

## NOTICE

TO: BCMB Manufacturers  
FROM: Beverage Container Management Board (BCMB)  
DATE: January 20, 2025  
RE: **REMINDER: Updates to BCMB Manufacturer and Retailer By-law**

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### REMINDER: Updates to the BCMB Manufacturer and Retailer By-law

Dear Alberta Manufacturers,

On December 9<sup>th</sup>, 2024, a [notice](#) was sent to manufacturers and retailers regarding Board-approved amendments to the [Manufacturer and Retailer By-law](#).

These changes will come into effect on **March 1, 2025**.

Changes to the By-law include:

- Alignment with current registration approval processes, including the recent changes to registration of alcohol containers.
- An introduction of definitions around approved method of recycling to reinforce the BCMB's mandate and prevent registration of containers that cannot be recycled at end-of-life.
- The establishment of increased reporting requirements in relation to recycling for the agents representing manufacturers, including the Alberta Beverage Container Recycling Corporation (ABCRC) and Alberta Beer Container Corporation (ABCC). We will continue working with these agents on processes for evaluating and verifying recycling with material processors at end-of-life.
- Terminology clarifications for consistency, including Compliance Framework exit clarification

### What You Need to Know

#### **Manufacturer Definition & Hierarchy**

The updated Manufacturer and Retailer By-law now ties Section 3.1 of the By-law to the definition of "Manufacturer" from the *Beverage Container Recycling Regulation* (BCRR) in Alberta. This emphasizes the need for agreements among producers, importers, and distributors to clarify roles for container registration and reporting and remittance prior to selling or distributing beverage containers in Alberta.

#### **Container Recyclability Focus**

##### *Mandate Compliance*

All beverage container components (container, lids, labels, adhesives, attachments) must meet recyclability standards. Albertans should expect that all container components are recycled when they return a container to an Alberta Depot for a refund of the deposit.

##### *Beverage Container Review Process*

New container designs or materials will continue to be analyzed to ensure they align with the province of Alberta's leading recycling practices and environmental goals.



### About Changes to By-laws

The BCMB's Registrations and Recycling Committee works to enhance the transparency and effectiveness of Alberta's Common Collection System.

All the BCMB's committees actively review processes, policies, and procedures to ensure alignment with the BCMB's regulatory mandate and industry best practices, with the purpose of supporting small businesses, reducing environmental impacts, ensuring strong governance, managing risks, improving services for Albertans and stakeholders, and fostering innovation across the beverage container recycling system.

All relevant By-laws, Acts, Regulations, Policies, and Agreements can be found [here](#).

### Looking Ahead

This year, the BCMB will be seeking manufacturers' input on various initiatives, including:

#### **Aspirational Industry Collection and Recycling Targets**

Establishing forward-looking container collection and recycling targets for Alberta's beverage container recycling system. The purpose of these targets is to drive improved performance, container design and recycling innovation.

#### **Transitioning from Problematic Materials**

Exploring the phased transition away from non-recyclable materials such as ceramic and crystal beverage containers, including barriers, impacts, and opportunities for stakeholders.

Ceramic and crystal materials, while currently deemed recyclable for compliance purposes, lack true recycling methods. Section 4.8 of the Manufacturer and Retailer By-law includes provisions for addressing these materials following stakeholder consultations.

### Next Steps

Throughout this year, the BCMB will engage stakeholders through consultation sessions to ensure all voices are heard in shaping the future and continued success of Alberta's beverage container recycling system. Your collaboration is essential to achieving our shared sustainability goals, and we are committed to keeping you informed and updated throughout the process.

If you have questions, or require more information, please contact Brent Campbell, Director of Registrations and Manufacturer Policy at [bcampbell@bcmb.ab.ca](mailto:bcampbell@bcmb.ab.ca).

