



BREWERS RECYCLED CONTAINER COLLECTION COUNCIL

CONTAINER STEWARDSHIP PLAN

2020 - 2024

DRAFT FOR CONSULTATION ONLY

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Product Stewardship Plan 2020-2024

- Schedule 1 Containers -

1. EXECUTIVE SUMMARY

- BC Brewers Recycled Container Collection Council (BRCCC) continues to support over 200 brewers that collectively represent the vast majority of the beer producers/sellers in BC, by managing their administrative responsibilities under Schedule 1: BC Recycling Regulation
- Brewers' Distributor Ltd. (BDL) continues its role as a service provider to BRCCC managing container refilling and collection, consolidation, recycling and reporting functions.
- Continued commitment to high performance
 - Set overall program and individual container recovery rate at 87.5%, (12.5% over the regulated requirement)
 - Container specific performance remains the highest in the province with a component of reuse through refill
- Container Plan (Schedule 1) works in tandem with Packaging and Paper Product (PPP) Program (Schedule 5) supported through efficient and convenient deposit-return systems offering direct incentives for BC consumers resulting in high participation and performance rates.
- Deposit return system supports full traceability of containers through their useable life and to final disposition as recycled
- Emphasis on resource efficiencies and waste reduction through standard container design
- Continued commitment to high materials management standards.
 - Only container stewardship program that supports refilling
 - Aluminum cans represent 91.5% percent of sales and offer a 95% reduction in energy use and emissions when recycled
- Continued emphasis on consumer awareness and convenience to support overall performance
 - Increase from 1,145 to 1,148 return locations throughout BC.
 - Commitment to continue expanding BRCCC's return collection network.
 - Target of 183 unlimited return locations by the end of 2020, 186 by the end of 2024
 - Establish a minimum of 1 unlimited return location in each Regional District by end-2020
 - Target of 75% of population within 10-minute drive of an authorized BRCCC return location by 2020
 - Conduct a consumer survey in 2019 to confirm awareness levels and set next steps for any future education programs
- Cost of program fully paid by brewers/producers, no consumer fees added to the product price at the point of purchase

2. INTRODUCTION

The BC Brewers Recycled Container Collection Council (BRCCC) is a not-for-profit society established by the brewing sector to transparently administer the financial and logistical requirements of the industry's stewardship in BC. The BRCCC Board of Directors is composed of members representing Brewers' Distributor Ltd. (BDL), Labatt Breweries Ltd., Molson Coors Canada, Sleeman Breweries Ltd., the BC Craft Brewers Guild and Canada's National Brewers. Board members collectively represent over 95 percent of the beer volume sold in the province, with a cross section of brand owners from local, national and international companies.

Under Schedule 1 of the Recycling Regulation (Reg. 206/2017), BRCCC is the stewardship agency for all refillable glass beer and cider bottles, as well as all metal beverage alcohol cans. BRCCC is seeking to renew this product stewardship plan on behalf of its stewards, for the collection and processing of these containers for the period of 2020 - 2024.

BDL is a privately-owned distribution and logistics company, operating in the western Canadian provinces of British Columbia, Alberta, Saskatchewan and Manitoba. BDL acts as the collection agent on behalf of the BRCCC. BDL's operations in BC focuses on two primary elements: the warehousing and distribution of beer, cider and coolers for a number of breweries and liquor suppliers to retail locations and licensed establishments throughout BC¹, for sale to the public ("full goods"); and the collection of certain beer and cider containers (i.e. refillable glass bottles and cans) and related secondary packaging on behalf of the BRCCC.

The Canadian brewing industry bases its business on circular economic principals and its program results speak for its continued commitment to leadership in environmental stewardship. Canadian brewers have been offering their product in refillable and recyclable containers for more than 90 years, maximizing the inherent value of the containers while minimizing waste. The deposit-return system builds loyal and longstanding relationships with consumers, leveraging the efficiencies of reverse logistics from home, store consolidation points, to product refill and/or container recycling facilities.

These two inter-connected elements – deposit-refunds and refillable/recyclable containers – have been the cornerstone of the Canadian brewers' system for decades. Through these mechanisms, the industry assumes full responsibility for end-of-life management of all of its products, including beverage containers and secondary packaging.

This product stewardship plan for containers focuses on maintaining previous high performance and continuous improvement in both reuse and recycling activities by assuring high consumer awareness and convenience.

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

3. CONTAINERS & MATERIALS

Under this BRCCC Plan, there are two types of containers: refillable glass bottles and metal cans. Sales percentage data in 2017 are provided below; (results have been externally audited and verified)

a. Schedule 1: Containers

Refillable Glass Bottles

- In 2017, refillable glass bottles accounted for 8.5% of total BRCCC packaged beer containers sold in BC [excluding kegs].
- The majority of refillable glass bottles sold in BC are the industry standard bottle (ISB): a 341 ml refillable glass bottle that is refilled on average 15 times per container. Beer sales in the ISB represented 6.8% of total BRCCC containers
- In addition to the ISB, some brand owners retail their products using proprietary refillable glass bottles (i.e. – brand specific bottles). These proprietary bottles represented approximately 1.7% of total BRCCC containers.

Metal Cans

- Product sold in cans represented about 91.5 % of total BRCCC beer containers sold in BC.
- While the majority of beverage alcohol cans are made of aluminum, a small minority are of the tin-plated steel variety.
- Domestic and import brand owners sell product in cans of various sizes, the most common of which is the 355-ml variety. BRCCC has been the designated product steward for all beverage alcohol sold in cans, including import beer, since 20b.

b. Schedule 5: Packaging and Paper Products

In addition to refillable bottles and metal cans, BRCCC also handles a number of other materials, including secondary packaging. These stewardship programs operate in tandem, as most refillable bottles are returned in their original packaging and shipped back to brewers for refilling. Information on these programs and their respective performance are provided by BRCCC in its annual report posted on www.envirobeerbc.com.

c. Other Materials

In addition to the Schedule 1 and Schedule 5 materials noted above, BRCCC also uses, collects and recycles a number of other materials. To the extent possible, BRCCC also reports on the recovery and recycling of these materials in its annual reports to the Ministry.

Refillable Kegs

 Refillable kegs of various sizes are sold by BRCCC brand owners, primarily to licensed establishments. They are shipped back to the brewers, where they are inspected, washed and refilled. Steel beer kegs have an expected service life of over 30 years and require no additional packaging. In fiscal 2017, 281,892 kegs of various sizes ranging from 18 litres to 59 litres were returned representing an overall annual recovery rate of 100%.

Shrink-Wrap

• Pallets of beer are often wrapped in plastic shrink-wrap for stability during shipping. Used shrink-wrap is baled and sold to a processor.

Pallets

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

Can Bins

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

4. 2020-2024 PLAN PERFORMANCE

In its over 90 years of operations, BDL and its predecessors have achieved some of the highest levels of program performance seen in Canada or elsewhere. In its 2015-2019 stewardship plan, BRCCC included several different performance matrices including; container recovery rates, accessibility through return locations, consumer awareness targets and proof of final disposition showing preference for domestic processing options.

