the US may be the challenge, but already our material is being used as recycled content in new bottles. The challenge is how do we increase that? It remains a small percentage, but we are seeing that this material is being used as recycled content in new bottles. There is a report from World Wildlife Fund (WWF) that was released a couple months ago – we are actually hoping to have the author of the report on our podcast, so I will certainly give everyone a heads up on that – but I think the amount of recycled content used right now is around 9 percent, but I think as most of us know, a lot of organizations have targets of 25-50 percent that they are hoping to achieve in the next five to ten years. So our expectation is that more and more of this material is going to end up as recycled content in new bottles. It is already happening today. Beverage companies are purchasing the material, but there continues to be materials going to textiles and other products and it is our expectation that in meeting the targets that they have set for themselves, beverage container companies are going to have to purchase larger quantities and a larger percentage of the material that we're recycling here in BC.	Consultation Session 4: Webinar with Regional Engineers Advisory Council on July 30, 2020
<b>2.8 Producers Paying the Costs of Obligated Material</b> (Section 9B: Producers Paying the Cost of Obligated Material)			

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
Depots get a fee for handling containers but retailers get nothing for the same service. Any plan for a level playing field?	Shabbir Beawerwala (Loblaws Inc.)	<p>Yes, from our perspective, and I think that gets to one of the key issues related to the Return-to-Retail requirements, having containers collected at retail is a growing cost. For us to send trucks around to a number of locations to collect containers doesn't make sense from a cost perspective or an environmental perspective.</p> <p>In addition, the government is essentially having retailers subsidize collection. We pay depots because it is our way of ensuring there is infrastructure. I think there needs to be a discussion about the costs of the current systems, because not only is the government mandating retailers, but the government through its liquor stores is also providing subsidized collection. The current system as it's structured does not seem to be sustainable.</p> <p>The increase in cost to consumers that would be required to change the current system and pay retailers and depot operators, does not seem sustainable, and not something retailers want to see, in terms of added cost to consumers.</p> <p>I think, really, the path forward is to come up with a voluntary Return-to-Retail system and to begin to implement other initiatives which can provide relief from having to have all containers go back to retail, which probably isn't sustainable in the long term.</p>	Consultation Session 2: Webinar with Retailers – July 23, 2020
<p>4. Commit to producers, not Depots and consumers, paying the full costs of its system, including the transition to modern customer services.</p> <p><i>(Note: For supporting points submitted relating to this recommendation, please see the full letter submitted in Appendix V. Written Feedback of this report.)</i></p>	Jay Aarsen (BC Bottle and Recycling Depot Association)	<p>Encorp has developed a cost-effective system for British Columbians to recycle all beverage containers registered with Return-It in accordance with the requirements of the regulation. Obligated beverage containers have a deposit charged at the time of purchase then refunded when the empty container is returned to an approved location for the deposit refund.</p> <p>When the revenue from unclaimed deposits and from sales of collected material are insufficient to cover the cost of recovering and recycling a specific container type, a Container Recycling Fee (CRF) is charged on the specific container to make up the shortfall. The CRF is remitted to Encorp upon the distribution and sale of new products in the Province. The CRF, which is paid once in the supply chain, is not a tax or a refundable deposit. The CRF's are set annually at a level which covers the costs of</p>	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		<p>administration, collection, transportation and responsible recycling of obligated products covered by the program.</p> <p>CRFs are reviewed regularly to ensure that they are no more than is necessary to cover the ongoing cost of operating the program and maintaining the appropriate reserves, consistent with Encorp's not-for-profit mandate.</p> <p>To support transparency, all of this information is also published and available in our Annual Report.</p>	
<b>2.9 Dispute Resolution</b>			
<p>2. Commit to and outline a good faith negotiation process to establish fees-for-service, managed by a neutral third party, that enables Depots to make a fair return on investment for all services and enhancements requested by Encorp. This process should include a way to fairly compensate Depots for the costs of implementing any new pilots.</p> <p><i>(Note: For supporting points submitted relating to this recommendation, please see the full letter submitted in Appendix V. Written Feedback of this report.)</i></p>	<p>Jay Aarsen <i>(BC Bottle and Recycling Depot Association)</i></p>	<p>The setting of handling fees involves a nearly year-long process with independent third parties, which was utilized in 2010 and in the most recent negotiation that took place in 2016. The 2017 handling fee schedule is in effect until 2021. The process to establish the next five-year handling fee schedule will begin in the third quarter of 2020. This process provides the basis for future fee setting, although we expect with varying commercial conditions it will evolve over time.</p> <p>It's also important to note that Encorp pays depots more than \$50 million in handling fees each year which is roughly equivalent to the collection costs for operating the entire blue box system in BC that collects roughly double the amount of material. As such, we need to continue to find ways to achieve greater efficiencies within our system operations to ensure that it is sustainable into the future.</p>	Written Feedback
<p>7. Outline a good faith dispute resolution process.</p> <p><i>(Note: For supporting points submitted relating to this recommendation, please see the full letter submitted in Appendix V. Written Feedback of this report.)</i></p>	<p>Jay Aarsen <i>(BC Bottle and Recycling Depot Association)</i></p>	<p>All Encorp depot, transport and processing contracts include dispute resolution terms that provide for, on notice of a dispute being filed by either party, a mandatory meeting to negotiate a resolution and, in the absence of resolution, mediation through a mutually appointed mediator or, failing that, arbitration.</p>	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		While not specified in the regulation, Encorp has established procedures for managing complaints or concerns from customers, local governments, retailers and non-commercial stakeholders.	
<b>3. Products Covered</b> (Section 3: Products Covered Under the Plan)			
<b>3.1 Aluminum Alcohol Containers</b>			
When will rural areas like Revelstoke combine/start taking beer cans with non-alcoholic cans together? We are not part of the pilot and the consumers demand is so high not to sort.	Aziz Barna (Revelstoke Bottle Depot)	Not sure why Revelstoke is not on the pilot. They will have to communicate to us. If you already have a licence agreement with the BRCCC, you wouldn't be eligible to participate. We agree that there is a strong desire for consumers to have everything managed through one stream. That's why we've added the containers into our Stewardship Plan, as a result of fatigue in having to deal with constant consumer complaints on having their refunds on alcoholic containers discounted. We don't think it's fair to consumers that they have a government mandated fee discounted, so given that no other agency or government was willing to take action, we felt that it was incumbent on us to at least deliver some type of solution to address the growing concerns we were hearing from consumers.	Consultation Session 1: Webinar with the General Public – July 16, 2020
Can you expand on the aluminum alcohol container segment - does this include beer or just other alcohol containers?	Alda Nicmans (BC Product Stewardship Council)	It includes all alcohol containers that are in aluminum containers, so that would include beer, cider, vodka, coolers, any sort of alcohol sold that's in an aluminum can. Most of those containers, if not all of those containers, are operating or managed under another stewardship plan. And we believe that having an integrated approach to manage those containers would provide value to all producers by making the process much more efficient, as well as make it much more easier on our consumers and our operators.	Consultation Session 3: Webinar with the BC Product Stewardship Council – July 28, 2020
Is aluminum in now or as of 2022?	Alda Nicmans (BC Product Stewardship Council)	We've implemented a pilot for the next six months. And our expectation is that our Stewardship Plan will be approved before the end of the year. So our current timeline is: we'll submit by the middle of October, and we're hoping that the Ministry of Environment and Climate Change Strategy can approve the plan before the end of the year. And we would like to be able to	Consultation Session 3: Webinar with the BC Product Stewardship Council – July 28, 2020

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		begin permanently managing all aluminum containers in one stream as of January 1, 2021.	
Can we have a list of the depots that are a part of the aluminum pilot? Is Express included?	Alda Nicmans (BC Product Stewardship Council)	You don't have to be on the Express program to be part of the pilot and anyone can see the list of depot's participating in the pilot. It's on our website, <a href="https://return-it.ca/nosortingcans/">return-it.ca/nosortingcans/</a> .	Consultation Session 3: Webinar with the BC Product Stewardship Council – July 28, 2020
Do you think with adding aluminum alcohol containers will resort locations like Big White and Silver Star be considered for express locations[?]	Alda Nicmans (BC Product Stewardship Council)	Yes, absolutely. So we've already actually initiated discussions with Big White. I believe we have a phone call tomorrow, with Janine and Tim.  And that was precisely our message to them with the barrier of having a reticent or reluctant partner, there's no reason we can't go ahead and start putting something at Big White. It's our intention that we'll be able to place something. It's our intention that we believe that our Stewardship Plan with alcoholic aluminum containers will be approved, and so we are moving ahead with planning on introducing an Express & GO station at Big White.	Consultation Session 3: Webinar with the BC Product Stewardship Council – July 28, 2020
Given the Province recently changed the Recycling Regulation to require deposits are refunded at the amount they're charged, does Encorp still plan to go ahead with collecting aluminum beer cans given the brewers will have to refund them at 10 cents wherever they're accepted?	Chris Underwood (City of Vancouver)	The challenge is that the way that the beer industry stewardship plan works is that they only contract a small percentage of the depot network, less than half, to collect containers, so their position would be that those are unlicensed locations, and so it wouldn't be their responsibility. There needs to be some proactive direction given by the Ministry, because right now it's unfair to consumers who come to our depot locations with our Return-It logo and drop off their containers and then find out after the fact that they're having their deposit discounted – and those complaints come to us – which is the reason in the first place that we implemented this pilot, or at least one of the main reasons, as we were frankly tired of having to deal with ongoing complaints from consumers – not about how we run our programs or how we're collecting containers or about experiences they had with our containers, but more around challenges with aluminum alcohol containers or aluminum beer containers. So we think that the current situation is unacceptable, and we think that the only way forward is to manage it as an integrated stream. I don't think going back makes sense from a consumer's perspective or from anyone else's perspective, as were going to have to continue to segregate containers that have the same deposit value – it's	Consultation Session 4: Webinar with Regional Engineers Advisory Council on July 30, 2020

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		unnecessary work and adds to the overall cost and complexity of the system.	
I just wanted to follow up on your point at the end, around the convenience related to Express and trying to engage the brewers to participate in that program. Just a clarification so I understand – are you accepting the beer cans and bottles at Express right now?	Monica Kosmak (City of Vancouver)	Yes, we are. The refillable bottles are really a minority – a very small percentage of people bring back their refillable bottles through the Express system – but a large percentage of containers are beer cans. We have been managing that, and really I think where it has become a larger issue is during the pandemic when liquor stores weren't open, we had more and more of our depots and Express locations accepting those containers. We just think that for Express to be successful over the long term, we can't continue to pay for all the costs of managing it without contribution or participation by the alcohol aluminum can producers – and it is beyond just brewers. When you look at the alcohol aluminum can it includes coolers, ciders, and whether those organizations are as conscious of the impacts as the brewers, because they are behind the stewardship plan, is something that we have to do some further investigation. But to us, if we're going to have the type of recycling system that all demographics of our population will use then it needs to be as convenient as possible so it's really crucial that we have an integrated system and that we have all the containers going through, particularly for Express.	Consultation Session 4: Webinar with Regional Engineers Advisory Council on July 30, 2020
I'm unclear why wouldn't people get a full deposit refund?	Nicola Roberts (Pender Island Recycling Depot)	Unfortunately there are two stewardship programs for beverage containers, one is ours and the other program is BRCCC, which is run by the Brewers. BRCCC only has agreements with roughly 70 of our 168 depots, so the rest of those locations do not have an agreement to manage beer containers. Of course, residents continue to bring beer containers back to those other locations and because those locations are not being paid to manage those containers, they have been forced to discount the deposit return on those containers to ensure they get some sort of revenue for managing them. So that's in part the issues we've tried to address with our new aluminum can pilot – not only to make it easier to sort, but also to make sure that everyone can get their full deposit refund.	Consultation Session 5: Webinar with Coast Waste Management Association – Aug 19, 2020

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
Regarding refillable beer bottles that haven't been picked up by Encorp yet, do we have any structure in place for bottle depots like ours?	Miae Lee ( <i>Barriere Return-It</i> )	I'm going to raise this again with the Ministry, but I think at the end of the day the Ministry has approved a stewardship plan, and they've approved one which is clearly not functioning at a level required. So it's not acceptable in the middle of summer for many of our depots to have their beer bottles overstocked and not picked up for weeks on end. So I am going to be following up with the Ministry later today, and I am going to be copying the Brewers on that email, and just clearly laying out that if the Brewers are now no longer able to effectively manage their stewardship plan requirements, then they should either change that and start managing their stewardship plan requirements or retire their stewardship plan. But it's not acceptable to leave our depots, especially our smaller, rural depots, having to manage this.	Consultation Session 6: Webinar with Depots – August 19th, 2020
Quick comment on the petition. I've asked a number of our customers at a couple of our depots that don't have the pilot program and a couple that have the pilot program, and the overwhelming support is that "yeah, we would love to not have to sort this stuff". Some customers, maybe 2%, said that they are indifferent and don't really care, but most are pretty stoked on the idea of being able to mix them all together. The ones that we've asked at the depots that have the pilot program are just happy and don't want to go back.	Vince Spronken ( <i>Island Return-It</i> )	Yes absolutely, and to that sorting issue, were not going to stop with aluminum cans. You're going to see us engage in a lot of work next year to try and reduce the number of sorts. Right now, to be honest, we've got a lot of sorts, and we want to reduce that as much as we can, maybe get it down to 3 or 4 sorts. It's clear that if we are going to make the system more sustainable and efficient for everyone, including our operators, that we need to make it simpler. So this is the first step but isn't the only step, we're going to look for other ways to streamline the system and make the whole sorting and collection system streamlined and more efficient in the future.	Consultation Session 6: Webinar with Depots – August 19th, 2020
<b>For beer bottle collection, we understand it is not easy to settle down for unifying with NRBC but is it impossible to combine like pop cans and beer cans? Also some alcohol pouch and alcohol drink box are increasing, any instruction for depot?</b>	Soo jin (Theresa) Lee ( <i>Blundell Return-It</i> )	Our preference would not be to unify with NRBC – it is too difficult to separate refillable and one-way glass bottles and if the refillable break then we lose the opportunity for the container to be reused. I think we contemplated that and even communicated in the beginning that's what we could do but I don't think we feel comfortable going down that road.  For the alcohol pouch and drink box, I believe that would be in our program and it should be collected – I don't know if someone else on the line, one of the Return-It people could address that question.	Consultation Session 6: Webinar with Depots – August 19th, 2020

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		At some point we will contemplate, I think with the 10 cent deposit, we were thinking of creating separate SKUs for containers but placing them in the pallet at the same time. So right now they are going in a plastic bag, but we will have to provide proper sorting to become available after we have implemented 10 cents for every single container, so we will address all the containers at the same time including alcohol pouch and drink boxes.	
<p>I just have one more quick comment on the depots that discount and how they get labelled as “ripping people off” and all that kind of stuff. I was discounting many years ago and the thing that really made me want to lose a little bit more money by applying to the Brewers and finally getting an agreement with them was the fact that I had one of my staff actually grabbed by the scuff of his neck and dragged over the counter at our depot over a 3 cent deposit difference. It was only a couple dollars at the end of the day, but the reality is that we get insulted all the time, on a daily basis, and it’s not the owners of the companies that are getting insulted – it’s the staff. They are getting threatened with violence and called names and its just unacceptable and I couldn’t handle it anymore and I decided to actually apply and get the agreements in a number of depots, not all of them because they wouldn’t allow me to get them in all of them, but I had to play all of these little games just to make sure that we could actually pay a full deposit to all of these customers who are low-income and what not, and they don’t need to be “ripped off” or feel like they’re being ripped off, and depots don’t need to have violence or insults threatened on</p>	<p>Vince Spronken (<i>Island Return-It</i>)</p>	<p>Thank you for your comment.</p>	<p>Consultation Session 6: Webinar with Depots – August 19th, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
their staff for something that isn't even their problem, so that's just my comment on that.			
<p>Why Encorp only doing beer cans program not the beer bottles. It is very difficult for depots to keep beer bottles in depots because no third party guys are willing to pick up beer bottles.</p> <p>In the future will Encorp pick up the beer bottles?</p>	Smile Surya (Clearwater Bottle Depot)	<p>The Ministry is on this zoom session, so part of this answer is going to be directed to the Ministry. The reason we didn't take beer bottles is because they're refillables and so they work in a different way and we are concerned about mixing them with our non-refillables. In other jurisdictions where the cans have been integrated, the beer program has typically continued to run a separate program for bottles, and we're fine with that. The thing that's not acceptable is that the government has approved a stewardship plan, and that stewardship plan is not taking responsibility for their products and picking them up from our depots on a regular basis. I'll be sending an email later today to the Brewers and copying the Ministry and basically saying "With all due respect, you either have a stewardship plan or you don't. And if you have a stewardship plan then you need to take what measures are necessary to pick up materials from our depots on a regular basis. It's not fair and it's not equitable to expect these depots store the bottles for you." And I think that's really it, and so we are conscious that it's a really busy time of the year but I think that if they're not willing to take responsibility for the product then I don't think they should have a stewardship plan and I think they should either retire their stewardship plan or the Ministry should put a pause on their stewardship plan until a point that they actually demonstrate that they have the ability to run their program in a reasonable manner and not rely on other parts of the supply chain to basically do the work for them and store these containers for them because they don't have the ability to pick them up. And I think its important to note that part of the challenge is because they use their own trucks in many cases, the focus of those trucks is delivering full goods, and then picking up containers from LDB retail locations. I don't think its any surprise that depots have often come at the back of the line when it came time to picking up bottles, but its just no longer acceptable. Were going to ask BDL to take action and if they won't then we're going to ask the Ministry of Environment to take action.</p>	Consultation Session 7: Webinar with Depots– August 20th, 2020

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>I just want to say something about the beer pricing. I've been running recycling depots in Vancouver for 30 years and honestly speaking, BDL has been the biggest enemy in any of mine because I've been trying to speak to them all the time to gain their license, but it's impossible to talk to them. Even if I talk to them it's impossible to gain them. If it's not in the right region where there is a benefit group, if there's a company who picks up beer containers near your depot, you don't get the license. Out of my 4 bottle depots, only the 1 that received the license is not having those pickup companies around them. They gained the license a few years ago but otherwise it's impossible to get the beer license. It was the biggest headache when I was running the recycling depots – the beer pricing. At one of the depots we had to give full refunds because there's a depot nearby who picks up the containers and they give full refunds. Without giving full refunds, we were losing money because they take their beer cans to the other depot. This is the result of the problems.</p>	<p>Min Kim <i>(Vancouver Central Bottle Depot)</i></p>	<p>I really appreciate that and I think you raised a great point. The way the system was created wasn't equitable and for whatever reason the Ministry approved that system and the fact that it had a hybrid cover rate it seemed like everything was fine, but at the end of the day it's obvious I think to everyone now – and I think the pilot has really demonstrated that – is that there are vast inequities in the system that were the result of Ministry approval of that plan. I think that we need to find a way to go beyond that. Again, it's not up to the customer to try and figure out which depots can and can't give them a full deposit refund. The truth is that they should be able to get a full deposit refund at any depot they go to, and if the Ministry isn't prepared to support that then I think it raises larger challenges or issues of how you maintain this province-wide network. Anyways, I think that that will be for the Ministry to decide when they decide on the approval of the plan, but I think that the situation you raised about urban depots and losing money on these containers just so you can keep your customers happy is a situation that we don't want to find any of the depots in.</p>	<p>Consultation Session 7: Webinar with Depots– August 20th, 2020</p>
<p>I did also want to mention, because there's a lot of depots on this call, that if folks are having problem with one stewardship agency collecting the materials, and what I'm hearing is beer bottles by BRCCC, I would definitely encourage folks to speak with that agency directly. If that agency isn't satisfying what you need, and this call is the first I've heard of that issue, then certainly talk to the steward for which you have a contract for those materials</p>	<p>Teresa Conner <i>(BC Government)</i></p>	<p>Thanks, Teresa.</p>	<p>Consultation Session 7: Webinar with Depots– August 20th, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
to rectify the situation, and if that's not being resolved then I do think that's good feedback to send back to the Ministry so that we are aware of that as well.			
Why do beer and pop cans need to be sorted separately? Aluminum cans are all aluminum, right?	Larry Key	Customers who return their empty beverage containers for a cash refund using the traditional over the counter service are asked to separate their alcohol cans such as beer from non-alcohol aluminum cans as in BC as these materials are managed by two different stewardship agencies. Beverage containers registered within our recycling system include soft drinks, juice, water, wine, coolers, spirits whereas beer and other aluminum alcohol cans are the responsibility of Brewers Distributor recycling system. On July 6, 2020, we announced a six-month <u>pilot program</u> at select Return-It depots that will enable consumers to return both alcohol and non-alcohol aluminum beverage containers together for recycling without sorting. The locations participating in this pilot can be found at <a href="https://www.return-it.ca/beverage/faqs/nosortingcans/">https://www.return-it.ca/beverage/faqs/nosortingcans/</a>	Written Feedback
<p>To defeat the beer company, I suggest....to involved in the police intentionally.</p> <p>Current both depot introduce to customers as below.</p> <p># Complain</p> <ul style="list-style-type: none"> <li>- 1st : Beer Manager</li> <li>- 2nd : Local Police Station(RCMP)</li> </ul> <p>At both depot, some customers(knowledge) visit the RCMP and report the beer company &amp; liquor to police, together.</p> <p>I hope that the police investigate the beer company and liquor store, together.</p>	Ju Sin (Ashcroft & Logan Lake Depot)	Thank you for your comment.	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>I am the Operations Manager of Kensington Return It; we have been in business since 1998. In these years, we have never been offered a Brewers Distribution Licence (BDL) but chose to be a part of the Return It aluminum can pilot program. Previous to this, we still accepted beer cans but we were not able to offer full deposit.</p> <p>We are located next door to a provincial government liquor store in a very busy shopping plaza in North Burnaby. As the liquor store only accepts 24 containers per customer per day, this causes a lot of frustration and confusion to the consumers. They do not understand the difference in returning containers to the liquor store vs a bottle depot; and also why a bottle depot gives less than the full deposit value. By not having a BDL contract, we had experienced a lot of complaints and at times aggressive behavior by the consumers. It affects not only the safety of our employees and other customers, but also our image and business at no fault of our own.</p>	<p>Aly Mitha (Kensington Return-It)</p>	<p>Thank you for your comments regarding the BDL contract.</p>	<p>Written Feedback</p>
<p>9. Regarding Encorp's plan to add beer cans to the Encorp-operated deposit return system:</p> <ul style="list-style-type: none"> <li>The Depots acknowledge that enabling all depots across BC to collect beer cans and provide a full return to customers is in the best interest of customers as it will end the need for discounting and ensure producers, not consumers, are paying the full costs of</li> </ul>	<p>Jay Aarsen (BC Bottle and Recycling Depot Association)</p>	<p>Thank you for your support of the plan. The discounting of a customer's deposit refund for aluminum alcohol containers at Return-It depots without a BRCCC/BDL license has led to customer dissatisfaction and confusion with the Return-It Recycling System, which has an impact on our system and if left unchecked could have a material impact on diverting material from our landfills, oceans and waterways. Our aluminum can pilot has simplified the system and helped support British Columbians in conveniently recycling their beverage containers as one stream with one deposit.</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>EPR. This action will also level the playing field between Depots. Depots support Encorp's plan to exclude refillable beer bottles from its proposed changes to the system, as these containers are managed through the highly effective and efficient BDL system.</p> <p><i>(Note: For supporting points submitted relating to this recommendation, please see the full letter submitted in Appendix V. Written Feedback of this report.)</i></p>			
<p>In light of new information I would like to retract the feedback I provided yesterday for the consultation of the Return-it Beverage Plan 2020. Specifically those made about the proposition to include aluminium beer containers.</p> <p>The disparity between the two stewardship schemes in terms of payment of each aluminium can paid to the depots does raise questions as to the effectiveness of the services. Especially comparing the motives of a private joint venture company in BDL and that of Non-Profit organisation in Encorp.</p> <p>I would strongly urge Encorp to provide a stronger case to the Ministry of Environment in terms of the long standing discounting, the efforts made to engage BDL to find better agreements for the payment of aluminium cans, and the lack of response from BDL to work together especially since the COVID outbreak and since the comments by Encorp</p>	<p>Jamie Benton <i>(Fraser Valley Regional District)</i></p>	<p>Thank you for your support – we will continue to advocate with the Ministry of Environment to address the discounting of aluminum beer containers and the impact this had had on the customer and small depot businesses in BC.</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
received by BRCCC during their consultation last year. This would provide an opportunity to give further evidence of the issues and number or complaints that have occurred at bottle depot locations.			
Beer container refunds: We support the principle of refunding the full amount of the deposit on all beverage containers, including beer aluminum cans and beer containers, and ending the practice of discounting. This is now required in the Recycling Regulation since the June 29, 2020 amendment.	Monica Kosmak (City of Vancouver)	Thank you for your comment.	Written Feedback
<p><u>Beer beverage container recycling</u></p> <p>One of the most time-consuming tasks when bringing cans into the Return-It depot is the need to physically sort the aluminum beer cans from the other non-beer cans. This task, in usually busy Return-it centres, is sufficient to turn consumers away from recycling altogether. With the new COVID reality of physically distancing, this makes it even more challenging to sort the beer cans from the other cans in a centre. With COVID with us for many months, potentially years, to come, and now that all cans have the same 10c deposit, there should be no need to spend time sorting cans within a centre.</p> <p>Furthermore, there is much confusion at the consumer level with regard to the amount of deposit that is actually returned when recycling beer bottles. Some Return-It centres appear to offer full beer bottle deposit refunds, while others do not. This double-standard leads to</p>	Mark McLaughlin (Simon Fraser University)	Thank you for your support.	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>consumer confusion, inefficiencies, and instills a sense of consumer mistrust tainting the entire BC recycling system. BC government authorities need to step in to streamline beer bottle recycling through the popular Return-It Centres in the province and to provide a system whereby all consumers can receive back the full beer bottle deposit that they have paid.</p>			
<p>Expanding the inclusion of beer containers at depots</p> <p>With only select depots providing full refunds on beer containers, binners often avoid depots that reduce refunds. Expanding full refunds on beer containers to more depots while making it easier for customers to sort their containers will allow binners to use more depots, which may be more convenient for them, and make their trip to the depot more efficient.</p>	<p>Brianne De Man (<i>Binners' Project</i>)</p>	<p>Thank you for your support.</p>	<p>Written Feedback</p>
<p>I have experienced BDL, Encorp, ProductCare, Recycle BC, and etc. In my opinion, BDL just feels like an enemy to all the bottle depots in Vancouver except the ones in their group. Watching it over 30 years, it is very obvious that BDL just runs for the profits of a group which includes BDL, beer container pick up companies, and bottle depots with BDL licenses. BDL is making an unfairness in the beverage container recycling industry in BC.</p> <p>If a bottle depot without a BDL license gives full refund on domestic beer containers, that depot would lose money. Vancouver west bottle depot is giving out full refund, otherwise</p>	<p>Min Kim (<i>Vancouver Central &amp; Vancouver West Bottle Depot</i>)</p>	<p>Thank you for your comments regarding the BDL contract.</p> <p><i>The following relevant response was provided to a similar comment during Consultation Session 7:</i></p> <p>The way the system was created wasn't equitable and for whatever reason the Ministry approved that system and the fact that it had a hybrid cover rate it seemed like everything was fine, but at the end of the day it's obvious I think to everyone now – and I think the pilot has really demonstrated that – is that there are vast inequities in the system that were the result of Ministry approval of that plan. I think that we need to find a way to go beyond that. Again, it's not up to the customer to try and figure out which depots can and can't give them a full deposit refund. The truth is that they should be able to get a full deposit refund at any depot they go to, and if the Ministry isn't</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>Vancouver west bottle depot could not become competitive in that region because there is a bottle depot very nearby, which is operated by beer container pickup company, giving full deposit back for domestic beer containers. They are located within 5-10 minutes from Vancouver West Bottle Depot.</p> <p>A few years ago, BDL gave out a few BDL licenses to bottle depots. What they did seemed very simple, if there is any depot near beer container pick up companies, they will never receive a BDL license because most of the beer container pickup companies run bottle depots themselves. They don't want to lose any volume of domestic beer containers by giving license to a nearby depots. There is quiet a few beer container pick-up companies in Vancouver.</p>		<p>prepared to support that then I think it raises larger challenges or issues of how you maintain this province-wide network. Anyways, I think that that will be for the Ministry to decide when they decide on the approval of the plan, but I think that the situation you raised about urban depots and losing money on these containers just so you can keep your customers happy is a situation that we don't want to find any of the depots in.</p>	
<p>Aluminum Beer Containers</p> <p>The approach suggested in the Stewardship Plan to provide a single collection network for all aluminum containers (alcohol and non-alcohol) may improve consumer convenience through integrating collection programs. Further details regarding this approach, related to topics such as financial transparency, impacts to return-to-retail collection and data monitoring and reporting, would be helpful for stakeholders to understand the potential implications of this approach.</p>	<p>Paul Henderson (Metro Vancouver)</p>	<p>Thank you for your comments.</p>	<p>Written Feedback</p>
<p><b>3.1.1 Appreciation for Pilot Program</b></p>			

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>Apart from the obvious benefits of the pilot program (i.e. a huge convenience), the entire community (grocery store, liquor store, pub) are all so happy with the program, but in terms of environmental impact I can't even put a number on how many families were driving trucks of beer cans to Prince George – that's roughly two hours away – to get the full deposit back, but now, with the pilot program, the volume at my depot in my small town has increased tremendously, but those people, more importantly, no longer have to spend the fuel, time, and money to get their deposit back so they are coming to our depot which is a huge thing for our small community. People don't have to travel now and a lot of lower-income families who are in the forest industry depend on that recycling income, so that's great for them. Another thing is that when people do go outside of the community, for example our depot supports a local foodbank, local sports team, so with the extra volume we're getting better able to support our local charities, so when people had to travel we weren't able to support our local charities as much either so this has just changed everything. There is so many benefits apart from the obvious that have made us able to seek out a better living. I strongly urge the ministry to keep this program, it is just better for everyone involved and I can't see how we could ever go back on this. It has been an instant, tremendous success and improvement to the recycling industry.</p>	<p>Chris Beach <i>(Burns Lake Recycling Depot)</i></p>	<p>I really appreciate those comments, Chris. I've heard from other communities around Armstrong, Clinton, Lillooet where people had to drive 45 mins – 1 hour because the only depot that accepts their beer cans was in Ashcroft at the time which was also having its deposits discounted. So I think that's a really untold story – the impact of this equitable system has really had a regional benefit to it and has really impacted a lot of our smaller, rural depots. I really appreciate this feedback.</p>	<p>Consultation Session 6: Webinar with Depots – August 19th, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>With regards to the pilot, our staff and customers all like the mixed beer containers. It is easier in many ways. Customers are thrilled and staff all enjoy not telling customers to separate containers anymore.</p>	<p>Vince Spronken (Island Return-It)</p>	<p>Appreciate that feedback, Vince.</p>	<p>Consultation Session 6: Webinar with Depots – August 19th, 2020</p>
<p>We have been serving East Vancouver for over 20 years now, and the fact that we were running the beer can program has been a dramatic help for the community. In East Vancouver there is a lot of low-income families and a lot of homeless people who really need this source of income for surviving. I just want to say that the introduction of this pilot program has made all of my community happy. They have been eager to help and wanted to write a letter to you guys about how we can help them out. On top of that, my employees have been happier than ever because they don't have to separate all the beer cans from the pop cans with the customer and they think it's a lot more easier and they offer to help people. I just want to say that you guys have been awesome and if there's anything we can do to support you guys please let us know.</p>	<p>Andrew Lee (Mount Pleasant Return-It)</p>	<p>I appreciate that feedback, and I appreciate that for communities such as the one that you operate in, this has been a huge benefit. In terms of support, the next stage is having feedback forms with signatures from your customers. We are in the process of developing a standard form that we will provide to you. If your customers would like to see this made permanent, have them sign the form, which we will provide and those will also be included in the consultation summary as another example as to why we think the government needs to take affirmative action and approve a plan where all aluminum containers can be managed in the same system.</p>	<p>Consultation Session 6: Webinar with Depots – August 19th, 2020</p>
<p>One thing I wanted to say – you talked about the inequity of the system, and while we built up a really good local reputation, there was always a level of mistrust with our customers that just assumed we were taking an extra cut on beer bottles – they couldn't understand how they just couldn't get the full price even if you explained it to them. They also couldn't understand how Alberta fixed this problem</p>	<p>Chris Beach (Burns Lake Recycling Depot)</p>	<p>I appreciate that Chris – you're not the first person to tell me that they thought it would never happen. I think, in part, people were so numb to the fact that this was never going to change but we weren't prepared to accept it. Although there's lots of reasons as to why it couldn't, it just seemed on the face of it as such an easy problem to solve. Again I just think, the government has often come to us about the need to increase access for rural residents, and I think some of your comments, and for the folks in Barriere and other places, that part of it is having an equitable system – we can't just continue to push rope and push this province-wide system without</p>	<p>Consultation Session 6: Webinar with Depots – August 19th, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>decades ago, and they couldn't understand how BC hasn't, and that caused a lot of stress. In my every workday people would think we were cheating them and I'm sure in a lot of other depots as well. So just fixing that has done a lot of great things to improve community relations, etc. and especially at a time like this with COVID – consumption is up, people are experiencing economic difficulties, and with the increase in prices of pop and water and beer, a lot of people are recycling and depending on this extra income to do little extra things that they otherwise wouldn't. So the timing is so good and this is a great example of Encorp and the Ministry getting things right and moving forward in the right direction and making people's lives easier. I just think the timing couldn't be better like right now with all the uncertainty in the world, so I really appreciate the movement on this and I have to admit that I never thought this would happen so this is such a big improvement so I want to encourage you to keep going with the sorts and everything. I just think it's a big win for the BC Government as well to just do the right thing.</p>		<p>giving the communities, where we've established operations, the right tools and the access to enough containers to make this a sustainable operation. So it really heartens me to hear that containers used to make their way 2.5 hours to Prince George are now being collected in the community and the money from these containers is staying in the community, and that's honestly what should happen and what the government wants to happen. So I think this is just more tangible evidence to them that the approach we're proposing is the right approach and the one that needs to be approved.</p>	
<p>Allen we want to thank you for supporting us and echo Chris' statement that client relations have improved dramatically. We love the pilot program and more importantly our customers do too. Our wish is that the pilot program be implemented as a permanent change and we will contact our local government</p>	<p>Miae Lee (<i>Barriere Return-It</i>)</p>	<p>Thanks – appreciate that.</p>	<p>Consultation Session 6: Webinar with Depots – August 19th, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
representatives to further improve our province's sustainability practices.			
For pilot system, going back to old system, it will be a huge negative impact on operators and consumers considering all the costs goes up. So government has to consider seriously. So hope this pilot goes as it is now	Soo jin (Theresa) Lee (Blundell Return-It)	Yeah and we appreciate that and I think there is some urgency to this. I think we created the 6 month pilot to get this up and running to demonstrate in a tangible way that this, in the way we are conducting this, would help improve the lives of not just consumers but operators as well, and make for a more equitable system in a tangible way. But it is clear that it is having such a dramatic impact that there really can't be a lot of excess time for deliberation. Our objective is to have this Stewardship Plan submitted by the middle of October and hopefully give the Ministry enough time that we can reach a positive solution and get approval of our plan before the end of the year and before the expiry of our pilot. I should also let you know that as a next step, we are going to be issuing a new amended agreement to provide depots with information of, if the plan is approved, what the handling fee would look like for aluminum containers post Dec. 31. You should be receiving information on that and an updated amended agreement. It won't supersede the one you have already signed for the pilot, but more importantly, it will have a start date of January 1 <sup>st</sup> 2021, and outline the payment plans post-pilot and I hope that all of you will receive this positively.	Consultation Session 6: Webinar with Depots – August 19th, 2020
Wanted to share some feedback from Barriere bottle depot. Since the pilot program has been implemented, we have gotten consistently great feedback. It is so much easier, and the overall customer experience is greater. We really like it.	Miae Lee (Barriere Return-It)	N/A	Consultation Session 6: Webinar with Depots – August 19th, 2020
I think it's a wonderful thing that we can take all of our empties to the Country Store. So much easier to be able to take everything to one place..anywhere else in town you can only take 2 flats a day per person which makes it hard don't always have the time to do that	Marina Hatton	Thank you for your support.	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>Thank you</p> <p>Really hoping this will stay</p>			
<p>This may be in the presentation, but I understand that the beer/pop cans is a pilot program through the end of the year. What is likelihood this will continue after January, 2021?</p>	<p>Mike Nestor <i>(Denman Island Residents Association – Waste Management)</i></p>	<p>I don't know if I can give you an estimate of the likelihood – I'll give you my expectation. My expectation is that beer and pop cans will be integrated within our program at the beginning of next year. Ultimately that decision is the Ministry of Environment's to make, but from our perspective we see no reason why we would go back to discounting– why we would go back to a system that clearly is not working. Especially given the significant positive feedback we have received from consumers and operators. It is clear that the system, as it is currently assigned in the other stewardship plan, is meant to create inequities and I don't think we can continue to operate these province-wide systems and have these inequities. Not only continue, but in some ways become even more perverse. We think we need a system that promotes equity across the network, so it is our expectation that those containers will be in our system by the beginning of next year.</p>	<p>Consultation Session 7: Webinar with Depots – August 20th, 2020</p>
<p>Our depot just started the new por system and we love it. Now that all the aluminum can go together I think it's a wonderful idea customers are going to love it makes our job and my staff much more easier to do It cuts back on a lot of sorting which my staff had to do and it was time consuming .The c bags are great to use, before my staff would get busy and push aside all the beer and pop cans and sort them all when they can now they enter the amount and they dump everything into the c-bags right away.</p> <p>We all needed this program years ago lol lol lol Encorp and the stewardship plan are doing a great job keep up the good work in helping us Depots out is a great thing thank you.</p>	<p>Roxanne Kilback <i>(Scotch Creek Bottle Depot)</i></p>	<p>Thank you for your support.</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>We are writing you regarding the Aluminum can pilot project we have had the pleasure of participating in.</p> <p>Our customers have been begging for an increase to their beer can refunds at our depot for years. We had just recently increased our refund from .05 to .08 in an effort to ease some of the upset our customers have been feeling, as during Covid 19 their options for a full refund had disappeared in our small town as return locations stopped accepting empties during the pandemic.</p> <p>Recycling is not everyone's favourite job at the best of times, so we at Gold Trail Recycling take great pride in offering our customers a very clean and inviting area to sort and return their empties. The increase in refund paid for beer cans has changed the dynamic in our depot.</p> <p>We have had to defend our beer pricing on a daily basis to customers who were very unhappy to find out our price for beer was different than what they had paid , I have personally had customers yell at me: you are f@#*&amp;\$g ripping people off!! Now we see everyone smile when they realize or hear they are now getting a full refund for beer. And you should see them light up when we tell them they can put "all" of their aluminum in ONE tray, instead of sorting pop cans from beer.</p> <p>We have gained new customers at our depot as a direct result of the change, and we feel this will have an even further reaching result</p>	<p>Leslie and Mike Glen and staff <i>(Gold Trail Recycling Ltd.)</i></p>	<p>Thank you for your support.</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>for us as we are a full service depot, accepting much more than just bottles and cans. When we gain a new customer, we gain the opportunity to help educate them on more recycling options.</p> <p>The positive benefits of this pilot project for us have been numerous. It saves our customers, frustration, and time at our depot. It has streamlined our processing of aluminum for shipping, as well as brought us customers we may never have had the opportunity to serve before.</p> <p>We feel that these changes need to become permanent. After having the chance to give our customers a better return for their beer cans as well as the convenience of calling a can a can, it would be very difficult to take that back.</p> <p>To try to revert to a system that our customers were unhappy with would cause major upheaval and uproar.</p> <p>We appreciate the opportunity to participate in and communicate our thoughts on this project.</p>			
<p>“ That makes sense!”</p> <p>This is a response I get from most of my customers after I inform them ‘no sorting’ on pop and beer cans.</p> <p>When you think about it, we have been forcing this nonsense to British Columbians for more then two decades now.</p>	<p>Kim Young (Moe’s Bottle Depot)</p>	<p>Thank you for your support.</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>As a depot operator since 1997 in my fast growing city, I would like to write in support of Encorp's pilot program.</p> <p>Just the other day a gentleman mentioned how great it is to not have to sort and receive full refunds at depot.</p> <p>Before many had to drive out of their way to receive full refunds not to mention the time wasted on sorting cans.</p> <p>Let me tell you, We are all in favor of this system over the old one.</p> <p>For myself the hardest part of operating a small bottle depot have been over discounting refunds to customers.</p> <p>By merging two stewardships to one system, I will no longer have that issues.</p> <p>Times are changing, we can not hold on to 30 year old system just because!</p> <p>All the social networks with media coverages, people are starting to ask democracy behind it all.</p> <p>We all know the main purpose of stewardship is to increase recovery rate to sustain our resources.</p> <p>When there's organization who's willing to take on this difficult task, we all need to support.</p> <p>At last we are heading to the right direction by making it simple, easy and convenient for all British Columbians.</p> <p>Thank you for your time reading my opinion.</p>			

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>First of all, I would like to thank you for the changes made by the Aluminum Can Pilot Program. Since the program was implemented, we have noticed that it made the running of our business more efficient. Not only does it save time for our customers, not having to separate the pop cans from the beer cans, it has also made processing these products faster. We no longer have to sort between an alcoholic beverage from the non-alcohol beverage.</p> <p>Since the beer cans, pop cans, and plastic containers are our top three collected products, we have found that merging the cans allowed us to close more bags per day, boosting our volume.</p> <p>More importantly, it has been a welcome space saving solution. Merging the two containers into one has given us more working space. We no longer have two separate storage areas. Instead, we are able to compact our storage into one clear, concise, and efficient working environment.</p> <p>We appreciate your efforts in creating positive, constructive alterations that benefit the recycling program and we sincerely hope that we are able to keep these revisions and look forward to future ones.</p>	<p>Jerry Orense (<i>Bridgeview Bottle Depot</i>)</p>	<p>Thank you for your support.</p>	<p>Written Feedback</p>
<p>I am writing in response to the new pilot program for aluminum with return it.</p> <p>So far this change has made the work flow process with cans a breeze as well as making</p>	<p>Tasha Bilinsky (<i>Salmo Valumart &amp; Bottle Depot</i>)</p>	<p>Thank you for your support.</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>our customers all happy with their pay outs as they are now getting the full refund.</p> <p>I hope this change is made permanent as it has made every part of working in the depot with my staff and customers much more efficient and also less stressful on busy days.</p>			
<p>The most difficult issue in Return-It recycling operating has been resolved, and we are ecstatic. Our customers are beyond pleased, and as a result our customer relations have improved dramatically.</p> <p>Our wish is that the pilot program will be implemented as a permanent change.</p>	<p><i>(Sorrento Bottle Depot &amp; North Shuswap Bottle Depot)</i></p>	<p>Thank you for your support.</p>	<p>Written Feedback</p>
<p>I am sending this email to ask that the 6 month trials of returning all beverage containers to one return it center be made permanent. It has encouraged more people to recycle as it is convenient. I watch our landfill fill up here in Lillooet and the more we can encourage people to recycle the better.</p>	<p>Holly Polischuk</p>	<p>Thank you for your support.</p>	<p>Written Feedback</p>
<p>Our customers are thrilled to receive full refund on beer and be able to return all items at one location !</p> <p>Our staff is happy because we are not faced with customers daily saying that we are ripping them off by not paying full refund on beer .</p> <p>As a family depot owner for 25 years we are very happy to see an increase in units that we are accepting. Thank you 😊</p>	<p>Leslie Glen (Gold Trail Recycling Ltd.)</p>	<p>Thank you for your support.</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>We are collecting signatures daily of customers that want to see this continue permanently .</p>			
<p>I am writing you a mail in regards of the feedback that our depot have came up with.</p> <p>As you may have known, we have given out 8 cents for beer cans for years and numerous customers have left the depot with Discomfort and frustrations.</p> <p>We lost so many customers due to this issue.</p> <p>Our primary goal is to make the customer 100% satisfied and we were not able to fulfill that for such a long time. We are so grateful that the pilot program launched and we signed without any doubt.</p> <p>It has been just over a month now and the results has been amazing. We have dramatically reduced customer's dissatisfaction rate. The word of mouth has been reached and we are seeing new customers, formerly going to different depot for more deposit.</p> <p>Our workers and including myself are overly satisfied with the amount of work being saved. The time and energy to separate beer and pop has been completely eliminated.</p> <p>We would like to say a big 'Thank You' for not only making our work easier but more importantly allowing us to fulfill our customers needs.</p>	<p>Sophia Jeong (Agassiz Bottle Depot)</p>	<p>Thank you for your support.</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>Hope this feedback helps in continuing this amazing pilot program.</p> <p>Thank you for reading this long email and hope you have a wonderful day!</p>			
<p>Now during the pilot, we have noticed a significant change in our customers' behavior. They are very happy to receive the full deposit they have paid and feel that it is fair, just and convenient. We as a depot, also feel safer and that it is fair and just. An aluminum can is an aluminum can and it should not have to be discounted because the depot does not have a BDL licence.</p> <p>We request to make this change permanent by the government approving the inclusion of alcohol aluminum containers in Encorp's stewardship plan.</p>	<p>Aly Mitha (Kensington Return-It)</p>	<p>Thank you for your support.</p>	<p>Written Feedback</p>
<p>With the inclusion of alcoholic/beer cans we feel it is on the right path to fulfill customer needs and wants for a return system that supports full deposits across the province and eliminating the long time problem of Return It depot discounting. The mixing of all cans into one stream will create efficiencies for all of our customers and our staff are excited about the possibilities and positive outcomes. Discounting creates customer mistrust and the potential for aggressive behaviour toward depot staff by unhappy customers expecting to receive their full deposits. After all, consumer ease and satisfaction is at the forefront of recycling.</p>	<p>Vince Spronken (Island Return It)</p>	<p>Thank you for your support.</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>We have two of our five depots currently signed up for the pilot program to mix beer and pop cans and the customer feedback is overwhelmingly positive. Many customers are very happy and surprised that they do not need to spend the extra time and effort to separate the two, after all a can is a can.</p>			
<b>3.2 Milk and Milk Substitute Containers</b>			
<p>Slide 11 - Will Milk and Milk substitutes be covered under Return-In and Recycle BC depots, how will that work?</p>	<p>Meghan Ebueza (Regional District of Nanaimo)</p>	<p>The plan right now is to include milk and milk substitute products, so it would go to depots for sure, and they would be collected much like they would every other product. There would be a deposit on milk containers and milk substitutes starting February 1<sup>st</sup> 2022 and those would come back to our depots and consumers would be eligible to get their deposit. It would essentially be included and managed in the system much like all other beverage containers are managed today.</p>	<p>Consultation Session 1: Webinar with the General Public – July 16, 2020</p>
<p>Will consumers still be able to put milk/milk substitute containers in with their curbside recycling (funded by Recycle BC) if they do not want to or are unable to get to a depot?</p>	<p>Jon Mills (City of Salmon Arm)</p>	<p>Yes, we haven't formally addressed this with Recycle BC yet, but our expectation is that those containers would fall under the current arrangement we have (which is really a tri-party arrangement) with them and their processor GFL. Right now, all containers that end up in the Recycle BC system, curbside or multi-family, are accounted for. We pay deposits to Recycle BC for those containers. It is our intent to include milk and milk substitute containers in that arrangement. Any milk container or milk substitute container that was collected and included in the blue box or multi-family recycling system would be accounted for and deposits for those materials would be paid to Recycle BC.</p>	<p>Consultation Session 1: Webinar with the General Public – July 16, 2020</p>
<p>Good morning, by adding milk and milk substitutes, will milkettes and creamers that are sold in a bag of i.e. 160 small containers-</p>	<p>Cristina Arabagi (Aquaterra Corporation)</p>	<p>The regulation is specific to 'ready to drink' sealed beverages. The intention is that the beverage would be consumed on its own. My belief is that these items will not be a part of the program, but we can double check to confirm</p>	<p>Consultation Session 1: Webinar with the General Public – July 16, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
will these become subject to beverage container program in year 2022? Thank you!		that for you. At this point, the regulation covers a ‘ready to drink’ beverage that is in a sealed container.  <i>Clarifying Note: The recycling regulation stipulates “ready to drink” milkettes and creamers are not considered “ready to drink” beverages and, therefore, are not captured under the Beverage Container schedule of the regulation but under the PPP schedule 5.</i>	
Has there been any consultation within government (in particular between the Ministry of the Environment and the BCCDC or WorkSafe) on the health and food safety implications of bringing milk into the retail to retail regime?	Julie Dickson (Save On Foods)	Not that we’re aware of, but we can certainly include that question in our summary and maybe get the Ministry of Environment to provide a response, hat we can include in our consultation summary.  But at this point, we’re not aware of any consultation they’ve had with BCCDC.	Consultation Session 2: Webinar with Retailers – July 23, 2020
Do dairy containers include yogurt tubs, ice cream buckets, yogurt drink bottles, tetra packs, etc.?	Shabbir Beawerwala (Loblaws Inc.)	It would be anything that is fluid. Milk, milk substitutes. I believe that yogurt drink bottles would fall under that, but we could confirm that.  Certainly anything like yogurt tubs, ice cream buckets, those items would not; it would have to be a dairy beverage.  Other milk products would not be included, cheese, yogurt, ice cream, etc., those would not be included in the program.	Consultation Session 2: Webinar with Retailers – July 23, 2020
When milk and milk substitute collection starts in February, 2022, will there be a deposit charged on these containers or are we just collecting the containers (like we used to years ago?)	Mike Nestor (Denman Island Residents Association – Waste Management)	In terms of milk and milk substitute collection, in 2022 they will be in the deposit program, so there will be a deposit charged on those containers and they will be managed like all our other containers in the system.	Consultation Session 7: Webinar with Depots– August 20th, 2020
Why are plastics containers ( milk cartons) not being recycled, but instead are tossed into the garbage!  As I discovered moving back to B.C. I found in general, many systems are unnecessarily	Larry Key	Milk and milk substitute containers are currently not covered by the Return-It system and do not have a deposit fee. Milk containers are specifically excluded from the deposit refund system by the <a href="#">Recycling Regulation</a> . In those areas which have curbside recycling collection, you may place all milk containers (both plastic jugs and cartons) in your blue box, blue bin or bag for pickup.	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>convoluted, and time consuming, returning empties is a good example.</p> <p>B.C. used to be ahead of Alberta in many processes but upon my return to B.C. I find B.C. has made many things much more difficult.</p>		<p>With that said, as a result of the government's <a href="#">CleanBC Plastics Action Plan</a>, milk and milk substitute containers will be included in the BC deposit refund system starting in 2022.</p>	
<p>8. Regarding Encorp's plan to add milk containers to the Encorp-operated deposit return system:</p> <ul style="list-style-type: none"> <li>The Depots fully support Encorp's plans to bring milk fully into the deposit return system.</li> </ul> <p>The Depots request that Encorp work with Depots as partners to establish an effective implementation plan, including helping customers identify which containers carry a deposit (those purchased post-implementation).</p>	<p>Jay Aarsen (BC Bottle and Recycling Depot Association)</p>	<p>If approved, Encorp's Stewardship Plan will include milk and milk substitute containers when they are scheduled to be added to the deposit system in 2022 under Schedule 1 (Beverage Containers). Encorp will engage with all stakeholders, including depots, in the implementation.</p>	<p>Written Feedback</p>
<p>Overall the FVRD is supportive of the changes to the Beverage Plan and glad that milk products will now be included under encorp.</p>	<p>Jamie Benton (Fraser Valley Regional District)</p>	<p>Thank you for your support.</p>	<p>Written Feedback</p>
<p>Expanding the deposit-refund system to include milk containers</p> <p>Expanding the deposit-refund system to include milk product containers, as is done in many other provinces, will allow binners to further their impact in recovering recyclable materials. Since its inception, members of</p>	<p>Brianne De Man (Binnars' Project)</p>	<p>Milk container are scheduled to be included into the deposit system in 2022.</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
Binnners' Project have been supportive of expanding the refund system to include milk product containers as this would increase their earnings as well. We are pleased to see this policy enacted.			
<b>3.3 Ancillary Packaging</b>			
You mentioned that you will start accepting ancillary packaging as part of the new Stewardship Plan. Does this mean that ancillary packaging associated with beverage containers was never covered under any PPP stewardship plans previously, and why?	Brienne De Man ( <i>Binnners' Project</i> )	It is covered under the Recycle BC plan, and so depots of ours with a Recycle BC contract are collecting that material and are able to have that material shipped to Recycle BC. The challenge is that the majority – almost 60% of depots – do not have a relationship with ReycleBC, and we know some of this material still comes to them, particularly the cardboard boxes for aluminum containers. From our perspective, we don't feel it's fair to have depots manage that material. We have included it in our Stewardship Plan so that we can begin constructing a system to make sure that this material, obligated material under Schedule 5, is being accounted for, that our depots do not have to pay money to either recycle it or landfill it, and that we can give credits back to our brand owners. Our intention is that we recycle this material, and then give credits back to brand owners at their request and that they can use in meeting their Schedule 5 obligations. Given it is an obligated material, we need to close this gap and ensure our depots don't bear the burden of paying for a material that is already included under the Recycling Regulation. There is a current plan, but unfortunately there are some gaps, and it's not comprehensive enough. While we totally understand the rationale for Recycle BC wanting only a set number of depots, we do want to make sure that our depots have some way in ensuring this material is collected, and they are being paid some money for this collection, and they are not having to pay for the costs to manage it themselves.	Consultation Session 1: Webinar with the General Public – July 16, 2020
With regards to the ancillary packaging addition to the plan. Will the Return-It program include recyclable items that Recycle BC does not collect? I'm thinking specifically of the 6	Andrea Patrao ( <i>Sunshine Coast Regional District</i> )	If BC liquor stores take them, I don't know what they do with them. So that is a challenge, the six pack rings. So let me take that away.  It isn't something we consider because it isn't recyclable. So, if we're going to do anything with the six pack rings, we would actually need to get some	Consultation Session 3: Webinar with the BC Product Stewardship Council – July 28, 2020

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
pack plastic rings which I think BC liquor stores take.		<p>engagement from producers, not just on the non-alcohol side but actually the alcohol side as well.</p> <p>So, all companies currently use what are called “hi-cone rings.” And I think most people on this call know those hi-cone rings have a photo-degradable additive that was put in there originally to protect animals. I think all of us—at least all of those who are old enough, so this might not apply to everyone—may remember issues of ducks being trapped in these six pack rings. So, given the concerns around that, they completely changed the system to include these photo-degradable additives. Of course, the challenge now is it's exactly what we don't want because you can't recycle that material. And of course, photo-degradable additives meaning that the plastic doesn't break down entirely. It just breaks down into smaller pieces, which is particularly the kind of thing we're trying to avoid, particularly in in marine environments, but irrespective actually in all natural environments. It's definitely an issue we have to address. I would note, though, that more and more companies are going to cartons for the cans, so there's certainly less plastic rings being used. But that doesn't diminish the issue, that it's still a material that can't be recycled and something that needs to be addressed in the future.</p>	
Are 6 pack rings included in the Ancillary packaging?	Tai Uhlmann ( <i>Let's Talk Trash</i> )	<p>Yes. And not surprisingly, it has been an issue with a few stakeholders in Powell River.</p> <p>It wasn't on our original list. It wasn't on our list of what to consider, but let me take that away.</p> <p>And I'd have to engage with some of our producers. The challenge for us will be: we want to focus on materials where we have recycling markets where our depots are having to manage material that could be recycled, and it may be ending up in the garbage or they may be paying the cost of managing that.</p> <p>For plastic rings right now there is no market. Even Recycle BC I don't think can include it in its Other Flexible Packaging stream. So that doesn't mean it shouldn't be addressed. But I need to have some more dialogue with some of our producer members to see what type of commitment there is to addressing it. And, again, as I noted before, it would be easier if we had all</p>	Consultation Session 3: Webinar with the BC Product Stewardship Council – July 28, 2020

