

NOTICE

TO: Alberta Bottle Depot Network

FROM: Beverage Container Management Board (BCMB)

DATE: April 25, 2025

RE: **Depot By-law Amendment**

Dear Depot Network,

On April 23, 2025, the BCMB Board of Directors approved amendments to the [Depot By-law](#).

Changes to the By-law include:

- Over shipping will now be considered compliant for the purpose of Quality Control (QC) compliance framework movement.
- The numerical percentages for variances will remain the same, but only negative percentages outside of those thresholds will result in compliance action.

The By-law changes will come into effect on **May 1, 2025**.

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

What You Need to Know

Definitions

Over shipping

Where the audited count of containers exceeds the expected count of containers noted on the bag tag and RBill.

Depot By-law Section 11.31 & 11.32 Amendments: Quality Control Variances

Section 11.31

The Depot By-law, Section 11.31 classifies QC audit results into Zone 1 (Pass) or Zone 2 (Fail). Previously, the By-law mandated that a variance less than or equal to +/- 2.5% was a pass, and greater than +/-2.5%



was a fail. Going forward, a variance of less than or equal to -2.5% or better will be a pass and greater than -2.5% or worse will be a fail. For the purpose of compliance action, over shipments will now be considered compliant and will be treated as a Zone 1. Therefore, they will only result in de-escalation or exit from the QC Compliance Framework. This change recognizes that there is already a natural consequence to over shipping, as depots lose out on handling commission and deposit refunds for containers that are over and above what they have declared.

Section 11.32

Section 11.32, outlines variances that will prompt entry into Level 1 of the QC Compliance framework. Similar to 11.31, the amendment is as follows:

- For a single material stream: -7% or worse
- For 3 month rolling:
 - -1.7% or worse for 0-1 L material streams
 - -3.5% or worse for Over 1 L material streams
 - -2% for all containers

While the percentages stay the same, over shipping will be considered compliant. Only a shortage that meets or exceeds the above thresholds will be subject to compliance action. Again, this change recognizes the financial consequence that is already incurred when over shipping.

Depots Currently in the QC Framework

If you are currently in the QC framework, you will remain at your current level and these changes will be applied to the next audit.

About Changes to By-laws

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.

This change is similar to a By-law amendment to the Refund Compliance Standard in the Depot By-law that was approved in 2021. By amending the QC Compliance Standard, the BCMB is ensuring consistency in By-law and reducing red tape by finding efficiencies where there are already natural consequences that encourage compliance.