While the Recycling Regulation establishes a legislative recovery rate of 75%, BRCCC's 2015-2019 plan set out to exceed that requirement aiming for an 87.5% recovery rate. BRCCC has achieved this enhanced target year over year with an annual average recovery rate of 91.2%, a result amongst the highest achieved for any product stewardship program globally.

Through this Plan, BRCCC is proposing to continue to maintain its high performance for this renewal period 2020 – 2024 for each performance measurement; container recovery, accessibility, consumer awareness and reuse and recycling activities.

5. COLLECTION SYSTEM AND CONSUMER ACCESS

a. Background

BRCCC acts as product steward for over 200 brewers, cider manufacturers and brewery agents using refillable glass bottles and cans, most of whom are based in British Columbia (See Table 8- Brand Owners using Refillable Bottles Registered under the BRCCC Plan). BRCCC brand owners continue to account for substantially all of the total market of the domestic beer sold in British Columbia. Authorization of brand owners to elect BRCCC as steward agent for beverage alcohol cans is undertaken by the LDB at the time that plan members complete full good listing applications.

Return-to-retail remains a vital component of BRCCC's container collection system and one which is highly supported by consumers and stakeholders (see Section 5.b). BRCCC's collection system provides a variety of options for consumers including:

- a) all BC Liquor Stores,
- b) all private retail liquor stores,
- c) all rural agency stores and
- d) selected bottle depots.

As of December 31, 2018, BRCCC offers BC consumers 1,145 locations to which they can return their beer containers (and associated secondary packaging) and at 182 of these locations, consumers are able to return an unlimited number of containers. (The full list of unlimited collection sites with addresses are provided in Appendix A.) All other locations will accept a maximum of 24 containers per day from consumers (with many accepting a larger number than this minimum amount).

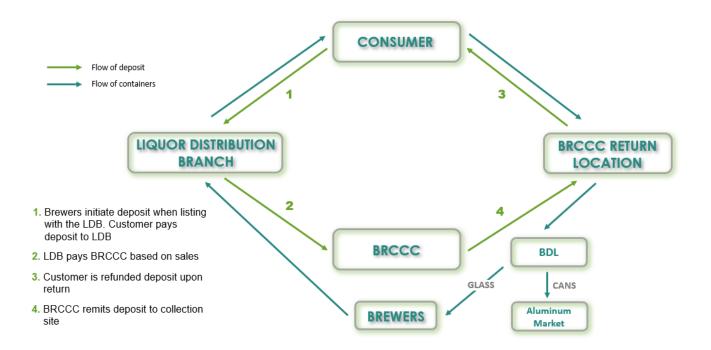
Location Description	# of Locations
Licensee Retail Stores (LRS)	649
Government Liquor Stores (GLS)	200
Rural Agency Stores	223
BRCCC Contracted Bottle Depots	73
TOTAL	1,145

Table 1 – Breakdown of BRCCC Return Locations by Channel (as of December 31, 2018)

b. Deposit Collection System and System Financing

BRCCC brand owners currently sell beer and certain alcoholic beverages contained in cans or refillable bottles to the Liquor Distribution Branch ("LDB") stores, licensee retail stores, LDB rural agency stores and licensed establishments ("Retailers").

When brand-owners list their full products with the LDB, they are charged the applicable deposit for each container. LDB remits the deposit payment to the BRCCC and then collects it from consumers at the point of sale on each container purchased. BRCCC pays the deposit to its collection sites which reimburse consumers when empty containers are returned. Any unredeemed deposits are used by BRCCC to cover collection, sorting and recycling costs.



c. Consumption Return site - Location Methodology, Coverage & Scope

In determining the appropriate system coverage, BRCCC utilizes geographic information systems (GIS) technology to identify potential service gaps as it pertains to container return locations. If a particular area of the province is under-serviced, BRCCC will identify a licensee retail store, bottle depot or other collection partner in that area and contract their collection services to ensure there is sufficient coverage throughout the province. In smaller communities the retailer is often an LDB agent and will accept all container returns from consumers.

BRCCC has a contractual agreement with the LDB regarding the collection of empty beer containers. As a matter of general business practice, BC Liquor Stores have a flexible and varied return system and have accommodated more than the regulatory limit of 24 containers per customer per day in many locations.

Based on BRCCC's most recent GIS survey (2018), 80% of BC consumers (or over 3.3 million BC residents) are within a 10-minute drive of an authorized BRCCC return location and 92% of BC consumers (or over 4 million BC residents) are within a 15-minute drive of an authorized BRCCC return location. These GIS results far exceed the accessibility standard established in the recent Stewardship Agencies of BC Action Plan and the programs' ten-year performance of >90% recovery rate, is a testament to this coverage.

6. PERFORMANCE MEASUREMENTS & TARGETS

Recovery rates for each of the primary containers within BRCCC's product stewardship categories (industry standard, proprietary refillable bottles and cans) remain the program's core performance measure. In addition to return rates, BRCCC will utilize the following indicators to assess performance:

Table 2 – BRCCC Performance Indicators and Associated Tracking Methodologies

Performance IndicatorRecovery Rates for ContainersNet Sales vs.Secondary Packaging Recoveredas per BRCCC

Consumer Accessibility Consumer Promotion & Education Pollution Prevention Benefits Methodology Net Sales vs. Net Returns by Container Type as per BRCCC Schedule 5 Stewardship Plan: 2017-2021

> See Subsection B Below See Subsection C Below See Subsection D Below

a. Recovery Rates for Containers

Performance Objective 2020-2024:

Achieve a minimum recovery rate of 87.5% overall and for each container type.

BRCCC will continue to maintain its container recovery rate target of 87.5% in each year of this stewardship plan renewal period (2020-2024). In keeping with its previous stewardship plan, it is BRCCC's intention that this recovery rate will be achieved for each category of containers type included in the BRCCC program. This commitment well exceeds the mandated provincial target of 75%.

BRCCC has continued its efforts to sustain its unlimited return collection network to support its targets. Since 2017, BRCCC added an additional 7 unlimited return locations to its collection network.

b. Consumer Accessibility

While consumer accessibility is a central tenant to the success of its high container recovery rate, BRCCC aims to balance the number of sites required to achieve performance objectives while ensuring its services systems remain cost effective. With 1145 existing return sites, BRCCC is able to maintain the highest performance rate of any product stewardship program in B.C. BRCCC will work to add 3 collection sites to its network over the course of this plan tallying 1148 collection sites, ensuring consumer convenience is improved and current high recovery rates are maintained.

Performance Objectives 2020-2024:

Continue to increase unlimited return collection network.

- Target of 1148 total locations with 186 collecting unlimited containers (112 retail stores and 74 depots)
- Ensure at minimum 1 unlimited return location in each Regional District by end-2020

Continue to achieve high levels of consumer accessibility.

• Target of 80% of population within 10-minute drive of an authorized BRCCC return location by 2024. BRCCC will repeat its GIS study in 2024.