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		the producers, including the alcohol producers, because that's certainly an issue that everyone, whether they're alcohol and non-alcohol, are using the same ring from the same producer of the rings. So if we're going to make a change, it needs to be across all containers, whether they're alcohol or not.	
<p>For ancillary packaging, why pursue a model that has producers purchasing 'tonnes of certified recycling' from Encorp, instead of doing a behind the scenes exchange or 'sale' to Recycle BC similar to how the two organizations handle Encorp materials found in their curbside collection? Could this create producers who are unwilling to remit sales fees to Recycle BC claiming they have already paid for their recycling through Encorp?</p>	<p>Sarah Willie <i>(Comox Valley Regional District)</i></p>	<p>Yeah, so that is long question. It's a really interesting question.</p> <p>So I'm understanding that with the Recycle BC model, we weren't sure how, what we would be able to arrive at as a solution. I don't think anything is off the table. So we still need to engage with Recycle BC. And there's nothing preventing them from coming with the proposal to us. And we would of course, consider that.</p> <p>I think what we wanted to do was insert a proposal or Stewardship Plan to begin the discussions. Knowing that at the end of the day, what we want is that our depots do not have to bear the cost of the material if they don't have a Recycle BC agreement. So that's another equity issue that we wanted to address.</p> <p>I think there's probably a range of different solutions that we can arrive at with Recycle BC. And we'd of course be interested in this discussion. So this is an initial proposal, and I think very much one that we need to work through and have some discussions on, but we need to address the issue. How we address the issue, I think we've got flexibility on.</p> <p>As it relates to the tonnes, I don't think we are going to, or last time I looked, there's somewhere in the neighborhood of 200,000 plus tonnes in the Recycle BC program. I'd be really surprised if we collect more than a couple thousand tonnes. So I don't think this is going to have a meaningful impact or material impact on the Recycle BC program or its financial model. I think at the end of the day, would producers use it as an opportunity to reduce their financial commitment? Absolutely. And may they save some money at that? Absolutely. But Recycle BC would also get additional tonnes. And whether those tonnes would be or come at less cost than they would have to otherwise, is probably the point.</p> <p>So I don't think it'll impact their financial model. I do think it'll allow for more material to be collected and recycled. And yeah, we're open to a range of</p>	<p>Consultation Session 3: Webinar with the BC Product Stewardship Council – July 28, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		different options, but we wanted to initiate discussion so we'll have more discussions and dialogue with Recycle BC. You know, what we can arrive at by the time we get to a final Stewardship Plan. But no, I think it's a great question and a totally valid point.	
Just for clarity, would the amount of secondary packaging collected by Return-It be deducted from the overall amount that beverage producers report to Recycle BC? Would this constitute the 'credit' for beverage producers recycling their secondary packaging which does not require collection by Recycle BC?	Andrew Doi (Metro Vancouver)	Yes that's correct. Let me clarify – the concept so far is that we would collect the material and then producers within our program would be able to apply for a credit, and then depending on how many producers apply we would provide or divvy up the amount of material collected and provide certificates of recycling that they can present to Recycle BC as credit against their obligation. Recycle BC could report that under their overall tonnage. The benefits would be that there is obviously more material collected, but we think there would be a benefit to our brand owners, and we think we could do that in a more efficient way at a lower cost. So, it would be a credit that they would apply and we would emphasize that at the end of the day. Last time I looked there was over 200,000 tonnes of material collected through Recycle BC, but what were talking about here would be 1,000-2,000 tonnes – pretty small amount of material, but nevertheless its Schedule 5 obligated material and there's an opportunity to take advantage of our existing infrastructure to make sure the material is collected. What we didn't want in this project was to create another stewardship plan and create unnecessary requirements for producers to have to report into the stewardship plan, so we think this is a good compromise in terms of ensuring that this material can be collected and that our depot operators don't have to pay for recycling or landfilling material, and that it will actually increase the amount of material collected, or accounted for, in the system.	Consultation Session 4: Webinar with Regional Engineers Advisory Council on July 30, 2020
Will ancillary packaging include 6-pack rings?	Kirsten Gellein (City of Nanaimo)	Ancillary packaging won't include 6-pack rings just because we don't have a recycling option. We have been approached by an entrepreneur around a reusable option. So we are just in the early stages but we are hoping that by next month, if everything goes well, we might be able to announce a pilot for re-usable 6-pack rings either in the fall or early 2021.	Consultation Session 5: Webinar with Coast Waste Management Association – Aug 19, 2020

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>10. Regarding Encorp's plan to provide ancillary packaging recycling services at Depots without Recycle BC contracts:</p> <ul style="list-style-type: none"> <li>The Depots acknowledge that this offer will be welcomed by some non-Recycle BC Depots. However, Depots with existing Recycle BC contracts or private recycling contracts are concerned this offering will become mandatory and interrupt their existing commercial relationships.</li> <li>It is imperative that Encorp commit to making this opportunity voluntary for Depots to opt into or out of and commit to refraining from interfering with Depots' commercial contracts with other clients (including PROs or the private sector).</li> </ul> <p>It is also imperative that Encorp commit to compensating Depots that opt into this program fairly for any work or infrastructure they must use to participate in this program (storage, onsite forklift drivers, etc.)</p>	<p>Jay Aarsen (BC Bottle and Recycling Depot Association)</p>	<p>As detailed in the plan, the proposal to collect ancillary packaging is specifically for depots that do not have a contract with Recycle BC. The proposal was in response to concerns from some depots that were forced to pay to recycle or landfill the material themselves. Joining the program will be voluntary.</p>	<p>Written Feedback</p>
<p>Recycle BC does not support Encorp Pacific's use of its stewardship plan to engage Recycle BC in a speculative proposal. Prior to releasing its stewardship plan, Encorp did not consult with Recycle BC regarding its position on page 8: "Our intention is to reach an agreement with Recycle BC to have our certificate of recycling</p>	<p>Tamara Burns (Recycle BC)</p>	<p>Encorp included this proposal in response from feedback from those depots that do not have a contract with the operator of the Schedule 5 program for Printed Paper and Packaging (PPP) about having to pay the costs of recycling or landfilling material covered under Schedule 5 of the Recycling Regulation themselves. While we did not consult with Recycle BC prior to issuing our stewardship plan, we have engaged with them subsequently to discuss our proposal.</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>recognized within their program”, which remains suppositional.</p> <p>We are requesting that Encorp remove any reference to Recycle BC in relation to its proposed collection of ancillary packaging prior to submitting its stewardship plan to the Ministry of Environment and Climate Change Strategy for review.</p> <p>Recycle BC has an extensive curbside and multi-family program and more than 215 depots collecting our materials on our behalf. Last year, 98.6% of BC households had access to our services provincially and we have achieved our government-mandated recovery rate every year.</p> <p>We encourage residents to leverage the world-leading collection network we have created and through which we achieve superior environmental outcomes on behalf of the producers that fund us and the residents of BC.</p>		<p>In all our communication during the consultation, including our conversations with Recycle BC, we have been clear that we are open to further discussions and other proposal to achieve the goal of ensuring this material can be captured and properly reported under the Recycle BC program.</p> <p>We have removed Recycle BC’s name from the plan as requested but it will not address the gap that has been identified. This proposal was not designed to divert material from the Recycle BC system nor be marketed to the customer but function as a passive program that addresses the gap in collection to ensure this material does not end up in the landfill. Similar to the agreement we have in place with Recycle BC to manage deposit glass that ends up in the blue box, this initiative would complement the system they have in place and address this gap in the collection system.</p>	
<p><i>“The collection of the ancillary packaging would support Encorp’s collection network at locations, which do not have a contract with Recycle BC and receive this material daily from customers who return it with their beverage containers.”</i></p> <p>In the revised stewardship plan, Encorp is intending to collect ancillary packaging from customers. This is a positive step and follows guiding principles that other Product stewards could follow in their plans. In regards to the recycling certificate for material collected and</p>	<p>Graham Casselman (Columbia Shuswap Regional District)</p>	<p>For clarification, the brand owners receive the certificate and these credits would apply toward their obligations under the regulation and volume based on the containers they have sold into the province.</p> <p>This program is intended for depots that do not have an existing contact with Recycle BC and are currently having to pay the costs of managing this material themselves.</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
recycled, this would only pertain to depots that do not collect Recycle BC material and therefore not every depot could have the benefits of receiving a certificate. The majority of the depots in the CSRD collect Recycle BC material.			
<p>Secondary Packaging</p> <p>The Stewardship Plan proposes to collect and recycle secondary packaging for beverage containers, such as boxboard or plastic film (included in the packaging and paper product category), at Return-It depots. The collection and recycling of secondary packaging provided by Encorp, will allow beverage producers to seek a certificate of recycling, or credit, for the recycling of packaging through the Recycle BC program. In addition, this packaging recycling opportunity provides enhanced convenience for consumers and depot operators. Further details on how this approach will be implemented, such as whether all depots and return-to-retail location will collect secondary packaging, would be helpful.</p>	<p>Paul Henderson (Metro Vancouver)</p>	<p>Thank you for your comments.</p>	<p>Written Feedback</p>
<b>3.4 Textiles</b>			
<p>Where do donated textiles through the Salvation Partnership go? Are textiles shipped overseas or used in North America. Are textile scraps included in collection?</p>	<p>Tai Uhlmann (Let's Talk Trash)</p>	<p>Yeah, that's a great question Tai. So yes, textile scraps are included in the collection.</p> <p>All we ask is the materials are clean and dry. It's okay if it's got holes, and we do include things like towels and other household textiles. And generally everything that's purchased from us by the Salvation Army, if it can, is sold in their stores, but I'll be honest: that will be a minority of the product.</p>	<p>Consultation Session 3: Webinar with the BC Product Stewardship Council – July 28, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		<p>There will be material that couldn't be sold in their stores, and typically they'll give about five to six weeks to try and sell it in their stores. And that will be packaged up and will be moved to other countries. And there will be a portion that can't even be sold and that will be cut up as scrap and used in things as fuel absorbent and other products you find in your hardware stores, Home Depots, that kind of thing.</p> <p>It is definitely our long-term intention to figure out and it was on our plan for this year in how we can start working with brand owners to try and develop sustainable recycling solutions for those materials. One of the challenges in doing pilots around textiles is you never have enough material to actually pilot different solutions. So, we now know that we're collecting enough material. I think we've collected somewhere in the neighborhood of going over the 200 tonne mark sometime in March this year. So we're probably closing in on 250 tonnes since the launch of the program. So we know there is enough material available that we can pilot things.</p> <p>And so we'd like to be able to do some work with brand owners and some innovative recyclers to see if we can develop long term recycling solutions by stringing off some of this material for pilots. Of course, the challenge this year is just with the pandemic. And so many retailers, particularly in the apparel industry—I know that there have definitely been some sectors of the retail industry that have not only survived, but you know, in some ways thrived—and I think just the grocery and pharmacy have been beneficiaries this year if you've determined that from the pandemic, but definitely apparel retailers I think, I've seen some numbers in the states, where year over year, there were 90% reductions in sales. So it just really hasn't been an opportunity this year to engage with apparel companies, given those kinds of challenges they're facing. So maybe as we get into 2021, or even 2022, we can restart those discussions. But that ultimately is our vision as we start to work with brand owners and see if we can start to use this material that we've collected to begin piloting sustainable solutions be it in mechanical or chemical recycling to have this material converted into recycled fiber that can be used in new clothing.</p>	

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
I wonder if you could talk a little bit more about how your partnership with the Salvation Army on the textiles is going to work?	Suzanne Bycraft (City of Richmond via Metro Vancouver)	So first of all, it is working – it has been in place since January. It is a 2 year partnership and we are really happy with it. Obviously there is a lot of flux during the pandemic, but we didn't actually stop collecting textiles during the pandemic, we continued to collect, and we were able to, once things returned to more normal operations, transfer that material to the Salvation Army. So, just like we had with our original agreement with another group, that material is being sold here in BC where it can through the Salvation Army's network of retail locations. Where it can't be sold within 5 weeks then that material is packaged up and sent to second-hand markets within other countries – particularly Latin America. There will be a portion of the material collected through household textiles or even clothing that is not able to be resold, and so that may be cut up for rags and used as absorbent in fuel or oil or anti-grease absorbent products that you can find at any hardware store. That's really how the program works. Part of our plan was to work with producers on a pilot to figure out how to stream off some of the materials into innovative recycling options to try and provide brand-owners with a circular approach to ensuring that they could access recycled content for new clothing. Of course, the pandemic has made that much more difficult, and so we don't know when we will be able to return to that – obviously we have needed to focus on other areas of just our base operations – but what I would say is that feedback on the textiles program from consumers has been really positive. I think they find the extra locations that we provide really convenient, and I think they like the fact that it is just another material that they can bring to the same location – that added convenience, that ability to drop off another multiple products at the same location.	Consultation Session 4: Webinar with Regional Engineers Advisory Council on July 30, 2020
<b>4. Other (Various Sections)</b>			
<b>4.1 Other Questions/Comments</b>			
If Terracycle had infrastructure out West that would use the pouches and additional materials would this appease the fact that you	Jamie Benton (Fraser Valley Regional District)	Yeah, so I don't think Terracycle is going to get facilities or locations out anytime soon.  Jamie, if you have information that I don't, I'd be happy to get that information. They typically have operated from a base of operations back	Consultation Session 3: Webinar with the BC Product Stewardship Council – July 28, 2020

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
can't presently send it for Energy from Waste (EFW)?		<p>East for their whole existence. And most of their programs are mailbag programs. So they seem to like that model of shipping stuff back to their home base and doing the recycling. Their home bases, I believe they have more than one. So don't hold out a lot of hope that we're going to see some sort of facility.</p> <p>Honestly, it's not that EFW (engineered fuel) is my preferred solution. I think there's some dialogue that needs to happen with brand owners.</p> <p>I'd point out the inequity. I think if we're going to have the EFW (engineered fuel) solution then it should be available to everyone. And if the government deems it's not an appropriate solution, then it shouldn't be an appropriate solution for anyone. So I just want equity.</p> <p>Ultimately, we'd like that material recycled. And we know that there's progress being made to adapt pouches to more of a single polymer as opposed to a multi-material solution. And if we can do that, and if that material can be recycled, that's obviously the end goal and where we'd like to go. During that transition, we think there's probably a lot of environmental benefits to managing that material as engineered fuel, here in BC, as opposed to shipping it across North America to be made into composite decking.</p>	
Can we share the information about where recyclables are sent and what they become with the public?	Nicola Roberts (Pender Island Recycling Depot)	Yes absolutely. That information is provided in our Annual Report every year so it is already accessible and I encourage everyone to go to our <a href="#">2019 Annual Report</a> where you can find that information.	Consultation Session 5: Webinar with Coast Waste Management Association – Aug 19, 2020
Has there been any consideration of collecting, without refund, beverage containers that fall outside the scope of the Encorp program (e.g. alcohol containers purchased in USA by Canadian consumers) to help reduce customer confusion/frustration?	Kirsten Gellein (City of Nanaimo)	I will have to do some digging, because I believe in areas where we get a number of US containers, we do accept them, we just don't provide the deposit for those containers. For example, if someone brought a few beer cans from across the border and it was clear that they weren't cans from BC, we would accept them and manage them, we just wouldn't provide the deposit refund. I don't think we promote that but it is something that we do. It typically happens for our depots that are along the border. I have to be honest, the issue of containers from the US, obviously right now isn't an issue because the border is closed, but even before that we weren't seeing	Consultation Session 5: Webinar with Coast Waste Management Association – Aug 19, 2020

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		that type of issue as we were say a decade ago, when the dollar was on par and Canadians were spending time in the US and purchasing products and bringing them back.	
Is there a reason we are going with a CNG hybrid vs. all electric vehicles (to reduce GHG emissions)?	Mike Nestor <i>(Denman Island Residents Association – Waste Management)</i>	We did a lot of analysis of the available electric options – we even test drove some electric trucks that people were using. But even the companies we approached that already had trucks that people were using were not necessarily happy with their performance. So I think we're still a couple years away. The CNG hybrid-electric gave us the best opportunity to go to the market now and roll this type of technology out and reduce our GHGs. At a future point, if all-electric options are available and they can meet the performance specifications that we require, I see no reason why we wouldn't make the switch over to them.	Consultation Session 7: Webinar with Depots– August 20th, 2020
Regarding Excess Revenue Over Expenses in your annual report: (\$33,967,383), more could be done with these assets..	William Langley	As a not for profit organization, we are committed to operating and managing a cost effective system that is sustainable in the long term. One of the ways we do this is by consistently monitoring the industry and testing evolving technology and processes to enhance the system.	Written Feedback
<ul style="list-style-type: none"> <li>• Guiding principles: Encorp's guiding principles are 25 years old. While many have stood the test of time, some could be refreshed to reflect current environmental policy. For example: <ul style="list-style-type: none"> <li>○ The principle to “divert used products from landfill and incineration” could be updated to: “Support a circular economy by maximizing reduction and reuse, enhancing recycling, and achieving zero waste to landfill and incinerator.” This aligns with the pollution prevention hierarchy in the Recycling</li> </ul> </li> </ul>	Monica Kosmak <i>(City of Vancouver)</i>	Thank you for your feedback. In 2019, Encorp started working with the Social Purpose Institute at the United Way to define its Social Purpose and why we exist for the betterment of society and our stakeholders. This was timely as we celebrated 25 years of diverting more than 20 billion containers from our landfill and marine environment. After extensive research and consultations with our employees and stakeholders, this year, we defined this Social Purpose statement which we will be launching and embedding within the organization in early 2021. This will also provide us with the opportunity to update and enhance our Guiding principles.	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>Regulation, the zero waste movement among local governments, and the international movement towards zero plastic pollution and a circular economy.</p> <p>Encorp may also wish to adopt a guiding principle to address the climate emergency by reducing greenhouse gas emissions.</p>			
<b>4.2 Consultation Process</b> (Section 4: Stakeholder Consultation)			
Will the slide deck be sent out to participants?	Jon Mills (City of Salmon Arm)	We will either send it out, or make it available on our website.	Consultation Session 1: Webinar with the General Public – July 16, 2020
Will you be emailing out this presentation to the participants?	Christal Hazard (Thrifty Foods and Safeway BC)	Absolutely.	Consultation Session 2: Webinar with Retailers – July 23, 2020
Will questions and responses from this session be included in the final plan when it's submitted?	Lucas Harris (BC Ministry of Environment and Climate Change Strategy)	Yes, as we discussed at the beginning, the questions and answers from this consultation session will be included in the consultation report we submit when we submit the final plan, target date October 15. Lucas is with the MOE [BC Ministry of Environment and Climate Change Strategy], so hopefully he'll be able to provide us with some information on that question regarding Ministry consultations with the BC Center for Disease Control around the health impacts of milk containers.	Consultation Session 2: Webinar with Retailers – July 23, 2020
Will you be getting this group together again to deliver the outcome of submitting your proposal?	Christal Hazard (Thrifty Foods and Safeway BC)	I'm going to assume that's around Return-to-Retail. If so, I think that would be great. We can coordinate through the Retail Council to have some subsequent discussions, maybe share the proposal, and get feedback, and certainly circle back with interested retailers in terms of supporting the initiative and trying to come up with a much more flexible system, and one based on voluntary requirements as opposed to mandatory.	Consultation Session 2: Webinar with Retailers – July 23, 2020

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>Could you make your presentation available to Andrew Doi so that it can be included in our REAC SWSC meeting minutes?</p>	<p>Chris Underwood (City of Vancouver)</p>	<p>Yes absolutely, that was our intention following this session to send the presentation to Andrew so he can include it and distribute it to members of the committee.</p>	<p>Consultation Session 4: Webinar with Regional Engineers Advisory Council on July 30, 2020</p>
<p>It is great to hear everyone’s feedback that they are providing to Encorp in terms of their stewardship program and their pilot program. I just wanted to circle back with a point that Allen made earlier about encouraging you to get in touch with your local MLA and the Minister about your positive support for the program. Like I said, I’m really glad that you have some positive thoughts about the program and I just want to let you know that writing into the Minister or the MLA may not necessarily be required at this point. Ministry staff, like me, are on all of these webinars, whether they are with depots or other stakeholders, so we are definitely hearing all the feedback and we are able to take that all into consideration. Writing in is a great way of sharing your perspective, but it also creates a lot of added work for us and takes us away from dealing with the important task of dealing with the underlying things in Encorp’s Stewardship Plan and delays our ability to do that important analysis. So I’m definitely happy to hear that you are supportive of the Encorp program, but I want to encourage you to not write in as it takes away from our ability to do other work on their program.</p>	<p>Lucas Harris (Ministry of Environment &amp; Climate Change Strategy)</p>	<p>It was never our intention to make more work for you guys. We appreciate all the diligence that the Ministry has shown in attending all these meetings, and there has been a number of really positive and insightful questions that have been asked of us by the MLAs through this, and we understand all the work that this process creates. I think where we’ve encouraged depots to contact their MLA is when we know that we do have agents and depot operators who have contacted their MLAs and the MLAs have gone up in the legislature and made comments calling into question what Encorp was doing and, as one commentator said, “trying to push independence out of the system”, and creating the view that this was Encorp trying to bully some depots while really, what we are trying to do, is to create a more equitable system, where more of our depots, typically our smaller depots, can achieve a more sustainable business by having the same fair access that all the other depots do, which we currently don’t have. So we certainly don’t want to make more work for you, but we are conscious that the group on the other side is a very determined group, and one that makes no bones about contacting their MLA, and we just worry if the depots on this call do not contact their MLA, then the narrative that gets developed is that its ‘Encorp vs. the depots’, where I really think that it is ‘Encorp and the majority of the depots trying to create a more equitable system’. A small minority of the depots that have benefitted from the existing system trying to get the message out that this is a really bad thing, and I just don’t think that’s the case. I totally understand your point of view but hopefully that explanation communicates and provides some context for the direction in which we’ve suggested.</p>	<p>Consultation Session 6: Webinar with Depots – August 19th, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>6. Commit to implementing good faith stakeholder engagement that enables Depots and other stakeholders to provide meaningful input into the stewardship plan and changes to enhance the beverage container recycling system.</p> <p><i>(Note: For supporting points submitted relating to this recommendation, please see the full letter submitted in Appendix V. Written Feedback of this report.)</i></p>	<p>Jay Aarsen <i>(BC Bottle and Recycling Depot Association)</i></p>	<p>The consultation process undertaken for this plan has exceeded the regulation requirements and provided many avenues for input and comment from all stakeholders, including depots.</p>	<p>Written Feedback</p>
<b>4.3 COVID-19</b>			
<p>Will there be any handling fee review in the near future due to various extra costs of Covid 19 - lower volume in some very resort based towns that has impacted significantly?</p>	<p>Aziz Barna <i>(Revelstoke Bottle Depot)</i></p>	<p>There are a number of things that need to be addressed in this question. One is that we're conscious that Return-It, while we make up the majority of the material going through these depots, we don't make up all of it. If there are any adjustments needing to be made, they need to be made by a number of organizations. In terms of handling fees, we also know our handling fees are coming up with 2022 as the next scheduled negotiation process, and so there are going to be two things in this Stewardship Plan that are going to impact that. Are we to include alcoholic containers going forward? This would have an impact. And having milk containers included would also increase the volume of containers.</p> <p>We want to understand those variables first before we can make any commitments to containers. In terms of volumes, one of the things that need to be discussed with both our depot operators and retailers, is given the significant drop in return to retail, does return to retail continue to make sense? Does the government, or its policy, inadvertently compete with depots, particularly in rural communities? We can't continue to have our brand owners support the province wide depot network if they are having to compete with largely subsidized return to retail networks. Either subsidized by retailers, or by the government through the liquor distribution branch system. These are complex issues. We are committed to finding ways to get more volume through our depots including through our rural depots, and</p>	<p>Consultation Session 1: Webinar with the General Public – July 16, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
		finding ways to make sure depots are competing on the same playing field, where everyone is getting the same amount, and some don't have a competitive advantage over others. That is our ultimate goal and objective.	
What changes in health and safety have been implemented due to COVID-19?	Luc Lortie (Costco Wholesale Canada Ltd.)	<p>We've worked with a small group of our depots to develop guidelines for all BC depot operators in managing the impacts of COVID-19. So we've recommended that the operators provide best practices with their staff, such as gloves and masks, enforce social distancing guidelines and limit the number of people in the depot at a time.</p> <p>If there is interest, we are happy to share those guidelines, they are pretty comprehensive.</p> <p>At the end of the day, what the guidelines are meant to provide was an overview of the types of things that operators should consider when managing their depots to protect both their staff and the public. But each site is required to have its own site-specific plan. That's the plan the WorkSafeBC will look at if they come in and do a site visit. They'll need to see that there's a site-specific plan.</p> <p>We worked with our depots to set up some guidelines and ensure that those guidelines reflect best practices, and we will continue to look at evolving those guidelines as direction from the Provincial Health Officer changes.</p>	Consultation Session 2: Webinar with Retailers – July 23, 2020
<p>Whereas:</p> <ul style="list-style-type: none"> <li>- Our staff have heightened health and safety concerns over the handling of loose beverage container returns in light COVID-19; and</li> <li>- we are also concerned about the upcoming addition of milk containers to the Return to Retail program due to food safety and hygiene concerns; and</li> <li>- the Retail Council of Canada (RCC) is developing a "COVID-19 Pandemic Beverage Container Return-to-Retail"</li> </ul>	Ton Truchan (Georgia Main Food Group)	Thanks you for your feedback. We agree with the points you have raised regarding return-to-retail and are committed to working with retailers, the Retail Council of Canada and the MOECCS to develop a more workable model for return-to-retail in light of the pandemic and the addition of milk containers into the deposit system.	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>plan which would have grocers adopt the acceptance of Return-It Express bags as an alternative to accepting loose beverage containers, should retailers be forced to resume collection; and</p> <ul style="list-style-type: none"> <li>- Georgia Main is supportive of accepting clean returns, of the type that we sell and with a limit of 24 items, as long as those returns are made in the course of a transaction and are in clear bags with labels that comply with the Return-It Express &amp; Go program; and</li> <li>- the RCC document is being submitted to WorkSafeBC, the Provincial Health Officer and B.C. Centre for Disease Control for approval and endorsement; and</li> <li>- the Return to Retail component of the collection network contributes only 5% of the total volume of beverage containers collected through the system; and</li> <li>- Return to Retail requirements are reportedly having a negative impact on Return-It depots in small rural communities, and the small communities we operate in all have Return-It depots nearby; and</li> <li>- Return-It is recommending the province to shift from mandatory to voluntary Return to Retail; and</li> </ul>			

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>- both the Retail Council of Canada and Georgia Main Food Group (GMFG) support the recommendation to eliminate mandatory Return to Retail collection; and</p> <p>should mandatory Return to Retail remain in effect, and if required GMFG will only do so in a manner that is safe for our employees and customers and would implement the RCC's recommendation of only accepting returns compliant with the Return it's Express &amp; Go program (in clear bags, with stickers) once it is approved by WorkSafeBC, the Provincial Health Officer and B.C. Centre for Disease Control.</p>			
<p><i>“Encorp recognizes recycling systems need to evolve with consumers’ expectations and the priority is to model convenience for the consumer. There are many enhancements Encorp implemented prior to the COVID-19 pandemic that have proven to be the most effective way to evolve the system into the future that meets customers’ needs and expectations.”</i></p> <p>As a product steward Encorp successfully engages with Regional Districts with updates and program developments. This is appreciated. During COVID-19 and through the early stages of the outbreak, ENCORN provided a plan that was able to be used by other organizations that were bringing the restart program. This level of communication was appreciated and showed the level of</p>	<p>Graham Casselman (Columbia Shuswap Regional District)</p>	<p>Thank you for your support.</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
adaptability and a progressive Product Steward.			
<b>4.4 Thanks/Appreciation</b>			
I had just one question, but would like to send a thank you note for simplifying administration of program by retailers. One deposit rate, removing first three ingredients criteria and professional staff.	Shabbir Beawerwala (Loblaws Inc.)	Appreciate that Shabbir. We are trying to make the program work more efficiently for everyone, including retailers. We haven't touched on it, but we are moving to the single-deposit rate this fall. Our 20-cent deposit is going to move to 10 cents. That's going to be happening on October 1. We will be having a separate webinar to talk through the implications of that. There will be a grace period where people will still be able to get the 20-cent deposit. But hopefully, starting on October 1 <sup>st</sup> , all deposits for all containers will be 10 cents and we'll have that change well in advance of the addition of milk, to again try and make sure the system is as simple and as efficient as possible.	Consultation Session 2: Webinar with Retailers – July 23, 2020
Thanks. Completely agree on the equity front.	Jamie Benton (Fraser Valley Regional District)	N/A	Consultation Session 3: Webinar with the BC Product Stewardship Council – July 28, 2020
Thank you	Tai Uhlmann (Let's Talk Trash)	N/A	Consultation Session 3: Webinar with the BC Product Stewardship Council – July 28, 2020
Thanks very much Allen and Team!	Alda Nicmans (BC Product Stewardship Council)	N/A	Consultation Session 3: Webinar with the BC Product Stewardship Council – July 28, 2020

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
Thanks for your answer, I like the voluntary option, that way remote retailers can still take them back.	Michael Zarbl <i>(Major Appliance Recycling Roundtable)</i>	N/A	Consultation Session 5: Webinar with Coast Waste Management Association – Aug 19, 2020
I love the Express program!!!!	Michael Zarbl <i>(Major Appliance Recycling Roundtable)</i>	N/A	Consultation Session 5: Webinar with Coast Waste Management Association – Aug 19, 2020
That's great to know! Thanks for that information, I would definitely use Express in that case	Kirsten Gellein <i>(City of Nanaimo)</i>	N/A	Consultation Session 5: Webinar with Coast Waste Management Association – Aug 19, 2020
Comment rather than a question. Great to see the combination of the two aluminum can streams - it will free up a lot of staff time sorting. Also including Dairy will end confusion to the public as to why milk is not a beverage.... Thanks !!	Peter Grant <i>(Salt Spring Island Recycling Depot)</i>	I totally agree with both points.	Consultation Session 5: Webinar with Coast Waste Management Association – Aug 19, 2020
Great, thanks for the info Allen!	Kirsten Gellein <i>(City of Nanaimo)</i>	N/A	Consultation Session 5: Webinar with Coast Waste Management Association – Aug 19, 2020
Allen, keep up with the good work. Thank you!	Veronica Bartlett <i>(Morrison Hershfield)</i>	N/A	Consultation Session 5: Webinar with Coast Waste Management Association – Aug 19, 2020
thank you for a very informative presentation!	Nicola Roberts	N/A	Consultation Session 5: Webinar with Coast Waste

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
	(Pender Island Recycling Depot)		Management Association – Aug 19, 2020
Thanks Allen and thank you also Sheila!	Peter Grant (Salt Spring Island Recycling Depot)	N/A	Consultation Session 5: Webinar with Coast Waste Management Association – Aug 19, 2020
Thanks for making sorting easier and convenient to do.	Marian DeSmet	Thank you for your support.	Written Feedback
Overall comment: As stated by various stakeholders I too agree that Encorp has done a fantastic job in educating the public through various awareness campaigns and partnerships (such as the Binners' project). As a 3rd party contractor, I am pleased with Encorp's commitments to sustainability and transparency around GHG accounting. Setting a baseline and continued tracking against the baseline for GHG emissions is considered best practice and great to see Encorp's continued commitment and transparency to do so. The set GHG targets in scope 3 emissions are evidence of strong environmental commitments.	Taspia Raka (Climate Smart)	Thank you for your support.	Written Feedback
<p>Plan Strengths</p> <p>Encorp is showing strong leadership and innovation through a number of actions in this proposed stewardship plan. Some highlights include:</p> <ul style="list-style-type: none"> <li>Innovative collection models: Expanding the Return-it Express programs (where</li> </ul>	Monica Kosmak (City of Vancouver)	Thank you for your support.	Written Feedback

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>consumers can drop off unsorted bottles at staffed depots and unstaffed kiosks) supports consumer convenience. While these can still be challenging to site in Vancouver, we look forward to continuing to work with you to explore the potential of these models.</p> <ul style="list-style-type: none"> <li>• Reducing greenhouse gas emissions: Encorp's plans to become Climate Smart Certified in 2020 and invest in technologies like trucks with mobile compaction units will reduce GHG emissions and vehicle trips, and help address the climate emergency.</li> <li>• Recycled content: Encorp is supporting a circular economy with its commitment to collect high quality plastic that could be used as recycled content in plastic beverage containers used by brandowners.</li> </ul> <p>Milk and milk substitute containers: Embracing these containers in Encorp's program aligns with the June 29, 2020 amendment to the Recycling Regulation that requires deposits on milk and milk substitute containers. Although this transition must be coordinated carefully with Recycle BC, this shift aligns with Alberta and Saskatchewan's deposit-refund programs. It also expands EPR to milk and milk substitute containers generated by the ICI sector and could improve the recovery and recycling</p>			

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>rates of these ICI containers thanks to the deposit-refund incentive.</p> <p>Consumer awareness: The 95% consumer awareness target is supported by Encorp's targeted marketing strategy and significant investment in awareness programs.</p>			
<p>Island Return It is pleased to be a part of the Return It system and a part of the collection network for used beverage containers. Having reviewed Return It's stewardship plan renewal, we believe it continues to provide the framework a high performing stewardship program that offers BC consumers plenty of convenient return locations, such as the Island Return It recycling depots. We strongly support the draft plan and believe it should receive Ministry approval as soon as possible.</p>	<p>Vince Spronken (Island Return It)</p>	<p>Thank you for your support.</p>	<p>Written Feedback</p>
<p><b>4.5 Out of Scope</b></p>			
<p>In terms of Electronic handling fee, the fee is based on weight, while new productions on recent technology produces small and smaller products. Any change in payment strategy in future based on this change?</p>	<p>Aziz Barna (Revelstoke Bottle Depot)</p>	<p>While we are responsible for operating the electronic product recycling program, in terms of managing their collection, we are not responsible for establishing those rates, so I would ask you to direct that question to Craig Wisehart of EPRA. That is outside the scope of this Stewardship Plan, and outside the scope of our role as a contractor on behalf of EPRA.</p>	<p>Consultation Session 1: Webinar with the General Public – July 16, 2020</p>
<p>What is happening with nonrefillable non-refundable glass?</p>	<p>Keenan Ebanks (Waste Management)</p>	<p>Non-refillable, non-refundable glass would be outside the Encorp program. That would be material captured in the Recycle BC program. It would be appropriate for RecycleBC to address this– I know there may be some instances where there's gaps in the collection of that material – but that would really be the Recycle BC program and I'd direct that question to them so they can answer it.</p>	<p>Consultation Session 5: Webinar with Coast Waste Management Association – Aug 19, 2020</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>Your return rate of 78.1% of containers is commendable though greater incentives for people to recycle are needed in the ESG world we inhabit. Far too many coffee cups litter public areas.</p>	<p>William Langley</p>	<p>Thank you for your comment. To help address the challenges with coffee cups being disposed of in commercial and public building, in February we announced a pilot program with Metro Vancouver, Tim Hortons and A&amp;W Canada to pilot British Columbia's first initiative to recycle coffee cups in commercial and public buildings. We will include a market analysis to determine the long-term viability of a broader program.</p>	<p>Written Feedback</p>
<p>12. Regarding Encorp's plan to reduce single-use plastics:</p> <ul style="list-style-type: none"> <li>• Overall, Depots support efforts to improve the environmental outcomes of the system, including efforts by the Government of BC and Encorp to reduce single-use plastics.</li> <li>• However, Depots protest the way Encorp has been introducing changes to reduce single-use plastics, which have disrupted workflows in-Depot, disrupted their relationships with commercial clients (that don't have room for C-Bags and must continue to use single-use plastic bags), and resulted in added costs to Depot operations.</li> </ul> <p>In good faith, the Depots request that Encorp commit to meaningful consultation with Depots prior to bringing in any additional changes so that Encorp can make decisions in the face of full information, and that Encorp commit to fully funding the costs of any future changes. The costs of Encorp's decision-making should not be downloaded to Depots.</p>	<p>Jay Aarsen <i>(BC Bottle and Recycling Depot Association)</i></p>	<p>This comment is not related to the plan, but specific to operational procedures which Return-It implements from time to time.</p> <p>The specific feedback about c-bags and commercial clients is limited to two depots which we have engaged with extensively as part of our project to transition out of single-use film for use in the transport of containers. These changes are consistent with our previously announced commitment to eliminate single-use plastic film from our supply chain by 2025.</p>	<p>Written Feedback</p>

Question/Comment	Individual (Organization)	Encorp Response	Communication Channel
<p>13. Regarding Encorp's plan to improve the customer experience by adding collection options for customers (i.e., Express, Express &amp; Go, and Express Plus) and improved signage/branding:</p> <ul style="list-style-type: none"> <li>• The Depots support Encorp's goal of improving the customer experience.</li> <li>• However, Encorp must recognize that Depots are autonomous businesses with other clients. As a result, it's imperative that as a monopoly system provider, Encorp commit to ending anticompetitive practices that divert revenues from existing Depots to Encorp. <ul style="list-style-type: none"> <li>○ Encorp must end anti-competitive practices that interfere with a Depot's ability to serve other clients (e.g., forced signage -including signage that doesn't comply with local bylaws, forced data systems, forced changes to depot workflow).</li> </ul> </li> </ul> <p>Encorp should encourage change through fair marketplace negotiation and not 'take-it-or-leave it' contracting –i.e., must compensate Depot fairly for their services.</p>	<p>Jay Aarsen <i>(BC Bottle and Recycling Depot Association)</i></p>	<p>These opinions are out of scope of the plan.</p> <p>As depots are independently owned and operated businesses, we will continue to collaborate with depots to ensure we have a system that supports British Columbians and protects the environment. By making it easier and more convenient for consumers to recycle their empty beverage containers, we can all work together to increase BC's recycling rates and divert more and more beverage containers from our landfills, oceans and waterways.</p> <p>We have no intention to interfere with the ability of depots to service other clients but we are not aligned with depots seeking greater compensation from Encorp while performing similar services for other organizations for a reduced cost. For the system to be fair and sustainable over the long term, Encorp cannot be in a position of having to indirectly subsidize other programs or services offered by depots.</p>	<p>Written Feedback</p>

## APPENDICES

### I. Consultation Brief

This section includes the Draft Stewardship Plan consultation brief posted to the dedicated consultation website (<https://www.return-it.ca/beverageplan2020>).

## Encorp Beverage Stewardship Plan Public Consultation July 15 to September 15, 2020

### Introduction Brief

Encorp Pacific is conducting public consultation on the DRAFT Beverage Stewardship Plan 2020-2024 as required under Section 6 of the Recycling Regulation. Input on the plan will be welcomed starting July 15, 2020 - September 15, 2020

### Background

Better known as Return-It, Encorp is pleased to release our Extended Producer Responsibility (EPR) program plan for public consultation, pursuant to the requirements of the BC Recycling Regulation ("Regulation") under the Environmental Management Act which sets out the requirements for extended producer responsibility including the requirement for Extended Producer Responsibility plans. This Stewardship Plan will replace Encorp's previous Stewardship Plan which was approved by the Ministry on November 20, 2014, and originally approved on July 19, 2007.

### Plan History

Encorp's plan, approved by the Ministry in 2007, had been renewed in 2014 & 2017 with no changes.

Encorp undertook a comprehensive consultation process on the performance targets for the five (5) year period starting 2019. However, due to recent regulatory changes initiated by the Ministry of Environment and Climate Change Strategy (MOECCS) in late 2019, Encorp has updated the Stewardship Plan to reflect the regulatory changes and will now conduct another full public consultation in 2020.

For your reference the regulatory changes can be found here: <https://www2.gov.bc.ca/gov/content/environment/waste-management/recycling/product-stewardship/packaging-and-paper-product> 

Encorp's revised Stewardship Plan and other reference documents are available on the right side of this page. We have provided pdf documents and reference material for download or viewing purposes.

### Consultation

We invite input and comments for the 62 days between July 15 and September 15, 2020.

A full report of the consultation process, input provided by stakeholders and responses will be included in the appendix and published on the Return-It website once completed.

## **II. Draft Beverage Stewardship Plan 2020 – 2024**

The following pages include the Draft Beverage Stewardship Plan 2020 – 2024.



# Beverage Container Stewardship Plan

## DRAFT

### 2020 – 2024

Submitted to: BC Ministry of Environment and Climate Change Strategy,  
Extended Producer Responsibility Section  
PO Box 9341, Stn Prov Govt  
Victoria, BC V8W 9M1

Prepared by: Encorp Pacific Canada  
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DRAFT

## Glossary of Terms and Abbreviations

<u>ENC</u>	Encorp Pacific Canada (Encorp)
<u>AC</u>	Advisory Committee
<u>BOD</u>	Board of Directors
<u>CNG</u>	Compressed natural gas
<u>CRF</u>	Container Recycling Fee
<u>Depot</u>	Return-It approved depot
<u>EPR</u>	Extended Producer Responsibility
<u>ICI</u>	Industrial, Commercial & Institutional
<u>MOECCS</u>	Ministry of Environment and Climate Change Strategy
<u>NGO</u>	Non-Government Organization
<u>R2R</u>	Return to retail
<u>SABC</u>	Stewardship Agencies of B.C

## Introduction

Encorp Pacific (Canada) (ENC), better known as Return-It, is pleased to submit this renewal plan for our Extended Producer Responsibility Program to the British Columbia Ministry of Environment and Climate Change Strategy, pursuant to the requirements of the BC Recycling Regulation (“Regulation”) under the *Environmental Management Act* which sets out the requirements for extended producer responsibility including the requirement for Extended Producer Responsibility (EPR), plans. The Stewardship Plan replaces Encorp’s previous Stewardship Plan which was approved by the MOECCS on November 20, 2014, and originally approved on July 19, 2007.

### 1. Duty of Producer

Section 2(1) of the Recycling Regulation requires a producer to 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 sell, offer for sale, distribute or use in a commercial enterprise the product in British Columbia.

### 2. Appointment of Stewardship Agency

Section 2 of the Recycling Regulation entails:

- (2) *If a producer appoints an agency to carry out duties of the producer under Part 2 on behalf of the producer, the producer, before the agency begins to carry out those duties, must notify the agency in writing of the appointment, specifying the duties under Part 2 that the agency will perform on behalf of the producer.*
- (3) *Before an agency begins to carry out duties on behalf of a producer, the agency must*  
*(a) confirm in writing to a director the duties under Part 2 that the agency will perform on behalf of each producer that has joined the agency, and*  
*(b) comply with Part 2 in respect of the duties referred to in paragraph (a).*
- (4) *On the request of a director, an agency must provide the director with either or both of the following:*  
*(a) a list of producers the agency currently represents;*  
*(b) a copy of any notification the agency received under subsection (2).*

Encorp Pacific (Canada) is a federally incorporated, not-for-profit, product stewardship corporation established in 1994 and appointed to fulfill the requirements of the Recycling Regulation, Schedule 1, Beverage Container Product Category (BC Reg.449/2004) as a non-share capital corporation under Part II of the Canada Corporations Act. The corporation is exempt from

income tax provided that strict Canada Revenue Agency rules are observed. This type of incorporation identifies owners as members and not shareholders and places restrictions on the use of operating reserves.

A link to the program's Federal Corporation Information is available at:

[www.return-it.ca/about/federal-corporation](http://www.return-it.ca/about/federal-corporation)

Encorp supports its stewards in fulfilling their obligation to establish collection and recycling programs under applicable provincial Extended Producer Responsibility (EPR) legislation. Our mandate is to develop, manage and improve systems to recover used packaging and end-of-life products from consumers and ensure that they are properly recycled and not land-filled or incinerated. As EPR programs and the need for recycling solutions for material streams continue to grow at a rapid pace, Encorp has been at the forefront of providing innovative solutions. Our systems also include the development and implementation of methods which provide solutions to reduce waste.

The corporation is governed by a Board of Directors (BOD) consisting of representatives of the retail and beverage industries as well as non-affiliated directors with relevant expertise. Encorp's strong governance model includes the mandate in our bylaws to appoint two independent directors and they typically chair the governance and audit committees. A list of current Board members is published in the corporation's Annual Report. This information plus more detail on how the corporation functions is available at: [www.returnit.ca/about/annualreports](http://www.returnit.ca/about/annualreports)

The Annual Report will also identify any significant changes to the agency's structure or governance if they occur.

Encorp is responsible for overseeing the program on behalf of its stewards, who are defined by the Regulation as the producers. The program operates according to the bylaws approved by its Board of Directors to manage the affairs of the corporation. The Board of Directors is responsible for the governance of the organization, ensuring it is meeting and exceeding high standards of accountability and transparency. Each of the program's stewards appoint Encorp as their stewardship agency as described in section 2(2) of the Regulation. Encorp supports and reports on the range of requirements identified in the regulation on behalf of its stewards and provides collection services throughout the province to ensure responsible recycling of those products collected.

Encorp represents approximately 358 stewards for the products identified in our program Plan.

A list of Encorp's stewards is available at:

[www.returnit.ca/beverage/recycling/brandowners](http://www.returnit.ca/beverage/recycling/brandowners)

Information about the program is available to stewards here:  
[www.returnit.ca/brandowners](http://www.returnit.ca/brandowners)

A key feature of Encorp's governance model is the existence of an Advisory Committee (AC), which ensures that management and the Board hears from a variety of stakeholders. Encorp's Advisory Committee fosters the exchange of information on our program and serves as a forum to discuss issues of local concern. Encorp's management supports the committee members in the selection of the AC members and the committee then votes to accept each member. The committee is comprised of a representative group that is knowledgeable of the industry and can provide meaningful input on the program. The Encorp AC members consist of representatives from the local government, NGO's, environmental groups, small brand owners, local retailers, Return-It depots and other relevant parties. The members of the committee are scheduled to meet on a bi-annual basis or as needed if additional meetings are required.

A current list of the AC members can be found here: [www.return-it.ca/ar2019](http://www.return-it.ca/ar2019)

Since its inception, Encorp has operated under the following principles:

- a) Divert used products from landfill and incineration.
- b) Develop and operate a system which provides consumer-friendly and convenient return points throughout the Province.
- c) Manage the system in a cost-effective manner that has the lowest possible impact on consumer prices.
- d) Run a cost-based system in which each container type pays its own costs with no cross subsidization.
- e) Find useable end products which maximize the value of the recovered materials.
- f) Treat all brand owners equitably.
- g) Provide a high degree of transparency in all its operations.

### **3. Products Covered Under the Plan**

Section 4 of the Recycling Regulation entails:

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

The Encorp Stewardship Plan includes producers of all beverages sold in British Columbia including but not limited to soft drinks, juice, water, wine, coolers, spirits, beer, ciders, milk and milk substitutes. The plan also includes all ready-to-drink beverage containers sold in British Columbia as identified under Schedule 1 of the Recycling Regulation such as aluminum cans, plastic, glass, bi-metal, drink boxes, gable

tops, bag-in-a-box, and stand-up pouches as well as refillable bottles. While none of Encorp's brand owners currently sell products packaged in refillable bottles, if they should choose to, Encorp will have those products covered under this Stewardship Plan. This plan does not include or address refillable beer bottles.

This stewardship plan proposes a number of changes to the containers and material managed within our program that reflect recent regulatory changes as well as input from our customers and collectors. Based on feedback and input from customers, this stewardship plan proposes to include aluminum beer containers and manage both alcohol and non-alcohol aluminum containers as a combined stream within our system. This change will improve convenience and help address customers' feedback on being able to recycle and receive a full deposit refund at any Return-It location. There has been a long-standing issue of customers having their refunds for aluminum alcohol containers discounted at the point of collection.

The discounting of a customer's deposit refund for aluminum alcohol containers has led to customer dissatisfaction and confusion with the Return-It Recycling System, which has an impact on our system and if left unchecked could have a material impact on diverting material from our landfills, oceans and waterways. It also responds to issues that have arisen since Encorp proactively raised the deposit on all containers under 1 litre, where we have seen a significant increase in complaints from customers questioning the requirement to separate alcohol and non-alcohol aluminum containers now that they both have the same 10-cent deposit value.

In response to the regulation change that includes milk and milk substitute containers under the Beverage Container Schedule 1 of the Recycling Regulation which will be effective February 1, 2022, Encorp will expand the acceptable products to include all regulated milk and milk substitute beverages and container types sold by registered brand owners into the Return-It system and be responsible for them as stipulated in the regulation. Encorp will inform the public and implement this change prior to the designated effective date. These containers will then be included into our established recycling streams and reported accordingly.

Within this stewardship plan, Encorp will expand its obligation and take responsibility for the ancillary packaging used by our brand owners in the packaging of their products. This addition to our acceptable product listing will include consumer packaging such as boxboard and plastic overwrap. The collection of the ancillary packaging would support Encorp's collection network at locations, which do not have a contract with Recycle BC and receive this material daily from customers who return it with their beverage containers.

Currently many of these operators will often have to pay to have the material recycled or may even be forced to send it to landfill. By establishing our own collection program for ancillary packaging, Encorp can ensure that the material will be responsibly recycled

throughout our collection network.

The intention of the program is not to develop a separate plan for ancillary packaging under Schedule 5 of the Recycling Regulation. Rather, the material collected will be tracked by weight and Encorp's brand owners will have the ability to obtain a certificate of recycling for the appropriate share of material collected and recycled. Our intention is to reach an agreement with Recycle BC to have our certificate of recycling recognized within their program.

A full, and up-to-date, list of all beverages and their containers covered by the Encorp plan can be found at: [www.return-it.ca/registeredbrands](http://www.return-it.ca/registeredbrands)

#### 4. Stakeholder Consultation

Section 5(1)(b) of the Recycling Regulation entails:

*The producer has undertaken satisfactory consultation with stakeholders prior to submitting the plan for approval and will provide opportunity for stakeholder input in the implementation and operation of the product stewardship program*

Stakeholder input on the program is welcome at any time and is considered in the program's development and enhancement.

Encorp's original plan, approved by the MOECCS in 2007, has been renewed in 2014 & 2017 with no changes.

Encorp undertook a comprehensive consultation process on the performance targets for the five (5) year period starting 2019. During this time, the MOECCS also initiated its CleanBC Plastics Action Consultation Plan which would result in upcoming regulatory changes. The CleanBC Plastics Action Plan outlined new policy opportunities and proposed amendments to the Recycling Regulation of the Environmental Management Act, including expanding the deposit-refund system to cover all beverage containers.

The complete CleanBC Plastics Action Plan document can be found here:

[https://engage.gov.bc.ca/app/uploads/sites/121/2019/07/CleanBC\\_PlasticsActionPlan\\_ConsultationPaper.pdf](https://engage.gov.bc.ca/app/uploads/sites/121/2019/07/CleanBC_PlasticsActionPlan_ConsultationPaper.pdf)

As a result, the MOECCS informed Encorp the changes to the regulation would affect Encorp Pacific's Beverage Container Stewardship Plan. In light of this information and as suggested by the MOECCS, Encorp did not submit the 2019 plan for approval and has updated its Stewardship Plan to reflect the regulatory changes and will conduct a full public consultation in 2020/2021.

Consultation will include a broad spectrum of stakeholders and diverse audiences to ensure access to the plan is as accessible and inclusive as possible. A full summary of the consultation process and findings will be included here, and in the appendix once completed.

For reference, the full report from the previous consultation can be found here: [www.returnit.ca/beverageplan2020](http://www.returnit.ca/beverageplan2020)

In November 2019, Encorp increased the deposit for all beverage containers carrying a 5-cent deposit to 10 cents. Prior to implementing this change, Encorp worked closely with its operations and logistics network, government, brand owners, stakeholders and BC consumers to both inform and ensure there were minimal system impacts as a result. The transition from a 5-cent to a 10-cent deposit was implemented seamlessly with positive stakeholder feedback.

This document survives all previous submissions and encompasses Encorp's new Beverage Container Stewardship Plan covering years 2020-2024.

## 5. Collection System and Consumer Accessibility

### o Recovery Rate

Section 5(1) of the Recycling Regulation entails:

- *(a) the plan will achieve, or is capable of achieving within a reasonable time,*
  - (i) a 75% recovery rate or another recovery rate established by the director,*
    - (A) for each subcategory listed in section 4 of Schedule 1 for the beverage container product category, and*
    - (B) for each product category covered by the plan, other than the beverage container product category, if required by the director.*
  - (ii) any performance requirements or targets established by the director.*
  - (iii) any performance requirements or targets in the plan.*
- *(c) 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 sold, offered for sale or distributed in British Columbia.*
  - (ii) with respect to the solvent and flammable liquids, pesticide, gasoline and pharmaceutical product categories,*
    - (A) the collection of residuals and containers that are or were in direct contact with a residual, and*
    - (B) the management of residuals and containers collected.*
  - (iii) reasonable and free consumer access to collection facilities.*
  - (v) assessing the performance of the producer's product stewardship program.*

Since commencing operation in 1994, the Program has established a comprehensive network of permanent collection locations where the public can conveniently return beverage containers covered within Encorp's plan under the Recycling Regulation Schedule 1, Beverage Containers. This network currently consists of 168 Return-it™ Depots, 1 Return-It Express Plus corporate location and 3 Express & GO stations.

In addition to the depot network, major grocery retailers, and government liquor store locations have also been mandated to accept refundable beverage containers within the regulation.

Section 6 of the Recycling Regulation – Schedule 1 provides:

*A container redemption facility or, subject to subsection (2), a retailer whose premises are not identified in an approved plan, must accept containers for return and pay to the person returning the containers a cash refund in an amount*

*(a) not less than the amount set out in Table 1, or*

*(b) if the amount of deposit collected is greater than the amount in Column 2 for the container size and beverage type set out opposite in Column 1, not less than the deposit amount collected.*

*(2) Subject to subsection (3), a person may return for refund to a retailer not more than 24 containers per day that are of the same beverage container subcategory and brand that the retailer sells.*

*(3) If the director determines that there are adequate container redemption facilities and retailers in a regional district, a person may return for refund to a retailer not more than 6 containers per day that are of the same beverage container subcategory and brand that the retailer sells to consumers.*

*(4) Subsections (2) and (3) do not apply to the return of containers to a retailer whose premises is identified as a container redemption facility in an approved plan.*

The Return-It™ network consists of 168 independently owned and operated Return-It depot collection facilities that have collection agreements with Encorp, as well as 1 corporate Return-It Express Plus location and 3 Express & GO unstaffed stations. The Return-It collection network provides convenient access throughout the province. In addition, there are approximately 455 Return to Retail (R2R) locations serviced directly by Encorp across the province to further enhance consumer convenience for a total of 627 collection locations operating within the province. The retail component of the collection network only contributes about 5% of the total volume of beverage containers collected through the system.

Encorp also has an agreement in place with Recycle BC and its post-collection processor to ensure that beverage containers collected within the curbside blue box system are accounted for and included in the total units collected and used to calculate Encorp's recovery rate.

In addition, Return-It™ depots and Express Plus locations provide the backbone for most of the larger stewardship programs operating in the province. Encorp continues to work collaboratively with other stewardship programs to improve coverage and consumer convenience. For example, Encorp is one of the major financial contributors of the First Nations Recycling Initiative working with nine other stewardship agencies who have come together to create a project specifically relevant to Indigenous communities who are interested in starting recycling programs.

Recognizing that it is not always economically viable to have traditional depot style coverage in all the hard to service, remote and rural areas of the province, Encorp has developed a criterion to ensure reasonable access as outlined in the Recycling Regulation. This criterion started with a premise of serving more than 97% of the province's population and the current criterion accomplishes that target. Reporting on this criterion will be done by GIS mapping and reporting in each Annual Report.

For rural coverage, Encorp has adopted, as a minimum criterion, a catchment population of 3,000 within a 45-minute driving radius. Encorp's catchment population criterion of 3,000 is at a much lower level than the industry standard of a population of over 4,000. For urban coverage (defined as a Census Metropolitan Area (CMA) by Statistics Canada) the Program has adopted a 30-minute driving radius, however most locations are within a 15-minute driving range. The exception to the 15-minute range is within the City of Vancouver, where it has been very challenging to site any new locations. These criteria have been utilized by Encorp to deliver collection coverage to more than 98.6% of the population in the province. The additional coverage provided by the mandated grocery retailers brings the provincial coverage up to 99.5%. The coverage from the retail sector is mainly associated with some rural areas where it has not been viable for a traditional depot to be located.

Encorp recognizes recycling systems need to evolve with consumers' expectations and the priority is to model convenience for the consumer. There are many enhancements Encorp implemented prior to the COVID-19 pandemic that have proven to be the most effective way to evolve the system into the future that meets customers' needs and expectations.

An example of this is Return-It Express. The Return-It in-depot Express service allows customers to put all their refundable containers into a bag and drop it off at the depot, then shortly after view their balance and redeem the deposit refund via Interac e-transfer or cheque through an online account. Free to register, no sorting, no line-ups, fast, easy and rewarding. During this time of increased focus on health and hygiene, many customers have opted to utilize our Return-

It Express service in place of the traditional over the counter service as the system supports social distancing and limits consumer interaction.

