July 26, 2021

# Brewers Recycled Container Collection Council

# Draft Schedule 5 Secondary Packaging Stewardship Plan Feedback

To Whom It May Concern:

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

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

Please see our comments by section below:

Section 4. Products Covered

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

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

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

## Section 6. Collection Accessibility and Collection System

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

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

**Single Use Plastic Reduction Plan**

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

**Packaging Recovery Rate**

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

**Beer Secondary Packaging Collection**

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

## Section 7 Consumer Awareness

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

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

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

## Section 8 Management of Program Costs

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

Section 9 Management of Environmental Impacts

**Pollution Prevention Hierarchy**

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

## Section 11 Performance Monitoring & Reporting Commitments

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

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

Sincerely,  
Sue Maxwell

On behalf of Zero Waste BC

1. When the word “reusable” is noted in this feedback, it is not a cardboard container that may transport beverages in one or two directions but a hard container designed for hundreds or thousands of uses. [↑](#footnote-ref-1)