Retail Locations

BC consumers continue to express significant support for the convenience of being able to return their empty containers to the retail locations where they make their purchases. For this reason, BRCCC continues to place a strong emphasis on contracting with retail locations to be unlimited return locations as a matter of priority (reflected in Table 3 below).

According to an Ipsos Reid poll conducted for BRCCC in December 2013, a significant majority of consumers said they preferred returning their empty beer containers to a retail location. Approximately 30% of consumers identified a retail location as where they are most likely to return their empty beer containers.⁴ Preference for retail locations was more pronounced among Metro Vancouver residents.

BRCCC has committed to conducting another consumer survey in 2020 to reaffirm these results.

In addition to maintaining a comprehensive retail collection network, BRCCC will continue to seek alternative drop off locations as the need may arise. These sites may provide an opportunity to facilitate unique partnerships including but not limited to service groups, mobile collection options and legions.

Bottle Depots

When selecting bottle depot locations to act as collectors, BRCCC places priority on contracting with locations that already serve multiple stewardship programs. While this will be an influential factor, final decisions regarding depot locations will be based on filling service gaps and appropriate fit. Locations will be added as performance targets require.

Program Year	Target Number of LRS Locations	Target Number of Depot Locations	Total Number of BRCCC Locations
2020	109	73	182
2021	109	73	182
2022	110	74	184
2023	111	74	185
2024	112	74	186

Table 3 – Targeted Number of Unlimited Return Locations by Type

Collection and Processing Partners

Through its service provider BDL, BRCCC enters into legally binding, detailed commercial agreements with all of its authorized collection sites (LRS, GLS, bottle depots) as well as its processing (recycling) partners.

Depot contracts include service provisions for three general types of depot activity

- (1) standard depots (public facing depots accepting back containers for BRCCC, which do not process or consolidate material)
- (2) processing depots which densify/bale aluminum from other locations as well as any volumes they themselves collect, and
- (3) consolidation depots which collect and stage returned containers from feeder standard depots until full shipping quantities are gathered to be sent out. A single depot location may provide services related to only one service and/or all three.

New contracts are awarded to depots based on system coverage requirements. All service providers (depots and processors) are contacted at minimum one year prior to contract expiry to restart renewal discussions.

All contracts outline the responsibilities and roles of the depot, schedules of payments and payment terms and general business obligations such as: insurance and assignment. Contracts also include provisions that deal with audit and inspection rights, representations and warranties, communication between the parties, the contract term and the termination rights of both parties. Dispute resolution is covered in a separate section of the contract.

Contract terms generally are five years in length with an automatic renewal for an additional year, unless advance written notice by either party is provided within the required timeframe of 180 days.

Specific services and the associated fees are covered in an Appendix attached to the draft contract template, and allowable adjustments to those fees are also covered in a separate Appendix.

A Depot Guidebook which provides more detailed information and operational instructions is included as an Appendix to the contract and intended as a day-to-day reference for depots.

In addition to a draft contract, service providers are provided with a description of minimum service standards and associated handling or management fees. All collectors, as part of their obligations in servicing the program, agree to a spot audit for the purposes of measuring quality control.

c. Consumer Promotion & Education

Performance Objectives 2020-2024:

Undertake increased consumer awareness and promotional activity.

• Target of 1 net new initiative in the 5-year renewal period of this plan

Consumer awareness of the BRCCC program for beer containers is very high and is proven by the program's results.

BRCCC commissioned Ipsos Reid to conduct a consumer survey that took place in 2013. The survey results indicate nearly all (96%) of British Columbians that were surveyed say they are aware that consumers pay a refundable deposit for their beer containers. Among respondents from households that consumed beer within the past year, 86% indicated that they collected and returned beer containers for the refund.²



BRCCC is committed to maintaining levels of awareness as it pertains to its depositreturn system. BRCCC will continue to monitor consumer attitudes and conduct surveys on an as-needed basis.

BRCCC will continue to maintain high consumer awareness of authorized BRCCC return locations. For example; branded posters (an example is found above) have been developed to help consumers identify BRCCC authorized return locations. BRCCC will use images and colour schemes in its promotional materials to provide a consistent consumer experience.

BRCCC has partnered with a number of collection locations to support Earth Day events, participates in BC Recycles summer ambassador tour, and supports numerous depot partners at consumer awareness and open house events providing information on the return system. New promotional items with BRCCC's logo and website has been distributed at these events. BRCCC continues to update its consumer website (www.envirobeer.com), to include digital copies of BRCCC branded promotional materials (currently posted at authorized return locations), information on the environmental benefits of refillable bottles, and directions to authorized return locations (via a postal code search). The website is mobile-enabled and contains a number of features designed for search-engine optimization.

BRCCC also produced updated on-line information video outlining BRCCC's stewardship activities in BC. The video is posted on its website and made available on YouTube. The video is designed to provide consumers with insight into BRCCC's flow of containers and the logistics of the recycling networks.

BRCCC is also a member of the Stewardship Agencies of British Columbia (SABC) and in this capacity and in partnership with the Recycling Council of British Columbia's (RCBC) participates in various consumer information vehicles, such as the Recycling Hotline, the RCBC website and the Recyclepedia tool. BRCCC updates its authorized return locations listed on each of these on a regular basis. In addition to its revamped website, BRCCC will direct consumers to the "BC Recycles" portal as a one-stop location for information on recycling in BC.

² Ipsos Reid survey conducted on behalf of Canada's National Brewers between December 23, 2013 and January 2, 2014. 1,251 adult respondents (aged 19+ years) participated – generating an estimated margin of error of ± 2.8 percentage points.

d. Pollution Prevention Benefits

Performance Objective 2020-2024:

Direct all collected materials for re-use or to recycling for highest end use.

All BRCCC containers are made from non-toxic, inert materials with established secondary markets. Furthermore, all glass containers (when not suitable for refilling) and cans are sent for processing at designated recycling facilities, focusing when possible, on domestic options.

BRCCC will continue reporting on its pollution prevention achievements, calculated using a) life-cycle inventory data sets made available by the US Environmental Protection Agency (EPA), and b) reports prepared for or by Environment Canada or Natural Resources Canada. A list of performance indicators and metrics can be found below.³

Table 4 – BRCCC Pollution Prevention Performance Indicators

Performance Indicator	Metric
Weight Materials Diverted	Tonnes
Avoided Greenhouse Gas Emissions	MT-CO2-eq
Avoided Energy Consumption	GJ
Weight of Avoided Pollutants	Tonnes
Avoided Tipping Fees (Estimated)	\$

In 2018, BRCCC renegotiated its contract with its depots. All locations recommitted to servicing the container recovery program.

Container Management

Each year, the densified aluminum cans collected within the BRCCC collection system are marketed to a purchaser for recycling. Within that contract the purchaser's material specifications are outlined along with the negotiated pricing terms and allowable payment adjustments. In addition, the purchaser provides BDL, on behalf of BRCCC, with a confirmation letter indicating that material sold to them is recycled and is not disposed in landfill, sent for incineration nor used in road aggregate.

