



**MINISTER OF  
SUSTAINABLE DEVELOPMENT**

Legislative Building  
Winnipeg, Manitoba, CANADA  
R3C 0V8

JUL 26 2018

Mr. Ken Friesen  
Executive Director  
Canadian Beverage Container Recycling Association  
705 – 281 McDermot Avenue  
Winnipeg MB R3B 0S9

Dear Mr. Friesen:

I am pleased to issue an Approval to the Canadian Beverage Container Recycling Association (CBCRA) for the Industry Stewardship Program Plan for Beverage Containers (the Program) for Manitoba effective July 1, 2018. Pursuant to Section 7(4) of the Packaging and Printed Paper Stewardship Regulation (Regulation) under the Waste Reduction and Prevention Act (WRAP Act), this Approval will expire June 30, 2023.

This Approval is issued to CBCRA under Section 7(2) of the Regulation and is subject to CBCRA meeting the conditions as set forth in "Attachment A" of this letter, and which forms part of this Approval.

If I am not assured that CBCRA is implementing or operating the Program substantially in accordance with its intent, or where I or my officials have concluded, based on relevant circumstances, that the Program or terms of this Approval, including "Attachment A: Conditions of Approval" should be reviewed, then pursuant to Section 8 of the Regulation new or additional conditions may be imposed as deemed appropriate so as to ensure that the environmental outcomes and regulatory requirements are fulfilled.

The Department intends to establish guidelines for third party assurance of non-financial information to be reported by all approved stewardship program operators in the Province of Manitoba. My officials in Manitoba Sustainable Development will work with CBCRA to establish guidelines to provide the Manitoba government with a reasonable level of assurance that key performance measures of the Program are reported accurately. Given that CBCRA achieved a recovery rate of around 70% in 2016, the Manitoba Government considers any discussions about a deposit program for beverage containers to be unnecessary.

It is a priority of this department that the Program provide convenient, province-wide accessibility to all Manitoba communities including Manitoba's northern, remote and First Nations communities. I expect CBCRA to work collaboratively with other Producer Responsibility Organizations to maximize synergies and deliver program outcomes in a cost effective and efficient manner.

Further, more needs to be done for collecting beverage containers from bins placed in public spaces and parks. I expect CBCRA to consult with municipalities as part of a study related to the cost of managing beverage containers from away-from-home bins and share this study with the department by 2020.

I will take this opportunity to remind you that under Section 11(1) of the Regulation, as Minister, I have the authority to suspend or cancel the Approval of the Program at any time if there is a breach or contravention by CBCRA as the operator of the Program, of either the WRAP Act or the Regulation or the conditions set forth in this Approval and, if applicable, subsequent amendments of this Approval.

Any notices to be provided to department officials pursuant to this Approval shall be submitted in writing to: Senior Manager, Waste Diversion and Recycling Unit, Manitoba Sustainable Development, 200 Saulteaux Crescent (Box 38), Winnipeg, Manitoba, R3J 3W3.

CBCRA should submit their next application for renewal of this Approval by January 31, 2023 to ensure adequate time for review and public consultations.

I look forward to the continued operation of the Program in the Province of Manitoba.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'R. Squires', is positioned above the printed name and title.

Rochelle Squires  
Minister

Attachment

c: Jim Goetz, Chair of the Board  
Glen Holmes

**ATTACHMENT A**  
**Conditions of Approval**  
Canadian Beverage Container Recycling Association (CBCRA)

The conditions set forth below form part of the Ministerial Approval for the CBCRA Beverage Container Stewardship Program pursuant to the Packaging and Printed Paper Stewardship Regulation (Regulation) and are as follows:

THAT CBCRA:

1. Implement and operate the Program substantially in accordance with its intent, consistent with the requirements of the WRAP Act, the Regulation, the Conditions of Approval and the Guideline for Packaging and Printed Paper Stewardship, as approved and amended from time to time.
2. Identify a senior official with CBCRA as a contact person to work with my officials at Manitoba Sustainable Development to provide such assistance or any information (including both financial and non-financial information) that may be deemed necessary in a timely manner to enable them to provide me with information to assess whether CBCRA has implemented the Program and it is operating substantially in accordance with its intent and the Conditions of Approval and, if applicable, subsequent amendments to this Approval.
3. Retained earnings shown on CBCRA financial statement for the Manitoba Program (total revenues less total expenditures), as determined by an external auditor, shall not at any time during the term of this Approval, exceed an amount equal to one year's program revenue.
4. Achieve a 75% recovery rate for beverage containers over the term of this Approval.
5. Work with municipalities to develop a plan to cover the cost of collecting and processing beverage containers from Recycle Everywhere bins placed in public spaces and share this plan with the department by 2020.
6. Submit an annual report to Senior Manager, Waste Diversion and Recycling Unit, Manitoba Sustainable Development per the applicable regulation and guidelines.
7. Maintain its status as a body corporate and registration under The Corporations Act, C.C.S.M. c. C225 (Manitoba) while operating the Program.