

STEWARDSHIP PLAN

PEI BEVERAGE CONTAINER PROGRAM

Submitted to the Minister of Environment, Energy and Climate Action
September 16, 2025

encorp^{re}
RECYCLE

TABLE OF CONTENTS

GLOSSARY OF TERMS AND ABBREVIATIONS	2
INTRODUCTION	4
ENCORP ATLANTIC/ENCORP ATLANTIQUE	4
PRODUCER RESPONSIBILITY	4
PROGRAM FUNDING	5
PROGRAM FUNDING SOURCES	5
OPERATING RESERVE	5
PRODUCTS COVERED UNDER THE PLAN	6
ACCEPTED PRODUCTS (PROGRAM MATERIALS)	6
NON-ACCEPTED PRODUCTS (NON-PROGRAM MATERIALS)	6
BEVERAGE CONTAINER MATERIAL TYPES	7
DEPOSIT AND REFUND AMOUNTS	11
COLLECTION AND PROCESSING OF MATERIALS	12
PROVINCE-WIDE UBC COLLECTION SYSTEM	12
HEALTH & SAFETY	14
FUTURE RESEARCH AND DEVELOPMENT	14
QUALITY ASSURANCE/QUALITY CONTROL	16
COLLECTION SYSTEM	16
FINANCES	16
COMMUNICATIONS PLAN	17
EDUCATION ON BEVERAGE CONTAINER RECYCLING	17
AD CAMPAIGNS	19
RECYCLING HERO SPECIAL PROGRAMMING (ANTI-LITTER/PRO-RECYCLING EDUCATION)	20
REPORTING COMMITMENTS	22
APPENDIX A – IDENTIFYING OBLIGATED PRODUCERS	23
APPENDIX B – PRODUCERS WITH DEPOSIT-BEARING BEVERAGE PRODUCTS PACKAGED IN REFILLABLE GLASS CONTAINERS	24
APPENDIX C – NON-ACCEPTABLE BEVERAGE CONTAINERS	25
APPENDIX D – DEPOTS	26
APPENDIX E – CONTRACTED SERVICE PROVIDERS	27
APPENDIX F – END-MARKETS	28
APPENDIX G – SORT LIST (MATERIALS)	29

GLOSSARY OF TERMS AND ABBREVIATIONS

Act	<i>Environmental Protection Act</i>
BCSP (or “Program”)	Beverage Container Stewardship Program
BCRNC	Beverage Container Recycling Network of Canada
CRF	container recycling fee
depot	beverage container depot – a designated return facility where consumers can return empty beverage containers for recycling and a deposit refund.
deposit	Refundable amount charged on top of the price of a beverage product at point-of-purchase (retail) as an incentive for consumers to return the empty container for recycling at designated return facilities. <i>The Environmental Protection Act’s Materials Stewardship and Recycling Regulations</i> require that retailers collect a deposit from consumers at the time of sale, in the amount specified in the beverage container stewardship plan and that the refund for an empty beverage container must equal the deposit amount originally collected.
deposit-bearing beverage containers	Sealed containers 5 L or less for ready-to-drink beverage products subject to a deposit. Note that the official definition of “beverage” in the <i>Environmental Protection Act’s Materials Stewardship and Recycling Regulations</i> excludes the following beverages: <i>milk, plant-based milk product alternatives that are fortified and a source of protein, unprocessed apple cider, concentrated drinks, infant formula, meal replacements or formulated liquid diets.</i>
EPR	Extended Producer Responsibility
Encorp	Encorp Atlantic/Encorp Atlantique non-profit producer responsibility organization created in 2023.
NB	New Brunswick
PEI	Prince Edward Island
Plan	Stewardship Plan
PRO	producer responsibility organization

producers	Beverage product manufacturers, distributors, importers/retailers and any other entity selling, offering for sale or otherwise distributing a beverage container in or into the province of Prince Edward Island. The Regulation defines “producer” as a: <i>“(i) manufacturer of the beverage container,</i> <i>(ii) a distributor of the beverage container in or into the province,</i> <i>(iii) where the beverage container is imported into the province, the first person to sell the beverage container in or into the province.”</i>
QA/QC	quality assurance/quality control
Regulations	<i>Materials Stewardship and Recycling Regulations (Environmental Protection Act)</i>
UBC	used beverage container (whenever mentioned in this document, all UBCs are assumed to be deposit-bearing).