Refillable bottles are sent back to brewers for re-use. Brewers provide a letter of intent to refill, and also provide details of the number of refillable glass bottles received that are not suitable for refilling and must instead be recycled.

³ Government of Canada. "Pollution Prevention". https://www.ec.gc.ca/p2/. Accessed May 9, 2014

7. **DISPUTE RESOLUTION**

a. Local Governments

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

b. Depots/Return Locations

Return locations play a pivotal role in ensuring positive consumer experience and overall program performance. If a return location is found to be in violation of its contractual commitments or legal obligations, BRCCC will take appropriate measures within the terms of its partnership agreements to rectify any issues and to ensure compliance with existing provisions.

c. Inquiries or Complaints from Consumers

Consumer inquiries or complaints are directed to the appropriate manager for follow-up and resolution. Through BRCCC's refreshed website <u>www.EnviroBeerBC.com</u>, consumers have access to information on BRCCC's product stewardship plans and annual reports. The website also provides an e-mail link for consumers who have any questions or complaints regarding either BRCCC's bottle return or its beer secondary packaging return programs. The website includes an e-mail address, contact phone number and a mailing address for public comments on BRCCC product stewardship activities. Consumer concerns will generally be addressed in writing (for example, e-mail questions are responded to via e-mail).

In 2018, BRCCC received a total of 10 consumer complaints which were predominately focused on consumers that chose to take their empty containers to unlicensed depots, thus receiving only part of their deposits. BRCCC will continue to work hard to mitigate any consumer deposit discounting by expanding the number of collection points to ensure convenient and comprehensive network of drop off sites, that are in-keeping with the 10-minute drive threshold for consumers.

BRCCC will continue to collaborate with all collection sites so that customers are informed and are encouraged to redirect consumers to licensed depots. All unlicensed depots that are eligible and encouraged to bring any beer containers they collect from customers for a full deposit refund. These incidences will be noted and if they persist BRCCC will explore opportunity to add additional collection site in the area or deploy local communication/education efforts.

While customer experience and convenience are of paramount interest to BRCCC it must ensure its collection and processing network do not overlap service levels between collectors resulting in overall system costs increases for consumers. BRCCC will work to balance the collection network between service convenience, program performance and overall cost efficiencies.

d. Disputes between BDL and Brewers/Brand Owners that use BRCCC system

BRCCC's container recovery system is subject to the listing and product approval process related to beer sales in the province under the BC Liquor Distribution Act. As part of the listing and approval process, brand owners must indicate their intention to designate BRCCC as their product steward for containers prior to selling their products in BC. Ongoing compliance is monitored through tracking within accounts receivable and internal brand registry systems.

For the purposes of initiating an action with the Ministry of the Environment and Climate Change, noncompliance is defined by BRCCC as a lack of responsiveness from a brand owner after more than four written notices have been sent. In the event that BRCCC does not receive a signed agency appointment agreement from the brand owner within the prescribed timeframe, BRCCC may utilize the following notifications to underscore the importance of compliance with the Recycling Regulation.

No. of Attempts	Timeline	Details
1st Contact	60 Days Prior	Letter is sent to brand owner obligated under the Recycling Regulation, informing them of their responsibilities
2nd Contact	No Response within 30 Days of 1st Contact	A second letter is sent to the brand owner for lack of reply from the previous correspondence. In this letter, BRCCC will point out that the brand owner is liable if their company contravenes the Act
3rd Contact	No Response within 30 Days of 2nd Contact	A final letter with a deadline for submitting membership documents is sent by BRCCC. At this stage, BRCCC will consider each brand owner on a case-by-case basis to decide whether to proceed to the final stage.
4th Contact	No Response by Stipulated Deadline in 3rd Contact Letter	A request for non-compliance actions is sent to the Ministry of the Environment, with a copy to the brand owner.

Table 5 – Timelines & Communication Methods for Addressing Potential Stewardship Disputes

e. Coordination and Cooperation with Other Stewardship Programs

With respect to other stewards' collection networks, BRCCC will monitor its overall recovery performance and will coordinate with other stewardship programs as necessary to ensure overall recovery performance and program efficiency.

8. MANAGEMENT OF ENVIRONMENTAL IMPACTS

a. Background

BC brewers have a long and established history of environmental leadership. Consistent with the requirements of the Recycling Regulation, all of the containers included in BRCCC product stewardship plans are re-useable, recyclable or both (see table below).

Table 6 – Breakdown of Recycling Attributes for BRCCC Containers & Packaging Streams

Container Description	Re-usable (Y/N)	Recyclable (Y/N)
Industry Standard Glass Bottles	Y	Y
Proprietary Glass Bottles	Y	Y
Aluminum Cans		Y
Kegs	Y	Y

Costs associated with managing and collecting BRCCC containers are paid directly and internalized by brand owners, with allocations determined by container type and sales volume. As a result, customers are not subject to additional handling or eco fees as an additional cost at the point of sale. BRCCC will continue to work with brewers and collection partners to coordinate the distribution, storage and delivery of goods and containers in ways that promote cost efficient, environmentally responsible practices.

b. Refillable Containers

The BRCCC container collection system continues to support refillable containers. Manufacturers have a cost-efficient system for getting refillable containers back. BRCCC remains the only B.C. product steward that maintains a percentage of its products in refillable containers.

Given that refillable bottles can be re-used an average of 15 times over their life-cycle, and the return rate for all refillable bottles averaged 93.6% during the previous program period. BRCCC producers utilized approximately 375 million fewer containers versus an alternative system utilizing one-way containers over a 5-year period.⁴

The majority of refillable containers utilized in British Columbia are of the industry standard bottle (ISB) variety. The ISB generates further environmental benefits, by reducing sorting costs and minimizing container transportation as empty bottles can be returned to the nearest brewery for reuse, rather than only to the brewery where they originated.

⁴ Figures provided for a) return rates and b) container savings are representative of data covering 2013 - 2017.

c. Pollution Prevention Hierarchy

BRCCC brand owners utilize two types of containers under the Schedule 1 product stewardship plan: refillable glass bottles and recyclable cans. Both methods of waste management are

among the "most preferable" in the expanded hierarchy (see Figure 1). BRCCC containers are 100% recyclable, non- toxic, and have established secondary markets. Similarly, current container designs emphasize both reusability and recyclability.

Reduce

The refillable glass bottle has a long history of use and its track record as an environmentally preferable container is well established. Refillable glass containers have superior environmental performance compared to the production of one-way glass containers. At present, BRCCC's closed loop system for refillable containers effectively reduces the total amount of bottles produced by approximately 75 million.

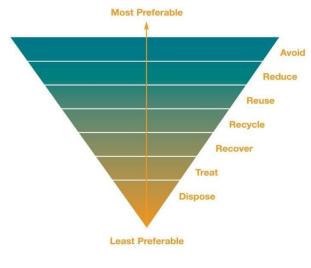


Figure 1 – Expanded Hierarchy of Waste Management Principles for Effective Environmental Protection

Reuse

Reusing glass bottles, comparably to producing new, saves considerable energy and reduces CO2 emissions. Energy requirements associated with washing and cleaning refillable bottles remain lower than those associated with producing new glass stock.