We have seen a large increase in consumers utilizing this service during this time, averaging approximately 300 new Express registrants per day. This change in customer behavior will become the expectation as we evolve the model to provide a better overall customer experience. Implementing Express services in current depot locations also provides a level of convenience that has proven to attract new customers and increase the number and variety of containers registered users recycle. In-depot Express services are currently available at over 70 locations, with plans to expand to all depots with a population base of over 10,000. To reach this target Encorp will install an additional 33 Express locations over the plan timeframe.

Express & GO is a newly developed unstaffed station that can be located in high density urban areas where finding suitable real estate is difficult and also, where viable, in hard to service rural areas where there are not sufficient volumes of material to support a traditional depot. The unstaffed stations also support social distancing and provide all the ease and convenience of Express plus a security level to meet Encorp's stringent audit and controls. In consultation with local governments and retail partners, Encorp will evaluate the further development of this service provision to expand our reach and improve recovery and customer convenience levels.

Express Plus are corporately owned facilities which Encorp manages and has specifically located to provide customers with Express services along with a select variety of other EPR program materials. These corporate Express Plus locations may be used as a sorting or consolidation site for a hub and spoke center to facilitate the sorting and counting of containers collected through nearby Express & GO stations.

Plastic bags used in the Return-It Express system are collected and shipped to Merlin Plastics for recycling. As a signatory of the Global Commitment led by the Ellen MacArthur Foundation to eliminate single use plastic film from our supply chain by 2025, Encorp is also working to implement a pilot to test reusable bags at a Return-It Express Plus location in 2021.

Finding a drop-off collection location is easy for the consumer. They can simply enter their location or postal code on our website: [www.return-it.ca/locations](http://www.return-it.ca/locations)

### **Recovery Rate**

Encorp's Board of Directors and management team continuously research, test and develop improvements that require significant investments in new systems and infrastructure to attract and retain customers to our collection network, such as Return-It Express. Other initiatives Encorp has implemented include:

- The elimination of single use plastic film from our collection supplies and

- replacing them with reusable mega bags
- Depot improvement and renovation programs providing funding and no interest loans for operators to upgrade locations and enhance the customer experience
- Standard signage programs identifying acceptable products from all stewardship programs for consistent messaging and to reduce consumer confusion
- Operational standards to ensure Express customers enjoy the same service features at all locations
- Compaction pilot program to identify the viability of using a CNG hybrid solution with a mobile compaction unit to transport compacted material from depots reducing the trips necessary and ultimately reducing the program's GHG emissions
- Automation pilot program to support depots in processing containers more efficiently and help contain the increasing cost of manual labor

Our Annual Report outlines and reports on the success metrics and results for the specific initiatives for each year of operations. Continuously adapting to the ongoing changes within the industry and consumer expectations is key to reaching the recovery rates as set out in the regulation.

The 2020-2024 Encorp stewardship plan has set the following recovery rate performance targets. These targets are based on exceeding the 75% overall requirement as set out in section 5 of the Recycling Regulation and encompasses all the categories listed in Section 4 of Schedule 1.

While ambitious, the recovery rate performance targets set out in this plan have been determined based on a comparison of the previous year's actual recovery rates and then used as a starting point from the 2019 results which showed an increase of .7% from 2018. Encorp also compiles comparable statistics from other jurisdictions in Canada to assess the expected performance levels. The inclusion of milk containers in 2022 will likely result in an initial decrease in the recovery for some categories, however we are optimistic that the target results can be achieved.

We have established targets of less than 75% for two categories of containers – pouches and bag-in-a-box. These materials represent a combined 1% of the containers within the Encorp system and have limited and changing market penetration across BC making it difficult to establish key areas to target our marketing messages.

The data and research collected shows that due to the relatively small number of these types of containers sold in scattered areas within the province, it is unlikely that we will be able to achieve a 75% recovery rate within the five year plan; however, we are optimistic that we can increase the recovery to the performance targets within the plan.

Encorp will continue to develop and implement targeted awareness tactics to address these two under-performing container types.

#### 2020 – 2024 Target Chart

	Container Mix, %	2020	2021	2022	2023	2024
Aluminum Cans	37.4%	81.3%	82.3%	83.4%	84.6%	86.0%
Non-Refillable Glass	15.9%	92.3%	93.3%	94.3%	94.8%	95.0%
< 1 Litre Plastic	33.3%	73.6%	74.6%	75.6%	76.8%	78.0%
> 1 Litre Plastic	4.6%	86.1%	86.3%	86.5%	86.7%	87.0%
Drink Boxes	6.8%	60.9%	63.9%	67.0%	71.0%	75.0%
Bag in Box	0.3%	54.1%	57.0%	60.0%	63.0%	66.0%
Bi Metal Cans	0.3%	85.0%	86.0%	87.0%	88.0%	89.0%
Gable Top	0.8%	69.3%	70.3%	71.8%	73.3%	75.0%
Pouches	0.7%	30.8%	40.8%	45.5%	50.0%	55.0%
<b>Overall</b>	<b>100.0%</b>	<b>78.9%</b>	<b>80.0%</b>	<b>81.2%</b>	<b>82.5%</b>	<b>83.7%</b>

Ancillary Packaging, boxboard and plastic overwrap will be separated from the container volumes and reported annually by weight collected. Eligible producers within the Encorp system will be able to apply for a certificate of recycling for ancillary packaging that is collected and recycled which can be applied towards their Schedule 5 packaging obligations.

## 6. Consumer Awareness

The performance target Encorp has set to achieve in this plan is a 95% awareness level of the beverage container deposit program and a 90% awareness level of where residents can return their empty beverage containers for the deposit refund and/or recycling.

Encorp makes significant investments in developing strategically targeted consumer awareness and education plans. An annual budget allocated toward implementing the plan is established and initiatives are monitored and measured. Success metrics are determined based on reaching our recovery rate goals, awareness objectives and performance targets set out in the stewardship plan.

Development of the annual Marketing Strategy follows five systematic steps and all results are reported in the Annual Report. [www.returnit.ca/annualreports](http://www.returnit.ca/annualreports).

1. Define our target audience(s) through annual benchmark studies and segmentation analysis conducted by an independent third party

2. Assess opportunities based on specific beverage container data, consumer habits and diverse demographics of the segment groups. (persons with disabilities, multicultural groups and First Nations)
3. Determine objectives to reach goals for each target audience, type of container, time of year and area of the province
4. Develop strategic tactics, budget allocations and implementation timelines
5. Establish measurements of success (Key Performance Indicators or KPIs) and build in flexibility to adapt to changing markets

Targeted messaging is developed and applied to the appropriate tactic to ensure that the program communicates the following:

1. Specific beverage containers covered under the program
2. Deposit and deposit refund levels
3. Where to take beverage containers for deposit refund and recycling
4. What happens to the materials collected and the benefits of recycling
5. Container Recycling Fee levels (CRF's)
6. How the deposits and CRF's are established and used

Examples of all marketing and communication materials can be found here:  
[www.returnit.ca/ar2019](http://www.returnit.ca/ar2019)

On a regular basis Encorp engages brand owners and retailers of regulated products to ensure they are aware of their obligations related to the EPR Program in BC. We employ dedicated staff trained to engage with the stewards so they can easily and responsibly comply with the regulation.

Encorp has a dedicated Customer Relations Team and process to educate and manage all customer and stakeholder inquiries. Its Customer Relations Team maintains a continuous focus on the customer and stakeholder experience and identifies improvement opportunities and potential solutions. Through a web-based ticketing system, all inquiries are quantified and tracked. Customer inquiries and trends are then analyzed and summarized in dashboards to evaluate and make recommend changes to its communications and system, as needed. To support the increasing number of customers through Return-It Express and other programs, Encorp continues to optimize its tools to enhance the customer and stakeholder experience.

## **7. Management of Environmental Impacts**

Section 5(1) of the Recycling Regulation provides:

- *(c) the plan adequately provides for:*
  - (v) the management of environmental impacts of the program.*
  - (v) assessing the performance of the producer's product stewardship program.*
  - (vii) eliminating or reducing the environmental impacts of a product throughout the product's life cycle.*
  - (viii) the management of the product in adherence to the order of preference in the pollution prevention hierarchy. The pollution prevention hierarchy is as follows in descending order of preference, such that pollution prevention is not undertaken at one level unless or until all feasible opportunities for pollution prevention at a higher level have been taken:*
    - (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.*

Encorp and brand owners have developed stable and sustainable markets to recycle obligated beverage containers in accordance with the requirements of the Recycling Regulation. All beverage containers covered under Encorp's stewardship plan are made from non-toxic, inert materials and all container types have established secondary markets.

The chart below outlines the markets by material type and provides the most recent environmental impacts of each.

<b>Material Type</b>	<b>Fate of Material</b>	<b>2019 % mix</b>	<b>2019 Recovery % (by weight)</b>	<b>2019 Energy Savings</b>	<b>2019 Weight Diverted from Landfill (mt)</b>	<b>2019 Tonnes CO2 reduced</b>
Aluminum	Aluminum cans collected are sold and shipped to a re-melt facility in the USA and turned back into sheet stock for use primarily by our brand owners to make new cans.	37.40%	80.80%	93%	5,547	55,914
Plastic	Plastic containers are sold to Merlin Plastics and shipped right here in Canada to their two separate facilities in British Columbia and Alberta to be cleaned and pelletized to become new raw material for manufacturers of various plastic products including new beverage containers, strapping material, and fibres.	37.90%	76.80%	86%	10,594	12,511
Glass	Glass containers are processed in British Columbia and shipped to a manufacturing plant that produces fibreglass insulation in Alberta; a facility that produces new glass bottles in Seattle, USA; a facility that manufactures sandblasting materials in Quesnel, BC; and municipal sites that use crushed glass as construction aggregates.	15.90%	91.00%	34%	75,172	26,138

<p>Polycoat (Gable Top, Drink Boxes)</p>	<p>Polycoat containers are sold to ICF International and shipped to manufacturing plants in South Korea, Thailand and Japan for material recovery and production of tissue paper from the recovered fibre. Encorp also ships polycoat containers to a second supplier, Continuous Material Recovery. Continuous Material Recovery receives drink box containers at their facility in Des Moines, Iowa where they produce building boards which are used as an alternative to traditional wallboards, roofing, floorunderlayment, ceiling tiles and structured insulated panel.</p>	<p>7.60%</p>	<p>67.80%</p>	<p>53%</p>	<p>1,729</p>	<p>9,154</p>
<p>Pouches</p>	<p>Stand up pouches made of layers of plastic and aluminium foil as well as the laminated plastic bags used inside bag-in-a-box containers are shipped to ICF International. They are in the process of conducting tests to determine the viability of using them within a thermal process to make a lumber product which can be used in the manufacture of furniture, ceiling tiles and wall board. More recently Encorp has found (in 2018) a viable end market through TerraCycle in New Jersey who is using this material to make various products such as composite decking, buckets, storage totes, non-food grade container &amp; trays.</p>	<p>0.70%</p>	<p>26.30%</p>	<p>53%</p>	<p>13</p>	<p>15</p>
<p>Bi-Metal</p>	<p>Other metal containers including Bi-Metal are sold to scrap metal dealers in BC for metal recovery.</p>	<p>0.30%</p>	<p>81.3%</p>	<p>82%</p>	<p>222</p>	<p>453</p>

Bag-In- Box	The plastic bladders inside the Bag-In-Box containers are shipped to TerraCycle in New Jersey for making products such as composite decking, buckets, storage totes, non-food grade container and trays. Cardboard from the outer layer of the box is recycled by local processors	0.30%	52.10%	53%	486	574
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Ancillary packaging: Encorp will partner with a pulp and paper recycler to have the paper packaging collected recycled into boxboard cartons. Plastic overwrap collected through our system will be managed through our existing plastic stream and recycled through our current partnership with Merlin Plastics.

Greenhouse gas (GHG) emissions: While recycling has an overall net benefit in terms of energy and emissions savings, the recycling process itself requires energy and thus has GHG emissions associated with it. When estimating net savings, Encorp calculates the GHG emissions specifically associated with its stewardship activities.

Since Encorp is not a manufacturing company, the majority of our associated GHG emissions come as a result of transporting materials as well as heating and powering our network of facilities. Therefore, we define Encorp’s GHG inventory boundary from the point that empty containers enter the Encorp system at either a depot or retailer, right through to when the materials are delivered to the end processors for recycling into new products.

Greenhouse gas (GHG) emissions are estimated using conversion factors and methodologies developed by the World Resource Institute’s Greenhouse Gas Protocol (WRIGGP). The collection, transportation and processing services provided to Encorp are done through third party independent contractors and the emissions produced by those activities are classified as Indirect Scope 3 GHG emissions in accordance with the WRIGGP.

Encorp plans to become Climate Smart Certified in 2020 which requires actions to reduce the GHG emissions. Therefore, Encorp continues to invest in technology and systems and to achieve this goal Encorp has implemented a pilot project using a newly designed compaction trailer which runs on compressed natural gas (CNG) to transport materials within the lower mainland area. Since compacted materials take up less space, one compaction truck can complete an entire route before returning to the recycler, thereby reducing the number of kilometers traveled per year. Initial estimated calculations show that a conversion of the pickup fleet to CNG may reduce our GHG output by 25%. The expected savings resulting from this change would also allow us to reduce the number of trucks needed in our transportation fleet. Upon completion of the pilot, we will be able to evaluate the data and experience to determine the business and environmental case for the implementation of compaction trailers across Encorp’s collection system.

Emission calculations from electricity purchased are based on data gathered from a number of depots and processors in each region of the province. Results are used to estimate the energy use per metric tonne of material collected, then extrapolated to the total weight of used beverage containers collected in the province. The estimated energy consumption in kWhs is then converted into the carbon dioxide emissions using the calculators offered by the WRIGGP.

Annually Encorp reports on the following estimated emissions inventory in our list of performance indicators and metrics:

- Metric weight of materials diverted from landfill
- Energy savings by material type
- Greenhouse gas emissions MT-CO<sub>2</sub>-eq avoided
- Energy savings

All beverage containers collected by Encorp under the beverage container program are shipped to recyclers for further processing into new material in accordance with section 8 of the regulation.

Current container recycling end fate reports can be found in each Annual Report. [www.returnit.ca/annualreports](http://www.returnit.ca/annualreports)

A number of Encorp's registered brand owners have made significant voluntary commitments to increase the use of recycled content in their plastic beverage containers. Encorp is committed to supporting those efforts and supporting companies in meeting their targets by increasing the volume of plastic containers collected and ensuring that the material recycled is of sufficient quality for use as recycled content in new plastic bottles.

## **8. Management of Program Costs**

Section 5(1) of the Recycling Regulation provides:

- *(c) 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 sold, offered for sale or distributed in British Columbia.
  - (v) the management of costs incurred by the program.
  - (v) assessing the performance of the producer's product stewardship program*

Encorp has developed a cost-effective system to recycle all beverage containers registered

with Return-It in accordance with the requirements of the regulation. Obligated beverage containers have a deposit charged at the time of purchase, then refunded when the empty container is returned to an approved location for the deposit refund.

When the revenue from unclaimed deposits and from sales of collected material are insufficient to cover the cost of recovering and recycling a specific container type, a Container Recycling Fee (CRF) is charged on the specific container to make up the shortfall. The CRF is remitted to Encorp upon the distribution and sale of new products in the Province. The CRF, which is paid once in the supply chain, is not a tax or a refundable deposit. The CRFs are set annually at a level which covers the costs of administration, collection, transportation and responsible recycling of obligated products covered by the program.

CRFs are reviewed regularly to ensure that they are no more than is necessary to cover the ongoing cost of operating the program and maintaining the appropriate reserves, consistent with Encorp's not-for-profit mandate.

The chart below provides an outline of CRF's for the past 3 years.

Container Type	01-Feb-18		01-Feb-19		01-Feb-20	
	CRF	Deposit	CRF	Deposit	CRF	Deposit
Aluminum	1.0 cents	5 cents	0.0 cents	5 cents	0.0 cents	10 cents
Plastic ≤ 1L	3.0 cents	5 cents	3.0 cents	5 cents	3.0 cents	10 cents
Plastic > 1L	4.0 cents	20 cents	5.0 cents	20 cents	5.0 cents	20 cents
Polystyrene	3.0 cents	10 cents	3.0 cents	10 cents	3.0 cents	10 cents
Glass ≤ 1L	8.0 cents	5 cents	6.0 cents	5 cents	7.0 cents	10 cents
Glass > 1L	16.0 cents	20 cents	17.0 cents	20 cents	18.0 cents	20 cents
Bi-Metal ≤ 1L	5.0 cents	5 cents	4.0 cents	5 cents	3.0 cents	10 cents
Bi-Metal > 1L	0.0 cents	20 cents	0.0 cents	20 cents	0.0 cents	20 cents
Bag-in-Box	-	20 cents	-	20 cents	-	20 cents

Drink Boxes ≤ 500 ml	1.0 cents	5 cents	0.0 cents	5 cents	0.0 cents	10 cents
Drink Boxes 501 ml - 1L	5.0 cents	5 cents	5.0 cents	5 cents	5.0 cents	10 cents
Gable Top ≤ 1L	0.0 cents	5 cents	0.0 cents	5 cents	0.0 cents	10 cents
Gable Top > 1L	6.0 cents	20 cents	5.0 cents	20 cents	4.0 cents	20 cents
Drink Pouches	0.0 cents	5 cents	0.0 cents	5 cents	0.0 cents	10 cents
Glass Wine & Spirits ≤ 1L	12.0 cents	10 cents	13.0 cents	10 cents	13.0 cents	10 cents
Glass Wine & Spirits > 1L	16.0 cents	20 cents	17.0 cents	20 cents	17.0 cents	20 cents
Non-Refillable Beer, Cider, Cooler Glass ≤ 1L	9.0 cents	10 cents	9.0 cents	10 cents	9.0 cents	10 cents
Non-Refillable Beer, Cider, Cooler Glass > 1L	16.0 cents	20 cents	17.0 cents	20 cents	17.0 cents	20 cents
Liquor Plastic ≤ 1L	4.0 cents	10 cents	4.0 cents	10 cents	4.0 cents	10 cents
Liquor Plastic > 1L	9.0 cents	20 cents	7.0 cents	20 cents	7.0 cents	20 cents
Liquor Bag-in-Box	5.0 cents	20 cents	7.0 cents	20 cents	7.0 cents	20 cents

Encorp's financial statements are audited annually and published on its website as part of its Annual Report. The Annual Report includes key financial information such as revenues and expenditures along with additional performance measures such as cost per tonne and other non-financial measures including the number of collection locations and tonnes collected. The non-financial information is also audited before being reported, thereby being in compliance with the current requirements for the Annual Director's Report to the Province.

Encorp management regularly reviews the program and shares best practices from across all provincial programs to ensure that the program delivers a high-quality service at the lowest practical cost.

## 9. Producers Paying the Costs of Obligated Materials & Dispute Resolution

The Ministry of Environment and Climate Change Strategy has developed guidelines regarding their expectations for data gathering, analysis and consultation with licensees, contractors and other members of supply chains to ensure the costs associated with EPR programs are being covered. The following outlines how Encorp addresses these guidelines.

Encorp pays for the collection, transportation and recycling of the beverage containers registered in its program. These services are provided through contracts with various suppliers. Transportation, consolidation and recycling services are typically awarded through a competitive bid process. Encorp either directly negotiates appropriate rates or issues competitive Requests for Proposals, all to maintain market costs.

Depot collection services are compensated through handling fees on a unit-based schedule. The depot Handling Fee (HF) reviews generally run every five years, concurrent with our contract period, however off-cycle reviews can occur when required.

The setting of handling fees involves a nearly year-long process, which was utilized in 2010 and in the most recent negotiation that took place in 2017. The 2017 handling fee schedule is in effect until 2021. The process to establish the next five-year handling fee schedule will begin in the third quarter of 2020. This process provides the basis for future fee setting, although we expect with varying commercial conditions it will evolve over time. The key elements of the process include:

- A series of meetings over a period of about 12 - 14 months that allow for both in-person attendance and web/conference call attendance by all Return-It depots in the province.
- Encorp collects and distributes to Return-It system participants information on factors that influence costs, such as local inflation rates, changes to minimum wage, fees paid in other provinces and occupancy costs. These are discussed by participants. Depots are invited to put forward any additional metrics that they believe are relevant to the negotiations.
- Additionally, Encorp contracts an independent third party to study the average costs borne by depots in order to meet the program requirements. The study reviews financial, labour and space costs for a representative sample of depots and allocates the revenues and costs to the Encorp program and other programs operating within the depots.
- The independent third-party consultants collect relevant data from participating depots, carry out site visits and interview participating depots. This allows the consultant to develop a portrait of the relative profitability of the Return-It beverage container

program in an average depot. It also allows them to view the relative profit generated to depots through the Encorp program compared to other revenue generating activity in the depots. The results are shared with all participants. The independent third-party consultant presents the results, carry out a Q&A with depots and also make themselves available for individual depot inquiries.

- Once the steps above have been completed Encorp will make an offer to depots for revised handling fees

The handling fees currently paid by Encorp are the highest paid to depots by any container deposit system operator in Canada.

### **Dispute Resolution**

All Encorp depot, transport and processing contracts include dispute resolution terms that provide for, on notice of a dispute being filed by either party, a mandatory meeting to negotiate a resolution and, in the absence of resolution, mediation through a mutually appointed mediator or, failing that, arbitration.

While not specified in the regulation, Encorp has established procedures for managing complaints or concerns on the part of customers, local governments, retailers and non-commercial stakeholders.

### **10 Performance Measurement Summary Table**

The performance targets laid out in this document have been based on historical data, future trends, planned initiatives and forecasts. Encorp will report on each of the performance target results annually. The report titled “Executive Summary” published in our Annual Report will show the progress toward each goal with the expectation that all goals will be achieved by the end of the plan’s effective date.

While they will be challenging to meet, they are attainable and Encorp is proud to deliver and continually improve on one of the best EPR programs in the Province.

#### **Collection System and Consumer Access**

**97%**

Return-It’s collection system and consumer access is measured annually by using GIS mapping of all collection locations and matching the location to the population base and drive time radius. In urban areas the drive time radius is set at 30 minutes, however most locations are within a 15-minute drive time and in rural areas 45 minutes. Coverage results are reported in each Annual Report and available on the Return-It website. [www.returnit.ca/locations](http://www.returnit.ca/locations)

#### **Overall Recovery Rate achieved by 2024**

**83.7%**

The recovery rate will be measured by calculating the number of beverage containers sold in the Province, by category, as defined in the regulation, compared to the number of beverage containers collected through the Return-It system.

	2020	2021	2022	2023	2024
Overall Recovery Rate	78.9%	80.0%	81.2%	82.5%	83.7%

Recovery by weight of material will be measured by the comparing the actual weight of beverage containers collected with the average weight recorded for beverages in each category.

Both measurements will be reported by category in each Annual Report. [www.returnit.ca/annualreports](http://www.returnit.ca/annualreports)

**Consumer Awareness of the System 95%**

Consumer awareness levels will be measured through annual benchmark studies conducted by a third-party market researcher. The methodology and sample sizes will be representative of the Province and statistically accurate to a margin of +/- 4%. The studies will track changes over time and provide valuable information and consumer trends.

In addition to the benchmark study, Return-It will conduct a Segmentation Analysis to better understand consumer behavior and identify target audiences particularly around throw away behavior of each target group.

**Consumer Awareness of Locations 90%**

The awareness of locations will also be measured using the same market research study and methodology as the system awareness. Results will be reported in each Annual Report.

**Environmental Impacts**

**Reduce Scope 1 emissions by 3% annually  
Implement GHG reduction initiatives for Scope 3 emissions to yield no less than 10% reduction in the GHG emissions as a result of those initiatives**

Environmental Impacts - Encorp will track and report on the following:

- Metric weight of materials diverted from landfill
- Energy savings by material type
- GHG emissions and MT-CO<sub>2</sub>, eq avoided
- End fate of each material type

### **Management of Program Costs**

**Annual audits conducted by third party for financial and non-financial reports**

Third party auditors will be contracted to audit both the financial and non-financial statements produced by management. The full statements will be published in the Annual Report and made available to the public.

All residents of BC contribute to the success of the Return-It program by recycling the beverage containers they purchase and can be proud of this model program. Further information can be found at [www.returnit.ca](http://www.returnit.ca).

### **In Conclusion**

Encorp has and will continue to deliver the best known and most respected EPR program in British Columbia. We recognize that recovery rates must increase and recycling systems need to continue to evolve with consumers' expectation and the current environment. We must continue to invest in our Return-It program and deliver high standards. We have already made considerable changes to our system to meet these expectations and will continue to go forward.

The COVID-19 pandemic has required Encorp to quickly adapt and make the necessary changes to our systems and customer return processes to ensure the health and safety of our employees and the public. As recycling has been deemed an essential service in BC, from the start of the pandemic we have prioritized and taken the necessary measures needed to support our employees, the system, depot operators, suppliers, collectors, transporters and others within the industry to ensure recycling operations can safely operate. Some of these changes include:

- Developing and sharing Health & Safety Re-Opening Guidelines for depot operators in BC. These Guidelines adopts proactive risk management strategies to minimize risk and are consistent with recommendations outlined by Provincial health authorities, the BC Centre for Disease Control and WorkSafeBC to protect employees, customers and the community
- Providing access and supply to personal protective equipment for our network
- Developing and providing educational and informational material for operators to use at their locations

- Establishing a safety plan for all Encorp employees, including workplace standards and policies
- Supporting and setting up “work at home” capability for employees
- Forming a permanent business continuity team

The experience and knowledge gained by our executive team provides us with a solid framework to permanently include policies and action plans for the successful management through the future.

We will review and carefully consider all feedback provided by the public, key stakeholders and ministry staff through the upcoming consultation process. A final version of the 2020 - 2024 Stewardship Plan will be submitted to the Ministry of Environment and Climate Change Strategy in October for consideration and approval by the Statutory Decision Maker (SDM).

Appendix A – Covered Product Categories

Appendix B – Public Consultation (*will be inserted when completed*)

## Appendix A – Covered Product Categories

### Schedule 1

[am. B.C. Regs. 112/2010, s. 11; 284/2016; 206/2017, s. 18.]

#### Beverage Container Product Category

##### *Definitions*

**Section 1** In this Schedule:

"beverage" means any liquid that is a ready-to-serve drink but does not include milk, milk substitutes, rice milk, soya milk, flavoured milk, infant formulas, meal replacements or dietary supplements;

"container" means a container made of aluminum, glass, paper, plastic, steel or other similar material, or any combination of them, that is or was sealed by its manufacturer

##### **Application**

**Section 3** This Schedule applies to a container that

- (a) may hold, holds or has held a beverage,
- (b) is offered for sale or sold in British Columbia, and
- (c) is not a refillable container having a capacity of 10 litres or more.

##### **Beverage container product subcategories**

**Section 4** The beverage container product category consists of the following subcategories based on container material and container size:

- (a) aluminum cans;
- (b) refillable glass bottles;
- (c) non-refillable glass bottles;
- (d) plastic containers, able to hold 1 litre or less;
- (e) plastic containers, able to hold more than 1 litre;
- (f) drinking boxes;
- (g) bag in a box;
- (h) bimetal cans;
- (i) gable top containers;
- (j) stand up pouches;
- (k) beverage containers not referred to in paragraphs (a) to (j).

### **III. Encorp Consultation Presentation**

The following pages include the PowerPoint that was presented during the sessions held as a part of the Draft Stewardship Plan consultations.



Encorp Pacific  
Beverage Stewardship Plan  
2020 - 2024  
Summary Presentation

## Presentation Overview



Slide 2

- **Webinar Instructions**
- **Background**
- **Summary by Key Section**
  - Products Covered Under the Plan
  - Collection System and Consumer Accessibility
  - Recovery Rate
  - Consumer Awareness
  - Management of Environmental Impacts
  - Management of Program Costs
  - Producers Paying the Cost of Obligated Material
- **Consultation Input Information**
- **Questions and Answers**
- **Closing**

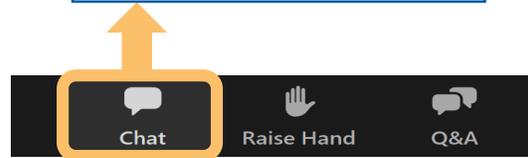
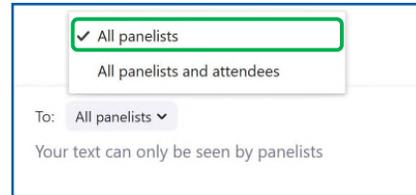
# Webinar Instruction



Slide 3

## • CHAT MESSAGES

- If you have Zoom related questions or issues, please type them into the **“Chat”** function and send it to **“All panelists.”**
  - We will do our best to help you fully participate in the session.



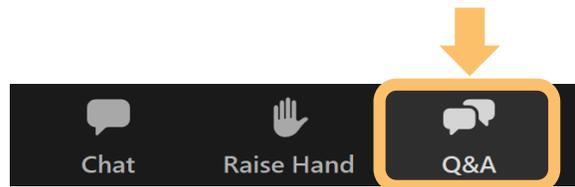
# Webinar Instruction



Slide 4

## • CONSULTATION QUESTIONS

- Throughout the presentation, feel free to ask consultation related questions by clicking the **Q&A icon** at the bottom of your screen.



# Webinar Instruction



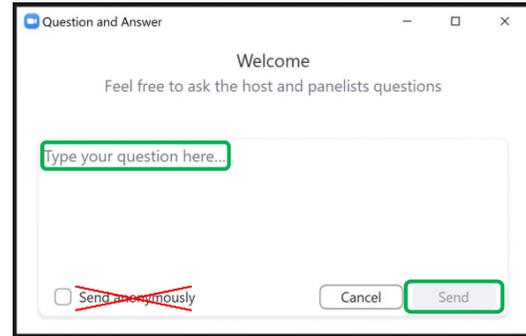
Slide 5

## • CONSULTATION QUESTIONS

- Please type your question in the dialog box that appears and then click **“Send.”**
- For consultation tracking purposes, **please do not** send questions anonymously.

### • Questions will be addressed at the end of the presentation.

- If possible, please cite the slide number the question refers to.



## Who Are We?

Operate within a 'framework' regulation versus 'prescriptive' regulation



Core business is used beverage container management. Responsible for most ready to drink beverage containers



Only province that is 100% industry managed



Service Provider for Electronic Products Recycling Association, and Major Appliances Recycling Roundtable



Largest & most recognized product stewardship agency in BC

Operating since 1994

Over **25 YEARS**

**over 750 employed**

Directly – 54 employees  
Indirectly – 700+ employees

**170+ network**

Established supply chain and infrastructure

**99%**  
**89%**

Consumer awareness  
Brand awareness

**98%**

of B.C.'s population has access to a beverage container return facility

6

## Background



Slide 7

- In 2017, Encorp applied to the Director and was approved to continue operating under the current plan with no changes except to update program performance targets and to address certain policy items that were introduced since the approval of the 2017 Stewardship Plan.
- The initial public consultation on those proposed targets was conducted between May 8, 2018, and June 22, 2018. As a result of the consultation process and discussions with the Ministry of Environment and Climate Change Strategy (MOECCS), Encorp further revised and expanded the categories of the proposed recovery rates.

## Background



Slide 8

- In November 2019, Encorp increased the deposit for all beverage containers carrying a 5-cent deposit to 10 cents. The transition from a 5 cent to a 10-cent deposit was implemented seamlessly with positive stakeholder feedback.
- Due to regulatory changes initiated by the MOECCS, Encorp has updated its Stewardship Plan and is now conducting a full public consultation.  
<https://www2.gov.bc.ca/gov/content/environment/waste-management/recycling/product-stewardship/packaging-and-paper-product>
- Encorp has extended the required 45-day consultation period for this new draft Stewardship Plan to 62 days, July 15 – Sept 15, 2020.
- A full summary of the consultation process and findings will be included in the Stewardship Plan's appendix once completed.

# Background - System Infrastructure



Slide 9

## The Return-It Network (93% of volume)

- 168 independently owned depots, 3 Express & GO stations, 1 Return-It Express Plus location

## Return to Retail (5% of volume)

- 260 Grocery Stores, 195 Government Liquor Stores

## Other Collection Points (2% of volume)

- Over one billion containers collected and recycled (78.1% recovery rate in 2019).
- 93,700 metric tonnes recycled in 2019.

# Units Collected and % of Mix Sold 2019



Slide 10

Container Type	Units
Aluminum	408 million units <b>37.4% of product mix</b>
Plastic	381 million units <b>37.9% of product mix</b>
Glass	197 million units <b>15.9% of product mix</b>
Drink Boxes/ Gable Tops	60 million units <b>7.6% of product mix</b>
Bi-Metal	3 million units <b>.3% of product mix</b>
Bag-in-Box	2 million units <b>.3% of product mix</b>
Pouches	2 million units <b>.7% of product mix</b>

## Section 3, Products Covered Under the Beverage Stewardship Plan



Slide 11

- **Milk and milk substitutes**
  - In response to the regulation change that includes milk and milk substitute containers which will be effective February 1, 2022, Encorp will expand the acceptable products to include all regulated milk and milk substitute beverages and container types sold by registered brand owners.
- **Ancillary packaging**
  - Encorp will expand its obligation and take responsibility for the ancillary packaging used by our brand owners in the packaging of their products. This will include consumer packaging such as boxboard and plastic overwrap to support Return-It's collection network at locations which do not have a contract with RecycleBC.
- **Aluminum alcohol containers**
  - Encorp will expand the acceptable products to include aluminum alcohol containers and manage both alcohol and non-alcohol aluminum containers as a combined stream within our system.

## Section 5, Collection System



Slide 12

- **The Return-It™ network** consists of independently owned and operated Return-It depot collection facilities that have collection agreements with Encorp, as well as corporate Return-It Express Plus locations and Express & GO unstaffed stations.
- **Return to Retail** is mandated under the regulation and this component of the collection network contributes about 5% of the total volume of registered beverage containers collected through the system.



## Section 5, Collection System



Slide 13

- **First Nations Recycling Initiative** – Encorp is a major financial contributors of the First Nations Recycling Initiative working with other stewardship agencies to operate recycling programs specifically relevant to Indigenous communities.
- **RecycleBC partnership** – Beverage containers collected within the curbside blue box system accounted for and are included in the total units collected and used to calculate Encorp's recovery rate.

## Section 5, Consumer Accessibility



Slide 14

- **Rural coverage** – Minimum catchment population of 3,000 within a 45-minute driving radius.
- **Urban coverage** – 30-minute driving radius, most locations are within a 15-minute driving range, with exception in the City of Vancouver where it has been very challenging to site any new locations.
- This criteria has delivered coverage to more than 98.6% of the Province's population.
- The additional coverage provided by the mandated grocery retailers brings the Provincial coverage up to 99.5%. The increase in coverage from the retail sector is mainly associated with some rural areas where it has not been viable for a traditional depot to be located.

## Section 5, Recovery Rate Performance Targets



Slide 15

	Container Mix, %	2020	2021	2022	2023	2024
Aluminum cans	37.4%	81.3%	82.3%	83.4%	84.6%	86.0%
Non-Refillable Glass	15.9%	92.3%	93.3%	94.3%	94.8%	95.0%
<1 Litre Plastic	33.3%	73.6%	74.6%	75.65	76.8%	78.0%
>1 Litre Plastic	4.6%	86.1%	86.3%	86.5%	86.7%	87.0%
Drink Boxes	6.8%	60.9%	63.9%	67.0%	71.0%	75.0%
Bag in Box	0.3%	54.1%	57.0%	60.0%	63.0%	66.0%
Bi Metal Cans	0.3%	85.0%	86.0%	87.0%	88.0%	89.0%
Gable Top	0.8%	69.3%	70.3%	71.8%	73.3%	75.0%
Pouches	0.7%	30.8%	40.8%	45.5%	50.0%	55.0%
<b>Overall</b>	<b>100.0%</b>	<b>78.9%</b>	<b>80.0%</b>	<b>81.2%</b>	<b>82.5%</b>	<b>83.7%</b>

## Section 5, Recovery Rate



Slide 16

- Recovery rate performance targets have been determined based on a comparison of the previous year's actual recovery rates and then used as a starting point from the 2019 results, which showed an increase of 0.7% from 2018.
- Encorp also compiles comparable statistics from other jurisdictions in Canada to assess the expected performance levels.
- The inclusion of milk containers in 2022 will likely result in an initial decrease in the recovery for some categories; however, Encorp is optimistic that the target results can be achieved.

## Measures to Increase the Recovery Rate and Modernize the System for a Greener Future



Slide 17

- We continuously research, test and develop improvements that require significant investments in new systems and infrastructure to attract and retain customers to our collection network.
  - **Contactless Recycling System:** Express, solar paneled Express & GO, Express Plus.
  - **The elimination of single use plastic film from our collection supplies** and replacing them with reusable mega bags.
  - **Depot improvement and renovation programs** providing funding and no interest loans for operators to upgrade locations and enhance the customer experience.



## Measures to Increase the Recovery Rate and Modernize the System for a Greener Future



Slide 18

- **Standard signage programs** identifying acceptable products from all stewardship programs for consistent messaging and to reduce consumer confusion.
- **Operational standards** to ensure Express customers enjoy the same service features at all locations.
- **Compaction pilot program** to identify the viability of using CNG hybrid trailers to transport compacted material from depots reducing the trips necessary and ultimately reducing the program's GHG emissions.
- **Automation pilot program** to support depots in processing containers more efficiently and to help contain the increasing cost of manual labor.



## Other Measures to Modernize the Recycling System



Slide 19

- Six-month pilot program at select depots to make it easier and more convenient for consumers to return both alcohol and non-alcohol aluminum beverage containers for recycling as one stream with one deposit
- Partnering with Salvation Army to expand our textiles program



## Section 6, Consumer Awareness



Slide 20

- The performance target for the awareness levels are:
  - 95% for the beverage container deposit program.
  - 90% awareness level of where residents can return containers for the deposit refund and/or recycling.
- Encorp makes significant investments in developing strategically targeted consumer awareness and education plans.
  - An annual budget allocated toward implementing the plan is established and initiatives are monitored and measured.
  - Success metrics are determined based on reaching our recovery rate goals, awareness objectives and performance targets set out in the stewardship plan.

## Section 7, Management Of Environmental Impacts



Slide 21

- Encorp and brand owners have developed stable and sustainable markets to recycle obligated beverage containers in accordance with the requirements of the recycling regulation.

Material Type	Fate of Material
<b>Aluminum</b>	Aluminum cans are sold and shipped to a re-melt facility in the USA and turned back into sheet stock for use primarily by our brand owners to make new cans.
<b>Plastic</b>	Plastic containers are sold to Merlin Plastics and shipped to their two facilities in British Columbia and Alberta to be cleaned and pelletized to become new raw material for manufacturers of various plastic products including new beverage containers, strapping material, and fibres.
<b>Glass</b>	Glass containers are processed in British Columbia and shipped to a manufacturing plant that produces fibreglass insulation in Alberta; a facility that produces new glass bottles in Seattle, USA; a facility that manufactures sandblasting materials in Quesnel, BC; and municipal sites that use crushed glass as construction aggregates.

## Section 7, Management Of Environmental Impacts



Slide 22

Material Type	Fate of Material
<b>Polycoat (Gable Top, Drink Boxes)</b>	Polycoat containers are sold to ICF International and shipped to manufacturing plants in South Korea, Thailand and Japan for material recovery and production of tissue paper from the recovered fibre. Encorp also ships polycoat containers to a second supplier, Continuous Material Recovery, who receive drink box containers at their facility in Des Moines, Iowa where they produce building boards which are used as an alternative to traditional wallboards, roofing, floor underlayment, ceiling tiles and structured insulated panel.
<b>Pouches</b>	Stand up pouches made of layers of plastic and aluminium foil as well as the laminated plastic bags used inside bag-in-a-box containers are shipped to ICF International. They are in the process of conducting tests to determine the viability of using them within a thermal process to make a lumber product which can be used in the manufacture of furniture, ceiling tiles and wall board. More recently, Encorp has found (in 2018) a viable end market through TerraCycle in New Jersey. TerraCycle uses this material to make various products such as composite decking, buckets, storage totes, non-food grade container and trays.
<b>Bag-In-Box</b>	The plastic bladders inside the Bag-In-Box containers are shipped to TerraCycle in New Jersey. They are being used for making products such as composite decking, buckets, storage totes, non-food grade container and trays. Cardboard from the outer layer of the box is recycled by local processors.

## Section 7, Management Of Environmental Impacts



Slide 23

- **Ancillary Packaging:** Encorp will partner with a pulp and paper recycler to have the paper packaging collected recycled into boxboard cartons. Plastic overwrap collected through our system will be managed through our existing plastic stream and recycled through our current partnership with Merlin Plastics.

## Section 7, Management Of Environmental Impacts



Slide 24

- Performance Target
  - Reduce Scope 1 emissions by 3% annually.
  - Implement GHG reduction initiatives for Scope 3 to yield no less than 10% GHG emissions as a result.
- While recycling has an overall net benefit in terms of energy and emissions savings, the recycling process itself requires energy and thus has GHG emissions associated with it. When estimating net savings, Encorp calculates the GHG emissions specifically associated with its stewardship activities.
- Plans to become Climate Smart Certified in 2020 – includes investing in technology and systems (i.e. compaction pilot program)
- Annually Encorp reports on the following estimated emissions inventory in our list of performance indicators and metrics:
  - Metric weight of materials diverted from landfill.
  - Energy savings by material type.
  - Greenhouse gas emissions MT-CO<sub>2</sub>-eq avoided.
  - Energy savings.

## Section 9, Paying The Cost of Obligated Product



Slide 25

- Encorp pays for the collection, transportation and recycling of the beverage containers registered in its program. These services are provided through contracts with various suppliers. Transportation, consolidation and recycling services are typically awarded through a competitive bid process. Encorp either directly negotiates appropriate rates or issues competitive Requests for Proposals, all to maintain market costs.
- Depot collection services are compensated through handling fees on a unit-based schedule. The depot Handling Fee (HF) reviews generally run every five years, concurrent with our contract period, however off-cycle reviews can occur when required.

## Section 9, Dispute Resolution



Slide 26

- All Encorp depot, transport and processing contracts include dispute resolution terms that provide for, on notice of a dispute being filed by either party, a mandatory meeting to negotiate a resolution and, in the absence of resolution, mediation through a mutually appointed mediator or, failing that, arbitration.
- While not specified in the regulation, Encorp has established procedures for managing complaints or concerns on the part of customers, local governments, retailers and non-commercial stakeholders.

# Section 10, Performance Measurement Summary Table



Slide 27

**Collection System and Consumer Access 97%**

Overall Recovery Rate achieved by 2024

	2020	2021	2022	2023	2024
<b>Overall Recovery Rate</b>	<b>78.9%</b>	<b>80.0%</b>	<b>81.2%</b>	<b>82.5%</b>	<b>83.7%</b>

**Consumer Awareness of the System 95%**

**Consumer Awareness of Locations 90%**

Environmental Impacts	<p><b>Reduce Scope 1 emissions by 3% annually.</b>                      Implement GHG reduction initiatives for <b>Scope 3 emissions to yield no less than 10% reduction</b> in the GHG emissions as a result of those initiatives.</p>
Management of Program Costs	<p><b>Annual audits conducted by third party for financial and non-financial reports.</b></p>

# Emerging Economy Task Force Report



Slide 28

- Shared our feedback and aligned with the recommendations outlined by the Emerging Economy Task Force committee in its March 2020 report, specifically:
  - Embracing technology and innovation
    - Consistent with our current practices and measures to modernize BC's recycling system
  - BC Government capitalize on opportunities presented by the circular economy
    - Encorp's system is a leading example of the potential for EPR programs to support the transition to a more circular economy

## Return-to-Retail



Slide 29

- Over the past few months, many retailers have stopped collecting used beverage containers (UBCs) at their stores
- We have received feedback from retailers about their continued concerns in handling containers given the heightened focus on health and hygiene especially in light of a potential 2<sup>nd</sup> wave of COVID-19
- In addition, many grocery retailers (and retailers in general) are concerned about the added food safety and hygiene impacts of storing used milk containers within their stores when milk and milk substitute containers are added to the deposit system in 2022

## Return-to-Retail – Rural Impacts



Slide 30

- Return-to-retail requirements are having a negative impact on depots in small, rural communities
- Many small communities have a depot, grocery store and liquor store all collecting UBCs when the depot could easily collect all the containers
- Encorp brand owners are being asked to support province-wide network of depots when many depots in these small communities are only able to collect 60 - 80% of the available containers and do not have access to a BDL contract

## Return-to-Retail Solutions



Slide 31

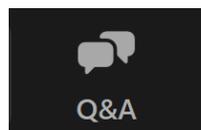
- Request province to shift from mandatory to voluntary return-to-retail system that could feature:
  - Partnership opportunities between retailers and Encorp to site Express & GO locations in underserved urban or suburban locations
  - Elimination of return-to-retail requirements in rural communities of less than 5,000 people with an existing depot
  - Establishment of additional Express & GO locations in rural communities between 1,000 and 2,500 people that do not currently have a depot

## Questions and Answers



Slide 32

### Written Questions



## Live Questions

### • RAISING YOUR HAND

- At this point, if there is a question you would like to ask verbally, please raise your hand by clicking the **“Raise Hand” icon**.



# Webinar Instruction



Slide 35

## • RAISING YOUR HAND

- Once you click the **“Raise Hand” icon**, the hand icon will become **blue** which means that your hand is raised.
- Please keep your hand up until we get to your question.



# Webinar Instruction



Slide 36

## • UNMUTING YOURSELF

- Once it is your turn to ask a question, we will enable your microphone and you will be asked to unmute through the following window:



- Please select **“Unmute.”** You may then ask your question.
- For follow up questions, please raise your hand again.

## Questions and Answers



Slide 37

### Live Questions



## Closing



Slide 38

[beverageplan2020@returnit.ca](mailto:beverageplan2020@returnit.ca)  
[www.return-it.ca/beverageplan2020](http://www.return-it.ca/beverageplan2020)

Please provide Input by September 15, 2020.



Thank You!

#### **IV. Webinar Registrants, Attendees, and Transcriptions**

The following section outlines the registrants, attendees, and transcriptions for each of the seven consultation sessions held between July 16th and August 20th, 2020.

### Consultation Session 1: Webinar with the General Public – July 16, 2020

#### *Registrants and Attendees*

No.	Registrant Name	Organization	City, Province	Attended Webinar (Yes/No)
1	Jodi Tomchyshyn London	JTL Squared Consulting Inc.	Calgary, AB	Yes
2	Cristina Arabagi	AquaTerra Corporation	Toronto, ON	Yes
3	Aziz Barna	Revelstoke Bottle Depot	Revelstoke, BC	Yes
4	Monica Kosmak	City of Vancouver	Vancouver, BC	Yes
5	Brook Lotzkar	Regional Recycling	Vancouver, BC	Yes
6	Brittany Mckinnon	City of Surrey	Surrey, BC	Yes
7	Kylin Han	AquaTerra Corporation	Richmond, BC	Yes
8	Cheryll Cox	Georgia Main Food Group	Vancouver, BC	Yes
9	Isabelle Faucher	Carton Council Canada	Toronto, ON	Yes
10	Lindsay Collins	Loblaws	Brampton, ON	Yes
11	Roberto Melfi	BC Ministry of Environment and Climate Change Strategy	Victoria, BC	Yes
12	Jillian Kittson	BC Ministry of Environment and Climate Change Strategy	Victoria, BC	Yes

No.	Registrant Name	Organization	City, Province	Attended Webinar (Yes/No)
13	Jay Aarsen	Interior Recycling	Vernon, BC	Yes
14	Brianne De Man	Binners' Project	Vancouver, BC	Yes
15	Meghan Ebueza	Regional District of Nanaimo	Nanaimo, BC	Yes
16	Anita Yuen	Haney Bottle Depot	Maple Ridge, BC	Yes
17	Rachel Morier	Brewers Distributors Limited	Toronto, ON	Yes
18	Sean Johnson	Sun-Rype	Kelowna, BC	Yes
19	Landon Hoyt	Binners' Project	Vancouver, BC	Yes
20	Romeo Arce	Regional Recycling	Vancouver, BC	Yes
21	Lucas Harris	Ministry of Environment and Climate Change Strategy	Victoria, BC	Yes
22	Maria Lo	Metro Vancouver	Burnaby, BC	Yes
23	Andrew Doi	Metro Vancouver	Burnaby, BC	Yes
24	Dennis Kinsey	CGS Ltd.	Maple Ridge, BC	Yes
25	Jon Mills	City of Salmon Arm	Salmon Arm, BC	Yes

No.	Registrant Name	Organization	City, Province	Attended Webinar (Yes/No)
26	Jeff Martel	City of Surrey	Surrey, BC	No
27	Michael Saguri	Perfect Marketing Corporation	Vancouver, BC	No
28	Roman Romaniuk	Acuity Analytics Ltd.	Spruce Grove, AB	No
29	Michael Pearce	N/A	Maple Ridge, BC	No
30	Dan Kinsey	Salvation Army	Langley, BC	No
31	Savannah Paine	Depot	Langley, BC	No
32	Lindsay Collins	Loblaws Inc.	Brampton, ON	No
33	Shabbir Beawerwala	Loblaws Inc.	Brampton, ON	No
34	Unknown (1-780-454-0400)	N/A	N/A	Yes

### Transcription

Question / Comment	Name (Organization)	Encorp Response
On side 9, Return to Retail is listed at 5%. Does this rate of utilization of Return to Retail also apply in Metro Vancouver?	Andrew Doi (Metro Vancouver)	We don't have the specific breakdown, but I would assume that we don't see a huge deviation in Metro Vancouver compared to other parts of the province. If we dive into the numbers deeper, probably 60%, of that, 5% is coming from grocery retail and less than 40% from government liquor stores.

Question / Comment	Name (Organization)	Encorp Response
		We can do further research if there's anything that shows there is a huge deviation from that 5%. We can include that in the consultation report and reply back with a written answer to Andrew.
Slide 11 - Will Milk and Milk substitutes be covered under Return-In and Recycle BC depots, how will that work?	Meghan Ebueza (Regional District of Nanaimo)	The plan right now is to include milk and milk substitute products, so it would go to depots for sure, and they would be collected much like they would every other product. There would be a deposit on milk containers and milk substitutes starting February 1 <sup>st</sup> 2022 and those would come back to our depots and consumers would be eligible to get their deposit. It would essentially be included and managed in the system much like all other beverage containers are managed today.
On slide 16, it seems that recovery rate targets are based (in part) on the prior year's performance. In the last Plan (2014? 2015?), Encorp used a 5-year rolling average to set recovery rate targets. Is Encorp proposing to use a different methodology to set performance targets? Can you share further details on the new methodology?	Andrew Doi (Metro Vancouver)	We used the prior year recovery rate as a base to calculate and forecast recovery rates into the future. We believe it is the most progressive way to calculate only because the recovery rate for each individual container categories in the past had much softer recovery rates, so therefore we are not using a 5 year rolling average. Otherwise we would come up with lower performance targets than we have proposed. We are targeting a year over year increase in recovery rates exceeding 1% for each year. We are coming up with a different methodology and using the prior year targets as a base to be exceeded in every subsequent year.
When will rural areas like Revelstoke combine/start taking beer cans with non-alcoholic cans together? We are not part of the pilot and the consumers demand is so high not to sort.	Aziz Barna (Revelstoke Bottle Depot)	Not sure why Revelstoke is not on the pilot. They will have to communicate to us. If you already have a licence agreement with the BRCCC, you wouldn't be eligible to participate. We agree that there is a strong desire for consumers to have everything managed through one stream. That's why we've added the containers into our Stewardship Plan, as a result of fatigue in having to deal with constant consumer complaints on having their refunds on alcoholic containers discounted. We don't think it's fair to consumers that they have a government mandated fee discounted, so given that no other agency or government was willing to take action, we felt that it was incumbent on us to at least deliver some type of solution to address the growing concerns we were hearing from consumers.
Are the targets unit-based (as opposed to weight-based)?	Isabelle Faucher (Carton Council Canada)	Yes, they are because that is what is called for in the Regulation and the Schedule.

Question / Comment	Name (Organization)	Encorp Response
Can you confirm the RVMs can take all containers, including cartons?	Isabelle Faucher (Carton Council Canada)	Reverse Vending Machines (RVMs) can't take all containers, we do believe that they will be able to take cartons. There may be some challenges with drink boxes that do not have the UPC code. We will need to have conversations about how we will address those issues. There will be some containers – especially large milk jugs – that may be a challenge for RVMs. At the end of the day, we think the RVMs will be able to take the majority of the containers and will just provide another solution for depots in terms of addressing some of the labour challenges, particularly at large depots. We do have RVMs in one depot. We do see a sizeable number of the customers using that depot do use the RVMs and do have a satisfactory experience.
Are you planning on deploying specific actions to grow the recovery rate of container types that have typically lagged in the past, in order to get them to the targets you have set?	Isabelle Faucher (Carton Council Canada)	Yes. For some of the container types that have been struggling, particularly when we look at the gable top and tetra pack – we're going to have to address this with a specific strategy. We are going to be adding a significant number of gable top containers. We are hoping to leverage the fact that all gable top beverage containers will be a part of the system now. We will not be asking consumers to differentiate between juice and milk. So, we will have to develop strategies to leverage that development and ensure consumers know they are eligible to get a deposit refund for these containers and understand that. From here we can increase the recovery rate for these containers. We'll work with other jurisdictions that have added milk containers to see if there are things we can leverage in terms of increasing the recovery rate, particularly of polycoat containers: gable top and tetra pack.
When is monthly and/or annual regional per capita returns available?	Meghan Ebueza (Regional District of Nanaimo)	We do regional breakdowns of recovery of containers in our annual reports. This has been a feature of our annual reports for a number of years now. I would direct Meghan to that report. We just published our 2019 report a couple of weeks ago. If there are any questions on this, please follow up with me and I can answer those questions offline.
Will consumers still be able to put milk/milk substitute containers in with their curbside recycling (funded by Recycle BC) if they do not want to or are unable to get to a depot?	Jon Mills (City of Salmon Arm)	Yes, we haven't formally addressed this with Recycle BC yet, but our expectation is that those containers would fall under the current arrangement we have (which is really a tri-party arrangement) with them and their processor GFL. Right now, all containers that end up in the Recycle BC system, curbside or multi-family, are accounted for. We pay deposits to Recycle BC for those containers. It is our intent to include milk and milk substitute containers in that arrangement. Any milk

Question / Comment	Name (Organization)	Encorp Response
		container or milk substitute container that was collected and included in the blue box or multi-family recycling system would be accounted for and deposits for those materials would be paid to Recycle BC.
Will there be any handling fee review in the near future due to various extra costs of Covid 19 - lower volume in some very resort based towns that has impacted significantly?	Aziz Barna (Revelstoke Bottle Depot)	<p>There are a number of things that need to be addressed in this question. One is that we're conscious that Return-It, while we make up the majority of the material going through these depots, we don't make up all of it. If there are any adjustments needing to be made, they need to be made by a number of organizations. In terms of handling fees, we also know our handling fees are coming up with 2022 as the next scheduled negotiation process, and so there are going to be two things in this Stewardship Plan that are going to impact that. Are we to include alcoholic containers going forward? This would have an impact. And having milk containers included would also increase the volume of containers.</p> <p>We want to understand those variables first before we can make any commitments to containers. In terms of volumes, one of the things that need to be discussed with both our depot operators and retailers, is given the significant drop in return to retail, does return to retail continue to make sense? Does the government, or its policy, inadvertently compete with depots, particularly in rural communities? We can't continue to have our brand owners support the province wide depot network if they are having to compete with largely subsidized return to retail networks. Either subsidized by retailers, or by the government through the liquor distribution branch system. These are complex issues. We are committed to finding ways to get more volume through our depots including through our rural depots, and finding ways to make sure depots are competing on the same playing field, where everyone is getting the same amount, and some don't have a competitive advantage over others. That is our ultimate goal and objective.</p>
You mentioned that you will start accepting ancillary packaging as part of the new Stewardship Plan. Does this mean that ancillary packaging associated with beverage containers was never covered under any PPP stewardship plans previously, and why?	Brienne De Man (Binner's Project)	It is covered under the Recycle BC plan, and so depots of ours with a Recycle BC contract are collecting that material and are able to have that material shipped to Recycle BC. The challenge is that the majority – almost 60% of depots – do not have a relationship with RecycleBC, and we know some of this material still comes to them, particularly the cardboard boxes for aluminum containers. From our perspective, we don't feel it's fair to have depots manage that material. We have included it in our Stewardship Plan so that we can begin constructing a system to make sure that this material, obligated material under Schedule 5, is being accounted for, that our depots do not have to pay money to either recycle it or

Question / Comment	Name (Organization)	Encorp Response
		landfill it, and that we can give credits back to our brand owners. Our intention is that we recycle this material, and then give credits back to brand owners at their request and that they can use in meeting their Schedule 5 obligations. Given it is an obligated material, we need to close this gap and ensure our depots don't bear the burden of paying for a material that is already included under the Recycling Regulation. There is a current plan, but unfortunately there are some gaps, and it's not comprehensive enough. While we totally understand the rationale for Recycle BC wanting only a set number of depots, we do want to make sure that our depots have some way in ensuring this material is collected, and they are being paid some money for this collection, and they are not having to pay for the costs to manage it themselves.
Good morning, by adding milk and milk substitutes, will milkettes and creamers that are sold in a bag of i.e. 160 small containers- will these become subject to beverage container program in year 2022? Thank you!	Cristina Arabagi (Aquaterra Corporation)	The regulation is specific to 'ready to drink' sealed beverages. The intention is that the beverage would be consumed on its own. My belief is that these items will not be a part of the program, but we can double check to confirm that for you. At this point, the regulation covers a 'ready to drink' beverage that is in a sealed container.  <i>Clarifying Note: The recycling regulation stipulates "ready to drink" milkettes and creamers are not considered "ready to drink" beverages and, therefore, are not captured under the Beverage Container schedule of the regulation but under the PPP schedule 5.</i>
To confirm, deposit amounts are not changing further from the current 10 cent / 20 cent, correct?	Isabelle Faucher (Carton Council Canada)	That is not correct. It is our intention to lower the 20 cent deposit to 10 cents this fall. We should have more information on the specific timing shortly, but we are planning to move to a unified flat deposit. With the recent changes by the government to include milk, one of the other changes was to establish a flat 10 cent deposit in the regulation, so it is our intent to drop the 20 cent rate down to 10 cents, so that all containers have a 10 cent deposit. We feel that this will make for a much more efficient system for operators in terms of being able to sort and count these containers, but it will also provide for more transparency for consumers. They will be able to more easily calculate the amount that they should be owed. It is a much simpler, more transparent system for everyone involved.
In terms of Electronic handling fee, the fee is based on weight, while new productions on recent technology produces small and smaller	Aziz Barna (Revelstoke Bottle Depot)	While we are responsible for operating the electronic product recycling program, in terms of managing their collection, we are not responsible for establishing those rates, so I would ask you to direct that question to Craig Wisehart of EPRA. That

Question / Comment	Name (Organization)	Encorp Response
products. Any change in payment strategy in future based on this change?		is outside the scope of this Stewardship Plan, and outside the scope of our role as a contractor on behalf of EPRA.
As it relates to Schedule 5 packaging collected at Return-It depots, will it ultimately be Encorp or Recycle BC which reports the tonnage?	Andrew Doi (Metro Vancouver)	We have no intention of reporting the tonnage, and no intention of having our brand owners report the tons that they supply to the marketplace. We think there is a functioning system out there already. Our intention is to collect the material, ensure that it meets the standards required for the third party assessment process to ensure it was actually recycled, and if at all possible, we would like to see the material recycled into new ancillary packaging for beverage containers. Whatever tons are collected, we would portion out certificates of recycling to our brand owners, and they would be able to use them in meeting their obligations under Schedule 5. They could provide those to Recycle BC and those tonnages could be included in Recycle BC's annual report.
Will the slide deck be sent out to participants?	Jon Mills (City of Salmon Arm)	We will either send it out, or make it available on our website.

