

NOTICE

- TO: BCMB Registrants
- FROM: Beverage Container Management Board
- DATE: July 3, 2025

RE: Additions and Grey Area Containers in Interpretation of Beverage Container Policy

Key Facts:

- Non-Alcoholic, Non-Concentrate Drink Mixes are now considered deposit-bearing
- Beverages with alcohol that need dilution (e.g., concentrated alcoholic mixers) will continue to be accepted
- Flavor additives and enhancers still exempt
- Exemption for infant formula specifically applies to products for infants aged 0-12 months
- Dairy alternatives are treated the same as dairy products

Key Dates

- July 1, 2025: the date that new containers will be accepted
- August 31, 2025: when all deposit-bearing need to be reported and remitted (retroactive to July 1, 2025)

Dear BCMB Registrants,

Beverage Container Management Board (BCMB) is issuing important updates to the <u>Interpretation of Beverage</u> <u>Container Policy</u>. These amendments are designed to provide greater clarity regarding containers regulated under the Beverage Container Recycling Regulation (BCRR, the "Regulation"), aiming to reduce confusion for all stakeholders, including manufacturers, retailers, public, and BCMB's Registrations team.

Established in 2009 with the inclusion of dairy products, the original Interpretation Policy, sought to clarify which containers were deposit-bearing. Over time, BCMB has identified "grey area containers" that require further clarification.

The updated policy addresses these ambiguities to ensure consistent application of the Regulation. It's important to note that many of the containers now explicitly addressed in this update were already being included or registered in the system due to past practices or evolving interpretations.

Key Amendments and Actions Required:

Non-Alcoholic, Non-Concentrate Drink Mixes

These are now considered deposit-bearing beverages, aligning them with alcoholic drink mixes (e.g., liqueurs) already in the system. Please begin registering these containers as of July 1, 2025. An example of a non-alcoholic, non-concentrate drink mix is a margarita mix.

• Alcoholic vs. Non-Alcoholic Containers Requiring Dilution

Beverages with alcohol that need dilution (e.g., concentrated alcoholic mixers) will continue to be accepted. However, non-alcoholic beverages requiring dilution to consume will remain exempt. This maintains current practice with clearer policy language. No change in current registration or collection practices is needed for these items.

• Flavor Additives and Enhancers

Items such as coffee syrups and concentrated water additives are explicitly confirmed as exempt from the deposit system. Continue to treat these as non-deposit-bearing.

• Infant Formula Exemption:

The exemption for infant formula now specifically applies to products for infants aged 0-12 months. This maintains current practice with clearer policy language. Ensure your product categorization aligns with this age-specific exemption.

• Dairy Alternatives

Dairy alternatives like oat creamer and almond milk are now explicitly mentioned as being treated the same as dairy products. This is a clarification, not a change in practice, as these containers have been part of the system since 2009. Continue current practices; no change is required.

• Reporting & Remittance

Reporting and remittance for newly added non-alcoholic, non-concentrate drink mix containers will be retroactive to July 1, 2025, to account for those already accepted at Alberta depots. After August 31, 2025, a compliance framework will be applied after the transition period to ensure all eligible containers are registered. Please communicate this change with the non-alcoholic, non-concentrate drink mix containers to any distributors and retailers you may supply to ensure deposit is being applied at retail.

The BCMB Registrations team (<u>registrations@bcmb.ab.ca</u>) is available to assist you with any questions regarding these policy updates and registration requirements. Your cooperation ensures the continued efficiency and success of Alberta's beverage container recycling system.