Similarly, kegs can be reused hundreds of times before approaching end-of-life. On a single trip, each keg can replace more than 160 bottles or cans. Kegs are repaired on an as-needed basis and can remain in service for up to 30 years. Finally, the secondary packaging used by brewers is similarly regularly reused. Beer bottle cases and cartons often serve up to 5 different functions before they are ultimately recycled. Consumer re-use of this packaging is why BRCCC is able to offer brewers a second stewardship program for managing their packaging and printed paper as these programs work in tandem.

Recycle

The collection and recycling of aluminum cans also generates significant environmental benefits versus the production of new, one-way containers. For every ton of aluminum recycled, more than 200 GJ of energy are saved from avoided production processes including bauxite mining, alumina refining, and electrolysis.⁵ The energy required to make aluminum cans from recycled aluminum is 95% less than energy utilized in creating virgin aluminum.

⁵ PE Americas. Life Cycle Impact Assessment of Aluminum Beverage Cans. 2010 Report.

Despite being reused an average of 15 times over their life-cycle, refillable glass bottles eventually require end-of-life management., In 2017, BRCCC sent more than 786,744 refillable containers, weighing approximately 458,936 pounds for reprocessing. Cullet from these containers was recycled into new, high-end use products including new bottles and fibreglass insulation.

Similar to refillable glass bottles, steel kegs also eventually approach the end of their individual lifecycles. Irreparable kegs are retired and sold to scrap dealers for recycling.

d. End-of-Life Management Locations

After being used and returned, empty glass containers are sent to brewery locations identified in Table 8 (Page 15). BRCCC ensures that containers are sent to the closest appropriate brewery in order to minimize the environmental impacts associated with transportation. Compacted aluminum cans are sent to processing plants for recycling. Similarly, reject glass from brand owners are sent to a recycling facility.

e. Pollution Avoidance

Where possible, BRCCC will continue to quantify the pollution avoidance associated with its product stewardship plan during its annual reporting process. The US Environmental Protection Agency's (EPA) life cycle inventory (LCI) database provides the inputs and outputs for all stages in aluminum can, as well as glass bottle, production. The data enables BRCCC to determine the avoided nitrogen dioxide, sulphur dioxide, particulate matter and related industrial solid waste from resource extraction and production.

Table 7 – Energy, Greenhouse Gas, and Pollutant Reductions from BRCCC Container Recovery

Pollutant/Symbol	Metric
Landfill Diverted (Glass)	MT
Landfill Diverted (Aluminum)	MT
Avoided Emissions (GHG)	MT CO ₂ -eq
Avoided Energy Use (Gigajoules)	GJ
Avoided Nitrogen Oxide (NOX) ¹⁴	MT
Avoided Sulphur Oxide (SO2) ¹⁵	МТ
Avoided Particulate Matter (PM) ¹⁶	MT
Avoided Solid Waste	MT

Landfill Avoidance:

The BRCCC product stewardship plan has generated significant benefits in terms of landfill avoidance. In 2017, almost 7,808 tons of aluminum and nearly 14,667 tons of glass were diverted away from landfill.

Reduced Energy Consumption:

BDL's closed loop distribution system also reduces energy requirements associated with the distribution of containers. As empty containers are collected when full goods are delivered, container exchange becomes fully integrated into the existing distribution system, reducing the need for one-way distribution trips.

9. STAKEHOLDER CONSULTATIONS

BRCCC will continue to ensure all interested and affected stakeholders have opportunities to provide their feedback into this plan. BRCCC is in regular contact with key program stakeholders, including the network of depot owners, private retail liquor store owners, the Liquor Distribution Branch and BC municipalities. BRCCC will meet with each of these stakeholders to review and gather feedback on the draft plan during the approvals process.

In addition to these individual stakeholder meetings, BRCCC will post stewardship plan on <u>www.EnviroBeerBC.com</u> for public review. In addition to posting the plan on these websites and hosting stakeholder meetings, the following additional public consultations will be undertaken:

- Member advisories to RCBC and CWMA members about the posting of the stewardship plan and stakeholder feedback mechanisms
- Use of social media to promote the stewardship plan to create additional awareness and encourage feedback
- Inclusion in a UBCM weekly newsletter to their members
- Inclusion in a CWMA information update

The final plan will include a complete list of consulted stakeholders with a table outlining the main feedback received from throughout the consultation process and BRCCC's response.

10. BEVERAGE CONTAINER AGENCY DETAILS

Name & Address:

Contact Individual:

BC Brewers Recycled Container Collection Council (BRCCC) 1711 Kingsway Ave Port Coquitlam, BC V3C 0B6, Canada Rachel Morier, Chair and Secretary

As all beer sold in cans in BC are part of the BRCCC plan and due to the number of canned brands and the frequency with which canned brands are added and deleted, a full list of brand names has not been included but can be made available upon request. However, the brand owners using refillable glass bottles registered under the BRCCC product stewardship plan are listed below.

Table 8 - Brand Owners using Refillable Bottles Registered under the BRCCC Plan (as of December 31, 2018)

Brewer Name	Brewer Address
Brick Brewing Co.	181 King St. South, Waterloo, ON., N2J 1P7
Chilkoot Brewing/Yukon Brewery	102 Copper Road, Whitehorse, YT Y1A 2A8
Columbia Brewery	1220 Erickson Street, Creston, BC V0B 1G0
Dead Frog	1-27272 Gloucester Way, Aldergrove, BC V4W 4A1
Garrison Brewery	1149 Marginal Road, Halifax, NS B3H 4P7
Granville Island Brewing	1000 1200 73 West, Vancouver, BC V6P 6G5
Great Western Brewing	519 Second Avenue North Saskatoon, SK S7K 2C6
Labatt Breweries Ltd.	Box 580, 210 Brunette Avenue, New Westminster, BC V3L 4Z2
McAuslan Brewing	5080 St. Ambroise, Montreal, PQ H4C 2G1
Molson Coors Canada	#1100-601 West Broadway, Vancouver, BC V5Z 4C2
Moosehead	89 Main St. West, Saint John, NB, E2M 3H2
Nelson Brewing	512 Latimer Street, Nelson, BC V1L 4T9
Okanagan Spring	2808 – 27 Avenue, Vernon, BC V1T 9K4
Oland Specialty Products	#402, 1148 Homer Street, Vancouver, BC V6B 2X6
Phillips Brewing	201 Government Street, Victoria, BC V8T 4P1
Propeller Brewing Company	2015 Gottingen Street, Halifax, NS B3K 3B1
R&B Brewing	54 East 4 Avenue, Unit 100, Vancouver, BC V5T 1E8
Russell Brewing Company/Fort Garry	202 13018 80 Avenue, Surrey, BC V3W 3A8
Sleeman Breweries Ltd.	551 Clair Road West, Guelph, ON N1L 1E9
Steam Whistle	255 Bremner Blvd., Toronto, ON M5V 3M9
Unibroue Inc.	80 Des Carrieres, Chambly, PQ, J3L 2H6
Vancouver Island Brewing	2330 Government Street, Victoria, BC V8T 5G5
Vincor International	P.O. Box 1650, Oliver, BC V0H 1T0
Mill Street Brewery	21 Tank House Lane, Toronto, ONT, M5A 3C4

11. FINANCIAL SUMMARY

BRCCC will continue to provide annual audited reports on the revenues associated with its deposit return system. These audited reports are based on the total deposit monies received by BRCCC and the total deposit refunds paid, to arrive at a recovery rate based on each container bearing a \$0.10 deposit and refund paid on each container collected.

