



September 30, 2019

BRCCC's Response to BC's *Plastics Action Plan*: Policy Consultation Paper

The BC Brewers Recycled Container Collection Council (BRCCC) is pleased to provide comments on the Ministry of Environment & Climate Change Strategy's policy consultation paper, *Plastics Action Plan*.

BRCCC continues to lead the way in product and environmental stewardship and has achieved one of the highest return rates for beverage containers in North America with a return rate of 89.24% in 2018.¹ BRCCC is the only stewardship agency in BC that has a container plan that supports refilling. BRCCC also accepts all secondary packaging associated with containers for return and recycling.

BRCCC supports over 200 brewers representing the majority of beer sellers/producers in BC and is proud of our long-standing commitment to environmental excellence. As such, we applaud the Ministry's efforts to expand recycling and recovery and also appreciate the mention that beer cans/bottles are returned more frequently by consumers. BC Brewers have managed beer container recycling for over 80 years and is perhaps BC's oldest producer responsibility waste management system, and certainly one of its most successful.

Solution 3: Expanding Recovery and Recycling of Beverage Containers

BRCCC has established a cost recovery mechanism for refillable bottles, cans and secondary packaging, that internalizes brewers' operating costs as a cost of doing business. As such, we seek to minimize system costs while maximizing resource recovery. As an example, BRCCC drives efficiencies by piggy-backing container returns on empty trailers returning from delivering full goods to retail and private sites. This results in significant avoided GHG emissions and carbon savings as a result of transportation efficiencies.

In addition to these features, BRCCC relies on operating as a distinct system to ensure that refillable containers are handled appropriately in order to be refilled again and to allow for secondary packaging to be returned with the containers and recycled for the highest end use. With the proposed changes to expand the recovery and recycling of beverage containers, it is important to consider how these changes might impact BRCCC's current high performance and program distinction to avoid container leakage into other systems and the mishandling of refillable containers.

As the province considers creating a uniform, minimum deposit, BRCCC would be pleased to share our expertise to ensure that the deposit return system for alcoholic cans and refillable containers in BC continues to operate fairly in a convenient, performance-driven and cost-effective manner to avoid added costs and confusion to BC consumers.

¹ BRCCC's [2019 Annual Report](#) to the BC Ministry of Environment & Climate Change Strategy (covers 2018 calendar year)

Conclusion

BRCCC's track record in managing beverage containers and secondary packaging is fully consistent with the Ministry's approach towards a circular economy where resources are continually conserved and reused as raw materials. The success of our stewardship program would not be possible without ongoing dialogue with government officials, engagement with our brewers and redemption system partners, and most importantly, participation from BC residents.

We look forward to working with the Ministry to help it realize its waste prevention goals and its recognition for leadership in managing EPR programs.