INTRODUCTION

This Prince Edward Island (PEI) Beverage Container Stewardship Program Plan is submitted by Encorp Atlantic/Encorp Atlantique (“Encorp”) to the Minister of Environment, Energy and Climate Action, pursuant to the requirements of the *Environmental Protection Act* R.S.P.E.I. 1988, Cap. E-9 (the “Act”); *Materials Recycling Regulations* (EC349/14) – *Beverage Container* (the “Regulations”). The Plan covers the period of April 1, 2026, to December 31, 2030.

Encorp has proudly offered support to the PEI Beverage Container Program for many years, providing data management services and industry expertise. With this Plan, Encorp is pleased to take on the role of producer responsibility organization (PRO) for PEI, to lead the Beverage Container Program’s transition to a full Extended Producer Responsibility (EPR) model. This shift will build on PEI’s strong history of beverage container recovery while introducing Encorp’s know-how on best practices, efficiencies, and consumer-focused improvements.

Encorp was established on January 1, 2023, to help beverage producers meet new EPR requirements introduced in New Brunswick (NB) as the province transitioned its long-standing beverage container recycling program to an EPR model. Since April 1, 2024, Encorp has served as the designated PRO for beverage product brand owners/producers under NB’s EPR legislation. Encorp is now preparing to take on a similar role in PEI, in line with proposed amendments to the Act’s Regulations. Having recently led NB’s successful transition to EPR, Encorp is proud to bring its industry expertise and proven EPR experience in Atlantic Canada to PEI.

ENCORP ATLANTIC/ENCORP ATLANTIQUE

With its head office located in Moncton, NB, Encorp is a federally incorporated, non-profit product stewardship association. The following organizations formed Encorp and are its governing members.

- BEER CANADA
- CANADIAN BEVERAGE ASSOCIATION
- CRAFT ALCOHOL NB
- RETAIL COUNCIL OF CANADA
- SPIRITS CANADA
- WINE GROWERS CANADA

PRODUCER RESPONSIBILITY

The Regulations state that “*no beverage container producer shall sell, offer for sale or otherwise distribute a beverage container in or into the province unless an agent of the beverage container producer operates a beverage container stewardship program in respect of the beverage containers*”. The Regulations further state that producers may appoint an agent to operate a beverage container stewardship program on their behalf. This Plan is submitted on behalf of registered beverage producers appointing Encorp as their agent/PRO to operate a stewardship program and fulfill the requirements of sections 111.05(1) and 111.05(2) of the Regulations.

PROGRAM FUNDING

PROGRAM FUNDING SOURCES

The BCSP managed by Encorp will be funded by the sale of processed materials to commodity markets and from unredeemed beverage container deposits. Additionally, a container recycling fee (CRF) mechanism will be established on container material types.

This revenue will be utilized to support various Program activities, including administration and all applicable operating costs. The CRF will be calculated annually as the net cost of recycling beverage containers and will be based on these guiding principles:

- All material types must be self-sustaining.
- There can be no cross-subsidization of different material streams.
- Each stream is responsible for the direct costs of managing its containers as well as a portion of the indirect costs based primarily on market share.

CRF rates will be calculated and communicated to producers in advance of implementation. Currently in the NB program, Encorp communicates CRF rates implemented April 1st of each year before the end of October of the previous year. Encorp will implement a similar notification process for the PEI BCSP. (Note: Notification of initial CRF rates for the PEI BCSP taking effect April 1, 2026, is dependent on the timing of approvals of this Stewardship Plan and may not be available by the end of October 2025, but Encorp will provide producers with as much advance notice as possible regarding initial CRF rates.)

