



April 18, 2023

Canadian Beverage Association Program Plan Feedback

Canadian Beverage Association

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Dear Alex Greco,

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. For more information on Zero Waste, please see the Zero Waste Hierarchy.¹

We are pleased that CBA will be submitting its plan which includes some improvements to its existing system but hope for many more. We submit these comments expecting that the program will show leadership in the realm of EPR to move it beyond mere recycling to actually changing the nature of the products and how the service is delivered, as envisioned in the Canadian Council of Ministers of Environment Canada-wide Action Plan for EPR. We also look forward to the program addressing the gaps noted in the Canadian Council of Academies circular economy study commissioned by Environment and Climate Change Canada.²

Please see our comments by section below:

Program Costs

We appreciate that the members are fully paying for their own costs.

¹ Zero Waste Hierarchy: <https://zerowastecanada.ca/zero-waste-hierarchy/>.

² Canadian Council of Academies, (2021), Turning Point. <https://cca-reports.ca/reports/the-circular-economy-in-canada/>

Stewardship Agency

The plan notes the four members of the plan but does not note if there are other non-participating companies and what it is doing to address that.

Public Education Materials and Strategies

This section addresses the needs for an internal collection system-based program, but given that collection is still not 100%, this, along with a better tracking system, should be strengthened. The program should conduct research to determine what the gaps are and then implement a program to address them. This plan could come with setting a target for internal awareness within the member companies if this is determined to be a factor in the missing units.

Governance

It would also be good to broaden the perspectives at the board to go beyond only industry members to include local government, environmental, Indigenous, design and recycling perspectives. The Board should be made up of at least 50% British Columbians, up from the current 0%.

Product Life Cycle Management

Better tracking should be done to understand where all the units go. Care should be taken when exporting units from the region that these units are still viable (and so the question is why they are being sold) rather than a way to offload costs. It is also unclear if units sold to third parties (removed from program counts) that are returned to the program members for recycling are counted as collected (but not part of the program) or if there are procedures to correct for this.

The program plan does not explain why there are no collection facilities outside of the Lower Mainland (whether that is because all units from the member companies are sent internally to the Lower Mainland before going to be processed or if units elsewhere in BC are landfilled). The plan should be clear that all units in BC will go to a qualified processor.

The process for collecting ozone depleting substances appears sound and it is appreciated that the program reuses or recycles parts, oil and light bulbs.

The program should develop environmental standards and ensure that all of their processors meet these standards.

Third party verification of data should be provided wherever possible and not just for the elements required by the Ministry.

Program Performance Measurement

The collection rate target should be 100%. The BC Recycling Regulation aims for a recovery rate of 75% “or another recovery rate established by the director”. In a case of closed-loop recovery of large expensive units, there is no reason why this of all programs should not have a target of 100%. The program should prove there is a collection system for 100% of the units.

Continuous improvement targets should include increased lifespan, design changes and increases in the percentage of materials recycled per unit. A target of 100% tracking should be one of them. Aiming for 95% of material content recycled by the end of the five year plan is recommended. Additional targets could be a 2% increase in lifespan over the next five years for each type of product, a target set for reuse of parts and a suitable target for disassembly to assist in meeting the recycling target.

Product Environmental Impact Reduction, Reusability and Recyclability

The program members are commended for their intent to increase lifespans of the products and to use the old parts. The members are also commended for the work to reduce the use of HFCs. The program seems to have good systems to manage refrigerants.

The program should work to change the design of the refrigeration units in order to extend the lifespans, increase repairability and increase recyclability of all components. Members could aim to minimize the number of types of units used in order to be better able to keep and reuse parts to maintain the units.

Minimizing shredder fluff and increasing recycling should also be achieved by dismantling the units before processing to set aside the glass, rubber, plastic and other non-metal components. The program should develop a system to collect and process the insulating foam in a way that minimizes GHGs released; shredding should not be used on this material.

In conclusion

The program plan needs stronger targets and more ambition in achieving the outcomes intended by the CCME Canada-wide Action Plan for EPR. This plan renewal, at a time when BC is planning to develop a Circular Economy Strategy and the recent UN Biodiversity agreement emphasizes the need to minimize our collective impact, is an opportunity to strengthen governance, reduce environmental impacts and the efforts and initiatives in this area should be strengthened, alongside the creation of related targets for redesign, reduction, reuse and disassembly. That said, we look forward to continued improvement of this program.

Sincerely,
Sue Maxwell
Board Chair,
Zero Waste BC