The summary audited deposit information for the past 5 reporting periods is outlined below:

Reporting Period	Deposits Received	Refunds Paid	Return Rate
2013	\$60,614,118	\$56,105,320	92.56%
2014	\$62,324,209	\$58,047,570	93.14%
2015	\$63,102,502	\$59,502,982	94.30%
2016	\$66,693,087	\$59,712,594	89.53%
2017	\$63,593,955	\$60,420,662	95.01%
TOTAL	\$316,327,871	\$293,789,128	92.87%

Table 9 – Five Year Summary: Audited Results of Deposit Refund Performance 2013-2017

a. Program Funding

BC brewers pay the full costs of managing their container recovery program. The cost for recovering the container is factored into the price of the product as any other input cost, such as labour, energy or transportation. As all costs of the BRCCC system are internalized, any inefficiency in the system accrues to brewers as an additional cost. Accordingly, brewers demand that BRCCC be diligent in ensuring the system is highly cost-effective, while maintaining best-in-class environmental performance and customer service levels.

A fundamental tenet of EPR is that costs of end-of-life management become internalized to producers to incent product design improvements and system efficiencies with an aim to reduce environmental and financial liabilities. BRCCC's program is run on a cost-recovery basis and is fully funded by the stewards participating in the program.

BRCCC collects container fees from brand owners, retains unredeemed deposits sales and retains revenues from aluminum material sales. From these revenues, the BRCCC, through BDL, pays container collection partners for collection of containers and arranges for the transportation and preparation of cans for recycling and bottles for refilling.

The BRCCC Board of Directors meets on a regular basis, to review program performance, audited and projected material revenues, unredeemed deposits, producer costs, container fees, service levels and environmental standards and measures.

12. PERFORMANCE MEASUREMENT SUMMARY TABLE

Unless otherwise stated, BRCCC will report annually on each of the following metrics:

Measure	2020	2021	2022	2023	2024
Recovery/ Collection Targets	87.5%*	87.5%*	87.5%*	87.5%*	87.5%*
	1145 return locations	1145 return locations	1146 return locations	1147 return locations	1148 return locations
Accessibility Targets	182 unlimited	182 unlimited	184 unlimited	185 unlimited	186 unlimited
_		At least 1 unlimited	return location in ea	ach Regional District	:
80% of population within 10 min. drive of BRCCC authorized return location**				turn	
Consumer Awareness Targets	1 net new consumer promotion/ education initiative				
Pollution Prevention Hierarchy/Product Life Cycle Targets Target to direct all collected materials for re-use or to recycling commodity m			/ markets		

Table 10 – Summary of BRCCC Plan Performance Measurement Targets 2020-2024

*Note – Stated target collection/recovery rate applies to both the overall rate and the rate for each container type ** Note – Percentage of population within a 10-minute drive of a BRCCC authorized return location will continue to increase as more unlimited return locations are signed up. However, the stated target is reflective that BRCCC will undertake a new GIS study in 2024, rather than on an annual basis. As a result, the performance on this measure will only be able to be measured when a new study is undertaken

APPENDIX A

BRCCC Unlimited Collection Sites (as of May 2019)

POWELL STREET RETURN-IT BOTTLE DE NEWTON BOTTLE DEPOT - BD COLUMBIA BOTTLE KELOWNA CHASER'S BOTTLE DEPOT NECHAKO BOTTLE DEPOT - #88 HOLDIN **B & G BOTTLE DEPOT** MACKENZIE ELKS BOTTLE DEPOT THE BOTTLE DEPOT **REGIONAL RECYCLING NANAIMO – HAYE REGIONAL RECYCLING – ABBOTSFORD** NORTH VANCOUVER RECYCLING LTD NORTH ISLAND BOTTLE DEPOT KAMLOOPS RECYCLING CENTRE FORT ST JOHN BOTTLE DEPOT UCLUELET BOTTLE DEPOT JUNCTION BOTTLE DEPOT CHILLIWACK BOTTLE DEPOT LTD JOE'S BOTTLE DEPOT REGIONAL RECYCLING VANCOUVER COQUITLAM RETURN IT DEPOT COMOX RETURN CENTRE MAPLE LEAF STORE #615 **DEE'S GENERAL STORE 623 BALFOUR AGENCY STORE 859** GRAMMA'S MARINE BEER STORE SHOOTER'S LICENSED LIQUOR STORE # ALFREDO'S PUB BEER STORE WELLINGTON BEER STORE NOBLE SPIRITS LIQUOR STORE NORTHWOOD LIQUOR STORE - LRS SUNSHINE HILLS LIQUOR STORE ALBERNI LIQUOR STORE MONKEY TREE PUB BEER STORE JOLLY COACHMAN BEER & WINE STORE NORTHERN MOTOR INN BEER STORE WALDORF PUB BEER STORE FIRST LITRE PUB BEER STORE DAN'S N PUB BEER STORE-HOOK & LADDER PUB BEER STORE CARIBOO HOTEL BEER STORE SHAUGHNESSY PUB & BEER & BLACK SWAN BEER STORE COMER STATION PUB BEER STORE

VANCOUVER SURREY **KELOWNA** VERNON PRINCE GEORGE **OUESNEL** MACKENZIE VICTORIA NANAIMO ABBOTSFORD NORTH VANCOUVER CAMPBELL RIVER **KAMLOOPS** FORT ST JOHN UCLUELET LADYSMITH CHILLIWACK MASSET VANCOUVER COQUITLAM COMOX CRESCENT VALLEY **BIRCH ISLAND** BALFOUR GIBSONS PRINCE GEORGE PRINCE GEORGE NANAIMO PRINCE GEORGE PRINCE GEORGE DELTA PORT ALBERNI VICTORIA PITT MEADOWS TERRACE VANCOUVER PRINCE GEORGE FORT NELSON SURREY **OUESNEL** PORT COQUITLAM SHAWNIGAN LAKE WILLIAMS LAKE