OPERATING RESERVE

Encorp will utilize an operating reserve to support Program funding and contingencies, as well as make capital investments in the regular management of Program operations. The maximum reserve amount will not exceed an average of one year's operating expenses over the life of the Plan. It will be reviewed annually to ensure adequate funding targets are established.

PRODUCTS COVERED UNDER THE PLAN

ACCEPTED PRODUCTS (PROGRAM MATERIALS)

This Plan covers the responsibilities of managing deposit-bearing beverage containers sold in PEI. The Regulations require that all sealed containers containing a beverage in a quantity that does not exceed 5 L sold in PEI be subject to a deposit, paid by consumers at the point of purchase at retail.

Most beverage products available to PEI consumers will be subject to a deposit. However, there are some exceptions, as outlined in the definition of “beverage”. The Regulations define a beverage as:

“a ready-to-serve liquid that is intended for human consumption, but does not include milk, plant-based milk product alternatives that are fortified and a source of protein, unprocessed apple cider, concentrated drinks, infant formula, meal replacements or formulated liquid diets.”

Encorp will require registered producers of beverage products that fit this definition to package their products in reusable (refillable) or recyclable containers using any of Encorp’s accepted material types (see section *Beverage Container Material Types*).

Beverage product consumers will be encouraged to return all empty deposit-bearing used beverage containers (UBCs) for products that fit this definition to designated return facilities, known as “beverage container depots”. At these depots, consumers will receive a full refund of the deposit in exchange for returning the empty container in an acceptable condition to be reused or recycled.

Consumer information will be available on Encorp’s website regarding the types of products that fit the Regulations’ definition of “beverage” and how to properly prepare eligible empty beverage containers to be returned at depots for deposit refunds. Educational materials prepared by Encorp will also be available at depots and featured on its social media channels. As new producers join the Program, Encorp will continue to expand its consumer education efforts on the types of beverage products that are part of the Program for which empty containers are accepted for a deposit refund at depots.

Moreover, Encorp will provide a reference tool on its website for depot operators on whether specific beverage products are subject to a deposit. Encorp will endeavour to ensure that depot operators and their staff stay informed about new beverage products in the market, including whether they are subject to a deposit, by regularly issuing educational notices. These communication tools will remain accessible on Encorp’s website and will be regularly updated to reflect any changes.

NON-ACCEPTED PRODUCTS (NON-PROGRAM MATERIALS)

The BCSP managed by Encorp will be responsible for managing Program products – meaning deposit-bearing beverage containers.

Containers for beverage products that do not fit the definition of “beverage” found in the Regulations will not be subject to a deposit. They will not be accepted for a deposit refund.

The definition excludes the containers for the following beverage products.

- **Milk.** (The beverage must be labelled as some sort of milk. This includes cow and goat milk labelled as “fat-free/skim milk” (0% M.F.), “partly skimmed milk” (1% or 2% M.F.), or “whole/homogenized milk” (3.25% M.F.). It also includes flavoured milk, like strawberry or chocolate milk.)
- **Plant-based milk product alternatives that are fortified and a source of protein.** (The beverage must be labelled as “fortified.” The label must also NOT have any warning indicating it is “not a source of protein.”)
- **Unprocessed apple cider.** (The beverage’s label must have no mention of being heated, pasteurized or otherwise processed.)
- **Concentrated beverages.** (These beverages are not considered “ready-to-drink”, because they need to be mixed or diluted before drinking. Examples include cocktail mixes, frozen juices, syrups, condensed milk, coffee cream, cereal cream, flavour enhancers, etc.)
- **Infant formula.** (The beverage must be labelled as “infant formula.”)
- **Meal replacements.** (The beverage must be labelled as “meal replacement.”)
- **Formulated liquid diets.** (The beverage must be labelled as “formulated liquid diet.”)