## Consultation Session 2: Webinar with Retailers – July 23, 2020

### *Registrants and Attendees*

No.	Registrant Name	Organization	City, Province	Attended Webinar (Yes/No)
1	Lucas Harris	BC Ministry of Environment and Climate Change Strategy	Victoria, BC	Yes
2	Roberto Melfi	BC Ministry of Environment and Climate Change Strategy	Victoria, BC	Yes
3	Christal Hazard	Thrifty Foods and Safeway BC	Victoria, BC	Yes
4	Joelle Assaraf	Costco Wholesale Canada Ltd	Ottawa, ON	Yes
5	Katherine Larocque	Costco Wholesale Canada Ltd	Ottawa, ON	Yes
6	Greg Wilson	Retail Council of Canada	Vancouver, BC	Yes
7	Staci Halyk	Georgia Main Food Group	Burnaby, BC	Yes
8	Lindsay Collins	Loblaws	Brampton, ON	Yes
9	Paul Cope	Save On Foods	Langley, BC	Yes
10	Morgan Sather	Federated Co-operatives Limited	Saskatoon, SK	Yes
11	Meghan Woods	BC Liquor Distribution Branch	Burnaby, BC	Yes
12	Luc Lortie	Costco Wholesale Canada Ltd	Nepean, ON	Yes

No.	Registrant Name	Organization	City, Province	Attended Webinar (Yes/No)
13	Raman Johal	London Drugs	Vancouver, BC	Yes
14	Shabbir Beawerwala	Loblaws Inc.	Brampton, ON	Yes
15	Julie Dickson	Save On Foods	Surrey, BC	Yes
16	Philippe Cantin	Retail Council of Canada	Montreal, QC	Yes
17	Avery Bruenjes	Retail Council of Canada	Vancouver, BC	Yes
18	Ariana Lo	Georgia Main Food Group	Burnaby, BC	Yes
19	Natalie Pecile	Tim Hortons	Toronto, ON	No
20	Kelsey Morden	Retail Council of Canada	Toronto, ON	No
21	Tom Truchan	Georgia Main Food Group	Burnaby, BC	No
22	Unknown (1-416-277-5942)	N/A	N/A	Yes
23	Unknown (1-604-252-7504)	N/A	N/A	Yes

***Transcription***

Question / Comment	Name (Organization)	Encorp Response
If Return-It collects from roughly 200 grocery stores, who collects from the other 1400+ grocery stores?	Greg Wilson <i>(Retail Council of Canada)</i>	In many cases, those other retail locations will have negotiated pick up arrangements with a local depot. In some cases, it may be that other stores are not collecting containers at all. We know a challenge with mandatory Return-to-Retail is that the government has limited compliance resources to actually enforce. We do get queries and questions from consumers from time to time on this.
Is there any barrier to grocers collecting Express bags from consumers?	Greg Wilson <i>(Retail Council of Canada)</i>	<p>We'd certainly be open to it. We haven't engaged in discussions, but if it made sense, we think it's certainly a possibility. Whether it's by locating an Express &amp; GO station in a parking lot of a grocery store, or having people bring in Express bags, we could pick them up currently as we do. But then it wouldn't involve staff at grocery stores counting the containers or providing the cash refund.</p> <p>We know once consumers switch over to Express, it's by far their preferred method. So I'm definitely interested in exploring opportunities to have Express locations managed through retail locations as well.</p>
What is the plastic recovery rate vs recycling rate?	Luc Lortie <i>(Costco Wholesale Canada Ltd.)</i>	<p>In the regulation, the way the recovery rate/collection rate is defined is containers collected vs. containers distributed.</p> <p>We don't publish any sort of plastic recycling recovery rates, but our partner Merlin Plastics recycles both the caps and the bottles. And we are dealing with extremely clean material. The material you get through a deposit program is much cleaner and more high-quality. We get a very clean stream of material, there is very little loss of material through the recycling process.</p> <p>It's not information we're required to publish under regulation, so it is not information that we track.</p>
Is there automation available to help grocers, particularly to help manage unsanitary milk containers?	Greg Wilson <i>(Retail Council of Canada)</i>	We spent a lot of time looking at RVMs. We've done a lot of investigation for our automation pilot; proposing RVMs in depot locations. We do have RVMs in one of the depot locations (the Kensington location in Burnaby, East Hastings, operates RVMs currently). There are limitations to those devices, and one is around the size. So things like 4L milk jugs would not be compatible, and could not be managed through that system. When we're looking at depots, it's primarily to handle plastic bottles, glass bottles, and aluminum cans—cylindrical items. It can handle cartons, but in particular drink boxes prove to be a

Question / Comment	Name (Organization)	Encorp Response
		<p>challenge, because often they don't include a bar code. And they may not be picked up through the system.</p> <p>RVMs are a complimentary tool, but they wouldn't—at least as they are designed right now—be a tool for managing milk containers, particularly large milk jugs.</p> <p>That wouldn't really be an option for managing those containers.</p>
<p>Will adoption of machines be mandatory? How many machines were tested and who will maintain the machines when they break and materials are left beside the machine?</p>	<p>Luc Lortie (Costco Wholesale Canada Ltd.)</p>	<p>I'm going to assume the question is around retail. We have no plans at this point to introduce automation at retail.</p> <p>All of the automation that we are discussing is for 8 depot locations. We've had a test site in our network operating for somewhere in the neighbourhood of 3–4 years. We've learned a lot about how automation works and how it can be leveraged to improve the efficiency of our depot operations.</p> <p>While we'll be helping facilitate the introduction of automation, the contracts for those systems will be between the independent operators and the company supplying the machines. There will be service contracts associated with those, and that will be dealt with in terms of providing the ongoing maintenance. All of that is part-and-parcel of the contract service offered to people who service the system.</p> <p>We've got experience in that. We also use some of that technology in our own count centre in New Westminster. We've found that to be a reasonable way to go, and effective.</p> <p>Just to clarify, it isn't our intention to introduce automation at retail, unless of course someone were to approach us, and we've discussed some limitations.</p> <p>But even on the depot side, it isn't mandatory. What we're trying to do is partner with depots that have large volume, where we think automation would make the most sense. Automation will not make sense for every depot in our program, but when depots have a certain volume, of say more than 7 million units/year, then it could address the challenges they face in terms of manually sorting that many containers—10 million or 15 million containers. At that point it seems like automation makes a lot of sense.</p>

Question / Comment	Name (Organization)	Encorp Response
Will the machines take milk products and are they designed to handle bacteria growth?	Luc Lortie (Costco Wholesale Canada Ltd.)	<p>Yes, they can handle—potentially—the cartons. In terms of bacteria growth, would have to talk to the operator. I know they used them in Alberta for a number of years. Milk cartons there have been sorted through these systems.</p> <p>The maintenance required is constant cleaning, so it needs to be cleaned really every day. Part of the issue in addressing that is the constant cleaning.</p> <p>As I said before, the challenge is large plastic milk jugs really can't be managed through reverse vending machines at this point.</p>
What changes in health and safety have been implemented due to COVID-19?	Luc Lortie (Costco Wholesale Canada Ltd.)	<p>We've worked with a small group of our depots to develop guidelines for all BC depot operators in managing the impacts of COVID-19. So we've recommended that the operators provide best practices with their staff, such as gloves and masks, enforce social distancing guidelines and limit the number of people in the depot at a time.</p> <p>If there is interest, we are happy to share those guidelines, they are pretty comprehensive.</p> <p>At the end of the day, what the guidelines are meant to provide was an overview of the types of things that operators should consider when managing their depots to protect both their staff and the public. But each site is required to have its own site-specific plan. That's the plan the WorkSafeBC will look at if they come in and do a site visit. They'll need to see that there's a site-specific plan.</p> <p>We worked with our depots to set up some guidelines and ensure that those guidelines reflect best practices, and we will continue to look at evolving those guidelines as direction from the Provincial Health Officer changes.</p>
What is being done to redress geographic gaps in depot service (West Side and West End of the City of Vancouver, parts of City of Victoria and West Vancouver)?	Greg Wilson (Retail Council of Canada)	<p>For all three areas, we are actively looking at establishing depots, establishing corporate Return-It Express Plus locations and establishing Express &amp; GO locations.</p> <p>We have a proposal right now for West Vancouver; we have a call with the City of Vancouver later this week around options in that community. We're actively working on a site in Victoria.</p>

Question / Comment	Name (Organization)	Encorp Response
		Within those communities, there are obviously gaps, and we are looking at a variety of options available to us to try and fill those gaps in the most efficient manner possible.
Would glass containers also be collected through the Express & GO? Or would both alcoholic and non-alcoholic containers still need to be taken to a depot?	Christal Hazard (Thrifty Foods and Safeway BC)	Alcoholic containers are already collected through our Express system, be it at the depot, Return-It Express Plus or Return-It Express & GO. We've had to publish guidelines and recommended to consumers and said "don't put more than 12 wine bottles in a bag, as it can be quite heavy for depots to manage," but we've had no issue in managing alcoholic containers, alcoholic glass containers, through the Express system. It seems to work quite well.
Has there been any consultation within government (in particular between the Ministry of the Environment and the BCCDC or WorkSafe) on the health and food safety implications of bringing milk into the retail to retail regime?	Julie Dickson (Save On Foods)	Not that we're aware of, but we can certainly include that question in our summary and maybe get the Ministry of Environment to provide a response, hat we can include in our consultation summary.  But at this point, we're not aware of any consultation they've had with BCCDC.
Why are Costco supercenters not mandated to collect any empties?	Shabbir Beawerwala (Loblaws Inc.)	Costco supercenters would fall under the same requirements as every other retailer. As far as I'm aware, because we've been involved in some of these discussions, they are collecting containers on a regular basis.  From the information we have as of today, Costco is not out of compliance and is collecting containers at their retail locations.
Will you be emailing out this presentation to the participants?	Christal Hazard (Thrifty Foods and Safeway BC)	Absolutely.
Depots get a fee for handling containers but retailers get nothing for the same service. Any plan for a level playing field?	Shabbir Beawerwala (Loblaws Inc.)	Yes, from our perspective, and I think that gets to one of the key issues related to the Return-to-Retail requirements, having containers collected at retail is a growing cost. For us to send trucks around to a number of locations to collect containers doesn't make sense from a cost perspective or an environmental perspective.  In addition, the government is essentially having retailers subsidize collection. We pay depots because it is our way of ensuring there is infrastructure. I think there needs to be a discussion about the costs of the current systems, because not only is the government mandating retailers, but the government through its

Question / Comment	Name (Organization)	Encorp Response
		<p>liquor stores is also providing subsidized collection. The current system as it's structured does not seem to be sustainable.</p> <p>The increase in cost to consumers that would be required to change the current system and pay retailers and depot operators, does not seem sustainable, and not something retailers want to see, in terms of added cost to consumers.</p> <p>I think, really, the path forward is to come up with a voluntary Return-to-Retail system and to begin to implement other initiatives which can provide relief from having to have all containers go back to retail, which probably isn't sustainable in the long term.</p>
Do dairy containers include yogurt tubs, ice cream buckets, yogurt drink bottles, tetra packs, etc.?	Shabbir Beawerwala (Loblaws Inc.)	<p>It would be anything that is fluid. Milk, milk substitutes. I believe that yogurt drink bottles would fall under that, but we could confirm that.</p> <p>Certainly anything like yogurt tubs, ice cream buckets, those items would not; it would have to be a dairy beverage.</p> <p>Other milk products would not be included, cheese, yogurt, ice cream, etc., those would not be included in the program.</p>
Has anyone studied the costs to retailers of return-to-retail?	Greg Wilson (Retail Council of Canada)	<p>Encorp itself has not. We are cognisant that there are costs to retailers. From our perspective, the challenge inherent in the current system is trying to manage the tension between the desire to have a province-wide depot system and to also manage a dwindling number of containers through retail. When you add on the health and safety implications of adding milk containers, we're conscious that—I think from our perspective, it's not just so much cost, it's whether it's sustainable to continue to operate the system as it is today.</p> <p>What we're proposing is to find other solutions. From a policy perspective, I think we'd support Return-to-Retail on a voluntary basis, if people believe there is a business case to be made. But for the most part, we just think that it would result in pretty marginal returns in terms of numbers of containers.</p> <p>We were at 10% containers coming back from Return-to-Retail 10 years ago, we're now down to 5%. It could be in the next 5 years that we are down to 2.5% particularly if things like Express become more and more popular, which right now is up to 85,000 subscribers.</p>

Question / Comment	Name (Organization)	Encorp Response
		<p>One of the hallmarks of the BC system has been the flexibility it has provided to innovate and provide new solutions for meeting consumer expectations.</p> <p>What we are looking for is some engagement with the government on providing some added flexibility, so that we can innovate and provide accessibility and convenience to consumers in new ways that make sense and maybe address the unsustainability in terms of the cost of the current system, as well as some of the health and safety concerns that have been raised with the introduction of milk.</p> <p>For milk containers, both of the other two jurisdictions in Western Canada to introduce milk operate depot-only systems. Last year we had a better recovery rate than Saskatchewan, the previous years both Alberta and Saskatchewan had a high recovery rate, while at the same time not having or using a Return-to-Retail collection system for containers.</p> <p>It seems clear we can achieve the target recovery rates and get our recovery rate up into the 80 percent plus without having to rely on Return-to-Retail, and we've got examples from nearby jurisdictions that it works.</p>
<p>With the growing concern from customers and employees, for handling the bottles in particular, you've proposed a couple of different ideas on how we can do things without having to handle them personally. What I'm wondering is: what is a realistic timeline for the rollout, or, either for some of these pilots, so, going beyond the pilot and going to rollout, or potentially for decisions being made on the collection of the Express bags at retail?</p>	<p>Christal Hazard (Thrifty Foods and Safeway BC)</p>	<p>Some of that will be government. We have been piloting Express &amp; GO since October. It works. We know it, and we're trying to roll out as many as we can this year.</p> <p>We have nine additional stations we want to roll out. If the retailers are interested, we can't put enough in the field fast enough.</p> <p>For both Express &amp; GO stations in retail, and Express bags coming in, we want some assurance from the government that this will meet the Return-to-Retail requirements. We think it should, but that's where we really need direction from government. If they do that, then I think we're off to the races.</p> <p>My only concern with that also comes down to the aluminum alcohol containers. Those really need to be in our system, because if we start accepting these bags at retail, we won't know what kind of containers are in there, and it's quite likely that we're going to get alcohol aluminum containers. So, we can't after the fact tell the consumer that "oh, those aren't allowed in the system," it doesn't make any sense. This is where we really need engagement from the province. From our perspective, we should have solutions in place before the end of the year,</p>

Question / Comment	Name (Organization)	Encorp Response
		<p>and we should be able to adapt the system next year, so that we have made the changes and have a functioning system prior to milk joining the system in 2022.</p> <p>We have time; decisions need to be made this year before the end of the year, which would be in accordance with the timeline that we've worked out for our Stewardship Plan, and then we can begin some of the roll out next year. But the sooner we know we can get the approvals we need, the faster we can do the roll out in 2021. And we would like to make these changes as quickly as possible.</p>
<p>Is there information on what portion of depot containers originate as Return-to-Retail containers?</p>	<p>Greg Wilson (Retail Council of Canada)</p>	<p>Unfortunately, there is not. We don't get information from our depots about the containers they are picking up from retail. We don't even know how many of their containers come in from commercial. All they have to report to us is the number or containers collected, and then they ship them to us.</p> <p>We don't have information on the break down on how many are coming in as walk-in customers and how many are coming in as commercial accounts, be it retail, restaurants, or other pick up locations.</p> <p>Unfortunately, depot operators haven't wanted to share that information.</p> <p>In some cases, they may not have the systems in place to track that type of information. I don't want it to seem like somehow they're refusing. It just may be that it's beyond the scope of what they're capable of doing.</p>
<p>I had just one question, but would like to send a thank you note for simplifying administration of program by retailers. One deposit rate, removing first three ingredients criteria and professional staff.</p>	<p>Shabbir Beawerwala (Loblaws Inc.)</p>	<p>Appreciate that Shabbir.</p> <p>We are trying to make the program work more efficiently for everyone, including retailers. We haven't touched on it, but we are moving to the single-deposit rate this fall. Our 20-cent deposit is going to move to 10 cents. That's going to be happening on October 1. We will be having a separate webinar to talk through the implications of that. There will be a grace period where people will still be able to get the 20-cent deposit. But hopefully, starting on October 1<sup>st</sup>, all deposits for all containers will be 10 cents and we'll have that change well in advance of the addition of milk, to again try and make sure the system is as simple and as efficient as possible.</p>
<p>Will questions and responses from this session be included in the final plan when it's submitted?</p>	<p>Lucas Harris</p>	<p>Yes, as we discussed at the beginning, the questions and answers from this consultation session will be included in the consultation report we submit when we submit the final plan, target date October 15. Lucas is with the MOE [BC</p>

Question / Comment	Name (Organization)	Encorp Response
	<i>(BC Ministry of Environment and Climate Change Strategy)</i>	Ministry of Environment and Climate Change Strategy], so hopefully he'll be able to provide us with some information on that question regarding Ministry consultations with the BC Center for Disease Control around the health impacts of milk containers.
Will you be getting this group together again to deliver the outcome of submitting your proposal?	Christal Hazard <i>(Thrifty Foods and Safeway BC)</i>	I'm going to assume that's around Return-to-Retail. If so, I think that would be great. We can coordinate through the Retail Council to have some subsequent discussions, maybe share the proposal, and get feedback, and certainly circle back with interested retailers in terms of supporting the initiative and trying to come up with a much more flexible system, and one based on voluntary requirements as opposed to mandatory.

### Consultation Session 3: Webinar with the BC Product Stewardship Council – July 28, 2020

#### *Registrants and Attendees*

No.	Registrant Name	Organization	City, Province	Attended Webinar (Yes/No)
1	Graham Casselman	Columbia Shuswap Regional District	Salmon Arm, BC	Yes
2	Roberto Melfi	BC Ministry of Environment and Climate Change Strategy	Victoria, BC	Yes
3	Jamie Benton	Fraser Valley Regional District	Chilliwack, BC	Yes
4	Sarah Willie	Cowichan Valley Regional District	Courtenay, BC	Yes
5	Tai Uhlmann	Let's Talk Trash	Powell River, BC	Yes
6	Andrea Patrao	Sunshine Coast Regional District	Sechelt, BC	Yes
7	Rachael Ryder	Regional District of Fraser-Fort George	Prince George, BC	Yes
8	Alda Nicmans	The British Columbia Product Stewardship Council	Langley, BC	Yes
9	Lucas Harris	BC Ministry of Environment and Climate Change Strategy	Victoria, BC	Yes
10	Darren Murray	Regional District of North Okanagan	Vernon, BC	Yes
11	Tera Grady	Cariboo Regional District	Williams Lake, BC	No
12	Wendy Dunn	Capital Regional District	Victoria, BC	No

No.	Registrant Name	Organization	City, Province	Attended Webinar (Yes/No)
13	Brenda Sauve	Alberni-Clayoquot Regional District	Port Alberni, BC	No
14	Kevin Paterson	Regional District of East Kootenay	Cranbrook, BC	No
15	Tauseef Waraich	Cowichan Valley Regional District	Duncan, BC	No
16	Jennifer Ivan	Comox Valley Regional District	Cumberland, BC	No
17	Laura Zapotichny	Regional District of Fraser-Fort George	Prince George, BC	No
18	Jamie Vieira	Thompson-Nicola Regional District	Kamloops, BC	No
19	Travis Barrington	Regional District of Central Kootenay	Nelson, BC	No
20	Janette Derksen	Regional District of Bulkley-Nechako	Burns Lake, BC	No

### Transcription

Question / Comment	Name (Organization)	Encorp Response
Can you expand on the aluminum alcohol container segment - does this include beer or just other alcohol containers?	Alda Nicmans (BC Product Stewardship Council)	It includes all alcohol containers that are in aluminum containers, so that would include beer, cider, vodka, coolers, any sort of alcohol sold that's in an aluminum can. Most of those containers, if not all of those containers, are operating or managed under another stewardship plan. And we believe that having an integrated approach to manage those containers would provide value to all producers by making the process much more efficient, as well as make it much more easier on our consumers and our operators.

Question / Comment	Name (Organization)	Encorp Response
<p>With regards to the ancillary packaging addition to the plan. Will the Return-It program include recyclable items that RecycleBC does not collect? I'm thinking specifically of the 6 pack plastic rings which I think BC liquor stores take.</p>	<p>Andrea Patrao (Sunshine Coast Regional District)</p>	<p>If BC liquor stores take them, I don't know what they do with them. So that is a challenge, the six pack rings. So let me take that away.</p> <p>It isn't something we consider because it isn't recyclable. So, if we're going to do anything with the six pack rings, we would actually need to get some engagement from producers, not just on the non-alcohol side but actually the alcohol side as well.</p> <p>So, all companies currently use what are called "hi-cone rings." And I think most people on this call know those hi-cone rings have a photo-degradable additive that was put in there originally to protect animals. I think all of us—at least all of those who are old enough, so this might not apply to everyone—may remember issues of ducks being trapped in these six pack rings. So, given the concerns around that, they completely changed the system to include these photo-degradable additives. Of course, the challenge now is it's exactly what we don't want because you can't recycle that material. And of course, photo-degradable additives meaning that the plastic doesn't break down entirely. It just breaks down into smaller pieces, which is particularly the kind of thing we're trying to avoid, particularly in in marine environments, but irrespective actually in all natural environments. It's definitely an issue we have to address. I would note, though, that more and more companies are going to cartons for the cans, so there's certainly less plastic rings being used. But that doesn't diminish the issue, that it's still a material that can't be recycled and something that needs to be addressed in the future.</p>
<p>Is aluminum in now or as of 2022?</p>	<p>Alda Nicmans (BC Product Stewardship Council)</p>	<p>We've implemented a pilot for the next six months. And our expectation is that our Stewardship Plan will be approved before the end of the year. So our current timeline is: we'll submit by the middle of October, and we're hoping that the Ministry of Environment and Climate Change Strategy can approve the plan before the end of the year. And we would like to be able to begin permanently managing all aluminum containers in one stream as of January 1, 2021.</p>
<p>Are 6 pack rings included in the Ancillary packaging?</p>	<p>Tai Uhlmann (Let's Talk Trash)</p>	<p>Yes. And not surprisingly, it has been an issue with a few stakeholders in Powell River.</p>

Question / Comment	Name (Organization)	Encorp Response
		<p>It wasn't on our original list. It wasn't on our list of what to consider, but let me take that away.</p> <p>And I'd have to engage with some of our producers. The challenge for us will be: we want to focus on materials where we have recycling markets where our depots are having to manage material that could be recycled, and it may be ending up in the garbage or they may be paying the cost of managing that.</p> <p>For plastic rings right now there is no market. Even Recycle BC I don't think can include it in its Other Flexible Packaging stream. So that doesn't mean it shouldn't be addressed. But I need to have some more dialogue with some of our producer members to see what type of commitment there is to addressing it. And, again, as I noted before, it would be easier if we had all the producers, including the alcohol producers, because that's certainly an issue that everyone, whether they're alcohol and non-alcohol, are using the same ring from the same producer of the rings. So if we're going to make a change, it needs to be across all containers, whether they're alcohol or not.</p>
<p>In terms of depot improvements will any funding go towards depot expansion. I realize that a lot are privately owned but their operational footprints already looked squeezed. By adding additional materials will this not add further pressure for space and/or systems management.</p>	<p>Jamie Benton (Fraser Valley Regional District)</p>	<p>Yeah, that's a great question. So, you know, these are independent businesses. We definitely have provided funds to upgrade the appearance, but when it comes to expanding the depot envelope or having their own location, you know, expanding the location, or changing the location, those are really costs that the independent operators need to take on. I do think that we are focused on ways to manage the material more efficiently. So again, you know, things like the aluminum can pilots, where we can have everything managed through one system, we think will increase the efficiencies and eliminate some challenges and having to have separate products stored for pickup on separate days.</p> <p>But it probably needs a broader look at all the materials being managed through the depots. It's probably not appropriate to have as many programs as we have managing material through the depots. That doesn't mean that we can't manage the same amount of material. It just questions whether we need separate programs for every category of material. Because the challenge with having so many separate programs is they all have their own supplies, their own pallets, and that puts strain on the depots.</p> <p>I think one of the other things I can also see are challenges with the recycled PPP material. So I know depots are concerned, particularly when it comes to</p>

Question / Comment	Name (Organization)	Encorp Response
		<p>styrofoam is the amount of space it's taking up. And so as depots get more material and we have things like milk come into the system, I am concerned that some of the depots may not have the space to manage materials like styrofoam, because there's just limits to what they can do and the space they have. So I think that's something that probably begs some dialogue in the future and probably needs both Return-It as the operator of the depots and licencing of the depots, as well as local government, as well as Recycle BC at the table to figure out how can we develop an integrated plan for recycling materials such as styrofoam, where you may not be able recycle that at every depot.</p>
<p>You mentioned that the cost for R2R is increasing on a per unit basis. Do you compensate retailers for their units accepted in the same way that you compensate depots, if you don't, how are costs increasing?</p>	<p>Sarah Willie (Comox Valley Regional District)</p>	<p>It's not the exact same, but there is some compensation for those that we're collecting from for sure.</p> <p>I think the way that costs are increasing is we're picking up less and less material, but the retailers still wish to be picked up as frequently as they were before. So all our retailers have challenges with their "back-of-house" storage area. All of them are trying to manage that small area efficiently and try and keep most of their square footage available for selling product. And so they're challenged to continue to manage containers. And honestly, as you know, we just had a webinar last week, and there were at least one or two retailers that don't even bother putting out their products, they pay the deposit out. And then it isn't actually worth it for them to keep the container separate. They're just putting them through mixed recycling, and maybe we're getting them and maybe we're not, we don't know. But that just points to some of the challenges of running retail operations and trying to be this mandated return for containers.</p> <p>So I think, really, the costs are—less and less people are taking advantage of Return to Retail. But it costs us the same to try and service these locations on this at the same schedule, picking up less. So that's just leading to year over year increases in costs. And our concern is, as more and more of those containers diminish, we don't think it's appropriate to try and just wait until Return to Retail is totally broken down. We think there's some fundamental issues at play, in that the government doesn't have the capacity to properly oversee Return to Retail and make sure that everyone is compliant in providing that service. But also that it may not make sense to mandate retailers to accept this when there are other options that might be better for the consumer. And I think at the end of the day there's now options available to address some of the issues</p>

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		<p>around rural communities. We think it's really the time to start thinking about how we can manage the system in a more efficient and modern way, and not just wait for it to collapse and then have to step in at the last minute and figure out how to fix it.</p> <p>(Note of Clarification: Encorp is not opposed to servicing retailers on a more frequent basis. Our primary issue is that we would never be able to service all return-to-retail locations in the province and this creates inequities for both retailers and depots, particularly in smaller communities.)</p>
<p>Where do donated textiles through the Salvation Partnership go? Are textiles shipped overseas or used in North America. Are textile scraps included in collection?</p>	<p>Tai Uhlmann (Let's Talk Trash)</p>	<p>Yeah, that's a great question Tai. So yes, textile scraps are included in the collection.</p> <p>All we ask is the materials are clean and dry. It's okay if it's got holes, and we do include things like towels and other household textiles. And generally everything that's purchased from us by the Salvation Army, if it can, is sold in their stores, but I'll be honest: that will be a minority of the product.</p> <p>There will be material that couldn't be sold in their stores, and typically they'll give about five to six weeks to try and sell it in their stores. And that will be packaged up and will be moved to other countries. And there will be a portion that can't even be sold and that will be cut up as scrap and used in things as fuel absorbent and other products you find in your hardware stores, Home Depots, that kind of thing.</p> <p>It is definitely our long-term intention to figure out and it was on our plan for this year in how we can start working with brand owners to try and develop sustainable recycling solutions for those materials. One of the challenges in doing pilots around textiles is you never have enough material to actually pilot different solutions. So, we now know that we're collecting enough material. I think we've collected somewhere in the neighborhood of going over the 200 tonne mark sometime in March this year. So we're probably closing in on 250 tonnes since the launch of the program. So we know there is enough material available that we can pilot things.</p> <p>And so we'd like to be able to do some work with brand owners and some innovative recyclers to see if we can develop long term recycling solutions by stringing off some of this material for pilots. Of course, the challenge this year is</p>

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		<p>just with the pandemic. And so many retailers, particularly in the apparel industry—I know that there have definitely been some sectors of the retail industry that have not only survived, but you know, in some ways thrived—and I think just the grocery and pharmacy have been beneficiaries this year if you've determined that from the pandemic, but definitely apparel retailers I think, I've seen some numbers in the states, where year over year, there were 90% reductions in sales. So it just really hasn't been an opportunity this year to engage with apparel companies, given those kinds of challenges they're facing. So maybe as we get into 2021, or even 2022, we can restart those discussions. But that ultimately is our vision as we start to work with brand owners and see if we can start to use this material that we've collected to begin piloting sustainable solutions be it in mechanical or chemical recycling to have this material converted into recycled fiber that can be used in new clothing.</p>
<p>Can we have a list of the depots that are a part of the aluminum pilot? Is Express included?</p>	<p>Alda Nicmans (BC Product Stewardship Council)</p>	<p>You don't have to be on the Express program to be part of the pilot and anyone can see the list of depot's participating in the pilot. It's on our website, <a href="https://return-it.ca/nosortingcans/">return-it.ca/nosortingcans/</a>.</p>
<p>To reduce space constraints, are depots incentivized or even allowed to bale materials under your current system?</p>	<p>Sarah Willie (Comox Valley Regional District)</p>	<p>Yes, good question.</p> <p>We don't have any compaction or densification within depots. From our perspective, what we're more interested in is compacting the material en-route; that's part of the reason we've done the compaction pilot. We think that combining en-route compaction, along with more frequent pickups, we can address, from our perspective, the challenges around beverage containers. Because beverage containers are a consumable material, we do regular pickups, either every two days or every day with our depots.</p> <p>The challenge becomes with material from other structural programs that are left there for a number of days, if not a number of weeks. And that becomes the challenge.</p> <p>We think that we're going to be able to address space constraints on the beverage container side. The next step will be: how do we address it on the other side, with the other materials that were made, and how it's currently constructed. It may not make sense to do pickups on as frequent a basis as we would like to see. And we need to think through how we manage that.</p>

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		<p>That's one of the ongoing challenges for us: is putting so much time and effort into managing infrastructure and supporting our depots. And then having programs that take advantage of that without working collaboratively with us to try and look at how we can make it work better for depots, and certainly we try to engage in those discussions. But to date, they have not been fruitful. Where we have programs working directly with us, or even where we've been hired as a contractor, especially electronics, it's been great, because we have shared objectives in terms of customer service and wanting to ensure the program is successful. It's not to say that other programs don't want to be successful or don't care about the customers. But we haven't had the same level of collaboration you'd like to see.</p>
<p>Do you think with adding aluminum alcohol containers will resort locations like Big White and Silver Star be considered for express locations[?]</p>	<p>Alda Nicmans (BC Product Stewardship Council)</p>	<p>Yes, absolutely. So we've already actually initiated discussions with Big White. I believe we have a phone call tomorrow, with Janine and Tim.</p> <p>And that was precisely our message to them with the barrier of having a reticent or reluctant partner, there's no reason we can't go ahead and start putting something at Big White. It's our intention that we'll be able to place something. It's our intention that we believe that our Stewardship Plan with alcoholic aluminum containers will be approved, and so we are moving ahead with planning on introducing an Express &amp; GO station at Big White.</p>
<p>If Terracycle had infrastructure out West that would use the pouches and additional materials would this appease the fact that you can't presently send it for Energy from Waste (EFW)?</p>	<p>Jamie Benton (Fraser Valley Regional District)</p>	<p>Yeah, so I don't think Terracycle is going to get facilities or locations out anytime soon.</p> <p>Jamie, if you have information that I don't, I'd be happy to get that information. They typically have operated from a base of operations back East for their whole existence. And most of their programs are mailbag programs. So they seem to like that model of shipping stuff back to their home base and doing the recycling. Their home bases, I believe they have more than one. So don't hold out a lot of hope that we're going to see some sort of facility.</p> <p>Honestly, it's not that EFW (engineered fuel) is my preferred solution. I think there's some dialogue that needs to happen with brand owners.</p> <p>I'd point out the inequity. I think if we're going to have the EFW (engineered fuel) solution then it should be available to everyone. And if the government deems</p>

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		<p>it's not an appropriate solution, then it shouldn't be an appropriate solution for anyone. So I just want equity.</p> <p>Ultimately, we'd like that material recycled. And we know that there's progress being made to adapt pouches to more of a single polymer as opposed to a multi-material solution. And if we can do that, and if that material can be recycled, that's obviously the end goal and where we'd like to go. During that transition, we think there's probably a lot of environmental benefits to managing that material as engineered fuel, here in BC, as opposed to shipping it across North America to be made into composite decking.</p>
Thanks. Completely agree on the equity front.	<p>Jamie Benton (Fraser Valley Regional District)</p>	N/A
Thank you	<p>Tai Uhlmann (Let's Talk Trash)</p>	N/A
<p>For ancillary packaging, why pursue a model that has producers purchasing 'tonnes of certified recycling' from Encorp, instead of doing a behind the scenes exchange or 'sale' to Recycle BC similar to how the two organizations handle Encorp materials found in their curbside collection? Could this create producers who are unwilling to remit sales fees to Recycle BC claiming they have already paid for their recycling through Encorp?</p>	<p>Sarah Willie (Comox Valley Regional District)</p>	<p>Yeah, so that is long question. It's a really interesting question.</p> <p>So I'm understanding that with the Recycle BC model, we weren't sure how, what we would be able to arrive at as a solution. I don't think anything is off the table. So we still need to engage with Recycle BC. And there's nothing preventing them from coming with the proposal to us. And we would of course, consider that.</p> <p>I think what we wanted to do was insert a proposal or Stewardship Plan to begin the discussions. Knowing that at the end of the day, what we want is that our depots do not have to bear the cost of the material if they don't have a Recycle BC agreement. So that's another equity issue that we wanted to address.</p> <p>I think there's probably a range of different solutions that we can arrive at with Recycle BC. And we'd of course be interested in this discussion. So this is an initial proposal, and I think very much one that we need to work through and have some discussions on, but we need to address the issue. How we address the issue, I think we've got flexibility on.</p>

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		<p>As it relates to the tonnes, I don't think we are going to, or last time I looked, there's somewhere in the neighborhood of 200,000 plus tonnes in the Recycle BC program. I'd be really surprised if we collect more than a couple thousand tonnes. So I don't think this is going to have a meaningful impact or material impact on the Recycle BC program or its financial model. I think at the end of the day, would producers use it as an opportunity to reduce their financial commitment? Absolutely. And may they save some money at that? Absolutely. But Recycle BC would also get additional tonnes. And whether those tonnes would be or come at less cost than they would have to otherwise, is probably the point.</p> <p>So I don't think it'll impact their financial model. I do think it'll allow for more material to be collected and recycled. And yeah, we're open to a range of different options, but we wanted to initiate discussion so we'll have more discussions and dialogue with Recycle BC. You know, what we can arrive at by the time we get to a final Stewardship Plan. But no, I think it's a great question and a totally valid point.</p>
<p>Can you—just for the for the folks on the line—talk about what kind of infrastructure requirements are required to support the Express &amp; GO stations?</p>	<p>Sarah Willie (Comox Valley Regional District)</p>	<p>Yes, that's great. So, really the only thing we need is access to power to access the internet. And I should point out that one of the benefits so you know, our first local government trial with this was in North Vancouver, and Metro Vancouver just came back to us and said they would be interested in partnering at two more sites.</p> <p>I think what makes the Express &amp; GO such a good fit with local governments is it's really a self-contained unit. We pay for the installation costs of the electricity and internet, we pay the ongoing operating costs of that; it really doesn't require much interaction with the attendant, especially once we get through some issues. With PIN questions, people wondering where their PIN is, we're working on that. But other than that, people come up, they punch in their PIN code, they drop off their bag and go. We come in, we collect the containers, we empty it out—in the case of the North Vancouver transfer station, every day. We have cameras in the containers, so we're aware if it's becoming too full, and can send a truck out in an expedited manner to pick up containers.</p> <p>The whole concept is that the container is self contained, and doesn't require a lot of ongoing interaction with the local government staff. And it can basically run</p>

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		<p>on its own. There's a label printer that we now actually build into the station. So again, there's maintenance issues, but those are for us to solve. So we refill the label printer, although we provide printing labels on hand in case we don't have a transporter and it needs to be done right away. But as much as possible, the idea is that it's self contained, and we can manage it directly without any large-scale support, and all the costs associated are the operational costs, the ones that we take care of directly. So we have specific accounts to manage the internet and the electricity on our own, or, if we have to pilot somewhere else, then we pay whatever share for managing that.</p> <p>Really space, electricity, and internet are what we need. For the electricity, it's interesting; in Tofino, where you know, it doesn't have the most sun, we're averaging, because we have the solar panels, the draw on the electricity is very small. So I think we're using about \$5 a month worth of electricity. So not really a material amount. And so still, even an area like that, most of our needs for electricity are actually managed by the solar panels.</p>
Thanks very much Allen and Team!	Alda Nicmans (BC Product Stewardship Council)	N/A

### Consultation Session 4: Webinar with Regional Engineers Advisory Council on July 30, 2020

#### *Registrants and Attendees*

No.	Registrant Name	Organization	City, Province	Attended Webinar (Yes/No)
1	Lucas Harris	BC Ministry of Environment and Climate Change Strategy	Victoria, BC	Yes
2	Sarah Evanetz	Metro Vancouver	Burnaby, BC	Yes
3	Adriana Velazquez	Metro Vancouver	Vancouver, BC	Yes
4	Stephanie Liu	Metro Vancouver	Burnaby, BC	Yes
5	Leeanne Fraser	BC Ministry of Environment and Climate Change Strategy	Victoria, BC	Yes
6	Andrew Doi	Metro Vancouver	Burnaby, BC	Yes
7	Suzanne Bycraft	City of Richmond via Metro Vancouver	Richmond, BC	Yes
8	Chris Underwood	City of Vancouver	Vancouver, BC	Yes
9	Chris Patton	City of Burnaby	Burnaby, BC	Yes
10	Paul Henderson	Metro Vancouver	Burnaby, BC	Yes
11	Verne Kucy	City of Coquitlam	Coquitlam, BC	Yes
12	Monica Kosmak	City of Vancouver	Vancouver, BC	Yes

No.	Registrant Name	Organization	City, Province	Attended Webinar (Yes/No)
13	Nanette van Doorn	Metro Vancouver	Burnaby, BC	Yes
14	Andrew Marr	Metro Vancouver	Burnaby, BC	Yes
15	Maria Lo	Metro Vancouver	Burnaby, BC	Yes
16	Allen Jensen	Metro Vancouver	Burnaby, BC	Yes

### Transcription

Question / Comment	Name (Organization)	Encorp Response
Under the new regulations, is it minimum 10 cents for all containers or can the deposit amount still be higher -- such as 30 cents on larger containers?	Suzanne Bycraft (City of Richmond via Metro Vancouver)	Yes, that's correct. The minimum is 10 cents but it can be higher. Two things: intention in October is to reduce the deposit on large containers from 20 cents to 10 cents so that all containers in the program carry a 10 cent deposit. We think this will greatly increase efficiency of our program for our operators, but also provide some transparency and simplification for our consumers – it'll be easy for them to understand how much is due back to them when everything is 10 cents. There are some containers, one way kegs, large one way water bottles (15L), those are some that we have to have another look at. Right now their deposit is 20 cents - I'm not sure if 20 cents really captures the impact of having those products in our program so that's something we have to look at in the future.
Is Encorp considering a hybrid return to retail/Express & GO option, where space is available at grocery retail locations (e.g. parking lots, etc)	Chris Underwood (City of Vancouver)	Yes absolutely – I think we are talking about a number of solutions with retailers who are concerned about having to manage used beverage containers on their premises. In part, because of the strong reaction that we got from staff, many of whom have been working long hours under very difficult conditions over the past few months, and for whom the addition of managing beverage containers may just be too much. Right now we are finalizing one contract on Vancouver Island in the District of Saanich – we are just waiting for the contract to be finalized with

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		the local government, and then we also have 2 active locations that we are discussing with retailers and shopping malls in Metro Vancouver. In the future we think there are lots of opportunities to locate these Express locations strategically with retailers and we think it makes a lot of sense for both Encorp and the retailer. It keeps the containers out of the retail environment, where there is concern about the health and safety impact of those containers, but it also provides the kind of convenience that consumers expect. I would say that for most, if not all, of the containers that we have in Tofino, North Vancouver, Burnaby, and SFU, have been very successful and we have had nothing but positive feedback from consumers about using the containers.
Could you make your presentation available to Andrew Doi so that it can be included in our REAC SWSC meeting minutes?	Chris Underwood (City of Vancouver)	Yes absolutely, that was our intention following this session to send the presentation to Andrew so he can include it and distribute it to members of the committee.
What percent of containers are collected through return to retail in the Lower Mainland, particularly in Vancouver?	Chris Underwood (City of Vancouver)	We don't have those breakouts right now, but we can do some investigation. Like I said it's about 5 percent province wide, but there may be some slight uptick in the City of Vancouver, but my expectation is probably the same in those areas where we are having problems locating depots. We may see more containers picked up by the informal binner network, as well as more containers ending up in the blue box and people forfeiting their deposit as there is no convenient location for them to bring their containers.
Given Encorp's commitment to circular economy and the pollution prevention hierarchy in the Recycling Regulation, what would it take to move Encorp's brandowners to embrace refilling reusable containers like the brewers? Has Encorp explored life cycle analysis to make this case?	Chris Underwood (City of Vancouver)	I think we are very open. We have included refillable products as an option under our plan, and prior to the pandemic we were working with one of the local brand-owners to plan out a potential pilot. Of course, that has been put on hold by the pandemic. One thing I would point out in doing that research, one of the things we are uncomfortable with, is the lack of washing facilities in the lower mainland. So we are conscious that right now refillable beer bottles are collected mostly right here in the lower mainland, but in other parts, like Vancouver Island, and other parts of the province, all those empty bottles are transported to a facility in Summerland – which from the lower mainland is four hours away – and then cleaned and washed there and then brought back to the lower mainland or Vancouver Island to be refilled. So, the current infrastructure that stands for refillable bottles is not great, and certainly the carbon footprint of driving a diesel truck with tens of thousands of empty bottles all over the province to

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		<p>Summerland and then back to the lower mainland or Vancouver Island for refill doesn't seem to us like a sound environmental initiative. So, we are conscious that as milk comes into the program that there will be some refillable containers there, and we are certainly looking forward to working with those producers and still looking to support the existing refillable containers available by those producers, and if there is interest from other brand-owners in piloting refillable projects, we will definitely be available for that. That's one of the reasons why we made that change in our Stewardship Plan to include refillable containers.</p>
<p>Given the Province recently changed the Recycling Regulation to require deposits are refunded at the amount they're charged, does Encorp still plan to go ahead with collecting aluminum beer cans given the brewers will have to refund them at 10 cents wherever they're accepted?</p>	<p>Chris Underwood (City of Vancouver)</p>	<p>The challenge is that the way that the beer industry stewardship plan works is that they only contract a small percentage of the depot network, less than half, to collect containers, so their position would be that those are unlicensed locations, and so it wouldn't be their responsibility. There needs to be some proactive direction given by the Ministry, because right now it's unfair to consumers who come to our depot locations with our Return-It logo and drop off their containers and then find out after the fact that they're having their deposit discounted – and those complaints come to us – which is the reason in the first place that we implemented this pilot, or at least one of the main reasons, as we were frankly tired of having to deal with ongoing complaints from consumers – not about how we run our programs or how we're collecting containers or about experiences they had with our containers, but more around challenges with aluminum alcohol containers or aluminum beer containers. So we think that the current situation is unacceptable, and we think that the only way forward is to manage it as an integrated stream. I don't think going back makes sense from a consumer's perspective or from anyone else's perspective, as were going to have to continue to segregate containers that have the same deposit value – it's unnecessary work and adds to the overall cost and complexity of the system.</p>
<p>Just for clarity, would the amount of secondary packaging collected by Return-It be deducted from the overall amount that beverage producers report to Recycle BC? Would this constitute the 'credit' for beverage producers recycling their secondary packaging which does not require collection by Recycle BC?</p>	<p>Andrew Doi (Metro Vancouver)</p>	<p>Yes that's correct. Let me clarify – the concept so far is that we would collect the material and then producers within our program would be able to apply for a credit, and then depending on how many producers apply we would provide or divvy up the amount of material collected and provide certificates of recycling that they can present to Recycle BC as credit against their obligation. Recycle BC could report that under their overall tonnage. The benefits would be that there is obviously more material collected, but we think there would be a benefit to our brand owners, and we think we could do that in a more efficient way at a</p>

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		<p>lower cost. So, it would be a credit that they would apply and we would emphasize that at the end of the day. Last time I looked there was over 200,000 tonnes of material collected through Recycle BC, but what were talking about here would be 1,000-2,000 tonnes – pretty small amount of material, but nevertheless its Schedule 5 obligated material and there’s an opportunity to take advantage of our existing infrastructure to make sure the material is collected. What we didn’t want in this project was to create another stewardship plan and create unnecessary requirements for producers to have to report into the stewardship plan, so we think this is a good compromise in terms of ensuring that this material can be collected and that our depot operators don’t have to pay for recycling or landfilling material, and that it will actually increase the amount of material collected, or accounted for, in the system.</p>
<p>Rather than moving straight to reducing the 20cent deposit to 10cents, would Encorp consider changing this to a pilot and adopt it if successful, or keep 20 cents if not successful?</p>	<p>Chris Underwood (City of Vancouver)</p>	<p>The desire to shift to 10 cents is really based on experience we had visiting Oregon. We were there over a year and a half ago, and seeing the advantages that having a single deposit provided them, I think we are already committed to transitioning to 10 cents. We don’t think it will have a significant impact, if any impact at all, on the recovery rate and we think it will be received well by consumers because: (A) Consumers are looking for any opportunity to have some costs deducted from them given the financial and economic impacts of the pandemic, but also, (B) I think just the added simplicity and making it easier for people to understand how much of a refund they should get – I don’t think we should underestimate the benefit of that simplicity or the increased transparency it provides to consumers.</p>
<p>Will there be a separate recycling fee charged to consumers?</p>	<p>Suzanne Bycraft (City of Richmond via Metro Vancouver)</p>	<p>A separate recycling fee charged to consumers in relation to what?</p>
<p>There have been separate fees charged as a recycling fee to consumers on containers in the past -- extra fee that was labeled by industry as a government fee.</p>	<p>Suzanne Bycraft (City of Richmond via Metro Vancouver)</p>	<p>Yes, so, we will continue to have container recycling fees –they are not labelled by Encorp as government fees. Ultimately, I don’t have control over, say, how retailers or other organizations may position that fee, but we do have container recycling fees in our program, we do publish those, and it is made public how much those fees are per container. Some containers, such as aluminum cans don’t have a container recycling fee at all, other containers may have recycling</p>

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		<p>fees in excess of 10 cents – usually those are glass. So that process will continue as before, and again, from our perspective we are clear that this is an industry fee and it's a container recycling fee and we provide lots of background and context for those fees on our website. How they're communicated by retailers or other organizations is not within the purview of our direct control. If there are issues you can always raise those with us, and if we find that there are players in the market who are inappropriately describing those as government fees, we can follow up with them and make sure that they are aware that there are broader contexts around the fees and the rationale for it and make sure that they are aware that it is an industry-based organization that develops and charges these fees to make sure that this material is responsibly recycled.</p>
<p>Just some clarification on the status of – I understand these changes for the minimum 10 cent deposit were effective as of June 29 – so I just wonder if everything has been implemented? And would you mind talking about the change in the electronic payments too, as to what's the status? Is everything in place or still being implemented?</p>	<p>Suzanne Bycraft (City of Richmond via Metro Vancouver)</p>	<p>So electronic payments – we've already been doing that for a while through the Express program – that is and has been live pretty much for the past year. The people that already use our Express &amp; GO system including the system at Metro Vancouver's North Shore transfer station, they are able to get their deposit refund through an e-Transfer. They go into their online account, they hit redeem, and then we'll email money transfer their refund to them. Of course, through that system we don't take in any of their banking information, that's simply done through the Interac platform, so we send the email and it's really up to the consumer to direct it to what account. So that system works great for us, it's efficient for consumers and means we don't have to take any banking information. As to the deposit, we are currently working on the strategy and communication plan around changing the deposit value – that's going to take place October 1<sup>st</sup>, so you can expect that we'll be in market in September with information about the change coming, and we can provide that information – an overview of the changes that are going to take place – to REAC through Andrew, and then I'm happy to take any questions about the process. But the idea is that those changes will be made October 1<sup>st</sup> – there will be a grace period, probably around 10 days, where people will be able to bring back their containers and get 20 cents, but after that grace period there will be the expectation that everyone will be charged 10 cents and also get 10 cents back when they bring back those containers. We should highlight that the change will impact roughly 6 percent of our containers. So when we raised the deposit value last November, that change impacted about 80 percent of the containers managed in our program, so pretty</p>

Question / Comment	Name (Organization)	Encorp Response
		significant, whereas this change really just addresses a small minority of the containers in our program.
I wonder if you could talk a little bit more about how your partnership with the Salvation Army on the textiles is going to work?	Suzanne Bycraft (City of Richmond via Metro Vancouver)	So first of all, it is working – it has been in place since January. It is a 2 year partnership and we are really happy with it. Obviously there is a lot of flux during the pandemic, but we didn't actually stop collecting textiles during the pandemic, we continued to collect, and we were able to, once things returned to more normal operations, transfer that material to the Salvation Army. So, just like we had with our original agreement with another group, that material is being sold here in BC where it can through the Salvation Army's network of retail locations. Where it can't be sold within 5 weeks then that material is packaged up and sent to second-hand markets within other countries – particularly Latin America. There will be a portion of the material collected through household textiles or even clothing that is not able to be resold, and so that may be cut up for rags and used as absorbent in fuel or oil or anti-grease absorbent products that you can find at any hardware store. That's really how the program works. Part of our plan was to work with producers on a pilot to figure out how to stream off some of the materials into innovative recycling options to try and provide brand-owners with a circular approach to ensuring that they could access recycled content for new clothing. Of course, the pandemic has made that much more difficult, and so we don't know when we will be able to return to that – obviously we have needed to focus on other areas of just our base operations – but what I would say is that feedback on the textiles program from consumers has been really positive. I think they find the extra locations that we provide really convenient, and I think they like the fact that it is just another material that they can bring to the same location – that added convenience, that ability to drop off another multiple products at the same location.
I just wanted to follow up on your point at the end, around the convenience related to Express and trying to engage the brewers to participate in that program. Just a clarification so I understand – are you accepting the beer cans and bottles at Express right now?	Monica Kosmak (City of Vancouver)	Yes, we are. The refillable bottles are really a minority – a very small percentage of people bring back their refillable bottles through the Express system – but a large percentage of containers are beer cans. We have been managing that, and really I think where it has become a larger issue is during the pandemic when liquor stores weren't open, we had more and more of our depots and Express locations accepting those containers. We just think that for Express to be successful over the long term, we can't continue to pay for all the costs of managing it without contribution or participation by the alcohol aluminum can

Question / Comment	Name (Organization)	Encorp Response
		<p>producers – and it is beyond just brewers. When you look at the alcohol aluminum can it includes coolers, ciders, and whether those organizations are as conscious of the impacts as the brewers, because they are behind the stewardship plan, is something that we have to do some further investigation. But to us, if we're going to have the type of recycling system that all demographics of our population will use then it needs to be as convenient as possible so it's really crucial that we have an integrated system and that we have all the containers going through, particularly for Express.</p>
<p>I think earlier in your presentation you said that you would be working with manufacturers on potentially recycling plastic bottles back into plastic bottles, and I always thought you could not recycle plastic back into any kind of a food product, so I was just wondering if you could comment on that?</p>	<p>Suzanne Bycraft <i>(City of Richmond via Metro Vancouver)</i></p>	<p>So I think there are challenges for sure, but there are opportunities. Whether that happens up here, or down in the US may be the challenge, but already our material is being used as recycled content in new bottles. The challenge is how do we increase that? It remains a small percentage, but we are seeing that this material is being used as recycled content in new bottles. There is a report from World Wildlife Fund (WWF) that was released a couple months ago – we are actually hoping to have the author of the report on our podcast, so I will certainly give everyone a heads up on that – but I think the amount of recycled content used right now is around 9 percent, but I think as most of us know, a lot of organizations have targets of 25-50 percent that they are hoping to achieve in the next five to ten years. So our expectation is that more and more of this material is going to end up as recycled content in new bottles. It is already happening today. Beverage companies are purchasing the material, but there continues to be materials going to textiles and other products and it is our expectation that in meeting the targets that they have set for themselves, beverage container companies are going to have to purchase larger quantities and a larger percentage of the material that we're recycling here in BC.</p>