1856 POWELL STREET 112-13245 72 AVENUE 680 DEASE RD 4702 31 ST 1922 1 AVE 476 LEGION DR 300 OSILINKA DRIVE 3961 QUADRA ST 2375 HAYES ROAD 750 RIVERSIDE RD **310 BROOKSBANK AVE** 1393C MAPLE ST 270 HALSTON RD 10104 93 AVE 2390 PACIFIC RIM HWY 149 OYSTER BAY DR 3 45934 TRETHEWAY AVE **1586 MAIN STREET** 960 EVANS AVE 2554 BARNET HWY 678 ANDERTON RD 1303 HWY 6 1537 LOST CREEK RD 7824 HIGHWAY 3A 412 MARINE DR 6957 GISCOME RD 4182 15 AVE 3956 VICTORIA AVE 100 TABOR BLVD S 2280 HART HWY 6439 120 ST 2790 ALBERNI HWY 4025 BORDEN STREET 19167 FORD RD 3086 HWY 16 E 1489 HASTINGS ST E 1724 STRATHCONA AVE 4204 50 AVE 8593 132 ST 254 FRONT ST LOT 1 2099 LOUGHEED HWY PO BOX 65 3015 MACKENZIE AVE N

BELMONT HOTEL BEER STORE **REYNOLDS HOTEL BEER STORE** STEAMERS COLD BEER STORE LIQUOR WAREHOUSE SAILOR HAGAR'S PUB BEER STORE OVERLANDER MOTOR INN BEER STORE CREEKSIDE PUB BEER STORE LARRY'S HOUSE OF SPIRITS WOODY'S ON BRUNETTE BEER STORE SUMMERLAND LIQUOR STORE ROYAL COACHMAN BEER STORE DAYS INN BARRIERE MOTOR INN BEER STORE BARCLAY BEER STORE ELDORADO LIQUOR STORE SOOKE RIVER HOTEL BEER STORE DUNCAN LIQUOR PLUS LTD SOUTH QUESNEL LIQUOR STORE JOHN B PUB BEER STORE WEE GEORDIE'S PUB BEER STORE BOLD 'N' COLD LIQUOR INC. MOONRAKERS PUB BEER STORE SAPPERTON LIQUOR STORE TUMBLER RIDGE INN BEER STORE FOUR MILE HOUSE PUB BEER STORE QUEENS MOTOR HOTEL BEER STORE-DEWDNEY INN BEER STORE HOSPITALITY INN LICENSED LIQUOR S GILLIGAN'S PUB BEER STORE WHISKI JACK'S PUB BEER STORE HIGHWAYMAN PUB BEER STORE GREENROCK LIQUOR STORE GREAT BEAR LIQUOR STORE HAREWOOD ARMS PUB BEER STORE LENNOX LIQOUR STORE (GARDEN CITY) THRIFTY FOODS LIQUOR STORE SKEENA HOTEL BEER STORE BY BAILEY'S PUB BEER STORE LEEWARD INN BEER STORE **BX NEIGHBOURHOOD PUB BEER STORE** LIGHTHOUSE BEER & WINE STORE RICHMOND LIQUOR STORE HAIDA INN BEER & WINE STORE WEST WIND PUB BEER STORE GLEN'S COLD BEER & WINE STORE HUME HOTEL LIQUOR BOUTIQUE

PRINCE RUPERT LILLOOET PRINCE GEORGE PRINCE RUPERT NORTH VANCOUVER WILLIAMS LAKE **KELOWNA** FORT ST JAMES COQUITLAM SUMMERLAND CAMPBELL RIVER TERRACE BARRIERE PORT ALBERNI SQUAMISH SOOKE DUNCAN QUESNEL COQUITLAM KITIMAT BURNS LAKE NEW WESTMINSTER NEW WESTMINSTER TUMBLER RIDGE VICTORIA NEW WESTMINSTER DEWDNEY PORT ALBERNI SECHELT WESTBANK ABBOTSFORD NANAIMO BURNABY NANAIMO RICHMOND COURTENAY TERRACE MAPLE RIDGE COMOX PRINCE GEORGE SECHELT RICHMOND CAMPBELL RIVER PORT ALBERNI VANDERHOOF NELSON

725 3 AVE W PO BOX 430 3350 BOEING RD 1125 A PARK AVE 221 FIRST ST W 1118 LAKEVIEW CRES 3929 LAKESHORE RD PO BOX 69 933 BRUNETTE AVE 4-7519 PRAIRIE VALLEY ROAD 84 DOGWOOD ST 4620 LAKELSE AVE PO BOX 889 4277 STAMP AVE 37991 2 AVE SOOKE RIVER RD 122 127 TRANS CANADA HWY 2330 HYDRAULIC RD 1000 AUSTIN AVE 178 NECHAKO CTR PO BOX 604 525 7 ST 444 COLUMBIA ST E **110 FOUNDERS PLACE** ATTN: GRAHAM 1110 EWEN AVE 8793 RIVER RD S 3835 REDFORD ST 1298 TOREDO ST WHISKI JACK'S PUB 32470 SIMON AVE **1860 DUFFERIN CRES** 175 5665 KINGSWAY 508 8 ST 400 9100 BLUNDELL RD 1590 CLIFF AVE 4519 GREIG ST 11232 DARTFORD ST 649 ANDERTON AVE 433 CARNEY ST 15580 WHARF ST 135 - 8555 SEA ISLAND HWY 1342 SHOPPERS ROW 4940 CHERRY CREEK RD PO BOX 938 422 VERNON ST

28 INN (2008) LTD **PS LIQUOR STORE** PG LIQUOR BOX **BRANDT'S CREEK BEER STORE** TERRA NOVA LIQUOR STORE ROOS COLD BEER WINE & LIQUOR STOR DUKE'S LIQUOR STORE CHEMAINUS LIQUOR STORE MA MILLERS LICENSE LIQUOR STORE **BUFFY'S LICENSED LIQUOR STORE ROYAL ENSIGN HOTEL/17 MILE HOUSE** MATTICK'S FARM LIQUOR PLUS CHL LIQUOR LULU ISLAND LIQOUR STORE 14TH AVENUE BEER & WINE STORE COURTENAY LIQUOR PLUS SHOOTERS LICENSED LIQUOR STORE CITY LIQUOR TERRACE INN LIQUOR STORE GREAT CANADIAN LIQUOR WAREHOUSE EDGEMONT LIQUOR SHOPPE OYSTER RIVER LIQUOR STORE NORTH SHORE LIQUOR SHOP SAANICH CENTRE LIQUOR PLUS HILLSIDE LIQUOR STORE LIQUOR PLUS FERNIE MOUNTAIN SPIRITS SASQUATCH INN LICENSED LIQUOR STO VICTORIA'S PRIVATE LIQUOR WEST COAST LIQUOR COMPANY LIQUOR PLUS COBBLE HILL **BIG JIM'S SPIRITS STORE** GILLNETTER PUB LIQUOR STORE **GRAPEVINE LIQUOR STORE** THRIFTY FOODS LIQUOR MILL BAY SPRUCELAND 10TH AVENUE LIQUOR STO **OLD TOWN COLD BEER & LIQUOR STORE** BEVERLY CORNERS LIQUOR STORE MISSION MERCHANTS UCLUELET LODGE LIQUOR STORE GOLD RIVER LIQUOR EXPRESS BATHGATE MARINA REGIONAL RECYCLING WHISTLER **REVELSTOKE BOTTLE DEPOT** ISLAND RETURN-IT - CAMPBELL RIVER CAMPBELL RIVER BOTTLE EXCHANGE