The Regulations also exclude from the Program via its definition of “beverage container”:

- **beverages in containers larger than 5 L.**

Deposit refunds will apply only to containers from beverage products sold—and therefore purchased—in PEI. Encorp will advise depots to watch for containers likely purchased outside the province, such as those labelled with imperial (instead of metric) volume measurements, which typically originate from the U.S.A. Furthermore, some containers may be non-acceptable to Encorp under the BCSP due to being broken, contaminated, unidentifiable, or having an unacceptable material type, etc. (See Appendix C – *Non-Acceptable Beverage Containers*.) While these containers will not be eligible for a deposit refund, depots may still accept them for recycling and include them in regular pickups.

BEVERAGE CONTAINER MATERIAL TYPES

Encorp will accept deposit-bearing beverage containers made from the following material types as part of the BCSP. Encorp will thus aim to recover and report on recovery rates for deposit-bearing beverage containers and related packaging made from all these material types. **Note that material fates may change from time to time based on the availability of commodity markets.**

MATERIAL TYPE / SORT	DEFINITION & EXAMPLES	MATERIAL FATE
Aluminum 5 L and Under	Definition: All deposit-bearing beverage products that are packaged in aluminum containers, including the container’s metal closure/tab. Examples: Soft drink cans, iced tea/coffee beverages in cans, energy drink cans, juice cans, beer cans, alcohol beverages like ciders and coolers packaged in cans, etc.	Recycled Aluminum UBCs collected by Encorp will be sent to a USA-based broker with connections to an aluminum smelter. Encorp will pool its aluminum containers with other similar beverage container management programs in Canada. Aluminum UBCs can be turned back into sheet stock for use primarily by beverage manufacturers to make new beverage containers.

PET*, Including Lids/Caps 5 L and Under  <i>*Note that current end-markets will require Encorp to ask depots to separate PET containers used for alcohol beverages from PET containers used for non-alcohol beverages due to the different grades of plastic used (PET containers for alcohol beverages are thicker). PET (Alcohol) and PET (Non-Alcohol) may thus be considered different material sorts by Encorp, each with their own data for reporting purposes.</i>	Definition: All deposit-bearing beverage products packaged in plastic containers displaying the number 1 polyethylene terephthalate (PET or PETE) resin code. PET is a very popular type of plastic used for packaging beverages and can be transparent/translucent (either clear or coloured light green, light blue, etc.) or opaque/pigmented (usually white). All parts of the container are recyclable, including the lid/cap. Examples: Water bottles and jugs, juice bottles and jugs, small (under 2 L) and large (2 L) soft drink bottles, bottles used for various non-alcohol beverages such as iced tea/coffee, kombucha, cannabis beverages, nutrition/sports drinks like protein and electrolyte drinks, etc. While most alcohol beverages are packaged in either aluminum or glass, some, like spirits (vodka, rum, gin, etc.), are sometimes packaged in plastic PET bottles.	Recycled PET containers collected by Encorp are currently going to a recycling facility in Nova Scotia. At this facility, containers are flaked and shipped to a wash facility, where they can become raw materials for manufacturers of various plastic products, including new beverage containers, automotive components, strapping material, and fibres.
HDPE Translucent, Including Lids/Caps 5 L and Under 	Definition: All deposit-bearing beverage products packaged in translucent plastic containers displaying the number 2 high-density polyethylene (HDPE) resin code. All parts of the container are recyclable, including the lid/cap. Examples: Water jugs, juice bottles and jugs, etc.	Recycled HDPE translucent containers collected by Encorp are currently processed through the same recycling and wash facilities as PET containers. Like PET containers, HDPE containers can become new raw materials for manufacturers of various plastic products, including new beverage containers, automotive components, strapping material, and fibres.
Non-Refillable Glass (Green, Clear & Brown) 5 L and Under	Definition: All deposit-bearing beverage products packaged in glass containers not intended to be reused. Glass beverage containers are always either green, clear or brown. Examples: Glass is most often used to package alcohol beverages, and typical examples include beer bottles, wine bottles, spirit bottles, etc. Although not as popular a choice as PET, glass is also sometimes used to make bottles for non-alcohol beverages like soda/soft drinks, iced tea/coffee, juice, kombucha, cannabis beverages, etc.	Recycled Non-refillable glass containers collected by Encorp are currently sent to a recycling facility in New Brunswick. At this facility, the glass containers can be granulated into a near sand-like material (cullet). Cullet can be used to make new bottles or related products like fibreglass material (home insulation) or can be mixed in aggregate materials used in road bedding or drainage material in septic-field applications.

