

September 17, 2019

Brewers Recycled Container Collection Council
Email: stewardship@bdl.ca

Re: RDN Response on Brewers Recycled Container Collection Council Draft Container Stewardship Plan

Dear Brewers Recycled Container Collection Council:

Thank you for the opportunity to comment on the Brewers Recycled Container Collection Council (BRCCC) Draft Container Stewardship Plan. The Regional District of Nanaimo (RDN) recognizes that the efforts of the BRCCC have been effective in allowing British Columbia to achieve a 91% recovery rate for beer glass bottles and metal cans. We recognize that BRCCC plans to continue to exceed the regulated requirement of 75% and, it would be beneficial to see the increased target goal in the Plan.

In the recent consultation on the BRCCC Container Stewardship Plan Consultation BC Product Stewardship Council members, including RDN staff, discussed recommendations to advance the EPR program and included the following:

1. Education
 - a. There is no indication in the Plan that BRCCC intends to work with Encorp on public engagement strategies. This education partnership should be encouraged to reduce customer confusion.
 - b. BRCCC should commit to working with Encorp depots to minimize customers having to go to different locations for beer containers vs. all other beverage containers.
2. Recyclability of BRCCC packaging
 - a. While the plan does mention refillable kegs, shrink-wrap, pallets and can bins, there is minimal information provided on recycling of secondary packaging. Considerations for minimizing and recovering secondary packaging should be presented in the plan.
 - b. The consultation plan should specifically address caps, six pack rings and boxboard associated with beer containers. There was some indication in the webinar that all BRCCC depots must accept these products.
 - c. There should be a level of fairness and clarity between Recycle BC and BRCCC as lids and boxboard are going into the Recycle BC stream and six pack rings are frequently disposed of as garbage.
3. Improved reporting on containers processed through other Stewardship agencies
 - a. From the call BRCCC has no formal processing agreement with Recycle BC and the percentage received through Recycle BC is not counted towards BRCCC diversion rate. There should be a commitment that BRCCC work with Recycle BC in terms of

capture of beverage containers and the allocation of deposits collected for containers that do not flow through BRCCC. EPR programs should be responsible for accounting for their product no matter how it is diverted.

The RDN Solid Waste Management Plan, which was submitted to the Ministry in July 2018, targets a 90% waste diversion goal over the 10 year plan period. The Plan outlines that this target can be achieved through the combined efforts of the RDN initiatives and the Province's action on advancing EPR programs. Further advancing EPR programs is in line with the RDN and Provincial interest in waste diversion.

On behalf of the RDN Board, I thank you in advance for your consideration of this matter.

Sincerely,

Ian Thorpe, Board Chair
Regional District of Nanaimo

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