NEW HAZELTON WILLIAMS LAKE PRINCE GEORGE **KELOWNA** RICHMOND COQUITLAM POWELL RIVER CHEMAINUS LANGFORD SOOKE SOOKE VICTORIA PRINCE GEORGE RICHMOND MISSION COURTENAY PRINCE GEORGE VICTORIA TERRACE CRANBROOK NORTH VANCOUVER CAMPBELL RIVER NORTH VANCOUVER VICTORIA VICTORIA VICTORIA FERNIE HARRISON MILLS LILLOOET BURNABY COBBLE HILL KITIMAT PORT COQUITLAM **BURNS LAKE** MILL BAY PRINCE GEORGE HAZELTON DUNCAN KELOWNA UCLUELET GOLD RIVER EGMONT WHISTLER REVELSTOKE CAMPBELL RIVER CAMPBELL RIVER

4545 10 AVE 245 DONALD RD 9912 SINTICH RD 101 437 GLENMORE RD 110 3671 WESTMINSTER HWY 940 3025 LOUGHEED HWY 7 -4493 MARINE AVE 107E 3055 OAK STREET 2903 SOOKE LAKE RD 6858 WESTCOAST RD 5128 SOOKE RD 133-5325 CORDOVA BAY RD 112 - 6333 SOUTHRIDGE AVENUE 9291 ALDERBRIDGE WAY 32516 14 AVE 2751 CLIFFE AVENUE 1512 12TH AVE 101 1505 ADMIRALS RD 3005 KALUM ST 2100 WILLOWBROOK DR 3020 EDGEMONT BLVD 2207B GLENMORE RD 1262 LYNN VALLEY RD 603 3991 QUADRA ST 3201 SHELBOURNE ST 4468 WEST SAANICH RD 1641 7 AVE 46001 LOUGHEED HWY 667 MAIN ST 7651 ROYAL OAK AVE 49 1400 COWICHAN BAY RD 225 276 CITY CENTRE 1864 ARGUE ST 156 FRANCOIS LAKE DR 108 2690 MILL BAY RD 3244 10 AVE 1520 OMINECCA ST 102 2755 BEVERLY ST 2 4600 LAKESHORE DR 250 MAIN ST UNITS 3 & 4 MUCHALAT DR 6781 BATHGATE RD 8001A NESTORS RD 97 CARTIER ST 1580F WILLOW ST 2210 S ISLAND HWY

ISLAND RETURN-IT - DUNCAN ISLAND RETURN-IT - SIDNEY COURTENAY RETURN CENTRE **INTERIOR FREIGHT & BOTTLE DEPOT L** J & C (PENTICTON) BOTTLE DEPOT BILL'S BOTTLE DEPOT LTD PARKSVILLE BOTTLE & RECYCLING DEP BOTTLE DEPOT THE LEE'S BOTTLE DEPOT LTD UNITED WE CAN MERRITT RETURN-IT DEPOT WIDE SKY DISPOSALS - FORT NELSON OLIVER BOTTLE DEPOT - BD OSOYOOS BOTTLE DEPOT - BD FLEETWOOD BOTTLE RETURN DEPOT - B PITT MEADOWS BOTTLE & RETURN-IT DE LOUGHEED RETURN-IT DEPOT INC ALDERGOVE RETURN-IT DEPOT HOPE BOTTLE DEPOT - BD LANGLEY BOTTLE DEPOT **REGIONAL RECYCLING - SOUTH** QUEENSBOROUGH LANDING RETURN-IT L EAST VAN BOTTLE DEPOT MAPLE RIDGE BOTTLE DEPOT SCOTT ROAD BOTTLE DEPOT GUILDFORD BOTTLE DEPOT PORT HARDY RETURN-IT CENTRE COLUMBIA BOTTLE KENT COLUMBIA BOTTLE ST PAUL **GENERAL GRANT'S SAHALI** SOUTH VAN BOTTLE DEPOT WALNUT GROVE BOTTLE DEPOT **REGIONAL RECYCLING - BURNABY REGIONAL RECYCLING - RICHMOND** DC RECYCLING EAST HASTINGS BOTTLE DEPOT NORTH SHORE BOTTLE DEPOT **REGIONAL RECYCLING - CLOVERDALE -**FRASER LAKE BOTTLE DEPOT VALEMONT RECYCLING CENTRE - BD THE BOTTLE DEPOT QUEENS THE BOTTLE DEPOT-GLANFORD PRINCETON RETURN IT DEPOT- PRD 10 ISLAND RETURN IT SALT SPRINGS ISL

DUNCAN SIDNEY COURTENAY VERNON PENTICTON SALMON ARM PARKSVILLE PORT ALBERNI BURNABY VANCOUVER MERRITT FORT NELSON OLIVER OSOYOOS SURREY PITT MEADOWS COOUITLAM ALDERGROVE HOPE LANGLEY NANAIMO NEW WESTMINSTER VANCOUVER MAPLE RIDGE SURREY SURREY PORT HARDY **KELOWNA KELOWNA KAMLOOPS** VANCOUVER LANGLEY BURNABY RICHMOND DAWSON CREEK BURNABY NORTH VANCOUVER SURREY FRASER LAKE VALEMONT VICTORIA SAANICH PRINCETON SALT SPRINGS ISLAND 6476 NORCROSS RD 5 10025 GALARAN RD 493 PUNTLEDGE RD 4205 24 AVE 200 ROSETOWN AVE PO BOX 816 611A ALBERNT HWY 3533 4 AVE 7383 BULLER AVE 449 INDUSTRIAL AVENUE 2352 CLAPPERTON AVENUE 4800 46TH AVENUE 5980 SAWMILL ROAD 8305 72 AVENUE 15093 FRASER HWY 19090 LOUGHEED HWY 1045A LOUGHEED HWY 27482 FRASWER HWY 930A - 6TH AVENUE 20137 INDUSTRIAL AVENUE 839 VICTORIA RD UNIT A-409 BOYNE STREET 2605 KASLO STREET 20475 LOUGHEED HWY #2 - 12111 86 AVENUE 100-14727 108 AVENUE 9300 TRUSTEE ROAD 1936 KENT ROAD 1314 ST PAUL STREET 115-805 NOTRE DAME DRIVE 34 EAST 69 AVENUE #8 - 20280 97 AVENUE 2874 NORLAND AVENUE 13300 VULCAN WAY 925 100 AVENUE 6893 HASTINGS STREET 235 DONAGHY AVENUE 5534 176 ST 20 COUGAR ST 1020 COMMERCIAL DR **655 QUEENS AVENUE** 4261 GLANFORD AVENUE 367 HWY 3 370 LOWER GANGES