Refillable Glass 5 L and Under	Definition: All beer products packaged in refillable glass industry-standard bottles (ISBs) or refillable glass proprietary bottles. These bottles often feature a twist cap and are either brown, green or clear in color. <i>Industry Standard Bottle (ISB)</i> - The ISB is a brown glass container that holds 341 ml of beer. It is approximately 23 cm in height, weighs 263 grams and features a twist cap. <i>Sleeman Proprietary Refillable Bottle:</i> - The Sleeman proprietary refillable bottle is a clear glass bottle embossed with a Sleeman logo, which holds 341 ml of beer, is of similar size and shape to the ISB and features a twist cap. <i>Molson Coors Proprietary Refillable Bottle:</i> - Molson Coors uses a proprietary bottle for its "Miller Genuine Draft" product. It is a clear glass bottle embossed with a Miller logo, which holds 355 ml of beer. It does not feature a twist cap. <i>Labatt Proprietary Refillable Bottle:</i> - Labatt uses a proprietary bottle for two of its Corona products, "Corona Sunbrew" and "Corona Extra". Both bottles are clear glass bottles featuring a unique marking on the bottle neck that indicates the bottle is refillable. They hold 330 ml of beer and are slightly taller than ISBs and other proprietary refillable bottles currently on the market. They do not feature a twist cap. Examples: Current producers that use refillable glass containers (ISBs and/or proprietary bottles) to package their beer products are listed in Appendix A.	Reused + Recycled At End of Life Encorp will ask depots to identify and segregate refillable glass beer products from non-refillable glass containers, so that they can be sent to various facilities in the Maritimes, Ontario, and Quebec for washing, sterilization, and redistribution among participating Beer Canada member brewers. Once these containers reach the end of their useful life, they can be sent to recycling facilities in the same manner as non-refillable glass. Unless chipped or broken, refillable glass beer containers in Canada are typically reused on average up to 15 times* after which they can be sent to appropriate end-markets for recycling. <u>*Source: "Who Pays What 2018: An Analysis of Beverage Container Collection & Costs in Canada." CM Consulting. 2018.</u>
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Cartons 3(Polycoat Containers & Wine Boxes*), Including Lids/Caps 5 L and Under <i>*Wine boxes refer to the carton packaging used in conjunction with plastic wine bladders/pouches for boxed wine, also commonly referred to as "bag-in-box".</i>	Definition: All deposit-bearing beverage products packaged in polycoat containers (aseptic or gable top) plus all box (cardboard) packaging used for deposit-bearing boxed wine (wine sold in a bag inside a box). All parts of the container are recyclable, including the lid/cap. Attached straws (i.e. juice boxes) can be recycled or recovered. Examples: Juice boxes, deposit-bearing plant-based milk product alternatives like almond, rice or oat milk packaged in polycoat containers, beverages made with dairy like eggnog and drinkable kefir packaged in polycoat containers, coconut water packaged in polycoat containers, cardboard boxes used for boxed wine packaging, etc.	Recycled Carton containers collected by Encorp are currently sent to a recycling broker in Nova Scotia, who can then resell the materials to various recycling facilities. Carton containers can be recycled into paper products, such as paper towels, tissue, office paper, and building materials.
Steel 5 L and Under	Definition: All deposit-bearing beverage products packaged in steel containers, including the closure. Examples: Certain cans as well as mini-kegs used for beer, juice cans (ex.: vegetable, tomato and pineapple juice), etc.	Recycled Steel containers, including bi-metal containers, collected by Encorp are currently sent to a scrap metal dealer in Nova Scotia for metal recovery.
Plastics (Other) / Pouches, Including Lids/Caps 5 L and Under HDPE  HDPE PIGMENTED PP  PP PS  PS OTHER  OTHER Pouches  LDPE	Definition: All deposit-bearing beverage products packaged in pigmented/opaque plastic containers displaying the number 2 high-density polyethylene (HDPE) resin symbol, or any plastic displaying the number 5 polypropylene (PP) symbol, number 6 polystyrene (PS) resin symbol, or number 7 (OTHER) resin symbol (meaning "other plastics," such as acrylic, nylon, polycarbonate, and polylactic acid and multilayer combinations of different plastics). This material sort/category also includes all deposit-bearing beverage products packaged in low-density polyethylene plastic pouches (resin symbol 4 - LDPE). All parts of the container can be recovered, including the lid/ cap. Attached straws (i.e. juice pouches) can be recycled or recovered. Examples: Bottles for drinkable yogurt or other beverages made with dairy (such as milkshakes, milk protein shakes and iced coffee) are often made with any of these types of plastics (usually HDPE or PP), little snack-size juice cups are made with PS, and juice pouches as well as wine bladder/pouches used in boxed wine are made with LDPE.	Energy Recovery Encorp currently sends containers made from plastics that are more difficult to recycle due to the lack of available end-markets to a facility in Nova Scotia for use in waste-to-energy. Although present in generally low volumes, Encorp will continue to explore market opportunities to recycle these plastics.