### Consultation Session 5: Webinar with Coast Waste Management Association – Aug 19, 2020

#### *Registrants and Attendees*

No.	Registrant Name	Organization	City, Province	Attended Webinar (Yes/No)
1	Veronica Bartlett	Morrison Hershfield	Burnaby, BC	Yes
2	Marika Smith	City of Victoria	Victoria, BC	Yes
3	Michael Zarbl	The Major Appliance Recycling Roundtable	Vancouver, BC	Yes
4	David Millman	Waste Management	Vancouver, BC	Yes
5	Sonam Bajwa	Regional District of Nanaimo	Nanaimo, BC	Yes
6	Brendan McShane	Recycle BC	North Vancouver, BC	Yes
7	Sitraka Ratsimanohatra	Product Care Recycling	Vancouver, BC	Yes
8	Izzie Abrams	Waste Connections of Canada	Vaughn, ON	Yes
9	Mark Kurschner	Product Care Recycling	Vancouver, BC	Yes
10	Kirsten Gellein	City of Nanaimo	Nanaimo, BC	Yes
11	Laura Midan	Abbotsford Mission Recycling	Abbotsford, BC	Yes
12	Lucas Harris	Ministry of Environment and Climate Change Strategy	Victoria, BC	Yes

No.	Registrant Name	Organization	City, Province	Attended Webinar (Yes/No)
13	Niki Roberts	Pender Island Recycling Depot	Pender Island, BC	Yes
14	D'Arcy Hipwell	The Bottle Depot	Victoria, BC	Yes
15	Andrea Panich	Capital Regional District	Victoria, BC	Yes
16	Keenan Ebanks	Waste Management	Saanichton, BC	Yes
17	Jerry Kusters	Rollins Machinery Ltd.	Chemainus, BC	Yes
18	Peter Grant	Salt Spring Island Recycling Depot	Salt Spring Island, BC	Yes
19	Sheila Molloy	Coast Waste Management Association	Victoria, BC	Yes
20	Jace Hunter	Brewers Distributor Ltd.	Coquitlam, BC	Yes
21	Sue Maxwell	Ecoinspire	Whistler, BC	Yes
22	Brenda Sauve	Alberni-Clayoquot Regional District	Port Alberni, BC	Yes
23	Leeanne Fraser	Ministry of Environment and Climate Change Strategy	Victoria, BC	Yes
24	Paul Appelt	District of Sechelt	Sechelt, BC	Yes
25	Lori Bryan	Waste Management Association of BC	Mission, BC	Yes

No.	Registrant Name	Organization	City, Province	Attended Webinar (Yes/No)
26	Isabelle Faucher	Carton Council Canada	Toronto, ON	Yes
27	Lorne Skoropada	Ridge Meadows Recycling	Ridge Meadows, BC	Yes
28	Christina Burns	Product Care Recycling	Vancouver, BC	Yes
29	Susan Collins	Container Recycling Institute	Culver City, CA, USA	No
30	Janet Stitt	Waste Management	Victoria, BC	No
31	Tom Watkins	Capital Regional District	Victoria, BC	No
32	Cynthia Shore	Republic Services	Vancouver, BC	No
33	Grant Hankins	Waste Management Association of BC	Mission, BC	No
34	Stephanie Valdal	Comox Strathcona Waste Management (CSWM) Service	Comox, BC	No
35	Bob Nichols	Recycle BC	North Vancouver, BC	No
36	Corinne Atwood	BC Bottle and Recycling Depot Association	Delta, BC	No
37	Rhiannon Moore	City of Victoria	Victoria, BC	No
38	David Lefebvre	CSSA  Recycle BC   Multi-Material Stewardship Western	North Vancouver, BC	No

**Transcription**

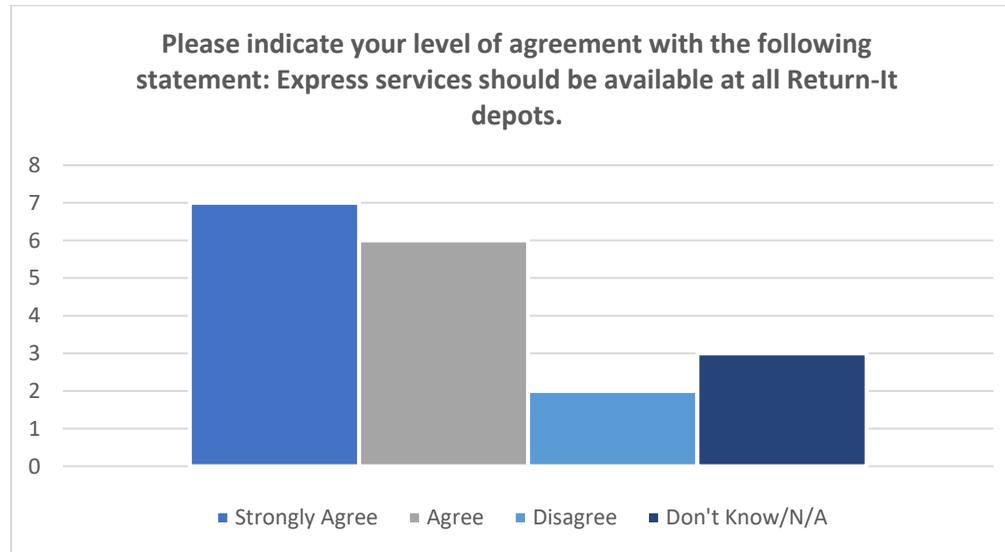
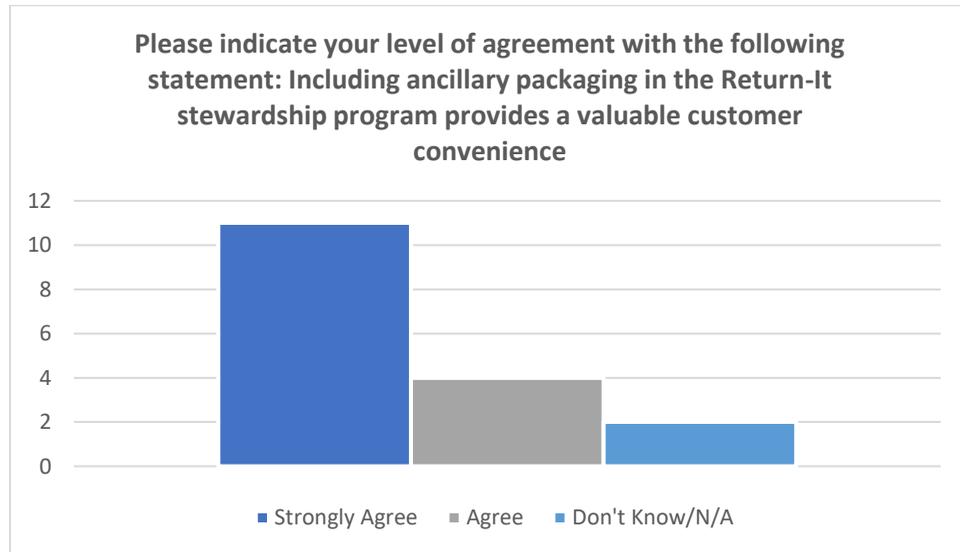
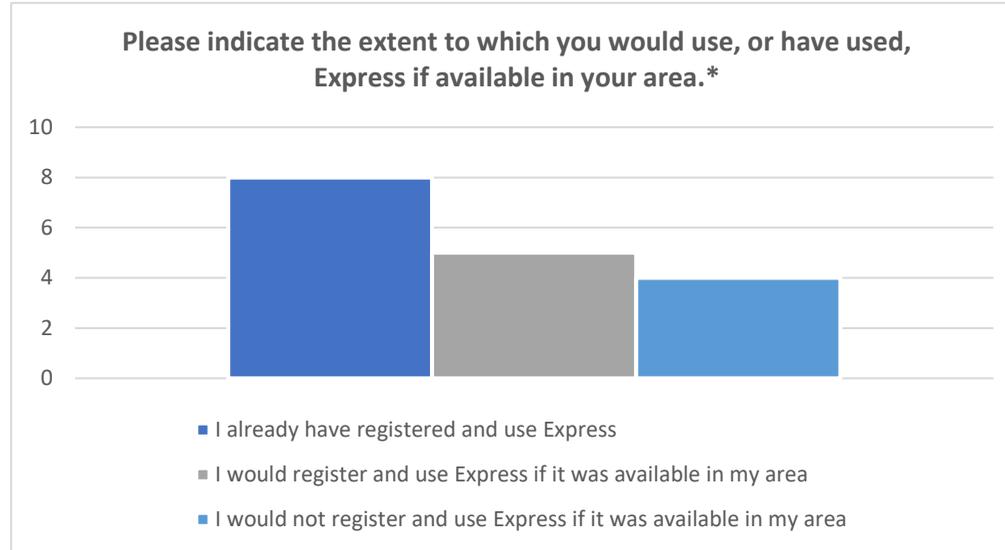
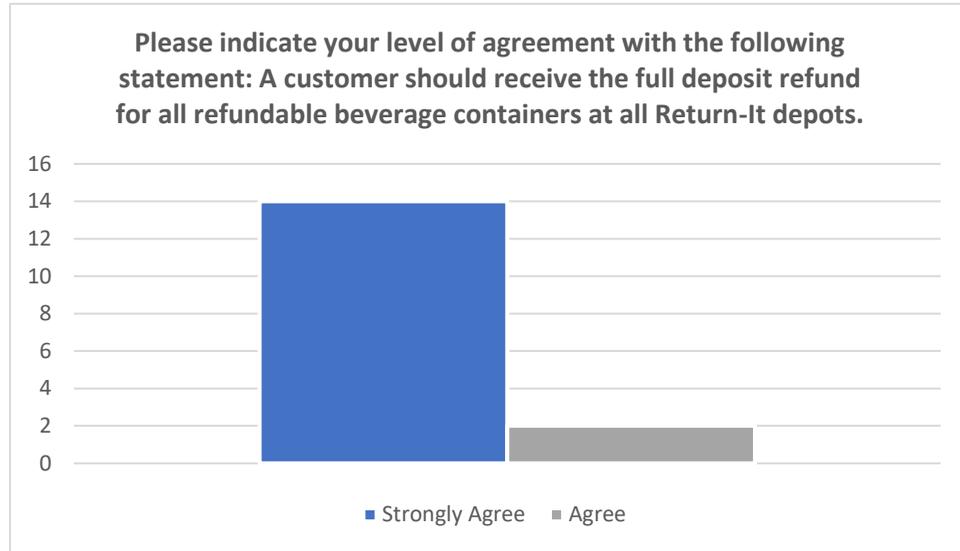
Question / Comment	Name (Organization)	Encorp Response
Will ancillary packaging include 6-pack rings?	Kirsten Gellein (City of Nanaimo)	Ancillary packaging won't include 6-pack rings just because we don't have a recycling option. We have been approached by an entrepreneur around a reusable option. So we are just in the early stages but we are hoping that by next month, if everything goes well, we might be able to announce a pilot for re-usable 6-pack rings either in the fall or early 2021.
What is happening with nonrefillable non-refundable glass?	Keenan Ebanks (Waste Management)	Non-refillable, non-refundable glass would be outside the Encorp program. That would be material captured in the Recycle BC program. It would be appropriate for RecycleBC to address this– I know there may be some instances where there's gaps in the collection of that material – but that would really be the Recycle BC program and I'd direct that question to them so they can answer it.
If return to retail was eliminated as an option, how would you address the needs of communities that currently do not have depot coverage.	Michael Zarbl (Major Appliance Recycling Roundtable)	Two things: 1) We are conscious that we are able to roll out these Express & GO stations in locations that would have otherwise not been able to support a conventional depot but also 2) Working with retail partners – I think what's wanted is a shift away from mandatory return to retail. In a lot of locations, there are sufficient collection facilities that having retailers collect it is not required. I think what's desired by everyone and retailers as well, is a move to voluntary return to retail. It may be that in some cases it may make sense to have return to retail – that's certainly the approach for other products (e.g. paint) under the recycling regulation and we're trying to do something similar. Most brand owners and retailers want to keep their customers happy and want to ensure that they can service them and continue to do so. What they don't want is to be mandated to take back containers from people that may not be customers. I think that can take place in a variety of circumstances. But I think the shift we're looking for is voluntary return to retail and enhanced Express & GO services across the province.
Thanks for your answer, I like the voluntary option, that way remote retailers can still take them back.	Michael Zarbl (Major Appliance Recycling Roundtable)	N/A

Question / Comment	Name (Organization)	Encorp Response
<p>How are pouches recycled as the regulation requires all beverage containers to be refilled or recycled? If they are hard to recycle, how is Encorp working to help producers move towards a better type of packaging?</p>	<p>Sue Maxwell (Ecoinspire)</p>	<p>Right now we're testing a couple of options for use of those containers as material in plastic lumber. They are definitely hard to recycle and we have had conversations with the largest brand owner of that material to make them aware of these challenges. Right now there's really one large brand owner and the rest of the companies/organizations using that material are basically operated offshore and their product is imported so it's really difficult to have any dialogue with them. The one thing I would add on this is that the one challenge for us is that there is an inequity in the Recycling Regulation that the other stewardship programs, such as Recycle BC, and no fault of their own, this is a regulatory issue not about their program, but under the Regulation they are allowed to direct this material to engineered fuel. We think that from an overall environmental impact, at least until we can get brand owners to move towards a more recyclable product, that might be the best way to manage the material. Certainly from a GHG footprint it would be a huge improvement from shipping it across the country to having it managed in the same way as similar material from other programs. Ultimately we know that there is a lot of work in this field to move to a single polymer pouch – there's one already in the marketplace and that's ultimately where we want to go but really we're just in the process of managing this material until that transition takes place.</p>
<p>I love the Express program!!!!</p>	<p>Michael Zarbl (Major Appliance Recycling Roundtable)</p>	<p>N/A</p>
<p>That's great to know! Thanks for that information, I would definitely use Express in that case</p>	<p>Kirsten Gellein (City of Nanaimo)</p>	<p>N/A</p>
<p>Comment rather than a question. Great to see the combination of the two aluminum can streams - it will free up a lot of staff time sorting. Also including Dairy will end confusion to the public as to why milk is not a beverage.... Thanks !!</p>	<p>Peter Grant (Salt Spring Island Recycling Depot)</p>	<p>I totally agree with both points.</p>

Question / Comment	Name (Organization)	Encorp Response
Can we share the information about where recyclables are sent and what they become with the public?	Nicola Roberts (Pender Island Recycling Depot)	Yes absolutely. That information is provided in our Annual Report every year so it is already accessible and I encourage everyone to go to our <a href="#">2019 Annual Report</a> where you can find that information.
Encorp is doing some great work. Well done on all the progress! For products that are more difficult to recycle, is Encorp 'penalizing' the producers who use these products compared to producers using more recyclable materials?	Veronica Bartlett (Morrison Hershfield)	Our approach is not so much to penalize producers, but rather to find a way to work with them to move the product up the pollution prevention hierarchy. It would be great if we can get some of these products moving towards that, for example, single polymer pouch would be much more recyclable and could be managed with some of our other material. It is not always the easier transition to work towards especially if we are working with other companies importing from overseas. That's been our approach to date and really the volume we're talking about is pretty minor – less than half a percent of the containers in our program. We are conscious of trying to address this issue but also conscious that it is a very minor role in terms of the overall context of the program.
Has there been any consideration of collecting, without refund, beverage containers that fall outside the scope of the Encorp program (e.g. alcohol containers purchased in USA by Canadian consumers) to help reduce customer confusion/frustration?	Kirsten Gellein (City of Nanaimo)	I will have to do some digging, because I believe in areas where we get a number of US containers, we do accept them, we just don't provide the deposit for those containers. For example, if someone brought a few beer cans from across the border and it was clear that they weren't cans from BC, we would accept them and manage them, we just wouldn't provide the deposit refund. I don't think we promote that but it is something that we do. It typically happens for our depots that are along the border. I have to be honest, the issue of containers from the US, obviously right now isn't an issue because the border is closed, but even before that we weren't seeing that type of issue as we were say a decade ago, when the dollar was on par and Canadians were spending time in the US and purchasing products and bringing them back.
I'm unclear why wouldn't people get a full deposit refund?	Nicola Roberts (Pender Island Recycling Depot)	Unfortunately there are two stewardship programs for beverage containers, one is ours and the other program is BRCCC, which is run by the Brewers. BRCCC only has agreements with roughly 70 of our 168 depots, so the rest of those locations do not have an agreement to manage beer containers. Of course, residents continue to bring beer containers back to those other locations and because those locations are not being paid to manage those containers, they have been forced to discount the deposit return on those containers to ensure they get some sort of revenue for managing them. So that's in part the issues

Question / Comment	Name (Organization)	Encorp Response
		we've tried to address with our new aluminum can pilot – not only to make it easier to sort, but also to make sure that everyone can get their full deposit refund.
Great, thanks for the info Allen!	Kirsten Gellein (City of Nanaimo)	N/A
Allen, keep up with the good work. Thank you!	Veronica Bartlett (Morrison Hershfield)	N/A
thank you for a very informative presentation!	Nicola Roberts (Pender Island Recycling Depot)	N/A
Thanks Allen and thank you also Sheila!	Peter Grant (Salt Spring Island Recycling Depot)	N/A

The following charts summarize the results of polling that took place during the webinar.



\* For this question, one of the participants indicated in the live chat that they chose "I would not register for Express" as they prefer to donate the refund to charity. After it was noted that they would still be able to use Express and donate the refund to charity, the individual then indicated that they would change their response to "I would register for Express". This change is not reflected in this chart.

### Consultation Session 6: Webinar with Depots – August 19th, 2020

#### *Registrants and Attendees*

No.	Registrant Name	Organization	City, Province	Attended Webinar (Yes/No)
1	Stan Wong	Go Green Bottle Depot & Recycling	Vancouver, BC	Yes
2	Tracie (Bok hee) Sung	Sapperton Return-It Depot	New Westminster, BC	Yes
3	Jay Son	Panorama Village Return It Depot	Surrey, BC	Yes
4	Andrew Lee	Mount Pleasant Return-It Depot	Vancouver, BC	Yes
5	Chris Beach	Burns Lake Return-It Recycling Depot	Burns Lake, BC	Yes
6	Ha Yeon Moon	Richmond Return-It Depot	Richmond, BC	Yes
7	Lucas Harris	BC Ministry of Environment and Climate Change Strategy	Victoria, BC	Yes
8	Miae Lee	Barriere Return-It Depot	Barriere, BC	Yes
9	Chris Bang	Collingwood Bottle Depot	Vancouver, BC	Yes
10	Soo Jin (Theresa) Lee	Blundell Return-It Centre	Richmond, BC	Yes
11	Junsung Park	Metrotown Return-It Centre	Langley, BC	Yes
12	Kat Slorstad	Fort St. James Bottle Depot	Fort St. James, BC	Yes

No.	Registrant Name	Organization	City, Province	Attended Webinar (Yes/No)
13	Young Kim	Moe's Bottle Depot	Abbotsford, BC	Yes
14	Jim Cameron	Island Foods	Port McNeill, BC	Yes
15	Vince Spronken	Island Return-It Depot	Duncan, BC	Yes
16	Angela Kim	Ladner Bottle Depot Co Ltd.	Surrey, BC	Yes
17	David Kim	OK Bottle Depot	Richmond, BC	Yes
18	Unknown	Chase & Sorrento Bottle Depot	Chase and Sorrento, BC	Yes
19	Anil Kotadia	Richmond Return-It Depot	Richmond, BC	Yes
20	Leeanne Fraser	BC Ministry of Environment and Climate Change Strategy	Victoria, BC	Yes
21	Leslie Glen	Gold Trail Recycling Ltd.	100 Mile House, BC	Yes
22	John Ahn	Encorp Pacific (Canada)	Summerland, BC	No
23	Jisung Kim	Castlegar Bottle Depot	Castlegar, BC	No
24	Sam Choi	PoCo Return-It Depot	Coquitlam, BC	No
25	Michael Choi	Hart Return-It Centre	Prince George, BC	No

No.	Registrant Name	Organization	City, Province	Attended Webinar (Yes/No)
26	Anita Yuen	Haney Bottle Depot	Maple Ridge, BC	No

### Transcription

Question / Comment	Name (Organization)	Encorp Response
Wanted to share some feedback from Barriere bottle depot. Since the pilot program has been implemented, we have gotten consistently great feedback. It is so much easier, and the overall customer experience is greater. We really like it.	Mia Lee (Barriere Return-It)	N/A
Apart from the obvious benefits of the pilot program (i.e. a huge convenience), the entire community (grocery store, liquor store, pub) are all so happy with the program, but in terms of environmental impact I can't even put a number on how many families were driving trucks of beer cans to Prince George – that's roughly two hours away – to get the full deposit back, but now, with the pilot program, the volume at my depot in my small town has increased tremendously, but those people, more importantly, no longer have to spend the fuel, time, and money to get their deposit back so they are coming to our depot which is a huge thing for our small community. People don't have to travel now and a lot of lower-income families who are in the forest industry depend on that recycling income, so that's great for them. Another thing is that when people do go outside of the community, for example our depot supports a local foodbank, local sports team, so with the extra volume we're getting better able to support our local charities, so when people had to travel we weren't able to support our local charities as much either so this has just changed everything. There is so many benefits apart from the obvious that have made us able to seek out a better living. I strongly urge the ministry to keep this program, it is just better for everyone involved and I can't see how we could ever go back on this. It has been	Chris Beach (Burns Lake Recycling Depot)	I really appreciate those comments, Chris. I've heard from other communities around Armstrong, Clinton, Lillooet where people had to drive 45 mins – 1 hour because the only depot that accepts their beer cans was in Ashcroft at the time which was also having its deposits discounted. So I think that's a really untold story – the impact of this equitable system has really had a regional benefit to it and has really impacted a lot of our smaller, rural depots. I really appreciate this feedback.

Question / Comment	Name (Organization)	Encorp Response
an instant, tremendous success and improvement to the recycling industry.		
For Express & GO, do we have to worry about containers install within our territory when retailer request? Would like to clarify for that issue	Soo jin (Theresa) Lee (Blundell Return-It)	The purpose of Express & GO is to fill gaps in the system. What we would like to do is have, in a perfect world, the mandatory return to retail should be removed, and we should see containers go back to depot and that would be the preference. Where we've had difficulties citing depots and where retailers may have no choice but to accept containers unless we put an Express & GO station, that's really where our objective is in putting in these Express & GO stations. In many cases, where we do put an Express & GO station in, there may be opportunities for those containers to flow to the depot, and that won't be universal and won't happen every time. But in a certain number of cases, it would make more sense for the containers to go to the depot. So one example for that would be our Tofino Express & GO – those containers are picked up by a truck and that truck drops them off at the Ucluelet depot on it's way down Island and those containers will be managed there, and the Ucluelet depot owner is quite happy with how that worked. Again, most of them are done on a case-by-case basis, but the objective with the Express & GO is to fill gaps in our system, and not to duplicate recycling infrastructure.
With regards to the pilot, our staff and customers all like the mixed beer containers. It is easier in many ways. Customers are thrilled and staff all enjoy not telling customers to separate containers anymore.	Vince Spronken (Island Return-It)	Appreciate that feedback, Vince.
We have been serving East Vancouver for over 20 years now, and the fact that we were running the beer can program has been a dramatic help for the community. In East Vancouver there is a lot of low-income families and a lot of homeless people who really need this source of income for surviving. I just want to say that the introduction of this pilot program has made all of my community happy. They have been eager to help and wanted to write a letter to you guys about how we can help them out. On top of that, my employees have been happier than ever because they don't have to separate all the beer cans from the pop cans with the customer and they think it's a lot more easier and they offer to	Andrew Lee (Mount Pleasant Return-It)	I appreciate that feedback, and I appreciate that for communities such as the one that you operate in, this has been a huge benefit. In terms of support, the next stage is having feedback forms with signatures from your customers. We are in the process of developing a standard form that we will provide to you. If your customers would like to see this made permanent, have them sign the form, which we will provide and those will also be included in the consultation summary as another example as to why we think the government needs to take affirmative action and approve a plan where all aluminum containers can be managed in the same system.

Question / Comment	Name (Organization)	Encorp Response
help people. I just want to say that you guys have been awesome and if there's anything we can do to support you guys please let us know.		
Regarding refillable beer bottles that haven't been picked up by Encorp yet, do we have any structure in place for bottle depots like ours?	Miae Lee ( <i>Barriere Return-It</i> )	I'm going to raise this again with the Ministry, but I think at the end of the day the Ministry has approved a stewardship plan, and they've approved one which is clearly not functioning at a level required. So it's not acceptable in the middle of summer for many of our depots to have their beer bottles overstocked and not picked up for weeks on end. So I am going to be following up with the Ministry later today, and I am going to be copying the Brewers on that email, and just clearly laying out that if the Brewers are now no longer able to effectively manage their stewardship plan requirements, then they should either change that and start managing their stewardship plan requirements or retire their stewardship plan. But it's not acceptable to leave our depots, especially our smaller, rural depots, having to manage this.
Quick comment on the petition. I've asked a number of our customers at a couple of our depots that don't have the pilot program and a couple that have the pilot program, and the overwhelming support is that "yeah, we would love to not have to sort this stuff". Some customers, maybe 2%, said that they are indifferent and don't really care, but most are pretty stoked on the idea of being able to mix them all together. The ones that we've asked at the depots that have the pilot program are just happy and don't want to go back. I have another comment on the greenhouse gas emissions – the containers that Encorp provides depots to store beverage containers for transport - One pallet, two of these big bags, is 5600 containers. Whereas one pallet of the Brewers sacks only carries 3600, so were talking about a 30% increase per pallet, and that increase of containers per pallet saved on staff, labor changing bags, and creates a bunch of efficiencies that need to be taken into consideration. Obviously one trailer carrying a whole bunch of air is obviously not as good as one trailer carrying a whole bunch of containers, so it does make a greenhouse impact.	Vince Spronken ( <i>Island Return-It</i> )	Yes absolutely, and to that sorting issue, were not going to stop with aluminum cans. You're going to see us engage in a lot of work next year to try and reduce the number of sorts. Right now, to be honest, we've got a lot of sorts, and we want to reduce that as much as we can, maybe get it down to 3 or 4 sorts. It's clear that if we are going to make the system more sustainable and efficient for everyone, including our operators, that we need to make it simpler. So this is the first step but isn't the only step, we're going to look for other ways to streamline the system and make the whole sorting and collection system streamlined and more efficient in the future.
For beer bottle collection, we understand it is not easy to settle down for unifying with NRBC but is it impossible to combine like pop cans and	Soo jin (Theresa) Lee ( <i>Blundell Return-It</i> )	Our preference would not be to unify with NRBC – it is too difficult to separate refillable and one-way glass bottles and if the refillable break then we lose the opportunity for the container to be reused. I think we contemplated that and even

Question / Comment	Name (Organization)	Encorp Response
<p>beer cans? Also some alcohol pouch and alcohol drink box are increasing, any instruction for depot?</p>		<p>communicated in the beginning that's what we could do but I don't think we feel comfortable going down that road.</p> <p>For the alcohol pouch and drink box, I believe that would be in our program and it should be collected – I don't know if someone else on the line, one of the Return-It people could address that question.</p> <p>At some point we will contemplate, I think with the 10 cent deposit, we were thinking of creating separate SKUs for containers but placing them in the pallet at the same time. So right now they are going in a plastic bag, but we will have to provide proper sorting to become available after we have implemented 10 cents for every single container, so we will address all the containers at the same time including alcohol pouch and drink boxes.</p>
<p>One thing I wanted to say – you talked about the inequity of the system, and while we built up a really good local reputation, there was always a level of mistrust with our customers that just assumed we were taking an extra cut on beer bottles – they couldn't understand how they just couldn't get the full price even if you explained it to them. They also couldn't understand how Alberta fixed this problem decades ago, and they couldn't understand how BC hasn't, and that caused a lot of stress. In my every workday people would think we were cheating them and I'm sure in a lot of other depots as well. So just fixing that has done a lot of great things to improve community relations, etc. and especially at a time like this with COVID – consumption is up, people are experiencing economic difficulties, and with the increase in prices of pop and water and beer, a lot of people are recycling and depending on this extra income to do little extra things that they otherwise wouldn't. So the timing is so good and this is a great example of Encorp and the Ministry getting things right and moving forward in the right direction and making people's lives easier. I just think the timing couldn't be better like right now with all the uncertainty in the world, so I really appreciate the movement on this and I have to admit that I never thought this would happen so this is such a big improvement so I want to encourage you to keep going with the sorts and everything. I just think it's a big win for the BC Government as well to just do the right thing.</p>	<p>Chris Beach (Burns Lake Recycling Depot)</p>	<p>I appreciate that Chris – you're not the first person to tell me that they thought it would never happen. I think, in part, people were so numb to the fact that this was never going to change but we weren't prepared to accept it. Although there's lots of reasons as to why it couldn't, it just seemed on the face of it as such an easy problem to solve. Again I just think, the government has often come to us about the need to increase access for rural residents, and I think some of your comments, and for the folks in Barriere and other places, that part of it is having an equitable system – we can't just continue to push rope and push this province-wide system without giving the communities, where we've established operations, the right tools and the access to enough containers to make this a sustainable operation. So it really heartens me to hear that containers used to make their way 2.5 hours to Prince George are now being collected in the community and the money from these containers is staying in the community, and that's honestly what should happen and what the government wants to happen. So I think this is just more tangible evidence to them that the approach we're proposing is the right approach and the one that needs to be approved.</p>

Question / Comment	Name (Organization)	Encorp Response
<p>It is great to hear everyone's feedback that they are providing to Encorp in terms of their stewardship program and their pilot program. I just wanted to circle back with a point that Allen made earlier about encouraging you to get in touch with your local MLA and the Minister about your positive support for the program. Like I said, I'm really glad that you have some positive thoughts about the program and I just want to let you know that writing into the Minister or the MLA may not necessarily be required at this point. Ministry staff, like me, are on all of these webinars, whether they are with depots or other stakeholders, so we are definitely hearing all the feedback and we are able to take that all into consideration. Writing in is a great way of sharing your perspective, but it also creates a lot of added work for us and takes us away from dealing with the important task of dealing with the underlying things in Encorp's Stewardship Plan and delays our ability to do that important analysis. So I'm definitely happy to hear that you are supportive of the Encorp program, but I want to encourage you to not write in as it takes away from our ability to do other work on their program.</p>	<p>Lucas Harris <i>(Ministry of Environment &amp; Climate Change Strategy)</i></p>	<p>It was never our intention to make more work for you guys. We appreciate all the diligence that the Ministry has shown in attending all these meetings, and there has been a number of really positive and insightful questions that have been asked of us by the MLAs through this, and we understand all the work that this process creates. I think where we've encouraged depots to contact their MLA is when we know that we do have agents and depot operators who have contacted their MLAs and the MLAs have gone up in the legislature and made comments calling into question what Encorp was doing and, as one commentator said, "trying to push independence out of the system", and creating the view that this was Encorp trying to bully some depots while really, what we are trying to do, is to create a more equitable system, where more of our depots, typically our smaller depots, can achieve a more sustainable business by having the same fair access that all the other depots do, which we currently don't have. So we certainly don't want to make more work for you, but we are conscious that the group on the other side is a very determined group, and one that makes no bones about contacting their MLA, and we just worry if the depots on this call do not contact their MLA, then the narrative that gets developed is that its 'Encorp vs. the depots', where I really think that it is 'Encorp and the majority of the depots trying to create a more equitable system'. A small minority of the depots that have benefitted from the existing system trying to get the message out that this is a really bad thing, and I just don't think that's the case. I totally understand your point of view but hopefully that explanation communicates and provides some context for the direction in which we've suggested.</p>
<p>Allen we want to thank you for supporting us and echo Chris' statement that client relations have improved dramatically. We love the pilot program and more importantly our customers do too. Our wish is that the pilot program be implemented as a permanent change and we will contact our local government representatives to further improve our province's sustainability practices.</p>	<p>Miae Lee <i>(Barriere Return-It)</i></p>	<p>Thanks – appreciate that.</p>
<p>For pilot system, going back to old system, it will be a huge negative impact on operators and consumers considering all the costs goes up. So government has to consider seriously. So hope this pilot goes as it is now</p>	<p>Soo jin (Theresa) Lee <i>(Blundell Return-It)</i></p>	<p>Yeah and we appreciate that and I think there is some urgency to this. I think we created the 6 month pilot to get this up and running to demonstrate in a tangible way that this, in the way we are conducting this, would help improve the lives of not just consumers but operators as well, and make for a more equitable system</p>

Question / Comment	Name (Organization)	Encorp Response
		<p>in a tangible way. But it is clear that it is having such a dramatic impact that there really can't be a lot of excess time for deliberation. Our objective is to have this Stewardship Plan submitted by the middle of October and hopefully give the Ministry enough time that we can reach a positive solution and get approval of our plan before the end of the year and before the expiry of our pilot. I should also let you know that as a next step, we are going to be issuing a new amended agreement to provide depots with information of, if the plan is approved, what the handling fee would look like for aluminum containers post Dec. 31. You should be receiving information on that and an updated amended agreement. It won't supersede the one you have already signed for the pilot, but more importantly, it will have a start date of January 1<sup>st</sup> 2021, and outline the payment plans post-pilot and I hope that all of you will receive this positively.</p>
<p>I just have one more quick comment on the depots that discount and how they get labelled as "ripping people off" and all that kind of stuff. I was discounting many years ago and the thing that really made me want to lose a little bit more money by applying to the Brewers and finally getting an agreement with them was the fact that I had one of my staff actually grabbed by the scuff of his neck and dragged over the counter at our depot over a 3 cent deposit difference. It was only a couple dollars at the end of the day, but the reality is that we get insulted all the time, on a daily basis, and it's not the owners of the companies that are getting insulted – it's the staff. They are getting threatened with violence and called names and it's just unacceptable and I couldn't handle it anymore and I decided to actually apply and get the agreements in a number of depots, not all of them because they wouldn't allow me to get them in all of them, but I had to play all of these little games just to make sure that we could actually pay a full deposit to all of these customers who are low-income and what not, and they don't need to be "ripped off" or feel like they're being ripped off, and depots don't need to have violence or insults threatened on their staff for something that isn't even their problem, so that's just my comment on that.</p>	<p>Vince Spronken (Island Return-It)</p>	<p>N/A</p>
<p>Also I would like to ask that Encorp develop more detailed instructions or education for Express users on pros and cons and guidelines. For example, they put multiple labels on the bags for secure their bags</p>	<p>Soo jin (Theresa) Lee (Blundell Return-It)</p>	<p>N/A</p>

Question / Comment	Name <i>(Organization)</i>	Encorp Response
which is a waste of depots cost and paper. So please give some guidelines that there are some risks and they can't get paid all the items in their bags if they are not registered. Some customers showed up with rude attitude. They treat us like robberies.		

### Consultation Session 7: Webinar with Depots– August 20th, 2020

#### *Registrants and Attendees*

No.	Registrant Name	Organization	City, Province	Attended Webinar (Yes/No)
1	Leeanne Fraser	BC Ministry of Environment and Climate Change Strategy	Victoria, BC	Yes
2	Savannah Paine	Willowbrook Recycling	Langley, BC	Yes
3	Mike Nestor	Denman Island Residents Association - Waste Management	Denman Island, BC	Yes
4	Young Nam	Boucherie Bottle Depot	West Kelowna, BC	Yes
5	B. Fredrickson	Vernon and District Association for Community Living	Vernon, BC	Yes
6	Teresa Conner	BC Ministry of Environment and Climate Change Strategy	Victoria, BC	Yes
7	Jin Kim	North Vancouver Bottle Depot	North Vancouver, BC	Yes
8	Greg St George	Nelson Leafs Recycling Center	Nelson, BC	Yes
9	Min Kim	Vancouver Central Bottle Depot	Vancouver, BC	Yes
10	Soo Dol Woo	Sardis Bottle Depot	Chilliwack, BC	Yes
11	Jerry Orense	Bridgeview Bottle Depot	Surrey, BC	Yes
12	Lucas Harris	Ministry of Environment and Climate Change Strategy	Victoria, BC	Yes

No.	Registrant Name	Organization	City, Province	Attended Webinar (Yes/No)
13	Jason Lee	Fernie Bottle Depot	Fernie, BC	Yes
14	Stew Young	GFL Environmental	Victoria, BC	Yes
15	Patrick Ashton	Mountain Valley Station	Slocan, BC	Yes
16	Smile Surya	Clearwater Bottle Depot	Clearwater, BC	Yes
17	Sung Kim	Aldergrove Bottle Depot	Aldergrove, BC	Yes
18	Meagan Salekin	Salmo Return-It Depot	Castlegar, BC	Yes
19	Tommy Lee	Kitimat Bottle Depot	Kitimat, BC	No
20	Sung Hoon Philip Ahn	Winfield Return-It Centre	Lake Country, BC	No
21	Austin You Seung Kim	PG Recycling & Return-it Centre	Prince George, BC	No

### Transcription

Question / Comment	Name (Organization)	Encorp Response
<p>This may be in the presentation, but I understand that the beer/pop cans is a pilot program through the end of the year. What is likelihood this will continue after January, 2021?</p> <p>When milk and milk substitute collection starts in February, 2022, will</p>	<p>Mike Nestor (Denman Island Residents Association – Waste Management)</p>	<p>I don't know if I can give you an estimate of the likelihood – I'll give you my expectation. My expectation is that beer and pop cans will be integrated within our program at the beginning of next year. Ultimately that decision is the Ministry of Environment's to make, but from our perspective we see no reason why we would go back to discounting– why we would go back to a system that clearly is</p>

Question / Comment	Name (Organization)	Encorp Response
<p>there be a deposit charged on these containers or are we just collecting the containers (like we used to years ago?)</p> <p>Is there a reason we are going with a CNG hybrid vs. all electric vehicles (to reduce GHG emissions)?</p>		<p>not working. Especially given the significant positive feedback we have received from consumers and operators. It is clear that the system, as it is currently assigned in the other stewardship plan, is meant to create inequities and I don't think we can continue to operate these province-wide systems and have these inequities. Not only continue, but in some ways become even more perverse. We think we need a system that promotes equity across the network, so it is our expectation that those containers will be in our system by the beginning of next year.</p> <p>In terms of milk and milk substitute collection, in 2022 they will be in the deposit program, so there will be a deposit charged on those containers and they will be managed like all our other containers in the system.</p> <p>We did a lot of analysis of the available electric options – we even test drove some electric trucks that people were using. But even the companies we approached that already had trucks that people were using were not necessarily happy with their performance. So I think we're still a couple years away. The CNG hybrid-electric gave us the best opportunity to go to the market now and roll this type of technology out and reduce our GHGs. At a future point, if all-electric options are available and they can meet the performance specifications that we require, I see no reason why we wouldn't make the switch over to them.</p>
<p>Why Encorp only doing beer cans program not the beer bottles. It is very difficult for depots to keep beer bottles in depots because no third party guys are willing to pick up beer bottles.</p> <p>In the future will Encorp pick up the beer bottles?</p>	<p>Smile Surya (Clearwater Bottle Depot)</p>	<p>The Ministry is on this zoom session, so part of this answer is going to be directed to the Ministry. The reason we didn't take beer bottles is because they're refillables and so they work in a different way and we are concerned about mixing them with our non-refillables. In other jurisdictions where the cans have been integrated, the beer program has typically continued to run a separate program for bottles, and we're fine with that. The thing that's not acceptable is that the government has approved a stewardship plan, and that stewardship plan is not taking responsibility for their products and picking them up from our depots on a regular basis. I'll be sending an email later today to the Brewers and copying the Ministry and basically saying "With all due respect, you either have a stewardship plan or you don't. And if you have a stewardship plan then you need to take what measures are necessary to pick up materials from our depots on a regular basis. It's not fair and it's not equitable to expect these depots store the bottles for you." And I think that's really it, and so we are conscious that it's a really busy time of the year but I think that if they're not</p>

Question / Comment	Name (Organization)	Encorp Response
		willing to take responsibility for the product then I don't think they should have a stewardship plan and I think they should either retire their stewardship plan or the Ministry should put a pause on their stewardship plan until a point that they actually demonstrate that they have the ability to run their program in a reasonable manner and not rely on other parts of the supply chain to basically do the work for them and store these containers for them because they don't have the ability to pick them up. And I think its important to note that part of the challenge is because they use their own trucks in many cases, the focus of those trucks is delivering full goods, and then picking up containers from LDB retail locations. I don't think its any surprise that depots have often come at the back of the line when it came time to picking up bottles, but its just no longer acceptable. Were going to ask BDL to take action and if they won't then we're going to ask the Ministry of Environment to take action.
Is there any talk of the container deposit being raised again? 10 cents is low compared to world market?	Savannah Paine (Depot)	I think most of you know that we're planning to actually lower the deposit from 20 cents to 10 cents. Our plan is to get to a unified deposit. A unified deposit opens up, or unlocks, a range of possibilities to manage our system more efficiently. I think what we've learned through the increased deposit is that it's had some impact, but at the end of the day the depots that have benefitted the most from the increased deposit are ones that have Express. And what that said to us is that it isn't necessarily the deposit value alone as much as the convenience. I think the first thing is to get us to a unified deposit and then from there begin to plan out how to maximize the convenience of the system. Once we're there we can look at whether this needs to increase. I think it's hard to look at comparisons across jurisdictions. Clearly we felt we needed to make the increase from 5 cents to 10 cents, but whether we want to go to more than that, particularly during a pandemic when so many people have had their livelihoods impacted – it's definitely not the right time. We'd look at it in the future but our focus right now is getting to a unified deposit and then integrating alcohol aluminum containers and milk containers into our system – that's really the focus for the next 3 to 5 years.
How many Express & GO placements are planned for the next 5 years? How will it affect traditional contracted depots?	Savannah Paine (Depot)	The Express & GO program is really meant to provide access in underserved areas. Either in small, rural areas like Tofino where we didn't have a depot, or in places like SFU, Burnaby, or North Van where we simply did not have enough depots, and where we had partners willing to cite a container. Our expectation is

Question / Comment	Name (Organization)	Encorp Response
		that over time, we probably won't have a lot of new depots so it's our expectation that existing depots will continue to be the backbone, but Express & GO will continue to provide ancillary services. In rural communities, and those beverage containers, like in Tofino, may go to a nearby depot, so in the case of Tofino they go to Ucluelet, in the lower mainland sometimes they go to another depot, sometimes they may go to our count center depending on location and volume. Some of that still needs to be worked out – we really need to take into account increased volume by the alcohol aluminum containers and the milk containers.
Will Encorp help depots financially with grants rather than loans for the high expense of automation? Or engage with government to provide grants?	Savannah Paine (Depot)	I think at the end of the day, we're conscious and respectful of the role of our depots as independent operators. You folks are business people, you take pride in that, and so we want to ensure that we have a system that's fair and equitable but also that these are independently run businesses. So I think we're definitely interested in facilitating loans to help get the start-up cost of automation, and then it's our hope that the automation pays for itself in terms of reduced labor and ultimately I think in managing the containers in a much more efficient way. We've looked at automation for a couple years now, and I think we're convinced that the benefits of automation will pay for themselves. That's where we've determined we need to play a role – providing interest free loans on the start-up costs. We think that's a way we can facilitate the introduction of automation and help get it in. I think once automation is in the system the benefits will become clearly evident in terms of the increased efficiency for our depots.
I just want to say something about the beer pricing. I've been running recycling depots in Vancouver for 30 years and honestly speaking, BDL has been the biggest enemy in any of mine because I've been trying to speak to them all the time to gain their license, but it's impossible to talk to them. Even if I talk to them it's impossible to gain them. If it's not in the right region where there is a benefit group, if there's a company who picks up beer containers near your depot, you don't get the license. Out of my 4 bottle depots, only the 1 that received the license is not having those pickup companies around them. They gained the license a few years ago but otherwise it's impossible to get the beer license. It was the biggest headache when I was running the recycling depots – the beer pricing. At one of the depots we had to give full refunds because there's a depot nearby who picks up the containers and they give full refunds.	Min Kim (Vancouver Central Bottle Depot)	I really appreciate that and I think you raised a great point. The way the system was created wasn't equitable and for whatever reason the Ministry approved that system and the fact that it had a hybrid cover rate it seemed like everything was fine, but at the end of the day it's obvious I think to everyone now – and I think the pilot has really demonstrated that – is that there are vast inequities in the system that were the result of Ministry approval of that plan. I think that we need to find a way to go beyond that. Again, it's not up to the customer to try and figure out which depots can and can't give them a full deposit refund. The truth is that they should be able to get a full deposit refund at any depot they go to, and if the Ministry isn't prepared to support that then I think it raises larger challenges or issues of how you maintain this province-wide network. Anyways, I think that that will be for the Ministry to decide when they decide on the approval of the plan, but I think that the situation you raised about urban depots and losing

Question / Comment	Name (Organization)	Encorp Response
Without giving full refunds, we were losing money because they take their beer cans to the other depot. This is the result of the problems.		money on these containers just so you can keep your customers happy is a situation that we don't want to find any of our depots in.
I just wanted to follow up – there was a question on the minimum deposit and the increase – I just wanted to add for clarity for this group. The government did set that minimum at 10 in the recent regulatory amendment after the research into other jurisdictions, but there is a commitment there to look at that 10 cent minimum in 2 years' time to see if we're seeing that increased recovery that we're hoping for across the province. So that's sort of the government's feedback on that one. I did also want to mention, because there's a lot of depots on this call, that if folks are having problem with one stewardship agency collecting the materials, and what I'm hearing is beer bottles by BRCCC, I would definitely encourage folks to speak with that agency directly. If that agency isn't satisfying what you need, and this call is the first I've heard of that issue, then certainly talk to the steward for which you have a contract for those materials to rectify the situation, and if that's not being resolved then I do think that's good feedback to send back to the Ministry so that we are aware of that as well.	Teresa Conner (BC Government)	Thanks, Teresa.
When will I see larger bags for small depots for aluminum cans	Patrick Ashton (Mountain Valley Station)	I don't think it's anything we have planned right now, but let me take that away. I am conscious that as we transition to the pilot, certainly there's a lot larger volume, but a lot of the alcohol cans will also be larger – I guess what you would call tallboys – so there's a lot more of those cans, so that creates a number of issues but we can definitely follow up on that in terms if larger bags are required or how we're going to manage that.

## V. Written Feedback

The following pages include all feedback received by Encorp via e-mail. They are organized based on the following categories of respondents:

- Depots and Transporters
- Municipal Government
- NGO's and Other Stakeholders
- Processors and Suppliers
- Public
- Retailers and Brandowners

## Depots and Transporters

*Please note that the following e-mailed feedback is from Scotch Creek Bottle Depot owner, Roxane Kilback.*

### Stewardship program



Roxanne kilback <kilback@me.com>  
To: beverageplan2020@returnit.ca

Reply Reply All Forward ...

Sat 18/07/2020 10:38 AM

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We removed extra line breaks from this message.

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MISE EN GARDE: Ce courriel ne provient pas du réseau de MNP. Méfiez-vous des liens ou pièces jointes qu'il pourrait contenir.

Our depot just started the new por system and we love it. Now that all the aluminum can go together I think it's a wonderful idea customers are going to love it it makes our job and my staff much more easier to do it cuts back on a lot of sorting which my staff had to do and it was time consuming .The c bags are great to use, before my staff would get busy and push aside all the beer and pop cans and sort them all when they can now they enter the amount and they dump everything into the c-bags right away.  
We all needed this program years ago lol lol lol Encorp and the stewardship plan are doing a great job keep up the good work in helping us Depots out is a great thing thank you.

Sent from my iPhone

### Pilot Program Suggestions.



parkjusin <parkjusin@naver.com>  
To: beverageplan2020@returnit.ca

Reply Reply All Forward ...

Sat 18/07/2020 1:00 PM

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Hello,  
I am Ju Sin and this is the Ashcroft & Logan Lake Depot.

To defeat the beer company, I suggest....to involved in the police intentionally.  
Current both depot introduce to customers as below.  
# Complain  
- 1st : Beer Manager( [REDACTED] )  
- 2nd : Local Police Station(RCMP)

At both depot, some customers(knowledge) visit the RCMP and report the beer company & liquor to police, together.  
I hope that the police investigate the beer company and liquor store, together.

Thank you so much.

Sent from my Samsung device

## Aluminum can test pilot



Gold Trail Recycling LTD -GTR Disposal &lt;goldtrailrecycling@live.com&gt;

To ● beverageplan2020@returnit.ca

Cc ● ENV.minister@gov.bc.ca; ● Lucas.Harris@gov.bc.ca; ● Teresa.Conner@gov.bc.ca; ● peter.milobar.MLA@leg.bc.ca; ● adam.olsen.MLA@leg.bc.ca; ● donna.barnett.MLA@leg.bc.ca

Reply

Reply All

Forward



Fri 24/07/2020 1:58 PM

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Hello,

We are writing you regarding the Aluminum can pilot project we have had the pleasure of participating in. Our customers have been begging for an increase to their beer can refunds at our depot for years. We had just recently increased our refund from .05 to .08 in an effort to ease some of the upset our customers have been feeling, as during Covid 19 their options for a full refund had disappeared in our small town as return locations stopped accepting empties during the pandemic.

Recycling is not everyone's favourite job at the best of times, so we at Gold Trail Recycling take great pride in offering our customers a very clean and inviting area to sort and return their empties. The increase in refund paid for beer cans has changed the dynamic in our depot.

We have had to defend our beer pricing on a daily basis to customers who were very unhappy to find out our price for beer was different than what they had paid, I have personally had customers yell at me: you are f@#\*&\$g ripping people off!! Now we see everyone smile when they realize or hear they are now getting a full refund for beer. And you should see them light up when we tell them they can put "all" of their aluminum in ONE tray, instead of sorting pop cans from beer.

We have gained new customers at our depot as a direct result of the change, and we feel this will have an even further reaching result for us as we are a full service depot, accepting much more than just bottles and cans. When we gain a new customer, we gain the opportunity to help educate them on more recycling options.

The positive benefits of this pilot project for us have been numerous. It saves our customers, frustration, and time at our depot. It has streamlined our processing of aluminum for shipping, as well as brought us customers we may never have had the opportunity to serve before.

We feel that these changes need to become permanent. After having the chance to give our customers a better return for their beer cans as well as the convenience of calling a can a can, it would be very difficult to take that back.

To try to revert to a system that our customers were unhappy with would cause major upheaval and uproar.

We appreciate the opportunity to participate in and communicate our thoughts on this project.

Thank you for your time,

Leslie and Mike Glen and staff at Gold Trail Recycling Ltd.

## In support of new system change.



kim young <zxotic@yahoo.com>  
To ● beverageplan2020@returnit.ca

Reply Reply All Forward ...  
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" That makes sense!"

This is a response I get from most of my customers after I inform them 'no sorting' on pop and beer cans.  
When you think about it, we have been forcing this nonsense to British Columbians for more then two decades now.

As a depot operator since 1997 in my fast growing city, I would like to write in support of Encorp's pilot program.  
Just the other day a gentleman mentioned how great it is to not have to sort and receive full refunds at depot.  
Before many had to drive out of their way to receive full refunds not to mention the time wasted on sorting cans.  
Let me tell you, We are all in favor of this system over the old one.  
For myself the hardest part of operating a small bottle depot have been over discounting refunds to customers.  
By merging two stewardships to one system, I will no longer have that issues.

Times are changing, we can not hold on to 30 year old system just because!  
All the social networks with media coverages, people are starting to ask democracy behind it all.  
We all know the main purpose of stewardship is to increase recovery rate to sustain our resources.  
When there's organization who's willing to take on this difficult task, we all need to support.  
At last we are heading to the right direction by making it simple, easy and convenient for all British Columbians.

Thank you for your time reading my opinion.

Kind regards,

Young

Sent from my iPad

## Aluminum Can Pilot Feedback



Luvis Orense &lt;luvisorense@hotmail.com&gt;

To ● beverageplan2020@returnit.ca  
 Cc ● ENV.minister@gov.bc.ca; ● Lucas.Harris@gov.bc.ca; ● Teresa.Conner@gov.bc.ca; ● peter.milobar.MLA@leg.bc.ca; ● adam.olsen.MLA@leg.bc.ca; ● bruce.ralston.MLA@leg.bc.ca

Reply Reply All Forward ...

Mon 27/07/2020 3:59 PM

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First of all, I would like to thank you for the changes made by the Aluminum Can Pilot Program. Since the program was implemented, we have noticed that it made the running of our business more efficient. Not only does it save time for our customers, not having to separate the pop cans from the beer cans, it has also made processing these products faster. We no longer have to sort between an alcoholic beverage from the non-alcohol beverage.

Since the beer cans, pop cans, and plastic containers are our top three collected products, we have found that merging the cans allowed us to close more bags per day, boosting our volume.

More importantly, it has been a welcome space saving solution. Merging the two containers into one has given us more working space. We no longer have two separate storage areas. Instead, we are able to compact our storage into one clear, concise, and efficient working environment.

We appreciate your efforts in creating positive, constructive alterations that benefit the recycling program and we sincerely hope that we are able to keep these revisions and look forward to future ones.

Kind Regards,

Jerry Orense

Manager of Bridgeview Bottle Depot

Sent from [Outlook](#)

## feedback



Valumart &lt;valumart@brilliantaviation.com&gt;

To ● beverageplan2020@returnit.ca; ● ENV.minister@gov.bc.ca; ● michelle.mungall.MLA@leg.bc.ca

Reply Reply All Forward ...

Tue 04/08/2020 11:12 AM

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Good morning,

I am writing in response to the new pilot program for aluminum with return it. So far this change has made the work flow process with cans a breeze as well as making our customers all happy with their pay outs as they are now getting the full refund. I hope this change is made permanent as it has made every part of working in the depot with my staff and customers much more efficient and also less stressful on busy days.

Thank you for your time,

Tasha Bilinsky  
 Manager – Salmo Valumart & Bottle Depot

## Pilot program



happybong03 <happybong03@gmail.com>  
To ● beverageplan2020@returnit.ca

Reply Reply All Forward ...  
Sat 08/08/2020 8:47 PM

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The most difficult issue in Return-It recycling operating has been resolved, and we are ecstatic. Our customers are beyond pleased, and as a result our customer relations have improved dramatically.

Our wish is that the pilot program will be implemented as a permanent change.

- Sorrento Bottle Depot & North Shuswap Bottle Depot

Sent from my Bell Samsung device over Canada's largest network.

## Input - Beverage Plan 2020



Gold Trail Recycling LTD -GTR Disposal <goldtrailrecycling@live.com>  
To ● beverageplan2020@returnit.ca

Reply Reply All Forward ...  
Wed 19/08/2020 12:02 PM

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Our customers are thrilled to receive full refund on beer and be able to return all items at one location !

Our staff is happy because we are not faced with customers daily saying that we are ripping them off by not paying full refund on beer .

As a family depot owner for 25 years we are very happy to see an increase in units that we are accepting. Thank you 😊

We are collecting signatures daily of customers that want to see this continue permanently .

**Leslie Glen**

*President, Gold Trail Recycling Ltd.*

Box 1120

100 Mile House, BC V0K2E0

[www.goldtrail.sfbcc.ca](http://www.goldtrail.sfbcc.ca) 250-395-1041

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Please note that the feedback below is from Agassiz Bottle Depot (ABD400).

**From:** 정현숙 <[sophia03151203@gmail.com](mailto:sophia03151203@gmail.com)>

**Sent:** Wednesday, August 26, 2020 5:18 PM

**To:** Paul Kim <[pkim@returnit.ca](mailto:pkim@returnit.ca)>

**Subject:** Feedback on Pilot Program

Hi Paul & Allen

Hope you are having a great day.

I am writing you a mail in regards of the feedback that our depot have came up with.

As you may have known, we have given out 8 cents for beer cans for years and numerous customers have left the depot with Discomfort and frustrations.

We lost so many customers due to this issue.

Our primary goal is to make the customer 100% satisfied and we were not able to fulfill that for such a long time. We are so grateful that the pilot program launched and we signed without any doubt.

It has been just over a month now and the results has been amazing. We have dramatically reduced customer's dissatisfaction rate. The word of mouth has been reached and we are seeing new customers, formerly going to different depot for more deposit.

Our workers and including myself are overly satisfied with the amount of work being saved. The time and energy to separate beer and pop has been completely eliminated.

We would like to say a big 'Thank You' for not only making our work easier but more importantly allowing us to fulfill our customers needs.

Hope this feedback helps in continuing this amazing pilot program.

Thank you for reading this long email and hope you have a wonderful day!

Kind Regards,

Sophia Jeong

## Beverage Plan 2020 - Stewardship Feedback



kensingtonreturnit <kensingtonreturnit@gmail.com>

To ● beverageplan2020@returnit.ca

Cc ● Lucas.Harris@gov.bc.ca; ● ENV.minister@gov.bc.ca; ● Teresa.Conner@gov.bc.ca;

● peter.milobar.MLA@leg.bc.ca; ● adam.olsen.MLA@leg.bc.ca; ● katrina.chen.MLA@leg.bc.ca

↩ Reply

↩ Reply All

➔ Forward



Tue 08/09/2020 10:22 PM

I am the Operations Manager of Kensington Return It; we have been in business since 1998. In these years, we have never been offered a Brewers Distribution Licence (BDL) but chose to be a part of the Return It aluminum can pilot program. Previous to this, we still accepted beer cans but we were not able to offer full deposit.

We are located next door to a provincial government liquor store in a very busy shopping plaza in North Burnaby. As the liquor store only accepts 24 containers per customer per day, this causes a lot of frustration and confusion to the consumers. They do not understand the difference in returning containers to the liquor store vs a bottle depot; and also why a bottle depot gives less than the full deposit value. By not having a BDL contract, we had experienced a lot of complaints and at times aggressive behavior by the consumers. It affects not only the safety of our employees and other customers, but also our image and business at no fault of our own.

Now during the pilot, we have noticed a significant change in our customers' behavior. They are very happy to receive the full deposit they have paid and feel that it is fair, just and convenient. We as a depot, also feel safer and that it is fair and just. An aluminum can is an aluminum can and it should not have to be discounted because the depot does not have a BDL licence.

We request to make this change permanent by the government approving the inclusion of alcohol aluminum containers in Encorp's stewardship plan.

Kind regards,

Aly Mitha

Operations Manager



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 Delta, BC, V4C 8E6  
 Phone: 604-930-0003 Fax: 604-930-0060  
 Email [bcbdrda@gmail.com](mailto:bcbdrda@gmail.com)

**September 15, 2020**

**Encorp Pacific (Canada) – Head Office**

100 – 4259 Canada Way  
 Burnaby, British Columbia  
 V5G 4Y2

Delivered via email to: [beverageplan2020@returnit.ca](mailto:beverageplan2020@returnit.ca)

**Re: Encorp Pacific Canada Beverage Container Stewardship Plan (DRAFT) 2020-2024**

Dear Mr. Allen Langdon – President & CEO,

Thank you for the opportunity to provide input on Encorp's Draft 2020-2024 Beverage Container Stewardship Plan. We, as a united group of British Columbia (BC) Depots and willing partners in the system, are sharing our concerns, experiences, and recommendations to improve the plan. It is our sincere hope that our input will result in well-informed amendments that will benefit Encorp's ability to achieve results, the Depots ability to thrive as small business entrepreneurs, and British Columbians who have relied on and benefited from a deposit return system for beverage containers for 50 years.

In this submission we:

- acknowledge the strengths of your plan and how it will help bolster beverage container recycling in our province;
- discuss our perspective on BC's vision for EPR and where we see a cavernous departure from it that appears to be growing over time;
- share direct evidence of Encorp practices that are furthering this departure; and
- use our on-the-ground experience to provide recommendations on critical enhancements to the stewardship plan that are needed to ensure it achieves the best possible results for British Columbia.

### Who we are

We are making this submission on behalf of the mass majority of the 168 Encorp-licensed Depots in BC. We have come together as a Depot network because we share similar missions, histories, and visions for the future, and we are experiencing similar challenges in delivering services and creating experiences that British Columbians expect and first endorsed when the government regulated EPR 16 years ago. For these reasons, our network of Depots is providing one single submission under the banner of the British Columbia Bottle and Recycling Depot Association (BCBRDA).

Encorp has a long history of negotiating and establishing contracts with individual Depots. As a result, your recent decisions have impacted some Depots differently than others. In the past, this tactic of dividing us by using 'Depot negotiating blocks' has resulted in decisions that pitted us against one another. Those Depots that benefitted from an individual decision were likely to support that decision out of rational self-interest, even as others were left behind.

We are changing our approach. Decisions that weaken some of us weaken the entire network. We believe the overall success of BC's beverage container recycling system is more important than the



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outcome of any single decision for any individual Depot. We also realize that as a network that serves the public, we must work together to ensure we are providing the common services and meeting the expectations of all of BC. We are team players and we want to help Encorp achieve its goal of a modern, effective, and sustainable system.

With that in mind, we have reviewed your Draft plan as team players. The bottom line of our assessment is that we are united in our concern that BC's beverage container recycling system is fraught with issues that threaten the continued success of the system, and that an amended stewardship plan that takes our concerns into account would benefit Depots, Encorp and all of BC.

### The strengths of your plan

BC Depots have 50 years history as the frontline of recycling system providers in our province, and some Depots have been around even longer. From the earliest days, supporting one of the world's first deposit return systems, we've demonstrated that a Depot-based recycling system can generate jobs and local economic returns, support our social systems and community initiatives, and positively contribute to environmental and climate outcomes.

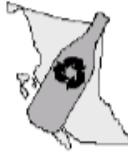
Since the introduction of EPR in BC 16 years ago, we've worked with Encorp to continue to advance those goals. We recognize that Encorp's success in capturing more beverage containers directly affects our businesses' success, and equally that as a group we are the largest and most reliable collection service provider for beverage containers in BC, so our ability to provide customers with a modern and satisfactory customer experience is paramount to Encorp's success. For this reason, we remain committed and supportive partners in improving and evolving the system.

In this latest update to the stewardship plan, it's clear that Encorp has given a lot of thought to customer experience. We are happy to see this and support the intent. As frontline service providers, we appreciate Encorp's desire to create system clarity, convenience, and achieve a positive customer experience, and as much as possible implement low-touch return options that support the health and safety of patrons, particularly in the context of the current global pandemic. We support this vision and want our Depots to be able to provide affordable and sustainable solutions and an exceptional customer experience.

### Where we are today: BC's choice point

BC adopted EPR for the benefit of all our people, our communities, and our businesses. How do we know this? Because we know that when government passes any new regulation that shifts a system, it does so because it believes the shift will provide added triple bottom line benefits (i.e., economic, social, and environmental) that outweigh the costs. So we know that as government was considering shifting the existing successful deposit return system (which had already provided 35 years of triple bottom line benefits) to EPR, it would have completed a cost-benefit analysis and assured itself of positive triple bottom line returns. We believe government would not have regulated this shift to EPR for this program (in particular) if their analysis had shown the shift would provide the government's endorsement for a monopoly system provider to:

- maintain a system whose container recovery rates remain stagnant for the next two decades, achieving little or no additional environmental benefit - **see Figure 1**;
- deliver no added encouragement for producers to design and market only containers that are in fact recyclable (which was one intended outcome of shifting to EPR);



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- be less than transparent about the use of consumer funds, such as using those funds to outcompete and replace small businesses;
- have the power to put small entrepreneurs out of business with 6 months' notice (and without consultation or negotiation);
- devalue 50 years of small businesses' investments; and
- eliminate green jobs and community services.

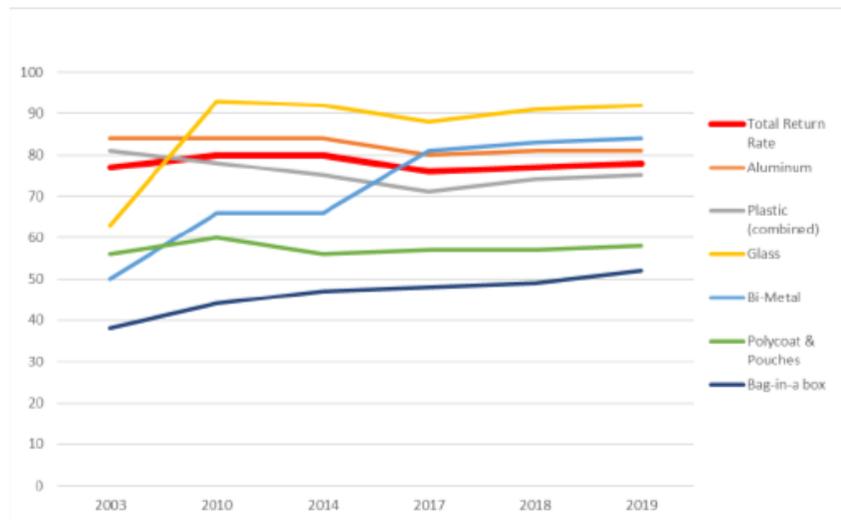


Figure 1: Return Rates for Beverage Containers 2003-2019

We believe government implemented EPR because it believed EPR would provide better environmental, social, and economic returns for BC. In fact, properly implemented EPR should create opportunities and innovations that benefit the very people that the system is created to serve. Specifically, EPR should:

- ensure that producers pay the full costs of collecting, managing, and ultimately recycling their products and packaging and in doing so,
  - create incentive to drastically increase recycling rates, and
  - encourage the redesign of products and packaging so they are more recyclable (and more environmentally friendly overall) and can be put back into a circular economy;
- instigate an economic system that delivers new marketplace opportunity, jobs and other social benefits, and better environmental outcomes than the status quo; and
- enable healthy competition in the marketplace that maximizes environmental, social, and economic benefits, including innovation, while minimizing cost.



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However, what we are seeing playing out in BC's deposit return system today isn't this original vision of EPR. We are witnessing a system that is reaping benefits for producers and Encorp (a monopoly product stewardship organization), while clawing back the 50 years of triple bottom line benefits. Specifically, what we see is Encorp's plan to:

- emphasize producers' license to achieve the lowest cost recovery system possible and, in doing so, dismantle:
  - 50 years of Depots' small business capital, infrastructure, and community investments,
  - green jobs,
  - services to the marginalized, and
  - frontline community services and education;
- download costs to consumers and small businesses;
- evade its primary responsibility of increasing collection and recycling rates across all its beverage container streams (even when other jurisdictions having long since surpassed Encorp's proposed 5-year results -see Figure 2);
- set an objective for a positive customer experience, while at the same setting up BC's frontline service providers up to fail to achieve this objective; and
- devalue 50 years of Depots' business value and community relationships by threatening to replace us (without fair compensation) with Encorp-owned facilities.

**There is a choice before the BC government as it reviews your stewardship plan:** Will it approve a system that is designed primarily to provide low-cost recovery for producers? Or will it require Encorp to develop a system designed to achieve something more for its people? This is what we as a coalition think should be addressed and what we want to be part of resolving.

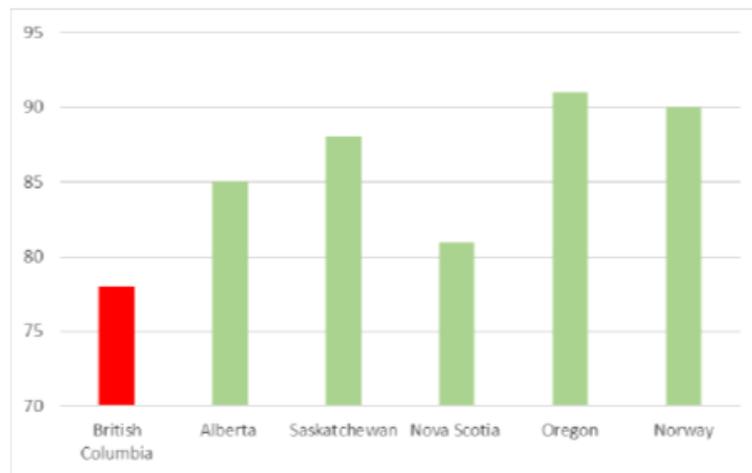


Figure 2: Overall Return Rates of Comparable Programs



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### Consideration: Balancing customer experience with system outcomes

We fully support improving the customer experience. We support modernization, automation (when it makes sense) and systems that protect the health of our patrons. However, we believe that Encorp's current approach to modernizing the system is counter to its objective of improving the customer experience. It's one thing to publicly declare a commitment to a modernized system that delivers a positive customer experience. It's another to effectively enable this system.

If Encorp is truly focused on delivering a positive customer experience, then it is prudent that it systemically reviews what the system was originally created to accomplish:

- drive a circular economy (by increasing recovery, delivering high-value recycling, and improving container redesign); and
- improve upon BC's decades-old deposit return system that delivered economic, social, and environmental benefits long before EPR was imagined.

We believe that if you asked British Columbians if they would prefer to trade jobs, community investments, and social and community programs to save a few minutes of time and interaction with Depot staff that the answer would be a resounding: **No!** The global pandemic has only increased British Columbians' focus on a prosperous economy and job creation, and the Government of British Columbia's 2020 budget very clearly stated, "In today's economy, we can't afford to leave anyone behind<sup>1</sup>."

We believe this means the government intends to enable a system that helps BC prosper, including:

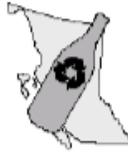
- the 168 Encorp-licenced Depots;
- the thousands of people whom we employ (i.e., many of whom would not be able or eligible for other types of work);
- the communities and sports groups that depend on us to create and help implement effective fundraising solutions with them; and
- the 'binners' who rely on the support and immediate cash (i.e., no bank account required) that we offer them.

As a result, we believe Encorp's stewardship plan should enable and enhance a recycling system that:

- maximizes benefits to British Columbians rather than just producers; and
- facilitates an effective and sustainable collection system that is fair to producers, consumers, communities, and Depot operators.

We also believe these provisions are critical to Encorp delivering on all the positive customer experiences that it has touted in its news releases and public communications.

<sup>1</sup> [https://www.bcbudget.gov.bc.ca/2020/pdf/2020\\_Strategic\\_Plan.pdf](https://www.bcbudget.gov.bc.ca/2020/pdf/2020_Strategic_Plan.pdf)



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### Our concerns

To be transparent, as small businesses we already have concerns about the way that Encorp uses its monopoly power to direct decisions, interact with us, and feign consultation without demonstrating how our evidence-based input will be used to evolve its thinking and practices. However, we're highly aware of Encorp's role under the *Recycling Regulation*, and which aspects of your proposed plan are within your purview. For this reason, we've limited our input on your plan to those aspects that we believe:

- directly contravene the government's original intent when it introduced the EPR system; and
- diminish your responsibility and accountability to government and British Columbians on behalf of producers.

Our concerns about your proposal include Encorp's plans to:

1. Deconstruct EPR's triple bottom line to focus on the lowest common denominator – i.e., the lowest cost recovery system for producers.
2. Eliminate jobs, capital investments, frontline relationships, and community education in favour of low-cost, low-touch approaches veiled as 'convenience' to reduce costs for producers.
3. Make consumers and Depots, not producers, shoulder the costs of implementing Encorp's new vision.
4. Eliminate healthy competition in the marketplace in favour of monopoly practices that:
  - force Depots, as small businesses, to adopt programs, practices, and make modernization investments for which they are not compensated, reducing depot viability;
  - pull business away from Depots by competing directly with us (e.g., installing Express Plus and Express & Go in our territories, physically confiscating Express bags dropped at our Depots) while, at the same time, enforcing new requirements, rules, and practices on us making that competition unfair and costly;
  - use a 'cancel culture', in which Encorp threatens to -and does- eliminate our contracts if we don't make modernization and site investments and readily adopt a never-ending list of new programs, process and procedural changes, branding, data systems, and other affiliative operational requirements that devalue our status as independent businesses and position us as de facto Encorp franchisees;
  - interfere in our commercial relationships with other clients (e.g., other PROs, other Depots, and transportation companies), reinforcing Encorp's efforts to diminish our status as independent businesses and position us as Encorp franchisees;
  - force Depots with Container Service Agreements (CSAs) into new Master Service Agreements (MSAs) that would require us to expand to take on new materials under the Encorp brand or risk having our contracts cancelled (again positioning us as de facto Encorp franchisees);
  - give Encorp full license to slowly cannibalize as much value as it can from the Depot network, including and all of the economic, social, and environmental capital that we have built over the past 50 years before it turns over all of those benefits for producers;
  - build huge reserve funds that enable Encorp to fund its vision on the backs of consumers; and
  - replace Depots with:
    - faceless, unstaffed drop off boxes located in parking lots and ATM vestibules;
    - back end MRF systems that fail to provide accurate container counts and can hide true recycling rates; and
    - systems that will only serve those who can afford bank accounts to accept e-transfers.



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What we see in Encorp's proposed stewardship plan is Encorp's plans to:

- take an existing world-class system that, with some collaborative modernization funded by its \$21 million of reserve funds, could deliver triple bottom line benefits to British Columbians for generations to come; and
- replace it with a monopoly-operated, vertically integrated system that is 'too big to fail', and too big for government to enforce against, and reduces EPR to a budget exercise for producers to meet the minimum environmental requirements.

### Evidence of a biased system

Now that we have presented our concerns with your vision and updated stewardship plan, in this section, we will illustrate our concerns with several examples of how Encorp's practices diminish our ability to:

- operate viable and sustainable businesses;
- operate without fear of retaliation and reprisal;
- invest the time, energy, and resources to provide input when Encorp asks for it as part of its 'duty to consult';
- feel that it is worthwhile to invest in a modernized system and innovations, especially knowing that, for many of us, our contracts could be terminated at any time;
- deliver positive customer experiences, including those that Encorp is committing to on behalf of the entire beverage container recycling system; and
- serve our customers as effectively as we have for the past 50 years.

To illustrate our concerns effectively, the examples that follow demonstrate how recent Encorp decisions and practices have negatively affected our Depots and BC.

## Unfair Business Practices: The Beer Pilot

**Using fear tactics to dictate contracts with no consultation or negotiation.**

Encorp announced the Beer Pilot in late June 2020, first by email to non-BDL Depots, which do not have separate contracts with Beer Distributors Limited (BDL). Non-BDL Depots make up almost 50% of Encorp-licensed Depots (i.e., 80 of 168). Attached to the email to non-BDL Depots was a contract they were asked to sign and return as soon as possible. The new contract required non-BDL Depots to agree to:

- a new handling fee for beer cans of 2.94-cents;
- a reduced handling fees for non-beer aluminum cans (from 3.52-cents to 2.94-cents); and
- a pilot start date of July 6, 2020.

The 16% reduction on handling fees for non-beer cans equates Depots losing thousands of dollars in revenue. Encorp did not consult with Depots or BDL prior to the implementation of the pilot and there was no negotiation on the handling fees offered.



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Prior to this change, most of the non-BDL Depots were discounting deposits from customers (in place of a handling fee) and returning these containers to BDL-licenced Depots.

The affected non-BDL Depots report the following negative outcomes of the pilot process:

- Encorp pressured Depots that did not immediately sign onto the pilot, telling them, “there will be no discount depots by December 2020, it’s in your best interest to sign the new contract”.
- Depots feared retribution if they did not sign (e.g., targeted over-auditing practices; those with Container Service Agreements (CSAs) feared Encorp would cancel their contracts and replace their businesses with an Encorp sea can).
- Some Depots had no choice but to sign because their CSAs were due for renewal, and Encorp refused to negotiate.
- Depots are losing thousands of dollars in handling fees on non-beer cans.
- Depots are only breaking even on beer cans (i.e., the new beer handling fee mirrors what they were making through discounting).

They also report the following positive outcomes:

- their customers are happy their refunds are no longer subject to discounting;
- there is slightly more efficiency in back-of-Depot processing;
- they support Encorp taking a stand against what they saw as BDL unfairness in creating have and have-not depots.

Bottom line: Non-BDL Depots are:

- happy they can better serve their customers;
- upset about their lost income on non-beer cans and the overall threat this creates to their viability;
- angry about feeling pressured into joining the pilot;
- fearful of exiting the pilot now that they have signed on, citing concerns that customers would be upset if they had to return to discounting.

BDL-Depots cite frustration that Encorp’s hostile takeover of beer cans, without warning, interfered with their commercial relationships with other Depots and transport companies (which they had put in place to serve non-BDL Depots). These Depots lost investments (e.g., transportation, staff) and had to make changes to workflows. These Depots are also frustrated that the pilot created an unlevel playing field regarding the customer experience with the non-BDL Depots, as BDL-Depot customers must still sort pop and beer cans separately.



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## Unfair Business Practices: The Return-It Express Pilot

Monopoly price setting with no negotiation or consultation.

The Return-It Express (Express) Pilot was first announced in 2017 to select pilot Depots. The Express system allows consumers to drop labelled, unsorted bags of beverage containers at a Depot without sorting or waiting at the Depot for a refund. Refunds are provided to customers via Interac e-transfer or cheque. The Express system mirrors similar, successful systems that had been operated by individual Depots for 15-20 or more years (e.g., Fast Drop, Drop & Go). Depots were offered an Express Pilot contract, but many report that they were pressured to sign the contract via follow up phone calls.

Contract details were such that:

- Depots were paid an additional \$0.004 (0.4-cents) in handling fees per non-beer beverage container for the duration of the pilot;
- Depots had to provide and pay for bag labels; and
- Depots had to sort containers.

There was no consultation with Depots on the mechanics of how the Express Pilot would work prior to contract offers being sent. Depots were told the pilot should not result in increased labour costs as Encorp expected Depots to sort Express bags during their in-Depot lull periods.

What happened? Depots report that customers like the system and began returning containers 'in droves', which demonstrates the system is providing a valuable customer service. However, Depots' have been inundated with Express bags – i.e., in some cases up to 50% of their intake has come through Express and, as a result, they have had to make wholesale changes in their workflows (staffing, storage, internal bag management). There are no 'lull times' at the Depots and their staff are doing far more work sorting.

Depots' concerns include:

- the mass quantity of bags being dropped off requires additional storage space (especially those from bottle drives);
- there is far more work needed to sort the bags and the \$0.004 did not make-up the extra sorting costs (\$0.004 = additional \$40 per 10,000 containers);
- 40-50% of the containers returned at some Depots are beer containers, for which they receive no handling fee (and therefore lose money);
- they can no longer service their other main client as requested (BDL does not support Express);
- they must pay for bag labels and customers can print off as many as they would like;
- customers can print labels at their Depots or have Encorp print them for them and hold those labels until their next visit, causing the following issues:
  - there is no mechanism at the Depot to confirm when or if a bag is returned,
  - customers can return bags labelled with one Depot's address to another Depot,



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- o if a bag is returned with an unreadable label, then Depots are charged lost bag fees (deductions on their EFTs),
  - o Depots have no recourse once a lost bag fee is charged; and
  - Depot are supposed to put the value of containers returned in bags with unreadable tags in an Encorp-account, and Encorp was supposed to use this money to pay for lost bags. However, Depots report that they, not Encorp, are paying for the lost bags through deductions on their EFTs.
- The implementation of the Express Pilot was wholly unfair to Depots. To address the extra costs, Depots requested that a time and motion study be completed so that Depots could receive fair compensation for the added work and costs associated with Express. Encorp promised to complete this study by March 2020, then July 2020, and then September 2020. At the time of writing this report, some Depots have been told Encorp will not revisit the Express handling fees until the next wholesale handling fee negotiation in 2021. This means that for more than 4 years Depots will have paid for the costs of implementing the pilot.
- Despite Depots concerns about the pilot, they are fearful of serving notice to exit it. Encorp has the power to cancel a CSA Depots' 'licence' with six months' notice and some of those Depots are already on month-to-month contracts. In the last year, one Depot was served a notice of cancellation of licence. Shortly after, Encorp placed a sea can near the Depot's location. This action has had a ripple effect of creating fear and promoting an uncertain business environment throughout the industry.

**Unfair Business Practices:  
Auditing Processes**

**No transparency, no fair dealing,  
use of pressure and fear tactics, no fair dispute resolution process.**

The Depots support fair marketplace practices, including auditing of Depots returns. This keeps the marketplace honest. However, Depots report that Encorp has begun to use auditing as a tool to punish those Depots that raise issues or challenge Encorp's practices. Specifically, Depots report:

- higher audit rates (than the Depot average) for Depots whose owners have not readily agreed to Encorp's demands for change;
- Depots are not allowed to attend when their bags are being audited;
- when a Depot's bag is audited and determined to be below (or above) an acceptable discrepancy threshold of 3%, Encorp can extrapolate the deductions (or overages) not just to the load the bag was on, but to a weeks' worth of containers from the Depot;
- there is no ability for a Depot to challenge an audit once it is complete -a fee is just deducted from their EFT payment weeks after;
- some of the deductions for non-conforming containers are those whose labels have fallen off or been taken off by the consumer, which is not in keeping with the purpose or intent of the regulation to recycle every last container (especially when producers face no consequences for having labels that are easy to remove);



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- the Depot receives no proof (e.g., pictures) of non-conforming containers deducted from the total;
- the Depot receives no confirmation of which load (from which Depot days) contributed to the audit results, and Depots have no ability to trace or resolve the issue in-house a go-forward basis;
- the audit can result in thousands of dollars of lost revenue (in a system with very narrow margins); and
- Encorp's data entry system is not-user friendly and induces errors, which contributes to miscounted bags.

In addition, Depots report that Encorp is unwilling to reverse its decisions and act fairly, even when Encorp admits that errors post-Depot are found. One specific example:

- between November - March 2020 many Depots reported significant and unexplainable post-audit deductions from their EFTs;
- they worked in-Depot to try to identify issues and began recounting bags to be sure of counts before bags were sent to Encorp -some Depots even began overfilling bags because the consequence of lost revenue was significantly impacting them;
- even with double counting all bags (and Depots being sure of counts), significant audit deductions were made;
- months later, Encorp admitted verbally that the audit issue stemmed from their transporter or processor (and didn't know which) and promised to refund Depots for EFT deductions (this promise was made prior to Covid-19); and
- more than 6-months after admitting their error, Encorp has still not refunded the unfair deductions made to Depots' EFTs -Depots were told that Encorp is still investigating and refunds were still under review.

Depots acknowledge human error can happen, and when the error is theirs, they should be held accountable. However, Depots are frustrated that:

- there is no transparency in the audit process;
- they cannot challenge an audit result;
- they cannot receive fair compensation even when Encorp admits the errors are Encorp's;
- they fear invoking the dispute resolution clauses in their contracts to resolve this issue because 1) the lack of transparency of the process leaves them with no physical proof on which to base a complaint, 2) they fear retribution (i.e., their licences will be cancelled or they will be targeted with even more unfair auditing), and 3) that the costs of hiring a mediator would outweigh any recouped payments from Encorp.

Bottom line: Depots are paying for the costs of Encorp's audit process, its errors, and its failed oversight of other service providers and Depots have no recourse to fix the issue.



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## Unfair Business Practices: Compaction Pilot

No consultation, negotiation, or compensation.

- In 2020, Encorp provided less than one weeks' notice that it planned to begin a Compaction Pilot.
- The pilot involved Encorp sending a compaction truck to a Depot and setting up in their parking lot.
- Depots were not given a choice about whether they would participate in the pilot, nor the days or times the compaction unit would be present.
- Depots with existing onsite compaction equipment were not given the opportunity to use their existing densification equipment for Encorp containers.
- Depots had to change workflows immediately to have certified forklift operators available on the specific day and time Encorp would be present, so they could deliver bags to their compaction vehicle in their parking lot.
- While the compaction truck is present at a Depot, it occupies space in their parking lots.
- In implementing the pilot, Encorp did not consider Depot workflows or the effect of taking up space in Depots' parking lots (including taking up valuable customer parking spaces on weekends).
- Encorp assumed the pilot had no affect on Depots and provided no additional compensation or consideration (i.e., taking up space in parking lots, changes to workflow, changes to staffing requirements, or their ability to serve other PRO clients).

## Unfair Business Practices: Lack of Fair Negotiation Processes

No negotiation, price setting, and anti-competitive practices.

- The last handling fee negotiations were in 2017. The next process is set to be complete in 2021.
- In the past, the process has involved a year-long process to create a 5-year unit-based fee schedule.
- The process includes:
  - Encorp contracting an 'independent' third-party (that reports to Encorp) to study the average costs borne by Depots to meet program requirements, and to create a portrait of a relative profitability of an average Depot and compare this to the relative profit of generated through other Depot activities (service to other clients).
  - Encorp applying influencing factors to inform its handling fee schedule -e.g., local inflation rates, changes to minimum wage, fees paid in other provinces and occupancy costs.



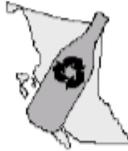
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- Encorp delivering this information to Depot operators through a series of meetings, followed by an invitation to Depots to put forward data to counter Encorp's assessment.
- Once this exercise is complete, Encorp makes an offer for a 5-year flat rate, plus (what has worked out to be, since the last negotiation) a 1% increase per year.
- Depots can dispute the offer, but in their experience the offer never changes -i.e., it's take-it-or-leave-it.
- This process cannot be defined as 'negotiation', but rather price setting.
- Depots state that the 2017 agreed-to handling fees did not include a requirement for Depots to sort containers, and in fact Encorp discouraged sorting to keep costs down.
  - Yet, later in 2017, when Encorp initiated the Express Pilot (which requires Depot sorting), it did not reopen the handling fee negotiation. Instead it provided another take-it-or-leave-it offer of an additional \$40 per 10,000 containers sorted.
  - Further, the 2017 fee schedule did not make any provision for year-over-year cost increases like inflation or changes to minimum wage (which were significant over this last 5-year period).
- At the end of the last handling fee setting process, Encorp committed by email (drafted by then President Scott Fraser) to review the process and develop a new one that was more constructive. To-date this has not happened.

## Unfair Business Practices: Encorp Competing with Depots

Anti-competitive behaviour  
(e.g., pursuing Depots' clients).

- To date, Encorp has three Express & Go sea cans placed in various locations, and it has stated its intention to add more in areas it deems uneconomic and underserved.
- In practice, Encorp has placed its sea cans in areas already actively served by Depots, and in doing so is actively competing with Depots.
- In addition, Depots' commercial clients are reporting that Encorp has approached them directly seeking a contract to place sea cans in their parking lots.
  - To bolster that competition, Encorp even sent out a flyer announcing the placement of a new sea can located at a Save-on-Foods in one Depot's territory.



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**Unfair Business Practices: Funding Programs**

**Creating an unlevel playing field amongst depots.**

- Over the years, Encorp has implemented several programs (loans, no interest loans, or financial incentives) to encourage Depot operational upgrading and physical renovation, adoption of Encorp’s Return-It brand, and improved Depot services and cleanliness.
- This funding has been welcomed by Depots; both Encorp and Depots benefit from enhancing the customer experience.
- However, the programs offered have various qualification criteria that enable some depots to take advantage of the funding while disqualifying others -the most concerning of these is ‘volume of throughput’, which is highly dependent on the geography and population size of the community in which the Depot is located.
- These funding programs have created ‘have and have not’ Depots, where only some Depots have access to the upgrades (like contactless hand washing and drying stations), which are less ‘glitzy’ and more necessary due to COVID-19. Funding upgrades without Encorp’s programs is especially difficult for small Depots to afford.
- Overall, the selective funding of large Depots over small Depots creates a competitive advantage for large Depots who can provide a better customer experience.

**Coming to the Table with Solutions**

Depots are poised and willing to come to the table with solutions. We’ve come knocking on your door with ideas, suggestions, and recommendations from our Depots, our associations, and environmental thought leaders on how we can be a bigger part of Encorp’s vision, and how we can collaborate to achieve a low-cost, triple bottom line future for managing beverage containers.

We don’t believe that a triple bottom line and a low-cost system are contrary to one another. We do believe that the recycling sector is big business enabled by small businesses, and that an unchecked monopoly approach is not in the best interests of any regulated system. We do believe that it is possible to be collaborative while still having the natural tension that exists between the agent who procures services and the service providers competing for contracts. We do believe that we are coming to the table with reasonable and thoughtful solutions, rather than grievances or demands, to enhance your draft stewardship proposal.

We have expressed our concerns. We have been open and honest about them, even though we fear this could come with relational consequences. We are choosing this path, along with our recommendations for enhancements to your proposed plan, because we believe that transparency, openness, and demonstrating that we are making the effort to co-create a system that’s works for all of us is the best path forward. With this, we are putting forward the following 14 recommendations.



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## Recommendations

### Substantive Recommendations

Our substantive comments can be summarized as follows: Encorp should commit to taking specific actions to build a stable business climate for Depots that will enable us to confidently invest in the future of our businesses and become an active partner in achieving Encorp's vision of a modern, safe, and sustainable system. To achieve this, we recommend Encorp amend its stewardship plan as follows:

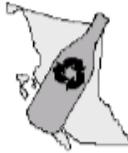
**1. Make a clear commitment in the stewardship plan to maintaining a strong, province-wide network of Depots and reporting on the value that the Depot system provides to BC.**

- In its stewardship plan, Encorp identifies that the Return-it system currently has 168 Encorp-licensed Depots, but it makes no commitment to maintain the Depot network. The stewardship plan could be read as Encorp implying that it has the power to or intends to replace (some or many or all) existing Depots with Encorp-operated facilities. Encorp has already served at least one Depot with a notice of licence cancellation and soon after placed a sea can near that Depot's location. Actions like these have created a climate of business uncertainty, raised concern about future Depot viability, and has discouraged Depots' willingness to invest in the betterment of the system. **Encorp should reverse this climate of fear by making a clear commitment in its stewardship plan to maintain and enhance the Depot network.**
- Encorp should also commit to ensuring that future decisions about the Depot network are made publicly and transparently so that BC can assess the impacts of those decisions on BC's triple bottom line. Encorp is a government-sanctioned monopoly that stepped into an existing operating marketplace and was given the power and authority to maintain or eliminate the role of Depots as a service provider in the deposit return system marketplace. But, with great market power comes great public responsibility. As a result, Encorp should commit to absolute transparency in any decision-making that effects the business and social capital built by the Depot network over the last 50 years. To be transparent about these effects, it must begin reporting on the existing business and social capital and how decisions would affect that capital. This includes reporting on the contribution of its licensed Depots to BC's triple bottom line, including:
  - Depots' small business contribution to BC's economy;
  - Depots' contribution to local communities through programs such as bottle drives and funding for special events;
  - number of people employed by Depots;
  - how Depots provide marginalized British Columbians with access to ready cash after a day's work cleaning container litter from BC's streets; and
  - the value that BC's 'binners' provide in cleaning up litter and capturing containers that would otherwise be disposed.



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- 2. Commit to and outline a good faith negotiation process to establish fees-for-service, managed by a neutral third party, that enables Depots to make a fair return on investment for all services and enhancements requested by Encorp. This process should include a way to fairly compensate Depots for the costs of implementing any new pilots.**
- A broken negotiation process to set fees-for-services is a core issue that underpins almost all of the Depots' concerns. Depots' primary complaint is that the process for determining compensation is not fair. Depots understand that negotiation is about give and take, but as small business entrepreneurs operating in a system governed by a government-sanctioned monopoly (and not the free market), they should be entitled to fair pay (fair return on investment) for a fair day's work including for:
    - regular services (i.e., collecting, sorting, and processing containers for Encorp),
    - implementing changes to workflows or business practices,
    - implementing new experimental pilots,
    - compensation for lost income and capital where Encorp enters direct competition with a Depot.
  - On March 30, 2017, in an email written by Encorp's Scott Fraser as part of the negotiation during the last handling fee agreement, Encorp committed that; "Encorp and Depot Operators will form a Committee to determine a better negotiating format for the next Handling Fee Agreement." Establishing a fair process to set fees is paramount to both parties fairly negotiating, especially in a setting where a government has provided a monopoly with the technical power to set 'take it or leave it' fees.
  - A fair negotiation process would:
    - Result in Depots having confidence they will receive 'fair pay for a fair days' work' and enable and encourage Depots to both make investments that improve the system and work as a partner in achieving Encorp's vision. For example, fair compensation must include a process to account for year-over-year increases to reflect increases in cost of living and be reflective of the fixed and labour cost realities that Depots face in different geographic regions of BC. Depots should not be asked to shoulder the costs of operating under a level that provides of fair return on investment.
    - Include 'triggers' for renegotiation between set negotiation periods. A handling fee review for the pilot services should be triggered within one year of any pilot beginning.
    - Be run by a neutral third party (i.e., one that will not turn over raw data to Encorp and is not beholden in its reporting). It is paramount, in the current business climate, that Depots have confidence that their confidential business data is not shared with its competitors (including Encorp, now that Encorp is setting up its own collection systems to compete with Depots).
    - Respect Depots existence as independent small businesses that have other clients. Like any negotiation with any service provider, Depots' ability to be profitable and serve other clients should be not a factor Encorp considers as it negotiates. The costs of providing the specific fee-for-service (i.e., operating the deposit return system) should be distinct, based on the actual costs of operating the system (e.g., minimum wage, taxation, local cost of living), and provide a fair return on investment for those services. Depots should



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have autonomy in negotiating with other clients (PROs or other recycling businesses). Depots ability to expand their businesses and gain independence over the short and long term could benefit Encorp's longer term vision -e.g., customer convenience of one-stop-shopping.

- Precede rolling out any new pilots. Pilots should not be communicated first to Depots via take-it-or-leave-it contract offers. Instead, prior to rolling out a pilot, Depots' on-the-ground experiences, workflows, and existing limitations should be used to inform how a pilot will be implemented. Once pilots begin, time & motion studies should be carried out in a timely fashion by a neutral third party. Encorp should act in good faith when implementing a pilot by committing to fairly compensate Depots for the costs of implementing the pilot -i.e., if studies show the initial compensation offered by Encorp to Depots to cover the costs of the pilot are not sufficient (including providing a fair rate of return), then Encorp should commit to providing backpay to cover those costs retroactively to the first day the pilot rolled out. This is the only way to ensure that producers, not Depots, are paying the full costs of implementing the system.
- Prevent the threatening of Depots with replacement by sea can or Encorp-corporate store if Depots fail to 'accept' the terms of a new contract, especially when those terms are to their detriment.

- For fair negotiating process, consider the system developed by the Beverage Container Management Board in Alberta using a uniform code of accounts.

**3. Commit to ending anti-competitive practices aimed at the systematic devaluation of 50 years of Depots' investments.**

- Encorp should commit to ending anti-competitive practices that divert revenues from Depots to Encorp.
  - Encorp has the market power to provide services (e.g., Express Plus and Express & Go) at a loss to 'out compete' Depots in areas already serviced by Depots.
  - Encorp should commit to ending direct competition with Depots by committing that any containers collected in a Depot's territory by Encorp will be processed only through the nearest Depot to the collection site. A Depot's territory may be defined legally under legal contract (i.e., as per the Depot Licence Agreements) or not (i.e., a reasonable area serviced by Depots under Container Service Agreements or Master Service Agreements).
  - Encorp should also commit to report transparently on the costs of investing in, situating, and operating Express Plus and Express Drop & Go and the container throughput of each facility so that these can be compared to the costs of operating Depots.
- Encorp should commit to fair and transparent business practices that prevent the devaluation of 50 years of Depots' investments.
  - Where Encorp wishes to bolster services for customers in areas already fully serviced by Depots (e.g., by introducing programs or delivering services of its own), then it should commit to providing fair compensation to impacted Depots.



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- Encorp should commit to ending practices that could be used as non-transparent means to punish Depots.
  - Improve the fairness and transparency of the audit process, including creating a system that enables Depots to fairly challenge results and have enough information that they can take corrective action in-Depot to prevent further issues. For audit results to be more than a punitive tool and become a quality control measure, audit results must be able to be challenged, be traceable to a specific load on a specific day, and notification of the issue must be reasonably delivered -e.g., two business days.
  - End extrapolation of audit findings from one bag to a week's worth of containers. This is unnecessarily punitive, especially when there is no history of an ongoing problem. Extrapolation to a single load is more reasonable and more likely to be fair (i.e., if a Depot has an issue with an employee, then the issue is likely isolated.)
  - Improve Depots trust in the system by allowing Depots or the BCBRDA Board to watch the audit process if they wish. This would provide Depots with confidence that audit staff are properly trained, and Depots aren't being unnecessarily penalized with deductions.

**4. Commit to producers, not Depots and consumers, paying the full costs of its system, including the transition to modern customer services.**

- Depots create economic value as autonomous, independent, small businesses. Small businesses power the Canadian and BC economy.
- As autonomous businesses that serve a range of clients, Depot investments in Encorp's vision should be voluntary and made because the Depots believe those investments make business sense.
- Encorp must commit to providing fair compensation for services (see Recommendation 6).
  - A properly and fairly funded system will entice and enable Depots to find business value in investing in Encorp's vision of modernization and automation.
  - A sign of an improperly funded system is the need for Encorp to pressure Depots into through take-it-or-leave-it contracts, instead of fair and transparent negotiating practices.
  - This includes any Encorp pilots, which are by definition 'a test'. The costs of pilots (i.e., experiments) conducted by Encorp should be paid by producers, as the costs of a learning curve during a pilot and the added real costs of implementation (e.g., labels, bags, extra sorting, handling, changes to workflows, changes to storage space) provide no added business value to Depots as small businesses –they only result in new costs.
  - If the costs of pilots are paid by Depots, then it is Depots, not producers who are paying for the implementation of the system.

**5. Commit to higher return targets and to more transparent reporting on the contribution of the system to a circular economy.**

- The return rates proposed are unreasonably low, For example, if Encorp is successful at adding beer into its system and if all Encorp achieved in future years was to maintain the current 2019 aluminum cans return rate (i.e., that achieved by Encorp and BDL combined), then it would surpass the return rate it is proposing it cannot achieve before 2023 in the first year of beer



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collection (see **Table 1**). That is non-sensical. Encorp should set meaningful and ambitious return rates. At a minimum, Encorp should commit to achieving the return rates achieved in Alberta and Saskatchewan over the last 5 years for all material combined.

**Table 1: Encorp and BDL Combined Return Rates for 2019**

	Sold	Returned	2019 Return Rate
Encorp	1,348,921,360	1,053,684,532	78%
Beer cans	640,529,412	573,084,216	89%
Total	1,989,450,772	1,626,768,748	82%

- Encorp should commit to achieving the minimum 75% recovery target for all historically low-performing material categories and outline a specific plan to increase recovery of these containers (i.e., polycoat, bag-in-a-box, and 'category k' containers).  
 Encorp currently doesn't propose a targeted plan to increase the recovery of low performing containers, despite 16 years of underperformance.
- Encorp should meet the BC Government's commitment to work towards a circular economy, as outlined in the CCME's Zero Plastic Waste Strategy, and establish solutions that encourage its producers to select materials that are fully recyclable through the system.
  - A circular economy is not a linear economy drawn in a circle. A circular economy maintains materials at their highest value and that system innovation reduces its overall environmental effects. A circular economy encourages product and packaging redesign.
  - But, Encorp's 16-year old EPR program still includes containers that are only partially recyclable or only down-cyclable. Examples of problem products include: ceramics, crystal, multi-material containers (containers with batteries, lights, mixed plastics, poor labels), polycoats, and bag-in-a-box.]. Encorp does not report on the end-fate of these materials transparently.
- Encorp should improve reporting on the ultimate value and use of the resultant recycled products.
  - Collection rate is not an accurate measure of whether a material is finally recycled and contributes to a circular economy or whether the material is downcycled to low value uses that are more accurately described as 'delayed disposal'. Depots provide clean, source separated materials that can be turned into new food grade containers, and the value of this service is indicated by the market value of the processed recycle.
  - Encorp should transparently report on the percentage of materials collected through each collection stream: Depot, Encorp facility, RecycleBC.
  - Encorp should transparently report how it is measuring and converting materials collected through the Recycle BC program into reports of units collected (i.e., tonnage to container count conversion).
  - Encorp should transparently report on the market value of the source separated materials vs the curbside collected materials.
  - Encorp should transparently report the amount and fate of any residual that comes from processing of source separated materials and curbside collected materials.



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**6. Commit to implementing good faith stakeholder engagement that enables Depots and other stakeholders to provide meaningful input into the stewardship plan and changes to enhance the beverage container recycling system.**

- Stakeholder engagement done transparently, earnestly, and well builds relationships and trust, enhances decision-making, and expedites innovation, system excellence, and system changes; without these, it does the opposite.
- Depots want to be part of improving BC's beverage container recycling system. We also want to know that our efforts to provide input, evidence, and share our experiences are considered as part of Encorp's decision-making processes and reflected in resulting decisions.
- Consultation by its very nature is best-suited to decision-makers that can be held accountable at varying intervals by the people they are asking for input. Government organizations in Canada use consultation effectively because they are representative democracies, where they are elected to make decisions on behalf their constituents and will not continue to hold office if their decisions do not reflect their constituents' interests. Without these checks and balances in place or, at minimum, a clear demonstration that decision-makers are applying stakeholder input, consultation is not confidence-building or an effective input mechanism.
- For Encorp to implement good faith stakeholder consultation, it would be necessary to:
  - Clearly indicate what decision(s) stakeholders can influence (i.e., where Encorp is willing to make changes and what it would take to make changes) and which are not open for input and why.
  - As part of inviting stakeholder input, communicate what was heard, what was considered (i.e., how stakeholder input, among other inputs, was used to make a decision), and what was decided and why.
  - Support stakeholders to build the necessary skills and capacity (i.e., an understanding of Encorp's decision-making processes) to effectively influence decisions; without this understanding, it's a poor use of time, energy, and resources for all involved.
- To effectively work with stakeholders for the benefit of the system, Encorp should consider the full engagement spectrum, including where it is beneficial to all to involve stakeholders' in decision-making and collaborate on mutually beneficial outcomes.
- Worth noting is that Depots are often on the receiving end of directive decisions by Encorp; we believe that a genuine commitment to involving Depots in your decision-making processes, where the decisions are not pre-determined and the time, energy, and expense that we put into sharing our ideas, knowledge, and experiences will be valued, would truly transform the beverage container recycling system in our province.



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#### 7. Outline a good faith dispute resolution process.

- A standard stepped dispute resolution process (i.e., conversation, mediation, and arbitration) applied in a monopoly system is invalid and ineffective.
- The Encorp-operated depot system can be likened to a David and Goliath model, where a monopoly is the gatekeeper to the marketplace. Individual depot licences can be cancelled with 6-months' notice regardless of performance.
- A fair outcome in a dispute between a small business and a monopoly cannot be expected because:
  - The average small mediation costs approximately \$10,000, which is not a small sum of money for a small business. A recent arbitration in Ontario cost more than \$100,000. Monopoly organizations can win simply by outspending a small business -i.e., forcing it to accept the costs of its share of a stepped dispute resolution process (from mediation to arbitration).
  - There is nothing compelling a monopoly to want to come to a mutually agreeable solution, which is a base motivation required for either conversation or mediation to be successful.
  - In a monopoly system that oversees small business players, what underpins any dispute is the small businesses' fear of the monopoly taking future retribution, simply because the monopoly has the power to do so. I.e, small business rightly fears that even if it wins the fight (the current dispute) it could lose the war (have its licence cancelled).
- A good faith dispute resolution should enable Depots to challenge Encorp-imposed decisions / actions (without fear of reprisal) regarding fair market value for services rendered and anti-competitive practices that threaten their business.

#### Recommendations on Specific Encorp Proposals

In addition to the substantive recommendations outlined above, we provide the following specific comments and recommendations:

#### 8. Regarding Encorp's plan to add milk containers to the Encorp-operated deposit return system:

- The Depots fully support Encorp's plans to bring milk fully into the deposit return system.
- The Depots request that Encorp work with Depots as partners to establish an effective implementation plan, including helping customers identify which containers carry a deposit (those purchased post-implementation).



**BC Bottle and Recycling Depot Association (BCBRDA)**

#33030, 11198 84th Avenue,  
Delta, BC, V4C 8E6

Phone: 604-930-0003 Fax: 604-930-0060

Email [bcbdrda@gmail.com](mailto:bcbdrda@gmail.com)

**9. Regarding Encorp's plan to add beer cans to the Encorp-operated deposit return system:**

- The Depots acknowledge that enabling all depots across BC to collect beer cans and provide a full return to customers is in the best interest of customers as it will end the need for discounting and ensure producers, not consumers, are paying the full costs of EPR. This action will also level the playing field between Depots. Depots support Encorp's plan to exclude refillable beer bottles from its proposed changes to the system, as these containers are managed through the highly effective and efficient BDL system.
- If government approves this change to the system:
  - Before the beer pilot moves to a permanent offering, Encorp must undertake fair negotiations to establish a fair handling fee for this material (see Recommendation 6).
  - Encorp should, in good faith, correct the wrong it did by (for all intents and purposes) unfairly pressuring pilot-Depots to sign a new contract and accept a lower aluminum can handling fee than non-Pilot depots. The beer handling fee increase only compensated non-BDL Depots for lost income due to discounting. The decision to lower the aluminum can fees at the same time as adding beer to the system caused significant financial hardship to pilot-Depots (tens of thousands of dollars), that put them at a competitive disadvantage to non-pilot Depots. Fixing prices in this way is not a fair marketplace business practice, and it resulted in pilot-Depots (not Encorp) paying for the cost of the beer pilot. This must be undone for Encorp to be viewed as a fair marketplace monopoly.

**10. Regarding Encorp's plan to provide ancillary packaging recycling services at Depots without Recycle BC contracts:**

- The Depots acknowledge that this offer will be welcomed by some non-Recycle BC Depots. However, Depots with existing Recycle BC contracts or private recycling contracts are concerned this offering will become mandatory and interrupt their existing commercial relationships.
- It is imperative that Encorp commit to making this opportunity voluntary for Depots to opt into or out of and commit to refraining from interfering with Depots' commercial contracts with other clients (including PROs or the private sector).
- It is also imperative that Encorp commit to compensating Depots that opt into this program fairly for any work or infrastructure they must use to participate in this program (storage, onsite forklift drivers, etc.)

**11. Regarding Encorp's plan to add climate smart reporting:**

- Encorp must recognize Depots are at various states of transformation in terms of Climate Smart reporting. Some depots have been Climate Smart for years. Others do not have the capacity to understand what is needed to report.
- Encorp should commit to not usurping the individual efforts of Depots for its own reporting purposes. Depots are independent businesses. Instead Encorp should commit to celebrating the successes of individual businesses in its network.
- If Encorp collects Depot Climate Smart data, there must be clear privacy policies in place that dictate how that data will be used and protect Depots' proprietary information.
- If Encorp wishes to be a change agent and affect better climate results, then it should ensure that it is providing the financial and intellectual capacity to help, especially small Depots, report accurately.



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 Email bcbnda@gmail.com

**12. Regarding Encorp's plan to reduce single-use plastics:**

- Overall, Depots support efforts to improve the environmental outcomes of the system, including efforts by the Government of BC and Encorp to reduce single-use plastics.
- However, Depots protest the way Encorp has been introducing changes to reduce single-use plastics, which have disrupted workflows in-Depot, disrupted their relationships with commercial clients (that don't have room for C-Bags and must continue to use single-use plastic bags), and resulted in added costs to Depot operations.
- In good faith, the Depots request that Encorp commit to meaningful consultation with Depots prior to bringing in any additional changes so that Encorp can make decisions in the face of full information, and that Encorp commit to fully funding the costs of any future changes. The costs of Encorp's decision-making should not be downloaded to Depots.

**13. Regarding Encorp's plan to improve the customer experience by adding collection options for customers (i.e., Express, Express & Go, and Express Plus) and improved signage/branding:**

- The Depots support Encorp's goal of improving the customer experience.
- However, Encorp must recognize that Depots are autonomous businesses with other clients. As a result, it's imperative that as a monopoly system provider, Encorp commit to ending anti-competitive practices that divert revenues from existing Depots to Encorp.
  - Encorp must end anti-competitive practices that interfere with a Depot's ability to serve other clients (e.g., forced signage -including signage that doesn't comply with local bylaws, forced data systems, forced changes to depot workflow).
  - Encorp should encourage change through fair marketplace negotiation and not 'take-it-or-leave it' contracting –i.e., must compensate Depot fairly for their services.

**14. Regarding Encorp's plan to modernizing processes through automation and compaction:**

- The Depots support modernization and compaction as optional programs to improve business efficiency where it makes business sense for individual Depots.
- However, Depots must have autonomy in decision-making about how their Depot operates and especially how they serve other clients –i.e., decisions to modernize should not be dictated through 'take it or leave it' contracting.
- Encorp should commit to providing a compensation system that encourages (but doesn't require) Depot modernization. Depots will make investments that improve their business efficiency for Encorp if those decisions make financial sense.



**BC Bottle and Recycling Depot Association (BCBRDA)**  
#33030, 11198 84th Avenue,  
Delta, BC, V4C 8E6  
Phone: 604-930-0003 Fax: 604-930-0060  
Email [bcbnda@gmail.com](mailto:bcbnda@gmail.com)

Thank you once again for the opportunity to provide input into your consultation process. I am available and would welcome the opportunity to discuss any of the recommendations or concerns mentioned above, and we look forward to working with Encorp as a partner in returning BC's deposit return system to a world class leading system.

Sincerely,

Jay Aarsen

A handwritten signature in black ink, appearing to read 'Jay Aarsen', with a horizontal line above it.

Chair, BCBRDA  
E: [jay@interiorrecycling.com](mailto:jay@interiorrecycling.com)  
T: 250-308-9044

cc: Ben Han, President KARMA, [hds6975@hanmail.net](mailto:hds6975@hanmail.net)  
cc: Brook Lotzkar, Independent, [brook@regionalrecycling.ca](mailto:brook@regionalrecycling.ca)

## consultation comments



Vince Spronken <vince@islandreturnit.com>  
To beverageplan2020@returnit.ca

Reply Reply All Forward ...

Tue 15/09/2020 1:21 PM

Island Return It is pleased to be a part of the Return It system and a part of the collection network for used beverage containers. Having reviewed Return It's stewardship plan renewal, we believe it continues to provide the framework a high performing stewardship program that offers BC consumers plenty of convenient return locations, such as the Island Return It recycling depots. We strongly support the draft plan and believe it should receive Ministry approval as soon as possible.

With the inclusion of alcoholic/beer cans we feel it is on the right path to fulfill customer needs and wants for a return system that supports full deposits across the province and eliminating the longtime problem of Return It depot discounting. The mixing of all cans into one stream will create efficiencies for all of our customers and our staff are excited about the possibilities and positive outcomes. Discounting creates customer mistrust and the potential for aggressive behaviour toward depot staff by unhappy customers expecting to receive their full deposits. After all, consumer ease and satisfaction is at the forefront of recycling.

We have two of our five depots currently signed up for the pilot program to mix beer and pop cans and the customer feedback is overwhelmingly positive. Many customers are very happy and surprised that they do not need to spend the extra time and effort to separate the two, after all a can is a can.

Vince Spronken  
Island Return It.

## Lets make beverage container recycling industry fair.



Kim Min <lofsha8@gmail.com>  
To beverageplan2020@returnit.ca

Reply Reply All Forward ...

Mon 14/09/2020 1:09 PM

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I have been involved in beverage container recycling business over 30 years in Vancouver. I have opened up and operated 4 bottle depots in Vancouver over last 30 years. I am running two of them now and my brother is running two others.( I am running Vancouver central bottle depot and Vancouver west bottle depot.)

I have experienced BDL, Encorp, ProductCare, Recycle BC, and etc. In my opinion, BDL just feels like an enemy to all the bottle depots in Vancouver except the ones in their group. Watching it over 30 years, it is very obvious that BDL just runs for the profits of a group which includes BDL, beer container pick up companies, and bottle depots with BDL licenses. BDL is making an unfairness in the beverage container recycling industry in BC.

If a bottle depot without a BDL license gives full refund on domestic beer containers, that depot would lose money. Vancouver west bottle depot is giving out full refund, otherwise Vancouver west bottle depot could not become competitive in that region because there is a bottle depot very nearby, which is operated by beer container pickup company, giving full deposit back for domestic beer containers. They are located within 5-10 minutes from Vancouver West Bottle Depot.

A few years ago, BDL gave out a few BDL licenses to bottle depots. What they did seemed very simple, if there is any depot near beer container pick up companies, they will never receive a BDL license because most of the beer container pickup companies run bottle depots themselves. They don't want to lose any volume of domestic beer containers by giving license to a nearby depots. There is quiet a few beer container pick-up companies in Vancouver.

Min Kim (778-888-8855)

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## Municipal Government

### FVRD comments - Return-It Beverage Plan 2020



Jamie Benton <jbenton@fvr.ca>  
To Beverageplan2020

Reply

Reply All

Forward



Thu 17/09/2020 3:15 PM

Hello,

In light of new information I would like to retract the feedback I provided yesterday for the consultation of the Return-it Beverage Plan 2020. Specifically those made about the proposition to include aluminium beer containers.

The disparity between the two stewardship schemes in terms of payment of each aluminium can paid to the depots does raise questions as to the effectiveness of the services. Especially comparing the motives of a private joint venture company in BDL and that of Non-Profit organisation in Encorp.

I would strongly urge Encorp to provide a stronger case to the Ministry of Environment in terms of the long standing discounting, the efforts made to engage BDL to find better agreements for the payment of aluminium cans, and the lack of response from BDL to work together especially since the COVID outbreak and since the comments by Encorp received by BRCCC during their consultation last year. This would provide an opportunity to give further evidence of the issues and number or complaints that have occurred at bottle depot locations.

Kind regards,

Jamie Benton  
Environmental Policy Analyst

Fraser Valley Regional District  
45950 Cheam Avenue, Chilliwack, BC V2P 1N6  
604-702-5021 | fvr.ca

*The FVRD is committed to reducing the risk of exposure and transmission of COVID-19 as we continue to deliver services to our citizens. Our corporate offices are open to the public on a by-appointment and limited walk-in basis. Please visit our website at [fvr.ca/covid19](https://fvr.ca/covid19) for more information on how we can serve you best during these challenging times.*

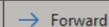
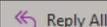
## Feedback on Encorp's Beverage Container Stewardship Plan 2020-2024 - September 15, 2020



Kosmak, Monica <Monica.Kosmak@vancouver.ca>

To ● beverageplan2020@returnit.ca

Cc ● Shames, Albert; ● Underwood, Chris



Tue 15/09/2020 11:06 AM

This message was sent with High importance.

September 15, 2020

Mr. Allen Langdon, President & CEO

Encorp Pacific (Canada)

100-4259 Canada Way

Burnaby, BC V5G 4Y2

VIA EMAIL: [beverageplan2020@returnit.ca](mailto:beverageplan2020@returnit.ca)

Dear Allen,

Thank you for the opportunity to comment on Encorp's proposed Beverage Container Stewardship Plan 2020-2024. Extended producer responsibility (EPR) programs like Encorp's will play a key role in the City of Vancouver achieving our Zero Waste 2040 goal of zero waste to landfill or incinerator by 2040.

City of Vancouver staff have reviewed the proposed plan and participated in Encorp's consultation webinar. As you know, I also co-chair Encorp's Advisory Committee. For clarification, these comments represent the views of City of Vancouver staff and not the advisory committee's.

*Please accept these as our formal comments on the plan in replacement of the version sent on September 14, 2020, which was sent in error.*

### Plan Strengths

Encorp is showing strong leadership and innovation through a number of actions in this proposed stewardship plan. Some highlights include:

- **Innovative collection models:** Expanding the Return-it Express programs (where consumers can drop off unsorted bottles at staffed depots and unstaffed kiosks) supports consumer convenience. While these can still be challenging to site in Vancouver, we look forward to continuing to work with you to explore the potential of these models.
- **Reducing greenhouse gas emissions:** Encorp's plans to become Climate Smart Certified in 2020 and invest in technologies like trucks with mobile compaction units will reduce GHG emissions and vehicle trips, and help address the climate emergency.
- **Recycled content:** Encorp is supporting a circular economy with its commitment to collect high quality plastic that could be used as recycled content in plastic beverage containers used by brandowners.
- **Milk and milk substitute containers:** Embracing these containers in Encorp's program aligns with the June 29, 2020 amendment to the Recycling Regulation that requires deposits on milk and milk substitute containers. Although this transition must be coordinated carefully with Recycle BC, this shift aligns with Alberta and Saskatchewan's deposit-refund programs. It also expands EPR to milk and milk substitute containers generated by the ICI sector and could improve the recovery and recycling rates of these ICI containers thanks to the deposit-refund incentive.
- **Consumer awareness:** The 95% consumer awareness target is supported by Encorp's targeted marketing strategy and significant investment in awareness programs.

### Refinements

In order to further strengthen the plan, we encourage Encorp to refine these areas:

- **Guiding principles:** Encorp's guiding principles are 25 years old. While many have stood the test of time, some could be refreshed to reflect current environmental policy. For example:
  - The principle to "divert used products from landfill and incineration" could be updated to: "Support a circular economy by maximizing reduction and reuse, enhancing recycling, and achieving zero waste to landfill and incinerator." This aligns with the pollution prevention hierarchy in the Recycling Regulation, the zero waste movement among local governments, and the international movement towards zero plastic pollution and a circular economy.
  - Encorp may also wish to adopt a guiding principle to address the climate emergency by reducing greenhouse gas emissions.
- **Recovery target:** We recommend changing the 2024 target from 83.7% to 86.1%. The proposed 83.7% is only 1.7% more than the final target approved by the ministry for the previous plan, which was 82% for 2018. Encorp's proposed target was calculated based on the actual increased recovery of 0.7% between 2018-2019. However, if Encorp applied the actual 1.6% increase achieved between 2017-2018, then the 2024 target could be 86.1%. This bolder target would demonstrate a stronger commitment to address the climate emergency, eliminate plastic pollution, and conserve resources by pursuing zero waste.

- **Refillable bottles:** We appreciate the statement in the draft plan that refillable bottles could be included in the program. However, the wording “if producers should choose those containers” falls short of the pollution prevention hierarchy in the Recycling Regulation, which requires producers to maximize higher levels of the hierarchy (reuse) before moving to lower levels of the hierarchy (recycling). We recommend Encorp introduce incentives and other opportunities to encourage producers to choose refillable containers.
- **Uniform 10-cent deposit:** We applaud Encorp for raising the minimum deposit from 5 cents to 10 cents to improve recovery rates. However, the proposal to reduce the 20 cent deposit on certain containers to 10 cents is a concern. Encorp’s hypothesis is that the simple message of 10 cents for all containers will mitigate the risk of declining recovery rates for these containers. To our knowledge, this hasn’t been proven. It would be prudent for Encorp to pilot the reduction from 20 cents to 10 cents, then formally adopt 10 cents if the recovery rates hold. Alternatively, Encorp could simply add a commitment in the plan to change the deposit back to 20 cents if the recovery rates for these containers do fall. Both options would still align with the Province’s changes to the Recycling Regulation on June 29, 2020, which require a *minimum* 10-cent deposit, not a universal one.
- **Beer container refunds:** We support the principle of refunding the full amount of the deposit on all beverage containers, including beer aluminum cans and beer containers, and ending the practice of discounting. This is now required in the Recycling Regulation since the June 29, 2020 amendment.
- **Energy recovery for beverage containers:** The table on page 19 shows that Encorp is testing thermal processes to manage stand-up pouches and the laminated plastic bags used inside bag-in-a-box containers. Also, during the webinar, Encorp suggested a need to level the playing field so that Encorp could use energy recovery like other EPR programs for certain materials. From our perspective, the Recycling Regulation requirement to only refill or recycle beverage containers should be maintained. This is because producers can readily choose container designs that are refillable or recyclable. Rather than pursue energy recovery, we encourage Encorp to develop local refillable or recycling markets and create incentives for brandowners to use refillable or recyclable containers. Doing so would fulfill the pollution prevention hierarchy requirement in the Recycling Regulation and support a circular economy.
- **Volume of containers collected through return-to-retail:** The plan states that 5% of containers are collected through return-to-retail across the province. To provide more context for stakeholders, please provide the percent of containers collected through return-to-retail in urban settings and include this in the next version of the plan.

Again, many thanks for giving stakeholders the opportunity to comment on the draft stewardship plan. Please feel free to contact me if you have any questions about this feedback.

Best regards,  
Monica

Monica Kosmak | Senior Project Manager (she/her/hers)  
Engineering Services Department | City of Vancouver  
[monica.kosmak@vancouver.ca](mailto:monica.kosmak@vancouver.ca)  
604.673.8069



## COLUMBIA SHUSWAP REGIONAL DISTRICT

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September 15, 2020

Responses to Encorp Beverage Stewardship Plan.

RecycleBC partnership – Beverage containers collected within the curbside blue box system accounted for and are included in the total units collected and used to calculate Encorp’s recovery rate.

At rural transfer stations and landfills there are a high amount of beverage containers that are dropped off. Some of these containers are brought to depots by site attendants, while others remain in the Recycle BC system. Encorp could look at expanding the curbside blue box program to also include beverage containers collected at transfer stations and landfills that end up in Recycle BC supersacks.

The collection of the ancillary packaging would support Encorp’s collection network at locations, which do not have a contract with Recycle BC and receive this material daily from customers who return it with their beverage containers.

In the revised stewardship plan, Encorp is intending to collect ancillary packaging from customers. This is a positive step and follows guiding principles that other Product stewards could follow in their plans. In regards to the *recycling certificate for material collected and recycled*, this would only pertain to depots that do not collect Recycle BC material and therefore not every depot could have the benefits of receiving a certificate. The majority of the depots in the CSRD collect Recycle BC material.

Encorp recognizes recycling systems need to evolve with consumers’ expectations and the priority is to model convenience for the consumer. There are many enhancements Encorp implemented prior to the COVID-19 pandemic that have proven to be the most effective way to evolve the system into the future that meets customers’ needs and expectations.

As a product steward Encorp successfully engages with Regional Districts with updates and program developments. This is appreciated. During COVID-19 and through the early stages of the outbreak, ENCORN provided a plan that was able to be used by other organizations that were beginning the restart program. This level of communication was appreciated and showed the level of adaptability and a progressive Product Steward.

#### ELECTORAL AREAS

A GOLDEN-COLUMBIA  
 B REVELSTOKE-COLUMBIA

C SOUTH SHUSWAP  
 D FALKLAND-SALMON VALLEY

E SICAMOUS-MALAKWA  
 F NORTH SHUSWAP-SEYMOUR ARM

#### MUNICIPALITIES

GOLDEN  
 REVELSTOKE

SALMON ARM  
 SICAMOUS



SEP 11 2020

Solid Waste Services  
Tel. 604 432-6400 Fax 604 451-6180

File: CR-24-03-EPR-1

Allen Langdon, President & CEO  
Encorp Pacific (Canada)  
100-4259 Canada Way  
Burnaby, BC V5G 4Y2  
**VIA EMAIL: [beverageplan2020@returnit.ca](mailto:beverageplan2020@returnit.ca)**

Dear Mr. Langdon:

#### **Encorp Beverage Stewardship Plan Consultation: 2020-2024**

Thank you for the opportunity to submit comments on the Beverage Container Stewardship Plan 2020-2024. We commend Encorp for its exceptionally high consumer awareness and consumer access achievements over the past 25 years. Metro Vancouver and member jurisdiction staff have participated in consultation events and reviewed the Stewardship Plan, and submit the following staff comments for consideration.

#### **Return-It Express & GO**

Return-It Express, which allows consumers to bundle beverage container returns and receive deposit refunds into their Return-It account, is an important innovation. The recent collaboration between Encorp and Metro Vancouver to initiate Return-It Express & GO collection at the North Shore Transfer Station has been a notable success and accounts for over 150,000 beverage containers per month. Metro Vancouver is working with Encorp to expand the Express & GO service to other Metro Vancouver transfer stations. Encorp is encouraged to continue to expand and enhance the Express and Express & GO program.

#### **Aluminum Beer Containers**

The approach suggested in the Stewardship Plan to provide a single collection network for all aluminum containers (alcohol and non-alcohol) may improve consumer convenience through integrating collection programs. Further details regarding this approach, related to topics such as financial transparency, impacts to return-to-retail collection and data monitoring and reporting, would be helpful for stakeholders to understand the potential implications of this approach.

#### **Secondary Packaging**

The Stewardship Plan proposes to collect and recycle secondary packaging for beverage containers, such as boxboard or plastic film (included in the packaging and paper product category), at Return-It depots. The collection and recycling of secondary packaging provided by Encorp, will allow beverage producers to seek a certificate of recycling, or credit, for the recycling of packaging through the

4730 Kingsway, Burnaby, BC, Canada V5H 0C6 | 604-432-6200 | [metrovancover.org](http://metrovancover.org)

Metro Vancouver Regional District | Greater Vancouver Water District | Greater Vancouver Sewerage and Drainage District | Metro Vancouver Housing Corporation

Recycle BC program. In addition, this packaging recycling opportunity provides enhanced convenience for consumers and depot operators. Further details on how this approach will be implemented, such as whether all depots and return-to-retail location will collect secondary packaging, would be helpful.

#### **Return-to-Retail**

The Stewardship Plan identifies 455 return-to-retail locations within the province, directly serviced by Encorp, together contributing 5% of the amount of beverage containers collected. Please provide an analysis of the rate of utilization of return-to-retail in urban areas, like Metro Vancouver. In addition, further details on the number and type of return-to-retail locations would be helpful for stakeholders.

#### **Recovery Rate Target**

In the 2014-2018 Stewardship Plan, Encorp developed a 5-year weighted average in setting performance targets. During consultations in 2018, 2019, and 2020, Encorp representatives stated that a 5-year weighted average was not used in setting new performance targets. The Stewardship Plan did not identify the reasons why Encorp is changing methodologies and further clarity would be helpful for stakeholders to understand the underlying factors in the new methodology for setting performance targets. Perhaps it would be possible for Encorp to demonstrate both methodologies used to determine performance targets, and then conduct a comparison.

Thanks again for the opportunity to comment on Encorp's draft stewardship plan, and we look forward to continuing to collaborate with Encorp on a range of initiatives to help increase diversion of beverage containers and other products.

Sincerely,



Paul Henderson, P.Eng.  
General Manager, Solid Waste Services

PH/ad

cc: Teresa Conner, Unit Head, Ministry of Environment and Climate Change Strategy  
Leeanne Fraser, Senior Policy Analyst, Ministry of Environment and Climate Change Strategy  
Lucas Harris, Senior Policy analyst, Ministry of Environment and Climate Change Strategy

## NGO's and Other Stakeholders

### Comments to 2020-2024 Beverage Center Stewardship Plan



Mark McLaughlin <mark\_mclaughlin@sfu.ca>  
 To ● beverageplan2020@returnit.ca  
 Cc ● alangdon@returnit.ca

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In regard to your Return-It 2020-2024 Beverage Container Stewardship plan, I would like to provide a few comments from my personal perspective:

#### Express & Go station

Simon Fraser University partnered with Encorp over the past year to pilot an Express & GO unstaffed station at our Burnaby Mountain campus.

Prior to COVID hitting in March, we believe the station was gaining traction with consumers and was starting to see regular usage. Since the onset of COVID, our campus has been empty and we suspect that usage is down.

We have no doubt that usage will bounce back once the campus returns to regular operations post-pandemic.

This self-service bag drop-off unit provides tremendous convenience to consumers in what can ultimately be a 24/7 environment. Community groups can use the Express & GO service to generate funds for their activities.

We are very pleased with the installation and our dealings with Encorp during construction. Following consultations with internal SFU groups, Encorp were quick to modify the station to ensure it was fully accessible.

This easy to use self-service station, running on solar power, is a great example of BC recycling innovation, and will only help increase beverage container return rates.

We believe the unit would be more effective if the bag label printer was located close to the Express & GO the station. In our particular circumstance, the label printer is located about 300m away and is only accessible during business store hours. A greater level of marketing of the station's presence and benefits to local population would also help increase awareness, and use.

#### Beer beverage container recycling

One of the most time-consuming tasks when bringing cans into the Return-It depot is the need to physically sort the alumni beer cans from the other non-beer cans. This task, in usually busy Return-it centres, is sufficient to turn consumers away from recycling altogether. With the new COVID reality of physically distancing, this makes it even more challenging to sort the beer cans from the other cans in a centre. With COVID with us for many months, potentially years, to come, and now that all cans have the same 10c deposit, there should be no need to spend time sorting cans within a centre.

Furthermore, there is much confusion at the consumer level with regard to the amount of deposit that is actually returned when recycling beer bottles. Some Return-It centres appear to offer full beer bottle deposit refunds, while others do not. This double-standard leads to consumer confusion, inefficiencies, and instills a sense of consumer mistrust tainting the entire BC recycling system. BC government authorities need to step in to streamline beer bottle recycling through the popular Return-It Centres in the province and to provide a system whereby all consumers can receive back the full beer bottle deposit that they have paid.

### Reverse Vending Machines

Unlike many other Canadian provinces, BC has not adopted Reverse Vending Machines as a way to promote beverage container recycling. Although there may be an initial upfront cost to procure the machine, these machines are popular with consumers and can provide a cashless recycling solution where retail space is limited. Return-It should pilot the use of these machines in various settings.

#### **Mark McLaughlin**

Chief Commercial Services Officer | Ancillary Services  
Simon Fraser University | MBC 2108  
8888 University Drive, Burnaby, BC V5A 1S6  
T: 778 782 3950 | M: 778 238 3950





September 15, 2020

Consultation Feedback  
 Encorp Pacific  
 100 – 4259 Canada Way  
 Burnaby, BC V5G 4Y2  
 Via email: [heverageplan2020@returnit.ca](mailto:heverageplan2020@returnit.ca)

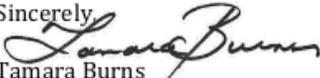
RE: Encorp Beverage Stewardship Plan, Consultation Feedback

Recycle BC does not support Encorp Pacific's use of its stewardship plan to engage Recycle BC in a speculative proposal. Prior to releasing its stewardship plan, Encorp did not consult with Recycle BC regarding its position on page 8: "Our intention is to reach an agreement with Recycle BC to have our certificate of recycling recognized within their program", which remains suppositional.

We are requesting that Encorp remove any reference to Recycle BC in relation to its proposed collection of ancillary packaging prior to submitting its stewardship plan to the Ministry of Environment and Climate Change Strategy for review.

Recycle BC has an extensive curbside and multi-family program and more than 215 depots collecting our materials on our behalf. Last year, 98.6% of BC households had access to our services provincially and we have achieved our government-mandated recovery rate every year.

We encourage residents to leverage the world-leading collection network we have created and through which we achieve superior environmental outcomes on behalf of the producers that fund us and the residents of BC.

Sincerely,  
  
 Tamara Burns  
 SVP, Recycle BC

Cc. Kris Ord, Executive Director, Ministry of Environment and Climate Change Strategy  
 Bob McDonald, Director, Ministry of Environment and Climate Change Strategy  
[ExtendedProducerResponsibility@gov.bc.ca](mailto:ExtendedProducerResponsibility@gov.bc.ca)

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 North Vancouver BC V7M 3J3  
 778-588-9504

RecycleBC.ca

 @RecycleBC  RecycleBC

**Binnners' Project**  
**Encorp Pacific Stewardship Plan Consultation**  
*September 15, 2020*



**Overview**

With the creation of Encorp Pacific's 2020 stewardship plan, Binnners' Project is pleased to submit feedback on behalf of the over 100 binnners within our membership.

**Binnners' Project**

Binnners' Project is a group of waste-pickers aided by support staff dedicated to improving their economic opportunities, and reducing the stigma they face as informal recyclable collectors.

Binnners' Project is a project on MakeWay's shared platform, a national Canadian charity that builds partnerships and solutions to help nature and communities thrive together.

*Characteristics of the Binner Community*

Binnners are among one of the most marginalized groups in urban areas. Their livelihoods stem from refunds received from used containers collected from bins. Binnners positively contribute to our environment by diverting a considerable amount of waste. Specifically, binnners work on the streets to recover bottles and cans that would often be thrown into landfill streams.

Binnners are a vulnerable population, with a range of features that lock in poverty, housing insecurity, and political invisibility. Most are dealing with, or have previously dealt with, addictions, mental health issues, physical disabilities, abuse, and/or homelessness. These keep in place barriers to full social and economic inclusion.

Yet, binnners are an essential part of the fabric of a well-functioning city, and they have proven their resiliency despite their place in the city being constantly contested. Binnners have been collecting bottles and cans, cleaning up BC's streets, and preventing these recyclable materials from heading to the landfill for decades. As a result, binnners are a vital part in helping our province reach its 78% return rate for refundables.

**Decreasing 20 cent deposit on containers over 1L**

Binnners have expressed concern over the lowering of the refund on containers over 1L from 20 cents to 10 cents. Not only will this decrease their income overall, they recognize that due to the size and weight of these containers, this change will de-incentivize them from collecting these containers, therefore leaving them from being collected and in many cases from being recycled. Instead, they would likely save room in their bags and carts for more, smaller containers. However, we are hopeful





that making it easier for customers to return beverage containers due to the standardized refund rate will allow binners to be more efficient in their work.

#### Expanding the deposit-refund system to include milk containers

Expanding the deposit-refund system to include milk product containers, as is done in many other provinces, will allow binners to further their impact in recovering recyclable materials. Since its inception, members of Binners' Project have been supportive of expanding the refund system to include milk product containers as this would increase their earnings as well. We are pleased to see this policy enacted.

#### Expanding the inclusion of beer containers at depots

With only select depots providing full refunds on beer containers, binners often avoid depots that reduce refunds. Expanding full refunds on beer containers to more depots while making it easier for customers to sort their containers will allow binners to use more depots, which may be more convenient for them, and make their trip to the depot more efficient.

#### Return-It Express

Binners have shared that they are not frequent users of the Return-It Express stations, and find it a barrier that this option is cashless with \$50 as the minimum refund before a cheque can be issued.

These concerns indicate the ongoing need for in-person and cash-based options for returning beverage containers, which we encourage Return-It to continue prioritizing as commercial locations become increasingly cashless.

#### Recommendations

Encorp Pacific reported a 78% return rate in 2019. We are grateful for Encorp Pacific's quick work in increasing 5-cent refunds to 10-cents in November of 2019, before it was provincially mandated. We encourage Encorp Pacific to consider additional ways to engage the binning community to ensure that containers over 1L are still being returned, even with the lower refund rate. We also encourage Encorp to consider engaging binners in their public education campaigns through storytelling and acknowledgment of the work of binners, which would further Binners' Project's mission in destigmatizing the work of binners while encouraging higher return rates on all refundable materials.

## Comments on Encorp Beverage Stewardship Plan



Taspia Raka &lt;taspia@climatesmartbusiness.com&gt;

To beverageplan2020@returnit.ca

Reply

Reply All

Forward



Thu 03/09/2020 10:57 AM

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**Overall comment:** As stated by various stakeholders I too agree that Encorp has done a fantastic job in educating the public through various awareness campaigns and partnerships (such as the Binners' project). As a 3rd party contractor, I am pleased with Encorp's commitments to sustainability and transparency around GHG accounting. Setting a baseline and continued tracking against the baseline for GHG emissions is considered best practice and great to see Encorp's continued commitment and transparency to do so. The set GHG targets in scope 3 emissions are evidence of strong environmental commitments.

**Questions:**

1. I am curious to learn about the CO2 reduced (from landfill diversion) methodology stated in page 17. It states the energy used for material recovery is included in the consideration. Are you using average numbers or manufacture specific estimates? Are you assuming general MSW (Municipal Solid Waste) landfill emissions for comparison?
  
2. Is the 25% reduction estimate from the conversion of the pickup fleet is that from the fuel-switching alone or the combination of reduced kilometers (due to materials being compacted as they are picked up) & fuel switching?
  
3. You have set a target of 3% from scope 1. Encorp's scope 1 emission is from heat alone from the facilities you are in. Do you have specific strategies in mind to tackle heating emissions from the buildings you currently occupy?
  
4. Wanted to confirm that Encorp is setting a target of 10% from scope 3 by 2024?

Kindly,

Taspia Raka client advisor and data analyst

Climate Smart cut costs. cut carbon.

507-163 W. Hastings St, Vancouver, BC V6B 1H5

taspia@climatesmartbusiness.com | 604-CLIMATE (254-6283) x226

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## Comments/input: Encorp Beverage Stewardship Plan



Marianne Pemberton <marianne@climatesmartb>  
To beverageplan2020@returnit.ca

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Mon 14/09/2020 9:04 AM

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Hello,

Thank you for the opportunity to provide comments on Encorp's latest stewardship plan. After reviewing your presentation and plan I have provided my comments below.

Warmly,  
Marianne

Page 12: In depot Express services are currently available at over 70 locations and with plans to expand to all depots with a population base of over 10,000. To reach this target Encorp will install an additional 33 Express locations over the plan timeframe. Express & GO is a newly developed unstaffed station that can be located in high density urban areas where finding suitable real estate is difficult and also, where viable, in hard to service rural areas where there are not sufficient volumes of material to support a traditional depot. The unstaffed stations also support social distancing and provide all the ease and convenience of Express plus a security level to meet Encorp's stringent audit and controls.

**Comment:** *This will likely be an increasing priority area given the current COVID context, though also comes at increased risk of contaminated waste streams. Consideration of the a new waste stream of single-use and/or "lost"/used reusable fabric facemasks may be an additional consideration when thinking of changes in the short and medium term.*

Page 13 Compaction pilot program to identify the viability of using a CNG hybrid solution with a mobile compaction unit to transport compacted material from depots reducing the trips necessary and ultimately reducing the program's GHG emissions

**Question:** *Will this pilot help in building the business case for Recycle BC's vendor suppliers to implement similar programs? Consideration of where the largest areas of opportunity for such a program to make an impact, both within Recycle BC's Scope 1 and Scope 3 emissions sources, can ensure such a pilot paves a pathway for amplified reductions.*

Page 17:

**Comment:** *Energy savings and tonnes CO2e reduced should be listed relative to a baseline. Reader has no way to know if this is year over year, based on 2010 levels, or if the comparison baseline was an average high or low year, skewing results.*

Page 19: Greenhouse gas emissions

**Comment:** *Given the end-of-life supply chains listed on pages 17 - 19, Recycle BC ought to consider prioritization guidelines when sourcing end of market vendors for recycled products which favour fewer kilometers travelled, and/or low carbon modes of transportation for goods in order to reduce emissions associated with total lifecycle.*

Page 23: Encorp pays for the collection, transportation and recycling of the beverage containers registered in its program. These services are provided through contracts with various suppliers. Transportation, consolidation and recycling services are typically awarded through a competitive bid process.

**Comment:** *With combined benefits of improved accuracy in data collection, pooling innovative solutions, and engaging supply chain, Recycle BC ought to consider greenhouse gas implications of suppliers vis a vis transportation and consolidation services. This Scope 3 emissions source is a significant source of reduction opportunity within BC and for Recycle BC, and can be implemented transparently and with increasing expectations over time. These standards and audits ought to be implemented in addition to the financial audits and interviews already conducted by the independent third-party consultant.*

Page 25: Reduce Scope 1 emissions by 3% annually Implement GHG reduction initiatives for Scope 3 emissions to yield no less than 10% reduction in the GHG emissions as a result of those initiatives

**Comment:** *Greenhouse gas reduction targets ought to include a baseline year and target completion year. For example, Recycle BC will reduce Scope 1 emissions by 3% annually based on 2018 levels but 2025. Recycle BC will reduce Scope 3 tCO<sub>2</sub>e by at least 10% by 2025, based on a 2018 baseline.*

--

**Marianne Pemberton** Client Services Manager

**Climate Smart** cut costs. cut carbon.

507-163 W. Hastings St, Vancouver, BC V6B 1H5

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[climatesmartbusiness.com](https://climatesmartbusiness.com) | [beep.eco](https://beep.eco) | [Twitter](#) | [LinkedIn](#)

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## Processors and Suppliers



September 15, 2020

Via Email: [beverageplan2020@returnit.ca](mailto:beverageplan2020@returnit.ca)

Encorp Pacific (Canada) / Return-It  
100 – 4259 Canada Way  
Burnaby, BC V5G 4Y2

Dear Encorp Pacific,

TOMRA Canada supports your mission to provide a convenient and effective redemption system for consumers in British Columbia (BC). Our comments on Encorp's revised [Draft Beverage Stewardship Plan 2020-2024](#) are based on over 40-years' experience innovating container deposit-return systems by providing collection and sorting technology, logistics, material processing, and data administration. We are available to you and your staff to share our thoughts in greater detail.

### **TOMRA Canada**

TOMRA has worked in Canada for over 35 years, employing over 100 professional, skilled, and non-skilled persons. Our installation base of over 1,900 Reverse Vending Systems in Québec, Ontario, Alberta, and British Columbia redeems over 1.7 billion used beverage containers each year. TOMRA Canada processes more than 31,575 metric tons of aluminum and plastic annually at our plant outside Montreal.

### **Summary of Recommendations (detailed below)**

- **Increase automation in the redemption process by using proven Reverse Vending technology** (e.g. reverse vending machines and back-room sorting technology). Improve access and make redemption a quick and safer 'hands-free' experience for customers and workers.
- **Integrate such technology and connect on-line to collect data, improve logistics and accounting integrity.** Register products and be able to collect data at barcode/brand level detail. This will give Encorp a transparent total view into how the system is performing, where improvements can be made, and generate the required reports to brand owners.
- **Material recovery through the redemption system is of a much higher value** than material collected from curbside and should be tracked separately to identify areas for continuous improvement in the redemption system.
- **Environmental impact assessment boundaries could be expanded to include the full lifecycle of a container** – such a view will allow you to more fully account for investments you make into your part of the system against the full GHG impact of different materials and processes.

### **Technology and Automation Support A Convenient and Productive Redemption System**

A high-performing deposit-return system requires a user-friendly, widely accessible redemption experience that is also cost-efficient for the sponsoring producers. We appreciate that the Plan prioritizes these and believe that your stated objective to integrate the latest available technology will serve all those needs. During this time of COVID-19 reverse vending technology was considered by regulators as the safest way for consumers and workers to redeem quickly in a safe environment. The integrity of the accounting and fraud controls processes is also supported through technology as it improves accuracy, enhances data collection, and facilitates general transparency into how well the system is performing and where it needs improvement.



### Recovery Targets and Data for Reporting

We support and commend Encorp for setting and achieving recovery targets that are higher than the 75% rate stipulated in the Regulation, as well as demonstrating year over year continued improvements: 78.9% in 2020, 80% in 2021, 81.2% in 2022, 82.5% in 2023, and 83.7% in 2024. This commitment shows confidence in the system and illustrates that increasing rates of collection are indeed possible when they are clearly outlined and are accompanied by a robust system.

### Material Quality Enables Recycled Content

The BC deposit program aggregates the data of containers collected through all collection programs into a single recovery rate. While this may provide a better understanding of the total number of recovered containers, we believe that if the redemption rate is tracked separately then Encorp and other stakeholders will be better able to identify opportunities to continuously improve areas including consumer access, material quality, accounting integrity, and operating costs.

The market price for PET collected within a bottle deposit system is generally 40% higher than curbside PET<sup>1</sup> with [RecyclingMarkets.net](https://www.recyclingmarkets.net) reporting even higher rates (58%-93%) in 2020. This higher quality yield provides the feedstock needed for producers to meet their recycled content commitments.

### Environmental Impact Assessment Boundaries Should Include the Full Lifecycle

We appreciate and support that Encorp is measuring greenhouse gas (GHG) emissions and savings as well as setting environmental impact targets associated with its stewardship activities. This information is critical in tracking the overall impact of the program. To provide a broader understanding of the full system, we suggest that the environmental impact assessment boundary is expanded to include the full lifecycle of a container – not just when it enters and leaves Encorp's DRS system. This will allow Encorp to more fully account for the GHG impact of different materials and system improvements throughout the process. Additionally, in order to provide further detail and transparency into the reporting of the metric weight of materials diverted from landfill required under the Plan, we suggest that the reporting includes a material flow analysis that illustrates which materials, in which quantities, are going to which processes. This information will allow a clear and better understanding of how exactly materials in the program are following the pollution prevention hierarchy described in Section 5(1) subsection (c) (page 16 in the Plan).

We look forward to the publication of the final Stewardship Plan as well as continuing to partner with Encorp to facilitate a cleaner and healthier environment where waste is treated as a resource.

Thank you for your consideration and hope this is helpful to your mission,

**Charles W. Riegler Jr.**

SVP Governmental Affairs and Compliance  
TOMRA Canada Inc.  
20500 Clark Graham Ave, Baie-D'Urfe, Quebec H9X 4B6, Canada  
+1.203.449.8393  
[Chuck.Riegler@tomra.com](mailto:Chuck.Riegler@tomra.com)

<sup>1</sup> Susan Collins of the Container Recycling Institute (CRI), as quoted in "CRI's "Duty to Warn" Webinar Debunks Recycling Myths." Commendatore, Cristina. 4 March 2019. <https://www.waste360.com/business/cris-duty-warn-webinar-debunks-recycling-myths>. Accessed on 2 September 2020.



### **About TOMRA**

TOMRA was founded on an innovation in 1972 that began with the design, manufacturing, and sale of reverse vending machines (RVMs) for automated collection of used beverage containers. Today TOMRA provides technology-led solutions that enable the circular economy with advanced collection and sorting systems that optimize resource recovery and minimize waste in the food, recycling, and mining industries.

### **TOMRA COLLECTION SOLUTIONS**

With an installed base of approximately 83,000 systems in over 60 markets, [TOMRA Reverse Vending](#) is the world's leading provider of reverse vending and clearinghouse solutions. Every year TOMRA facilitates the collection of more than 40 billion empty cans and bottles and provides retailers and other customers with an effective and efficient way of collecting, sorting, and processing these containers.

TOMRA's material recovery business includes the pick-up, transportation, and processing of used beverage containers in North America, as well as the subsequent brokerage of the processed material to recyclers. The revenue stream in this business area is derived from fees received from bottlers based on the volume of containers processed. Currently, [TOMRA Material Recovery](#) processes over 340,000 metric tons of containers annually.

### **TOMRA SORTING SOLUTIONS**

TOMRA Sorting Solutions creates sensor-based technologies for sorting and process analysis within the recycling, mining, food, and other industries. [TOMRA Recycling](#) is a global leader in its field and has pioneered the automation of waste sorting. Its flexible sorting systems perform an extensive range of sorting tasks and can both prepare and sort various types of metals and waste for either material recycling or energy recovery. Currently TOMRA Sorting Recycling has an installed base of close to 5,960 units across more than 40 markets.

## Public

**Do not lower prices!**

 George and Connie Gaspar <gaspar\_family@live.ca>  
To: beverageplan2020@returnit.ca

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Mon 06/07/2020 5:43 PM

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Please do not lower the return-it pricing on all bottles and cans to 10 cents. If anything, increase the price to 25 cents each (when bought and returned). This hit financially motivates people to return their cans. It also encourages people not to litter (abandoned cans) and those who come across them, to pick them up and return them themselves.

As a family we do a lot of recycling. It is discouraging when we go fishing to have to pick up dozens of cans along the river bank.

We believe that setting the can/bottle price at 10 cents will have a negative effect on recycling.

Thanks,

The Gaspar Family

Sent from my iPad

**Thank you**

 Marian DeSmet <mdesmet142@gmail.com>  
To: beverageplan2020@returnit.ca

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Thanks for making sorting easier and convenient to do.

Sent from my iPhone

**Deposits**

 lee.nielsen@shaw.ca  
To: beverageplan2020@returnit.ca

 Reply  Reply All  Forward 

Mon 06/07/2020 7:59 PM

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I agree with the unified price for containers but I defiantly do not agree that with lowering the amount.  
I feel all returns should be 20 cents not the 10 cents we have had for years.  
My justification for this is that if ALL containers paid 20 cents it would be a further incentive to return used containers.

Regards  
Lee Nielsen

## 20cent to 10cent



Linda McKay <lbmckay@hotmail.com>  
To ● beverageplan2020@returnit.ca

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New deposit Change in put:

Will we still be paying higher deposits in the stores for the Purchase of products?  
Ex wine bottles 2 L Pop Etc..

If we're paying for the higher deposit Price It should be returned to the customer.

Thanks  
Linda

## Why bother



Bill Henderson <billh.ca@gmail.com>  
To ● beverageplan2020@returnit.ca

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Why would anyone want to bother returning there larger beverage containers to get half of what they were charged for deposit paid on the containers at time of purchase. Unless deposit rates on beverage containers are lowered to match the return value it is not worth it to take in empties. Not to mention the loss of "income" for non-profit organizations who rely on bottle drives to function.

## Encore Pacific Stewardship Plan



William Langley <wlangley@icloud.com>  
To ● beverageplan2020@returnit.ca

Reply Reply All Forward ...  
Tue 07/07/2020 12:26 PM

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Comments and input:

In order to encourage people to recycle and to provide a better income for people that rely on bottle recycling, I suggest you raise the bottle return fee to \$.25 on all containers. Make recycling a worthwhile task.

Your state in your Return-It Blog that a \$.10 rate of return is for all beverage containers. Does that include beer containers-it's not clearly stated. Please clarify this.

Regarding Excess Revenue Over Expenses in your annual report: (\$33,967,383), more could be done with these assets..

Your return rate of 78.1% of containers is commendable though greater incentives for people to recycle are needed in the ESG world we inhabit. Far too many coffee cups litter public areas.

I hope the Express Program works well as it sounds like a positive step forward

## Archaic and slow process - users are required to do ALL the sorting!



Larry Key <larry\_key@hotmail.com>  
To ● beverageplan2020@returnit.ca

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Good day:

I just moved back to B.C. from Alberta.

I was very shocked to see the many "rules" required to return empties!

In B.C. the user is required to spend time sorting the returned items into the various categories.  
Not only is this very time consuming and confusing, but it is awkward with cans falling all over the place.

In Alberta, the user takes the returns to a depot and the workers very quickly do all the sorting.  
I didn't do a manual account of employees, but I am guessing there is no reduction in employees in B.C. despite the consumer doing all the sorting.  
So why must the consumer do all the work?

The questions I have are:

- 1 - why do beer and pop cans need to be sorted separately? Aluminum cans are all aluminum, right?
- 2 - why are plastics containers ( milk cartons) not being recycled, but instead are tossed into the garbage!

As I discovered moving back to B.C. I found in general, many systems are unnecessarily convoluted, and time consuming, returning empties is a good example.

B.C. used to be ahead of Alberta in many processes but upon my return to B.C. I find B.C. has made many things much more difficult.

Thank you!

Larry Key

Sent from my iPad

## Bottle returns at Country Store Lillooet BC



Marina Hatton <marina\_hatton61@hotmail.ca>  
To ● beverageplan2020@returnit.ca

Reply Reply All Forward ...

Sun 09/08/2020 6:07 PM

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Hello

I think it's a wonderful thing that we can take all of our empties to the Country Store. So much easier to be able to take everything to one place..anywhere else in town you can only take 2 flats a day per person which makes it hard don't always have the time to do that

Thank you

Really hoping this will stay



Virus-free. [www.avg.com](http://www.avg.com)

## Permanent change to beverage returns



Holly <hollypoli@shaw.ca>  
To ● beverageplan2020@returnit.ca

Reply Reply All Forward ...

Mon 10/08/2020 7:51 AM

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Hello

I am sending this email to ask that the 6 month trials of returning all beverage containers to one return it center be made permanent. It has encouraged more people to recycle as it is convenient. I watch our landfill fill up here in Lillooet and the more we can encourage people to recycle the better.

Thank you  
Holly Polischuk

## Return pricing



Mary-Lynn White <marylynn.white@gmail.com>  
To ● beverageplan2020@returnit.ca

Reply Reply All Forward ...

Wed 12/08/2020 3:11 PM

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Are stores going to still charge us \$.20 for over 1 litre size beverage containers? If so this is not fair to the returnee.  
Mary-Lynn

Sent from my iPhone

## recycling



DAVID PROBST <dprobst@shaw.ca>  
To ● beverageplan2020@returnit.ca

Reply Reply All Forward ...

Wed 12/08/2020 3:51 PM

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to whom it may concern:

The recycling system is not working. You are not interested in recycling as a whole. I drove by the Vance Road depot over a period of about a month at different times only to see long lines of people with impressive amounts of beverage containers. Finally I went just before it opened only to be confronted with another long line up. I took all my various items to the dump. Which is where all non-curb pickup recycling is going. All your promotion and efforts are in the field of beverage containers with little to no help for other recyclables. Please don't give me the covid line.

## new 10 cent deposit



Gerard <gvolk@shaw.ca>  
To beverageplan2020@returnit.ca

Reply Reply All Forward ...

Wed 12/08/2020 7:38 PM

Follow up. Start by September 1, 2020. Due by September 1, 2020.  
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It was just a short time ago that you increased the deposit to 10 cents for grocery cans and bottles, this was to promote better recycling now your going to reduce the 20 cent bottles to 10 cents, how does this promote more recycling? For the street people that rely on the bottles for income all your doing is robbing them for recycling the larger and heavier bottles, totally unfair, if anything the liquor store glass should be increased to 20 cents, this would truly increase the recycling. Gerard.

## Comments on the Vancouver Return-it system



Randy Forsythe <rforsythe234@gmail.com>  
To beverageplan2020@returnit.ca  
Cc Randy Forsythe

Reply Reply All Forward ...

Tue 25/08/2020 1:02 PM

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Hello,

As a regular and frequent Return-it customer for many years, here are my comments and one question:

- 1) Most of the people I meet at the recycling depots I use in Vancouver are unaware of the upcoming 20c to 10c drop for containers >1L.
  - more marketing studies, public interaction and advertising are required to inform people.
  - many of your customers don't have easy access to go online so more direct means of communication are required at the recycling depots.
- 2) There is less incentive for people to return >1L bottles that currently fetch 20c when they soon will only get 10c. Homeowners just won't be bothered to bring in the >1L containers for 10c. Bidders and pickers would rather get 40c for four smaller cans at 10c each than only 10c for a single >1L container when the volume is roughly the same. The incentive just isn't there. Plus, bidders /pickers don't like hauling around the bigger containers' volume.
- 3) Will the deposit and recycle fee at point of purchase for the >1L containers be reduced?

Sincerely,  
Randy Forsythe

## Retailers and Brandowners

### GMFG Input on the Beverage Stewardship Plan



Tom Truchan <TomT@georgiamain.com>

To ● beverageplan2020@returnit.ca

Cc ● Michelle Simpson; ● Staci Halyk; ● Grace MacInnes

↩ Reply

↩ Reply All

→ Forward



Tue 15/09/2020 12:18 PM

Good afternoon,

In response to Encorp Pacific's invitation to provide input on the draft Beverage Stewardship Plan 2020-2024, Georgia Main Food Group which represents the IGA and Fresh St. Market stores in British Columbia, makes the following submission:

Whereas:

- Our staff have heightened health and safety concerns over the handling of loose beverage container returns in light COVID-19; and
- we are also concerned about the upcoming addition of milk containers to the Return to Retail program due to food safety and hygiene concerns; and
- the Retail Council of Canada (RCC) is developing a "COVID-19 Pandemic Beverage Container Return-to-Retail" plan which would have grocers adopt the acceptance of Return-It Express bags as an alternative to accepting loose beverage containers, should retailers be forced to resume collection; and
- Georgia Main is supportive of accepting clean returns, of the type that we sell and with a limit of 24 items, as long as those returns are made in the course of a transaction and are in clear bags with labels that comply with the Return-It Express & Go program; and
- the RCC document is being submitted to WorkSafeBC, the Provincial Health Officer and B.C. Centre for Disease Control for approval and endorsement; and
- the Return to Retail component of the collection network contributes only 5% of the total volume of beverage containers collected through the system; and
- Return to Retail requirements are reportedly having a negative impact on Return-It depots in small rural communities, and the small communities we operate in all have Return-It depots nearby; and
- Return-It is recommending the province to shift from mandatory to voluntary Return to Retail; and
- both the Retail Council of Canada and Georgia Main Food Group (GMFG) support the recommendation to eliminate mandatory Return to Retail collection; and
- should mandatory Return to Retail remain in effect, and if required GMFG will only do so in a manner that is safe for our employees and customers and would implement the RCC's recommendation of only accepting returns compliant with the Return it's Express & Go program (in clear bags, with stickers) once it is approved by WorkSafeBC, the Provincial Health Officer and B.C. Centre for Disease Control.

Best regards,



**Tom Truchan**

*Manager of Sustainability*

200 - 4401 Still Creek Drive • Burnaby, BC V5C 6G9

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## **VI. Encorp Advisory Committee Input**

Prior to presenting the Draft Stewardship Plan to the Board of Directors and the public, Encorp's Advisory Committee was consulted on the plan and provided valuable input which resulted in changes to the plan prior to the official public consultation period.

The following pages contain input on the initial version of the Draft Stewardship Plan from the Encorp Advisory Committee.

**ENCORP PACIFIC (CANADA)  
ADVISORY COMMITTEE MEETING**

Wednesday, June 17, 2020  
9:00 a.m. – 11:15 p.m.

*Location:*  
Video Conference

**Committee Members**

Monica Kosmak – Chair  
Louise Schwarz  
Brock Macdonald  
Vince Spronken  
Bud Fraser  
Meghan Woods  
Tera Grady

**Management/Staff**

Allen Langdon  
Sandy Sigmund  
Elena Zevakhina  
Wendy Kramell  
Baljit Lalli

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Management provided an overview of the stewardship plan consultation process, including estimated timelines of the schedule and consultation. The Advisory Committee's feedback will be captured and documented in a summary and blacklined version of the stewardship plan, which will be shared with Encorp's Board of Directors.

Management provided feedback and addressed the following questions on its draft Stewardship Plan

- Q: Are the committee members selected by the Advisory Committee members or selected by Encorp staff and voted by the committee as approved? What can be done to clarify?  
A: Encorp supports the committee with selecting members. New members are voted and approved by Advisory Committee members.
- Q: The plan states that the Advisory Committee meets quarterly, should this be updated to the current practice of meeting biannually?  
A: The plan will be updated to reflect the current practice.
- Q: The current list of members are from the 2018 annual report and is not current. Is there another resource to point to for a list of committee members?  
A: The current list of members will be updated once the link is changed from the 2018 annual report to the 2019 annual report. The change will happen prior to the plan submission.

- Q: The Guiding Principles are over 25 years old. Why haven't they been refreshed in light of the climate crisis, the zero waste movement and plastic pollution?

A: The language in this section will be updated going forward. Encorp is continuously working towards evolving its Guiding Principles and this will be part of its Social Purpose initiative.
- Q: Saying that refillable bottles will be covered under the plan if brand owners choose to use them is a good first step. However, it's not reflective of Encorp's efforts to drive innovation in other areas like textiles, coffee cup recycling, cupshare, etc. What commitments could Encorp include in the plan to explore this option further with brand owners?

A: Our first step is to include refillables as an option in the plan. As brand owners are looking for solutions, we will work to support those opportunities. One challenge is that a very small amount of the obligated products in our program are produced here in BC. The advent of COVID-19, as well, has changed the landscape, even if temporarily, for all reusable solutions.
- Q: Could the cupshare pilot be mentioned as a reusable initiative that Encorp is exploring, or would that fall outside the scope of this Beverage Container Stewardship Plan?

A: That initiative would fall outside of the Stewardship Plan and not appropriate to reference at this time.
- Q: The plan states Encorp will expand the acceptable products to include all those container types sold by registered brand owners into the Return-It system and be responsible as stipulated in the regulation; does this refer to milk containers?

A: Yes.
- Q: Does ancillary packaging refer only to consumer packaging, or also transport packaging?

A: Only consumer packaging. The Stewardship Plan will be updated to clarify this reference.
- Q: How will Encorp and Recycle BC's recovery rate calculations be coordinated if Encorp will be collecting this residential packaging?

A: Encorp will not complete separate reporting. Brand owners would use the collection as a credit with Recycle BC.
- Q: Encorp undertook a comprehensive consultation process on proposed performance targets for the five (5) year period starting 2019. Can a summary of this consultation be included?

A: We can provide a link to this.
- Q: Due to upcoming regulatory changes initiated by the MOECCS in late 2019, Encorp has updated its Stewardship Plan to reflect the likely regulatory changes and will conduct a full public consultation in 2020/2021. Will the consultation be based on this draft Stewardship Plan?

A: Yes

- Q: What are Encorp's plans to engage diverse audiences in its consultation process to ensure the plan is as accessible and inclusive as possible? (e.g. First Nations, multi-cultural, multi-lingual, persons with disabilities, communities without depots, etc.)

A: We will include stakeholders we have worked with in the past such as Bidders, Indigenous Zero Waste Committee, BC Product Stewardship council etc. Management invited the committee to advise them of any groups or contacts they felt would be of value.

- Q: Will the Advisory Committees' comments be included in the consultation summary?

A: Yes

- Q: Will the Advisory Committee have an opportunity to provide feedback after today's meeting?

A: Yes, the Advisory Committee can provide feedback as part of the consultation process which will begin in July..

- Q: Is the number of Return to Retail locations across the province (550) still current in light of COVID-19?

A: Containers are currently not being collected at retail locations but under normal circumstances would be mandated by the regulation to collect beverage containers. Retail in 2019 accounted for 5% of the volume, which we can highlight in the plan.

- Q: As Encorp continues to work collaboratively with other stewardship programs to improve coverage and consumer convenience could this be an opportunity to address the free riding issue by saying that each stewardship program pays its own way?

A: We feel we have addressed the primary free rider issue through the inclusion of aluminum beer containers in our plan.

- Q: Statement in the plan reads, "Recognizing that it is not possible to have coverage in all the hard to service, remote and rural areas of the province." Why? What is the basis for this decision?

A: Conventional depots require certain minimum volumes to be profitable. To address this issue, we have started implementing Express & GO stations to provide increased service to rural communities.

Q: What is the demographic of the communities that do not have access to Encorp's return locations?

A: We do not have the full demographics of those areas, except for Statistics Canada. In terms of engaging First Nations communities, we joined the First Nations Recycling Initiative to engage the community and better understand where there may be gaps in our system.

Q: What options has Encorp explored to serve these underserved communities?

A: Express & GO is an option for increasing service to rural communities. Having all aluminum cans included in the plan will help us accelerate our expansion of Express & GO. In the past this has been a limitation in establishing infrastructure in communities where half the containers we collect will be aluminum beer containers.

- Q: This criterion started with a premise of serving more than 97% of the province's population and current criteria accomplishes that target. If the additional coverage provided by the mandated grocery retailers brings the provincial coverage up to 99.5%, why isn't 99.5% the target?

A: The industry standard is set at 95%, Return-It's collection network covers 97% and that is our minimum target level based on the criteria. When we include the return to retail locations serviced by us, the coverage increases to 99.5%. The increase in coverage from the retail sector is mainly associated with some rural areas where it has not been viable for a traditional depot to be located and the City of Vancouver is where it has been challenging to site any collection locations. We feel it is important to make this clarification to ensure people understand the differences in the measurements

- "For rural coverage... minimum population of 3,000 within a 45-minute driving radius. For urban coverage... 30-minute driving radius..."

Q: Does this refer only to the proximity of Encorp depots, or return-to-retail locations?

A: It is based on both.

Q: This appears to be the criterion established by SABC, but what consultation has Encorp conducted to gauge if this is acceptable to its customers, particularly those who fall outside this driving radius?

A: We are ahead of the SABC standard.

The SABC standard measures the rural coverage based on only servicing populations over 4000 for rural areas and a minimum 30 minute drive in urban areas. The SABC criteria was established based on Encorp's baseline coverage over 5 years ago. Encorp has revised our criteria to include populations over 3000 people within a 45 minute driving radius and in urban areas a 15 minute driving radius, however, we have not been able to meet the urban criteria in the City of Vancouver. This is due to both the challenge to site locations and traffic congestion.

The Express & GO stations, Express Plus style locations and our flexibility to work with small communities provide us with the ability to increase coverage in both rural and urban areas.

Q: Many residents in urban centres rely on transit, cycling and walking, and some cities are adopting goals to reduce driving trips. What criterion could Encorp adopt to support this and address the climate crisis?

A: We are trying to find additional Express & GO locations to help with proximity and accessibility.

Q: Is there an opportunity to mention Encorp's partnership with Recycle BC here as another collection pathway?

A: We will include a mention of it in the Stewardship Plan.

- Q: Return-It Express - for readers' context, is it possible to describe where the Province is at with respect to cashless deposit-refunds, and describe the feedback received from the Binner community?

A: We have not had any negative feedback from Bidders. Cash refunds are still available from conventional depots. The Province should have passed amendments to allow for cashless refunds by the time the plan is released for consultation.

- Q: Are corporately owned Express Plus facilities owned by Encorp, as opposed to depots which are privately owned?

A Yes. We operate the Yaletown location directly while our depot network is run by independent owner-operators.

- Q Why is the arrangement with Recycle BC not mentioned as a collection pathway?

A We will mention the pathway but in the end our choice is to focus on the pathways where customers can get their full deposit-refund.

- Q:What are the assumptions that factor into these annual recovery rate targets?

A:We look at the statistics from other Recycling Affiliates where there was a deposit value change, our action plan and strategic direction to improve recovery rate, and our 2019 baseline..

- Q:At a time when plastic pollution has emerged as a global environmental issue on par with the climate crisis, why are the lowest targets for containers that are wholly or partially made from plastic (plastic <1 L, drink boxes, bag in box, pouches)?

A:We have doubled deposits for containers under a litre. Bag in box and pouches represents an extremely small area of the market; we continue to look for more options to manage pouches in particular..

- Q: What are Encorp's plans to assess, and potentially improve, consumer awareness and customer satisfaction through the lens of accessibility and inclusion? (e.g. Persons with disabilities, First Nations, multi-cultural and multi-lingual groups?)

- We conduct annual benchmark studies and segmentation analysis through an independent third party to determine educational opportunities based on specific beverage container data, consumer habits and diverse demographics of the segment

groups. These studies include persons with disabilities, multicultural groups and First Nations. We use this information to develop targeted messaging and information to increase awareness. The awareness data and progress is measured and reported in our annual reports.

- Q: Are the pouches an ingredient in the lumber product, or are they combusted to produce it?  
A: They are shredded, then added to the mix to produce the lumber.
- Q: Is this market considered a “stable and sustainable market” as described on p. 13?  
A: This has been done as a pilot. At this time, in our opinion, it would not be considered a stable market.
- Q: In the conclusion it is stated, “We have reviewed and carefully considered all the feedback provided by the public and Ministry staff.” Is this a placeholder sentence, given that previous sections of the plan say that more consultation will be done?  
A: Yes. This will be amended.
- Q: Is there any content to add in terms of Encorp’s contingency plans for managing pandemics, such as actions to ensure business continuity and protect the health and safety of employees and customers?  
A: We will review and determine if we can make some additions.
- Q: Why doesn’t the plan mention some of Encorp’s impressive initiatives to reduce waste (e.g. mega bags), improve customer service experience at depots (e.g. 5-star system), and support depot operators (e.g. loans to invest in facility improvements)? These all contribute to improved recovery rates and reducing Encorp’s overall environmental footprint (including GHG footprint).  
A: We agree and we will make those adjustments.

## **VII. Express Registered Users Survey Results**

The Return-it Express system which to date includes over 70 depot locations, 1 Express Plus and 3 Express & Go Stations now has over 100,000 registered users. The convenience of the system along with the contactless features; no sorting or cash handling have been welcomed by customers. The satisfaction level is at an extremely high level.

Over 70,000 users were polled between August 4<sup>th</sup> and August 12 2020 and the following pages contain the Express Users Survey 2020 Results Report.



# Express Users Survey 2020

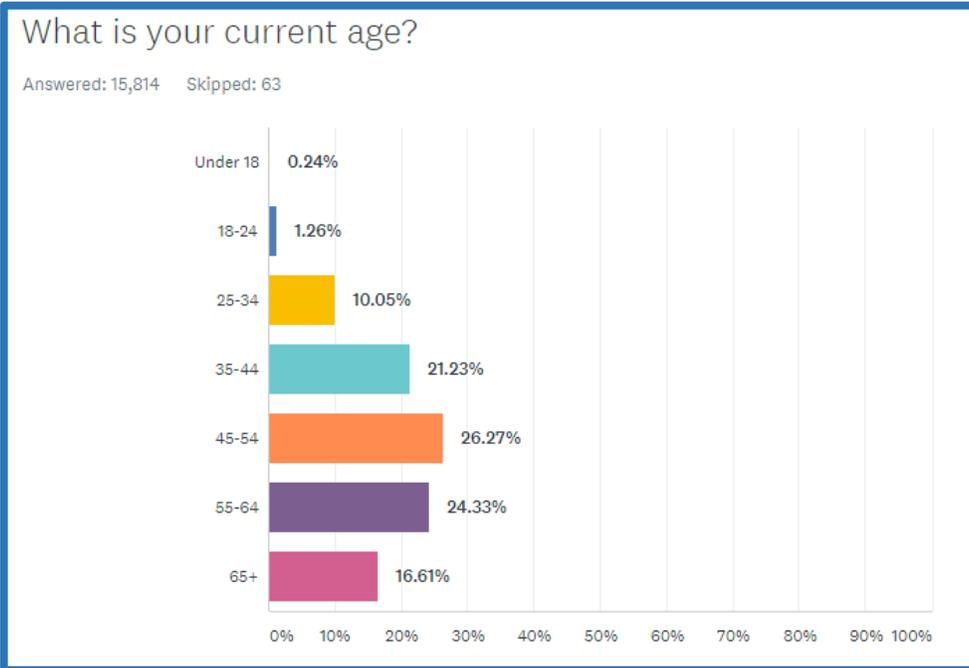
Results Report

# Survey method

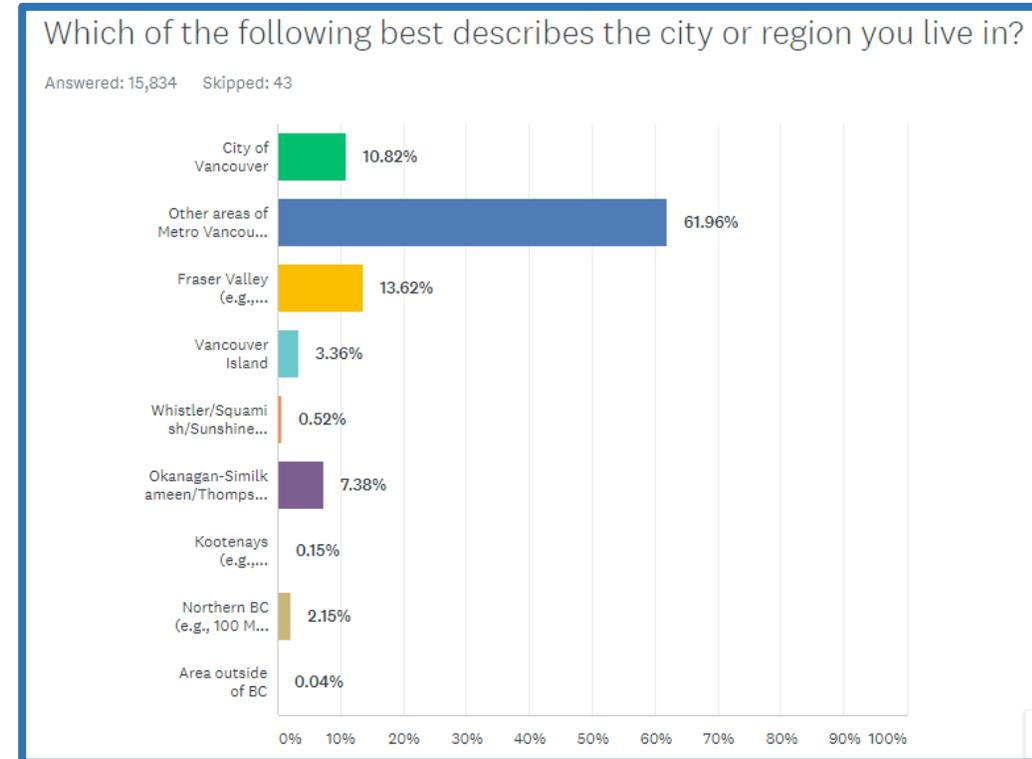


- Created using Survey Monkey by the Return-It Marketing team
- Sent to over **73,000** active Express users between August 4<sup>th</sup>-8<sup>th</sup>
  - *Survey Monkey limits the number of survey recipients to 20,000 per 24 hour period, so the survey had to be sent out over multiple days*
- Survey completed by **15,877** Express users
- Survey closed on August 12th

# Express Users – who are they?



- 50% of users are between the ages of 45-64



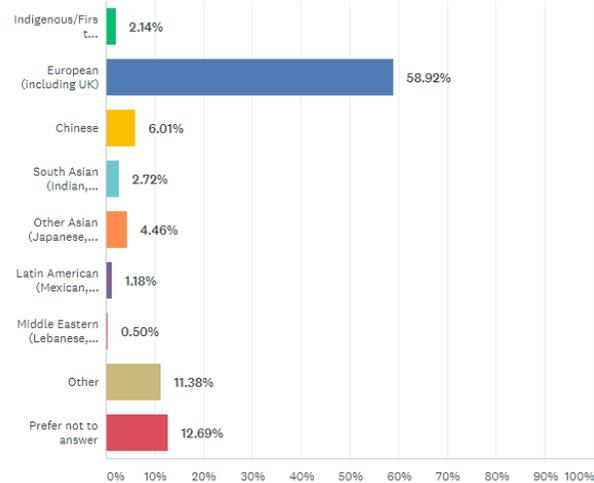
- 62% of users live outside of the City of Vancouver in the Metro Vancouver region

# Express Users – who are they?



The next question refers to the cultural or ethnic origins of your ancestors, from both sides of your family. Ethnic ancestry refers to your roots or cultural background and should not be confused with citizenship or nationality. Which of the following cultural or ethnic groups do you/your ancestors belong to?

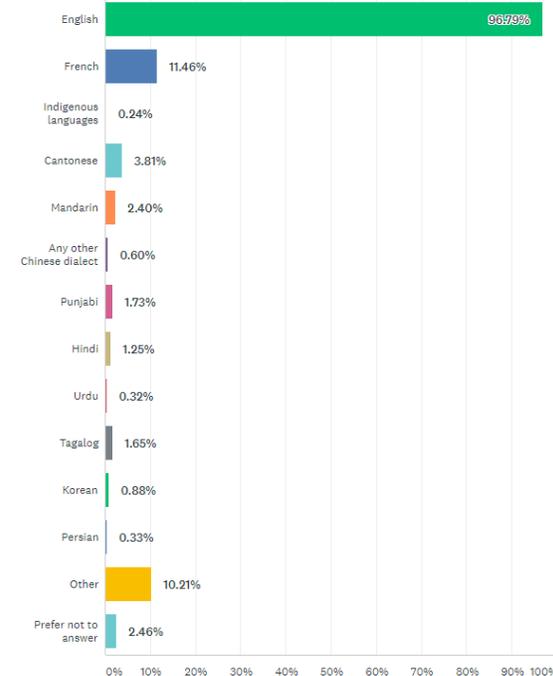
Answered: 15,817 Skipped: 60



- 59% of users who took the survey are of European descent

Which of the following languages are you able to speak?

Answered: 15,830 Skipped: 47



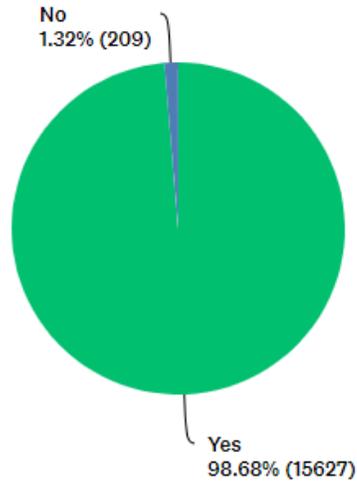
- 97% of users who took the survey speak English (since the survey is in English, this is not necessarily a reflection of the languages overall users speak)

# Usage & Satisfaction



Do you find the Express system easy to use?

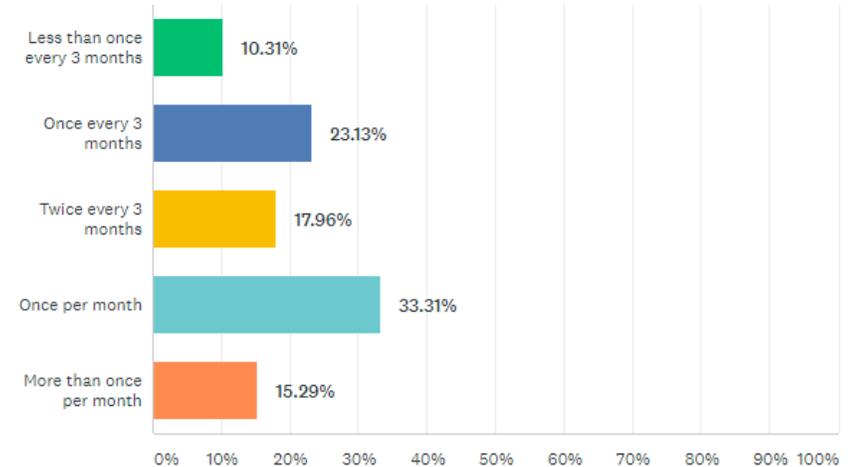
Answered: 15,836 Skipped: 41



- Nearly 99% of users find the Express system easy to use

Approximately how often do you use Return-It Express to return your empty drink containers for refund?

Answered: 15,831 Skipped: 46



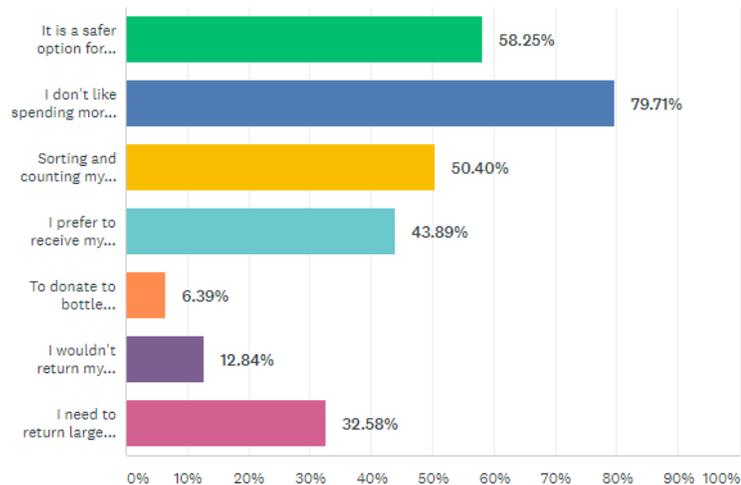
- 51% of users use Express more than once per 3-month period
- *We know that traditional returners visit the depot about once every 3 months, so it's important to note that Express users are visiting the depot more often*

# Usage & Satisfaction



Why do you use the Return-It Express service? Choose all that apply

Answered: 15,815 Skipped: 62



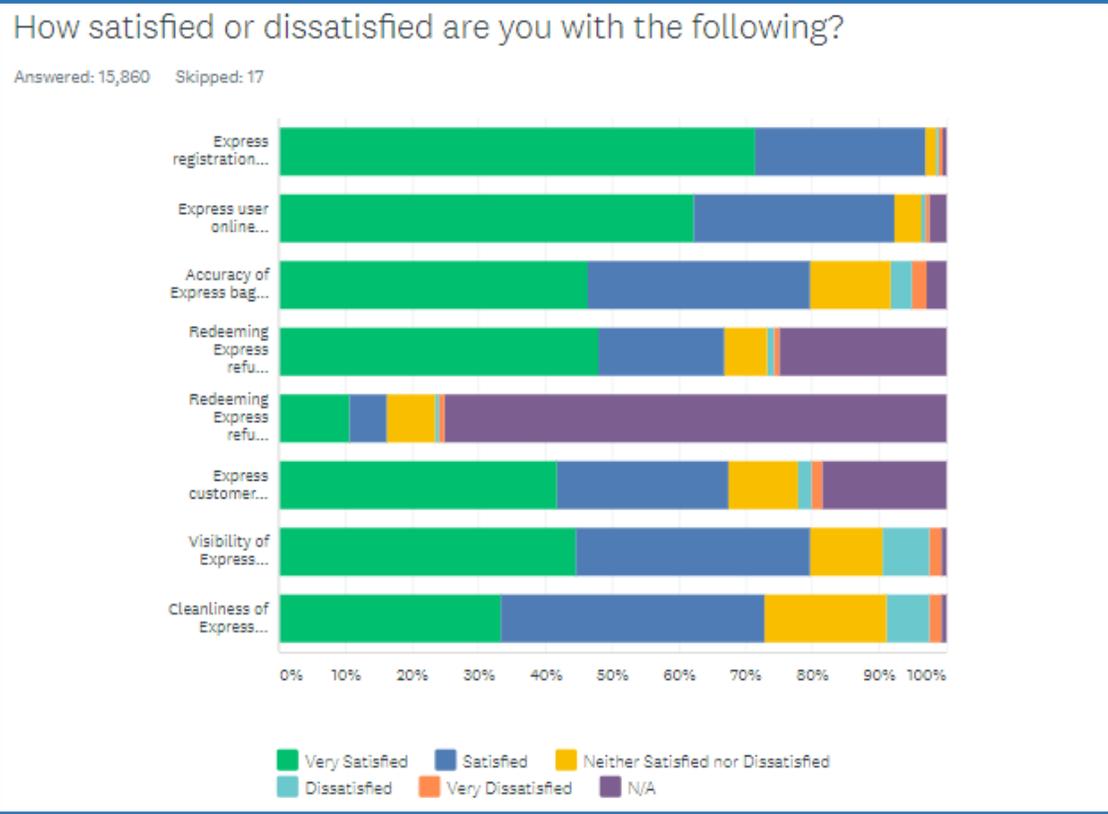
ANSWER CHOICES	RESPONSES
It is a safer option for getting my refunds during the COVID-19 pandemic	58.25% 9,213
I don't like spending more time than necessary in the bottle depot	79.71% 12,606
Sorting and counting my containers is a waste of time	50.40% 7,971
I prefer to receive my refunds electronically (no cash)	43.89% 6,941
To donate to bottle drives/charities	6.39% 1,011
I wouldn't return my containers for refund otherwise	12.84% 2,031
I need to return large amounts of containers that are a hassle to sort and count myself	32.58% 5,153

Total Respondents: 15,815

When asked why users use the Express service, we found that:

- The vast majority of users don't want to spend more time than necessary in the depot
- More than half of users feel Express is a safer alternative to regular returns during the COVID-19 pandemic
- Very few users (about 13%) say they would *not* return containers for refund without Express
- Even fewer (6%) use Express to donate to charities

# Usage & Satisfaction

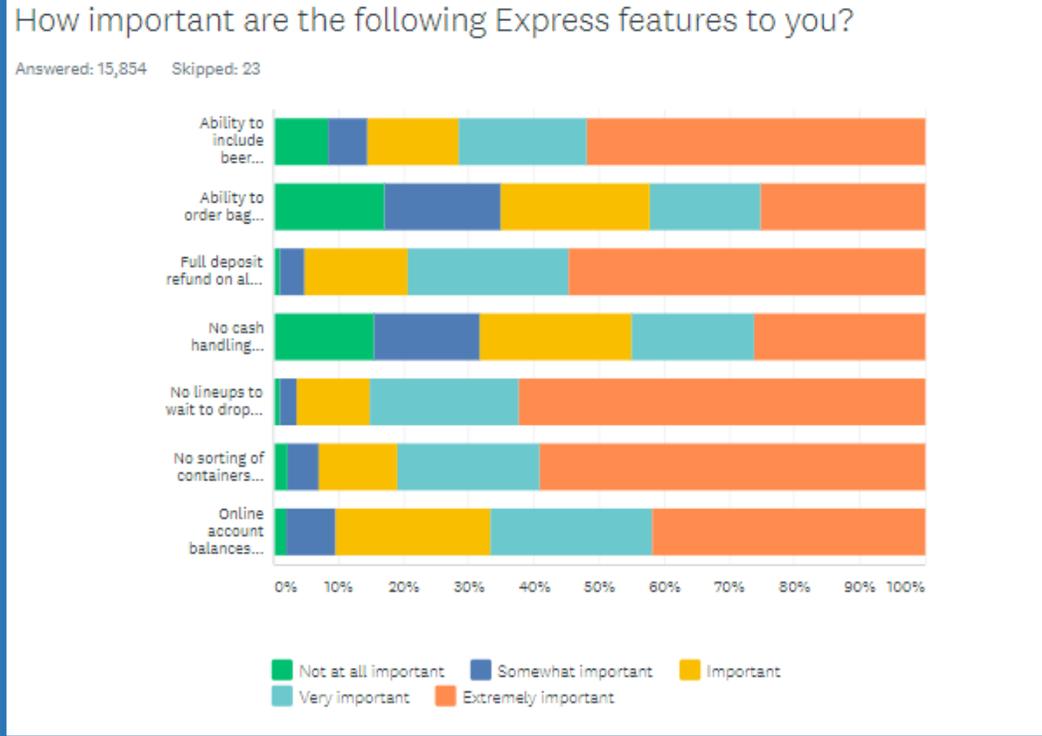


Asking Express users about their satisfaction level regarding different features of Express, we found that:

- Users are overall satisfied with the Express system
- Users are very satisfied with the online components of Express like registering & using the Express online dashboard
- Nearly 80% are “Satisfied” or “Very Satisfied” with bag counts
- Users are least satisfied overall with the cleanliness of depots and visibility of Express signage/drop-off at the depots

	VERY SATISFIED	SATISFIED	NEITHER SATISFIED NOR DISSATISFIED	DISSATISFIED	VERY DISSATISFIED	N/A	TOTAL	WEIGHTED AVERAGE
Express registration process	71.51% 11,306	25.42% 4,018	1.74% 276	0.32% 51	0.61% 97	0.40% 63	15,809	4.68
Express user online dashboard (express.returnit.ca)	62.23% 9,807	30.08% 4,741	4.18% 658	0.53% 84	0.63% 100	2.35% 370	15,760	4.56
Accuracy of Express bag counts	46.37% 7,322	33.36% 5,268	11.99% 1,894	3.19% 504	2.32% 367	2.75% 436	15,790	4.22
Redeeming Express refunds via e-transfer	48.09% 7,651	18.82% 2,956	6.47% 1,016	0.87% 137	0.91% 143	24.84% 3,901	15,703	4.49
Redeeming Express refunds via mailed cheque	10.61% 1,634	5.57% 857	7.25% 1,117	0.58% 90	0.81% 124	75.18% 11,676	15,397	3.99
Express customer service	41.84% 6,870	25.68% 4,033	10.37% 1,629	2.09% 328	1.55% 244	18.47% 2,900	16,704	4.28
Visibility of Express drop-off at the depot	44.67% 7,054	35.13% 5,547	10.82% 1,709	6.93% 1,095	1.88% 297	0.57% 90	15,792	4.14
Cleanliness of Express Drop-off at the depot	33.41% 5,278	39.52% 6,243	18.30% 2,891	6.41% 1,013	1.82% 287	0.53% 84	15,796	3.97

# Usage & Satisfaction



Asking Express users which Express features are most important to them, we found:

- The most important Express feature to users is not having to wait in line at the depot, closely followed by no sorting and getting a full deposit refund
- The least important features to Express users are the ability to order bag labels by mail and not having to handle cash at the depot

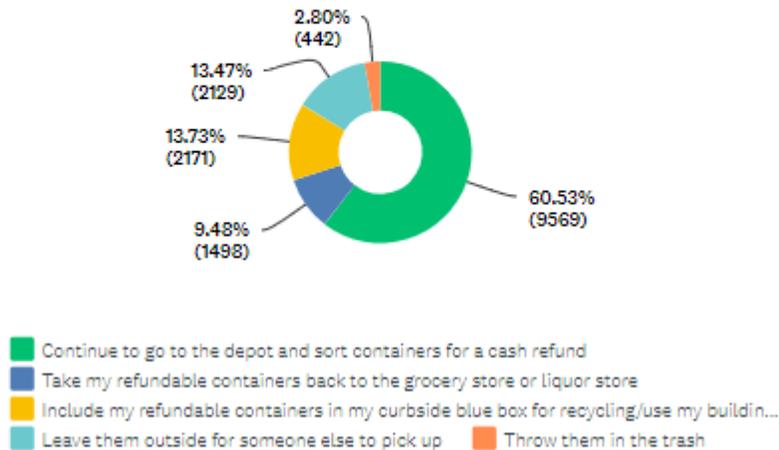
	NOT AT ALL IMPORTANT	SOMEWHAT IMPORTANT	IMPORTANT	VERY IMPORTANT	EXTREMELY IMPORTANT	TOTAL	WEIGHTED AVERAGE
Ability to include beer containers in the bag	8.41% 1,328	5.96% 941	14.07% 2,222	19.77% 3,123	51.81% 8,184	16,797	4.01
Ability to order bag labels online through my account	17.00% 2,681	17.86% 2,817	22.99% 3,626	17.04% 2,687	25.12% 3,962	16,772	3.16
Full deposit refund on all containers	1.06% 168	3.79% 598	15.86% 2,604	24.59% 3,882	54.71% 8,639	16,790	4.28
No cash handling required	15.45% 2,436	16.33% 2,576	23.25% 3,667	18.90% 2,960	26.08% 4,112	16,769	3.24
No lineups to wait to drop off containers	1.00% 158	2.60% 412	11.23% 1,777	23.00% 3,639	62.17% 9,837	16,822	4.43
No sorting of containers required	2.15% 340	4.91% 777	12.00% 1,900	21.99% 3,481	58.95% 9,331	16,828	4.31
Online account balances available anytime	1.98% 313	7.61% 1,203	23.83% 3,766	24.84% 3,926	41.74% 6,596	16,804	3.97

# Usage & Satisfaction



If the Express service was not available, what would you most often do with your refundable containers instead?

Answered: 15,809 Skipped: 68



Without the Express service, we found:

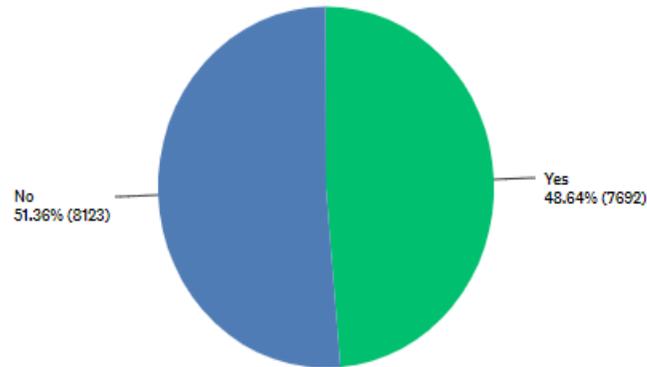
- 60% of users would continue to go to the depot and sort containers for a cash refund
- About 37% of users would recycle their containers another way
- Only about 3% of users said they would trash their containers without Express
- This suggests up to 40% of Express users are users who would not visit a Return-It depot/did not visit Return-It depots without the Express service!

# Beer/alcohol containers



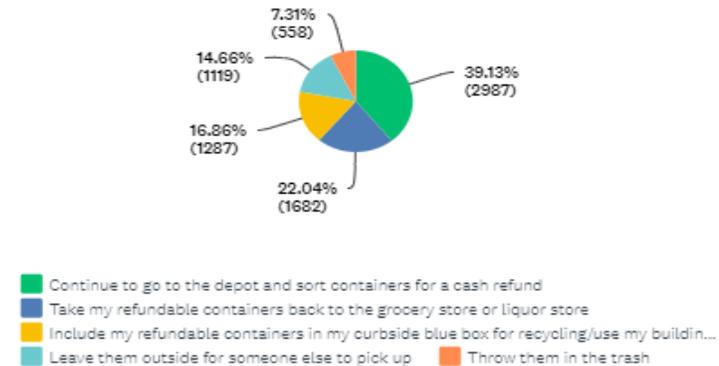
If beer containers were excluded from the Express system, would you stop using this service?

Answered: 15,815 Skipped: 62



You indicated if beer containers were excluded from the Express system, you would no longer use the service. What would you do with your refundable containers instead?

Answered: 7,633 Skipped: 8,244



When asked about beer containers, we learned that:

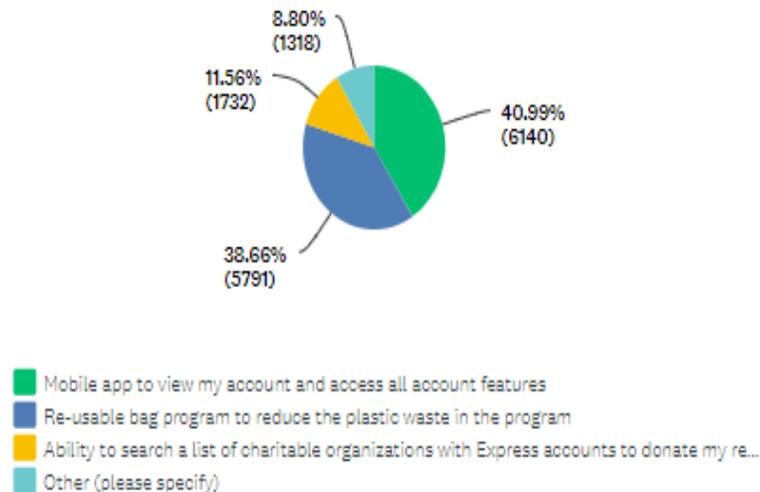
- 51% of users would no longer use Express if beer containers were excluded
- Of that 51%, 39% would use traditional depot services instead; 54% would recycle the containers another way, and 7% said they would trash the containers

# Potential Express enhancements



Which of these possible future enhancements to the Express system would be the most valuable/important to you?

Answered: 14,981 Skipped: 896



When asked about potential added features to the Express system, we found:

- An Express mobile app would be the most valuable added feature for Express users, followed closely by a re-usable bag program
- Less than 12% of users said a database of charitable organizations with Express accounts would be the most valuable enhancement

## VIII. Draft Stewardship Plan Support Letters

The following pages contain letters of support for the Draft Stewardship Plan. The following list provides an overview of the stakeholder categories and corresponding organizations of respondents:

- **Depots and Transporters**
  - Island Return It
  - Nelson Leafs Recycling Center
- **Processors and Suppliers**
  - Emterra Environmental
  - Merlin Plastics Supply Inc.
- **Retailers and Brandowners:**
  - Retail Council Of Canada
  - The Canadian Beverage Association
  - The Carton Council of Canada
  - Western Dairy Council

Please note that several pieces of Written Feedback sent in by stakeholders to a dedicated e-mail address also contained support for the Draft Stewardship Plan. This feedback is included within the section titled “Consultation Participants’ Questions and Comments and Encorp’s Responses” in the body of the report, starting on page 9.

## Depots and Transporters

**From:** Vince Spronken <[vince@islandreturnit.com](mailto:vince@islandreturnit.com)>

**Subject:** Encorp Stewardship plan support

**Date:** August 31, 2020 at 2:07:49 PM PDT

**To:** [sonia.furstenau.mla@leg.bc.ca](mailto:sonia.furstenau.mla@leg.bc.ca)

Ms. Sonia Furstenau, MLA

I hope this email finds you well.

I would like to express my concerns about the beverage container refund system as it is in British Columbia and my support for the Encorp stewardship plan. I met you in Victoria about a year ago with Allen Langdon from Encorp to show my support for the increase in deposit levels from five cents a unit to ten and the inclusion of dairy and dairy substitutes to the refund system. I am happy to see that both the deposit levels have been increased and inclusion of dairy have now been approved and will be implemented in February 2022.

In this email, I would like to express my support for Encorp's stewardship plan as it is submitted to officially include the dairy, remove the requirement for return to retail, but more importantly to support the efforts of Encorp to include beer cans into their stewardship plan. In BC, we are still required to separate beer cans from pop cans and frankly this needs to stop. A can is a can. They should be treated equally and there should really be no need to separate the two. With the increased deposit from five cents to ten cents for non-alcoholic cans the equality of the two containers is even more apparent. Many consumers that return beverage containers for a refund don't understand why they are still obligated to separate these two identical materials.

### **Who we are**

I am Vince Spronken and my family and partner operate a number of refund/redemption centres on Vancouver Island. We own and operate 'Island Return It', a Vancouver Island Based company. We currently have 5 locations across the island (in Campbell River, Duncan, Cobble Hill, Esquimalt and on SaltSpring Island) and we employed over 50 employees. We did also operate a 6th depot in Sidney, however we have since sold it. We are currently part of 5 different stewardship programs (Encorp, BDL, Product Care, Call2Recycle, Recycle BC, Etc) We have been pioneer in the recycling industry by offering great customers service, bring up the bottle depot stigma of being a disgusting or unwelcome facilities, to bright and clean facilities. We are proud of what we accomplished, and we are always looking to make the Recycling of Beverage Containers Stewardship better.

### **Brewers Distributors Limited - Discounting deposit**

Island Return It provides full refunds on all containers. We used to be a part of a group of depots that discounted. We discounted because of the poor fees paid by the Brewers Distributors Limited (BDL) which did not and still does not adequately cover costs associated with the collection of their managed used beverage containers. We decided to pursue paying full deposit for many reasons to which we lost revenue. One of these reasons would be the staff

safety; one day in particular one of our staff was assaulted for not paying full deposit. Also, on a regular basis our staff were being accused of ripping people off. We in no way want to be associated with shortchanging consumers or putting staff at risk, so we decided to put our staff first and actively pursue the brewers for an agreement. Even though it did not pay well, we applied for the sake of our front line staff who do not deserve to be insulted by people who legitimately needed the full deposits back.

### **Agreements**

The BC recycling regulations state that a full deposit must be paid. We appreciate this and decided to take a cut on profits, which ultimately cost our staff increases in wages as well. After a year of applying, we finally received our first two BDL's agreements to receive service and a sub par handling fee for their products. Fortunately, Encorp's handling fee for their stewardship plan are set at a rate that covers all costs associated with collecting their managed containers, giving us the opportunity to accept the considered the brewers fees. Basically, Encorp pays well enough to effectively subsidize our loss with the brewers. With these agreements, we were able to pay a full deposit on their managed products to the consumers. Duncan and Campbell River were our first to receive this poor paying agreement. Our other three depots at the time were denied citing that BDL had sufficient coverage in the requested areas. Sufficient coverage being liquor and beer/wine stores that do not even really want to collect empties. Their business is to sell full goods, not to collect empties. It took years to get an approved agreement for Sidney and many more years for our SaltSpring depot. We were forced to deliver BDL's empties off SaltSpring island including ferry costs, all while BDLs transporter had empty trucks on the island twice a week and driving past our receiving door each time. We basically paid to remove beer from the gulf island unnecessarily for countless years. Over the years, we spent our money and time transporting and handling these containers, staff lost out on wages, but customer satisfaction increased significantly and staff safety was measured.

### **Discounted Depots**

It has taken over eight years for us to get 4 of our (at the time) 6 depots licensed by the brewers. We have been transporting empty beer containers from our non licensed depots to our licensed depots at our own cost. We made an agreement with a BDL agent in Victoria to receive our beer containers at the current handling rate but we still transported the product at our cost. All of the transport that we did was at our cost, in turn subsidized the brewers low cost recovery system, saving them money. We have recently sold our location in Sidney and now operate 5 depots, three of which have agreements with the brewers and two that still do not. If our depots are an example of the time it takes for the brewers to set up Return-It depots with an agreement and the ability to pay full deposits to consumers, it will take a good 50 years to get the remaining over one hundred discounting depots in BC to accept brewers containers for full deposit. That is if any of these discounting depots are willing to be paid poorly for collecting the brewers containers. It would appear that BC is the only province with this problem where all consumers are required to receive a full deposit, but somehow many depots are forced to not pay the full deposit due to an uneven contractual landscape. It seems BDL supports the discounting in BC.

I am sure the brewers factored into their cost equation that all the discounting depots in BC would help keep their costs low. Many of the brewers agents collected brewers controlled containers from the depots that discount. They do this while collecting the full handling fee for these containers while not having to collect the containers individually, but rather by collecting larger bulk amounts from discounting depots who essentially consolidate the material for them. This practice is probably the only way to actually turn a proper profit from the collection of the brewers used containers. Collecting these containers at a depot level is unfortunately too costly to turn a proper profit. Large bulk purchases with minimal labour is the only way to make money handling the brewers used beverage containers. These agents made great goodwill deals on the back of the brewers system that essentially ignored discounting to save money. With over 60% of all Return-It depots in BC discounting, one can only assume that a large percentage of the redeemed beer cans and refillable bottles came from the depots that discounted. These discounted containers are then collected by brewer agents and saving the brewers countless costs of collecting their containers from all the Return-It depots in BC individually. Basically the system of discounting is paying for the brewers stewardship plan. This is practiced across the province and most depots can not afford to take the loss to pay full deposits and only get deposit value back by these agents. Very few of these agents would pay any portion of the brewers handling fee to the depots that discount. I may have actually been the only one in BC and I appreciate the effort that the Victoria agent did to support a full deposit. This whole explanation is to serve as a guide to how the brewers are unwilling to help the depots that collect refundables on their behalf.

### **Pursue of an agreement and Transportation**

We have two out of six depots still without agreements with the brewers. We have been asking for ten plus years now. The brewers gave us a reason why they can not give us an agreement: is that there is a full deposit beer and wine store down the road, so there is no need for us to receive an agreement. Now that we are in the age of covid-19, all of these return to retail stores are refusing to collect empties. So we continue to collect large amounts of their products, transport it at our cost to either an agent in Victoria or our other depot in Duncan. Paying the transportation and consolidation costs for the brewers stewardship plan, and handling the products far too many times costing us increased labour costs and underutilizing our square footage. Square footage that could be used for other upcoming programs such as the Return-It express system. And like I said before, this type of transport is happening across the province, saving significant amounts of transportation costs to the brewers. All while posting a great recovery rate of over 90% and doing it with the help of over a hundred depots that discount beer cans and refillable beer bottles. I would venture to suggest that possibly 40 to 50% of all beer cans are collected from non licensed depots who most likely discount and in turn subsidize the brewers low cost stewardship plan. Is it right for small businesses to subsidize a larger corporate distributor?

### **Encorp Pilot program**

Our two remaining unlicensed depots in Esquimalt and South Cowichan ( in your riding ) have accepted Encorp's pilot offer to all non licensed depots to collect beer cans and mix them with the pop. This new pilot program is great! If you have not yet brought your own empties to

our depot since the change, please do. If you have alcohol cans, please mix all of them and non alcohol cans together. Ask a few of the customers how they feel about the change. Overall they are pleased and do not want to go back to separating these containers. Ask the staff how they like it. All signs point to a great new system that saves time for customers and time and space for depots. Customer satisfaction is increased at our depots and one can only imagine the overwhelming positive feedback from customers across BC that bring these containers to discounting depots who will be receiving their full deposit and not having to separate the cans from each other. After all, a can is a can and the customers do not care at all about the rivalling policies of the two stewardship agencies in BC. They care about convenience and the easiest way they can to do their chores. Some customers I have spoken to don't really care about separating. These are the people that say "I will do whatever needs to be done, but if we don't need to separate them, I will be pleased". The benefits greatly outweigh the negatives in this proposal by Encorp.

Furthermore, service levels by Encorp are far superior to BDL who only transport when it's convenient to their transportation companies. We are often left with such poor service by their transporters that we have ended up storing their product outside and unsecured for some times up to five days worth of product plugging up our depot and yard. Encorp has never left us hanging with supplies or service levels. Encorp's system pays all aspects of their recovery system well enough to do a good job . The brewers system is based on back hauling and transporters are paid to collect empties as a part of their delivery services of full goods. Often missing pick ups due to overtime or other issues and the brewers having no real incentive for transporters to go and collect these low priority products. This leaves depots with overloads of product and costing small independent businesses to store brewers products. It is currently a major problem across the island and I have been very unsatisfied with their service levels. The brewers collection/storage supplies for depots to use to store their product hold only 2/3rd of what is held by Encorp's collection supplies known as big bags. These big bags carry 1000L of volume while the brewers supplied bags carry 625L. Encorp's system create less wasted space in trucks and less wasted space inside depots as well as time savings for staff. Basically for every full trailer load of Encorp big bags we would need 1.6 trailers for the brewers smaller bags. A significant space savings as well as fuel cost and labour savings. These savings and the fact that if Encorp could provide a modern, full deposit system for all depots in British Columbia, we would see more consumers staying in their own communities to return their empties. Countless consumers drive past their local depot that are forced to discount in order to receive their full deposits. Sometimes I hear over a half hours drive just to save a few bucks after the time and fuel is spent.

### **BDL vs Encorp**

If the brewers are not willing to service and pay a fair handling fee to all Return-It locations in BC, I feel that the responsibility of being a good steward is out of their reach. They should have their responsibilities to only include the refillable bottles and back hauling from retail locations that choose to collect empties. Encorp has already proven to be able, capable and to take on the issues of discounting in this province - a problem that has dogged the industry for decades. A problem that the brewers seem to ignore as it saves them money. A problem that, when resolved will unfortunately adversely effect the goodwill agreements that a handful of

BDL agents have with discounting depots, but will ultimately have positive effects on the majority of depots in BC and the low income residents of their communities. These depots who currently discount deserve to have the opportunity to offer a full deposit, mix their cans together and get a fair handling fee by Encorp. It will be up to Encorp to offer a fair handling fee to all the depots of BC in order to get support by the depots. If Encorp offers too low of a handling fee, they might not get the desired outcome. It will be up to them to come up with a reasonable fee that all depots can accept and support. Encorp currently does not charge a container recycling fee on the cans they collect and the Encorp system will likely not cost the consumer any extra fees, nor will the depots be left in a position to discount any longer. Staff safety is paramount and if all depots in BC pay a full deposit, insults and threats by unhappy customers will likely be abolished.

Our company has seen both sides of this equation. We have discounted in the past and we were, until the Encorp pilot program started, collecting beer cans from a discounting depot in the north island. While we were benefiting to some degree from the discounting depot in the north island, we are pleased that we are no longer receiving their product and they are being serviced by Encorp while being paid fairly. However, the fees paid by Encorp could in fact be a bit better on the mixed cans, but their offer is a good start. We are of the belief that the Return It locations in BC should all be serviced adequately and paid fairly to collect empties. Encorp is proving that they are willing to step up to the plate to provide a top tier refund system in BC while the brewers are proving to be wanting to continue the status quo of exploiting a broken system and keeping cost unreasonably low while also providing poor service levels and the unwillingness to address the big black eye we currently have on our refund redemption system in BC. The practice of discounting, and it needs to stop. There are however a number of larger refund renters in BC that will say that the efforts by Encorp are unreasonable and destroying commercial agreements while making a monopoly over the beverage container refund system. In fact, what they appear to be doing is creating greater equality in the uneven deposit system of BC. They will be allowing smaller depots to offer correct pricing for refunds and creating an environment where consumers will be going to depots through convenience and customer service, not because one is ripping customers off while the other offers pricing due to uneven competitive advantages.

### **Conclusion**

I think that Encorp should take on the acceptance of the beer cans and bring the return system of British Columbia to a modern time where a can is a can and make recovery easy. The consumers of BC deserve to finally have the opportunity to receive a full deposit at ALL Return-It location or retail store that chooses to collect containers. The brewers would still likely have some sort of system in place to backhaul from beer and wine stores as Covid eases and retailers resume collecting refundables.

I am looking for your support on this issue. Both the brewers(BDL or BRCCC) and Encorp Stewardship plans are up for renewal by the Ministry of Environment. I would like to see support for the Encorp Stewardship plan and the acceptance of their plan to include the alcoholic can. I would like to see the Encorp plan approved before the brewers plan. The acceptance of the Encorp Stewardship plan would have profound impacts on the refund system in BC and create a

level playing field across the board for all depots to offer a full deposit. We can not go back to the old system. It just does not make sense. We feel that the Encorp stewardship lan deserves strong support and should be approved is soon as possible to allow them time to implement meaningful, positive, change in the industry. There will be a handful of the Return-It depots that are brewers agents that will be unfortunately adversely effected by this Encorp plan, however I feel like the overall impact of the removal of discounting in BC will be positive. I have seen the ease and the simplicity of collecting all cans as one at two of our depots frankly fear being forced to go back to the separation of these products once again. I would hope that all of our depots have the opportunity to mix the pop and beer cans in the future and that this offer by Encorp extends to all depots. Not just the depots that have no agreements with the brewers.

This email serves as my perspective on this matter and I can only speak on how I feel this industry is lopsided. We are the only province that has this problem and the separation of the beer and pop can needs to stop in BC. If you need any clarification or want to discuss further about this email, please do not hesitate to contact me by [email vince@islandreturnit.com](mailto:vince@islandreturnit.com).

I am away until September 7th.

Thank you for your time.

Sincerely,

Vince Spronken  
Island Return It  
(250) 710-3478

## Comments on the Beer/Aluminum Pilot Program

To Whom it May Concern

I wanted to pass along a couple of comments with regards to the new pilot program that began in early July.

Firstly, we have had countless customer compliments regarding the fact that sorting beer and aluminum cans is no longer required. This makes it easier on customers and staff alike. Since reopening after the Covid 19 shutdown, we have had to limit the number of customers in the building at any one time. Customers are now accumulating cans at home and bringing in full bags at a time to be handed in for refund. This allows us to process customers more efficiently. What used to take customers 20 minutes to sort now takes 5 minutes or less in some cases. This limits the amount of exposure to customers and staff alike which, in a post Covid 19 world is a great thing for all involved.

Secondly, we are a depot that does not have a contract with BDL so discounting the price we paid for beer cans was the only way we could generate income for that product. Myself and my staff appreciate not dealing with customer complaints about why we do not pay full price for beer cans. People do not understand that with the current system set up the way it is we would not make any money at all if we paid 10 cents for beer cans. In fact, it would cost us money as there would be labour costs associated with processing that product and no income coming from it.

In closing, I believe that making this pilot program permanent is the best solution for customers and depots alike. I also believe that when you make recycling easier for the public, you will see a recovery rate substantially higher than what it was before.

Sincerely,

Greg St George  
Manager  
Nelson Leafs Recycling Center  
Nelson, BC

## Processors and Suppliers



September 02, 2020

BC Ministry of Environment  
Encorp Pacific Stewardship Plan Consultation  
PO Box 9047 Stn. Prov. Gov.  
Victoria, BC, V8W 9E2

To Whom It May Concern:

**RE: Letter of Support for Encorp Pacific (Canada) Stewardship Plan**

It is with great pleasure that Halton Recycling Ltd. dba Emterra Environmental (Emterra) submits our letter of support for Encorp Pacific's (Encorp) Stewardship Plan and its targets.

Emterra has been providing commercial and municipal recyclables, garbage and organics collection, and recyclables processing services, since 1976. The depth of our experience in the industry allow us to be a leader in waste diversion and recovery in Canada, where we:

- Service over 80 communities representing 10% of Canada's population through multiple municipal and commercial recycling, solid waste, and yard waste and organics collection contracts, and through post-collection recycling and material recovery contracts.
- Collect and process over 500,000 tonnes of recyclables each year.
- Own and operate over 700 collection vehicles.
- Employ over 1000 people.

Since Encorp was established in 1994, Emterra has been committed to helping them achieve high used beverage container (UBC) recovery rates through a variety of Processing and Recycling of Used Beverage Container (UBC) contracts. Our current Encorp contracts in British Columbia (Kamloops, Nanaimo, Chilliwack, and Surrey) receive and process 7,000,000 kg of used beverage containers per month.

The Emterra BC locations employs over 25 full time equivalent positions.

During this time, we have found Encorp's level of professionalism and service delivery to be exemplary. Specifically, we have found that their ongoing public education and awareness campaigns have supported a reduction in the volume of UBCs collected at curbside, while simultaneously we've seen the volume of UBC's received and processed through their Bottle depot – Return It Centres remain strong.

The success and provincial reach (especially throughout the remote areas of BC) of Encorp's Bottle Depot – Return-it Centres has also been integral to our (as a partner in Green by Nature) ability to execute the operational demands associated with collecting other recoverable items covered under the Province's Printed Paper and Packaging Recycling Regulation.

We hereby submit our letter of support for Encorp and look forward being an active partner in their continuing success as a product steward. We are confident their structural, operational, and promotional strategies and initiatives will enable them to meet their 2018-2022 proposed performance targets.

For more information or clarification, please contact:

- Emmie Leung, Director and CEO; email: [emmie.leung@emterra.ca](mailto:emmie.leung@emterra.ca); phone: 604-866-9761
- Ed Walsh, VP of Operations, BC; email: [ed.walsh@emterra.ca](mailto:ed.walsh@emterra.ca); phone: 250-268-2400

Sincerely,

**Halton Recycling Ltd. dba Emterra Environmental**

Ed Walsh  
VP Operations, BC

**From:** Tony Moucachen tony@merlinplastics.com  
**Sent:** September 8, 2020 9:09 AM  
**To:** beverageplan2020@returnit.ca  
**Cc:** Sandy Sigmund <ssigmund@returnit.ca>; Allen Langdon alangdon@returnit.ca  
**Subject:** Letter of Support for Encorp Pacific (Canada) Stewardship Plan

### **Letter of Support for Encorp Pacific (Canada) Stewardship Plan**

Via email to [beverageplan2020@returnit.ca](mailto:beverageplan2020@returnit.ca)

Merlin Plastics Supply Inc. is a plastics recycler based in British Columbia. We are pleased to write this letter in support of Encorp Pacific (Canada) and their proposed stewardship plan.

Merlin Plastics Supply Inc - a Background - Merlin Plastics was founded in the late 1980s and we were fortunate to obtain an initial loan from the BC MOE through their recycling partnership program. With this loan, we built a recycling plant to recycle plastic beverage containers, specifically starting with milk jugs, in an annual volume of approximately 2 million pounds. We initially operated out of a 2,000 square foot facility. Since then, we have worked diligently and grown with the industry. Today, we are the largest plastics recycler in Canada and recycle over 200 million pounds per year. We recycle a variety of plastic beverage containers out of our two facilities that comprise over 500,000 square feet in area. This growth has been largely due to the strong environmental policies and leadership of the BC Ministry of the Environment which helped create and nurture well run stewardship organizations such as Encorp. Most recently, the MOE has expanded the program from just beverage containers to include milk jugs. As a result of this change, Encorp will be able to recover an even greater volume of containers and this will incentivize consumers to return milk jugs along with their other beverage containers. We are ready, willing and able to continue to grow our partnership with Encorp and recover this additional volume to better serve the community in British Columbia.

Our History with Encorp - We have worked with Encorp since their inception in 1994. It is our view that Encorp services the community to an extremely high standard and provides consumers with an effective way to return containers. In support of this statement, we note that Encorp has achieved a remarkably high return rate; one of the highest rates we have seen across North America. Encorp's initiatives definitely make consumers aware of the ability to recycle beverage containers and when and where this can be done as evidenced by the high rate of return achieved in BC.

Infrastructure - Merlin believes that Encorp has provided the infrastructure necessary for the community to return containers and keep them out of the landfills and our waterways. They provide the consumer with the opportunity to bring the containers back for refund. And if the consumer is not diligent and fails to return it, then any other person who picks it up is also entitled to receive the refund deposit money and this all works to ensure the maximum number of containers are returned and recycled effectively.

Summary – We firmly consider Encorp to be an effective and responsible stewardship organization and one that is doing an effective job in BC. We wholeheartedly support their stewardship plan.

Should you have any questions, we would be pleased to respond at your convenience.

Yours truly,

**Merlin Plastics Supply Inc.**

Per: Tony Moucachen, President

## Retailers and Brandowners

11 September 2020

Allen Langdon  
President and Chief Executive Officer  
Encorp Pacific (Canada)  
100-4259 Canada Way  
Burnaby, B.C. V5G 4Y2

**By email to: [beverageplan2020@returnit.ca](mailto:beverageplan2020@returnit.ca)**

**Subject: Return-It Draft Beverage Container Stewardship Plan 2020-2024**

Dear Allen,

*Retail is Canada's largest private sector employer. Over 308,000 British Columbians worked in our industry before the onset of the crisis precipitated by the COVID-19 pandemic. The sector annually generates over \$11 billion (2018 data) in wages and employee benefits for British Columbians. Core retail sales (excluding vehicles and gasoline) in B.C. were \$56.4 billion in 2019. Retail Council of Canada (RCC) is a not-for-profit industry-funded association that represents small, medium and large retail businesses in every community across the country. As the Voice of Retail™, we proudly represent more than 56,000 British Columbian storefronts in all retail formats, including department, grocery, pharmacy, specialty, discount, independent retailers and online merchants.*

RCC writes on behalf of retailers in response to the consultation on the proposed beverage container stewardship plan for 2020 to 2024.

The retail industry has significant disagreements with government over the parameters of mandatory return-to-retail. In particular, our view is that mandated return-to-retail is only appropriate where the stewardship agency is able to collect containers from the retailers mandated by the regulation. For more than 10,000 sellers of beverage containers in British Columbia there is not a level playing field. ***Government has an urgent obligation to redress this inequity.***

RCC, and our members, are strong supporters of the industry-leader Return-It beverage container stewardship plan executed by Encorp Pacific. We note that Return-It is the leading North American stewardship agency in two respects – agency governance, and, consumer awareness. On both fronts, Return-It is heads and shoulders above other similar agencies.

The recovery rate will undoubtedly continue to rebound as is generally the case during times of a weak economy, and as a result of significant investments by Return-It, particularly in Express, Express & Go and Express Plus. Our view is that automation can play a significant factor in (a) providing safety for consumers and workers, (b) ensuring consumer affordability of products under the system by helping to manage system costs, while, (c) providing excellent environmental outcomes.

RCC wishes to provide specific response to several proposals in the draft stewardship plan:

1. Include aluminum beer containers and manage both alcohol and non-alcohol containers as a combined stream.

Retail strongly favours this change. As with consumers, retail stores are negatively impacted by discounting. The significant amount of refund-discounting embedded within the system results in a direct cost absorbed by retailers. This is fundamentally unfair.

In addition, particularly for retail stores with small square footage, participation in multiple stewardship programs is challenging – for store operations, as well as in finance and administration. The ability to manage all beverage containers within one recovery system will provide stores with significant operational benefits.

RCC's view in regard to the number of stewardship programs in British Columbia (4 packaging programs, 5 or 6 electronics programs) is well understood by Government. What appears not to be well-understood is the negative financial and operational impacts of the requirement to participate in 23 different regimes – each with its own unique requirements and administrative burdens. For some retailers, this change could reduce that burden.

2. Include milk and milk substitute beverage container types.

Retail's view on this aspect is also clear. RCC and our members are very opposed to the June 29, 2020 change to the Recycling Regulation and ask Government to rescind this change. The midst of a pandemic is not the time to make significant changes to store operations, particularly changes which will put retail workers at risk through handling more unrinsed beverage contained. Containers for milk and milk substitutes had been well-managed by one of the existing Schedule 5 programs.

This change by Government will only result in increased costs and complexity for consumers and stores alike. The retail view is that this change to the regulation is simply "green-washing."

3. Manage ancillary packaging for Encorp Pacific's brand owners.

RCC is very supportive of this change. Our perspective is that it will provide operational and financial efficiency – particularly for very small brand owners – as well as improved environmental outcomes. It is an excellent example of the ability of programs operating under the different Schedules of British Columbia's regulation to cooperate – as the two agencies in question have demonstrated time and time again.

4. Return-It Express & Go, and, Return-It Express Plus

Our industry's view is that these three initiatives hold the greatest promise of all of the recent changes to the Return-It system.

Consumer accessibility to facilities for safe return of their beverage containers is a priority at any

time. This need is exaggerated by the pandemic. In the view of the retail industry, this automation has significant promise to address service gaps and thus provide significant improvements to consumer accessibility – particularly in locations where land costs and financial metrics from small population size results in depot siting and viability significant challenges.

In conclusion, RCC would like to restate that, during this pandemic when many agencies have had significant financial and operational challenges, Return-It has continued to provide excellent service to British Columbia. This plan addresses challenges brought to them by both government and stakeholders: our view is that Encorp Pacific has done an excellent job in answering those issues and therefore this program plan has our support and merits approval by the Ministry.

Yours truly,



Philippe Cantin  
Senior Director, Sustainability Innovation and Circular Economy

Copy: Hon. George Heyman, Minister of Environment and Climate Change Strategy  
Laurel Nash, Assistant Deputy Minister, Environmental Protection Division  
Kris Ord, Executive Director, Environmental Standards Branch  
Bob McDonald, Director, Extended Producer Responsibility  
Teresa Conner, Unit Head, Packaging, Extended Producer Responsibility

September 14, 2020

Hon. George Heyman,  
Minister of Environment & Climate Change Strategy  
PO Box 9047 Stn Pov Govt  
Rm 112, Parliament Buildings  
Victoria BC  
V8W 9E2

Delivered by email: [ENV.minister@gov.bc.ca](mailto:ENV.minister@gov.bc.ca)

Dear Minister,

I am writing on behalf of the members of the Canadian Beverage Association (CBA) in support of the Encorp Pacific Beverage Stewardship Plan 2020 – 2024. As you know our association represents the vast majority of non-alcoholic beverage brands and companies in Canada, with our members operating 20 facilities and more than 1200 employees in British Columbia.

In British Columbia, the CBA and its members are actively involved in the management and oversight of the province's beverage container recycling program through their membership in Encorp Pacific. Last year, this program collected more than a billion containers<sup>1</sup> and achieved a recovery rate of 78.1%.<sup>2</sup> Encorp's activities in 2019 contributed to the reduction of about 104.8 thousand tonnes of CO2 equivalent being released into the atmosphere, compared to 102.6 thousand tonnes in 2018.

The plastic beverage containers our sector uses are made of polyethylene terephthalate (PET), which is you know is a safe, durable, 100% recyclable plastic material. It is collected at high rates in well-established recycling programs across the country including through Encorp Pacific's Return-It BC program. PET is an important plastic in our economy and is one of the main commodities supporting recycling programs, as one of the most valuable material in recycling bins.

The Beverage industry believes that building a strong economy requires investments to create healthy, sustainable communities. A key part of that investment is in education, supporting residents in understanding the important role they play in recovering beverage containers. Encorp Pacific has consistently delivered effective educational campaigns in British Columbia for all age groups, which we support as a part of their 2020-2024 plan.

The recovery of PET through programs successful programs like Return-It, supports the broader development of a circular economy framework that will protect the environment, help companies stay competitive and drive innovation.

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<sup>1</sup> <https://www.cbc.ca/news/canada/british-columbia/b-c-recycled-1-billion-drink-containers-last-year-and-it-wants-more-1.4843538>

<sup>2</sup> <https://www.return-it.ca/ar2019/>

The CBA and our members are happy to endorse the Encorp Pacific Beverage Stewardship Plan 2020 – 2024. We believe that this plan, and Encorp Pacific is soundly positioned to continue to lead the important work of recovering beverage containers in British Columbia.

Sincerely,

A handwritten signature in black ink that reads "Jim Goetz". The signature is written in a cursive style with a prominent initial "J" and a long, sweeping underline.

Jim Goetz, President  
Canadian Beverage Association

c.c. Allen Langdon, President & CEO, Encorp Pacific

September 16 2020

Encorp Pacific  
100-4259 Canada Way, Burnaby, BC V5G 4Y2

Dear Allen:

Thank you for the opportunity to submit comments on Encorp Pacific's Draft Beverage Container Stewardship Plan, 2020-2024.

As you know, the mission of the Carton Council of Canada (CCC) is to deliver long-term collaborative solutions with multiple stakeholders in the value-chain in order to grow the recovery and recycling of cartons.

Generally speaking, we are supportive of the draft plan.

We would welcome the opportunity to exchange with you on how you plan to achieve the targets for the Drink Boxes and Gable Top categories. In particular, we would like to understand where you think the opportunity for capturing more of those beverage container types lie, and whether conducting a study would be helpful in this sense.

We would also welcome the opportunity to work with you on promotion and education to support the addition of milk and milk substitute cartons ahead of the February 1, 2022 implementation date.

In closing, we commend Encorp Pacific for the quality of the consultation process that it has led to date, and we look forward to continuing the work to advance the recovery of beverage cartons in British Columbia.

Regards,



Isabelle Faucher  
Managing Director

Follow us on [LinkedIn](#) for news and information about carton recycling and our activities.



September 15, 2020

Allen Langdon  
President & CEO  
Encorp Pacific (Canada)  
100 – 4259 Canada Way  
Burnaby, BC V5G 4Y2

Dear Allen,

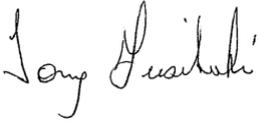
**Re: Encorp Pacific (Canada) Beverage Container Stewardship Plan  
and Inclusion of Used Milk Containers**

The Western Dairy Council is the trade association for dairy processors in British Columbia, Alberta, Saskatchewan and Manitoba. Collectively, our twenty member companies process more than 97% of the milk produced in the western provinces, including a slightly higher proportion in British Columbia, and market virtually all major branded dairy products sold in the province.

Thank you and your staff for joining us at the Western Dairy Council's Board of Directors meeting on September 10. We appreciated your providing us with a clearer understanding of Encorp's role in the management and operation of BC's deposit/refund system for used beverage containers, of the Beverage Container Stewardship Plan 2020-2024, and of Encorp's provisions for the inclusion of milk containers in the plan.

The Council acknowledges the Government of British Columbia's decision to add used milk and milk substitute containers to its deposit/refund system, effective February 1, 2022. In light of this decision, we are prepared to work with Encorp to facilitate a smooth transition to the system for our members and for consumers of milk products in British Columbia. Having now reviewed the draft document, we are comfortable with the approach taken by Encorp and supportive of the proposed Stewardship Plan. We look forward to working with you and your team on the next steps leading to implementation.

Sincerely yours,  
**WESTERN DAIRY COUNCIL**

A handwritten signature in black ink that reads "Tony Gusikoski". The signature is written in a cursive style with a large initial "T" and a distinct "G".

Tony Gusikoski  
Chair

cc. Western Dairy Council Board of Directors