Cardboard Packaging (Boxes) for Refillable Glass	Definition: Cardboard/boxboard packaging used in selling 6-packs, 8-packs, 12-packs, 16-packs, and 24-packs of beer in refillable glass containers (either ISBs or proprietary bottles). Consumers will be encouraged to return refillable glass beer bottles to the depot in the cardboard/boxboard cases in which they are sold (note, however, that there is no deposit on the packaging itself). Examples: Cardboard/boxboard cases with refillable glass ISBs or proprietary bottles from producers listed in Appendix A.	Recycled Consumers will be encouraged to return refillable beer bottles in the cardboard or boxboard cases in which they are sold. Depots will use these to pack and palletize empty refillable beer bottles. Upon being collected and transported to the same facilities as the refillable beer bottles, this packaging will be sent to carton and paper packing recycling facilities in New Brunswick, Nova Scotia, Quebec, and Ontario, where it may be recycled into new corrugated boxes and boxboard boxes.
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DEPOSIT AND REFUND AMOUNTS

111.05 (2) An applicant shall submit with an application made under subsection (1) a detailed written proposal outlining

(g) the amount of a deposit for a beverage container and how the deposit is collected and refunded.

In accordance with sections 111.09 (1), (2) of the Regulations, the Program will have a full-back deposit refund structure for all qualifying beverage containers. The full refund model will be introduced on April 1, 2026.

For consumers, the deposit amount will need to be visible on receipts and shown separately for each deposit-bearing beverage product. Consumers will receive a full refund on deposits paid for beverage products when they return empty deposit-bearing beverage containers to any depot in PEI.

CONTAINER TYPE*	DEPOSIT	REFUND
All container types except non-refillable glass containers over 500ml for alcohol beverages	10 cents	10 cents
Non-refillable glass containers over 500 ml for alcohol beverages	20 cents	20 cents
Refillable glass (beer bottles)	10 cents	10 cents

**Will apply to all beverage containers 5 L and under for products that fit the Regulations' definition of "beverage."*

COLLECTION AND PROCESSING OF MATERIALS

111.05 (2) An applicant shall submit with an application made under subsection (1) a detailed written proposal outlining

(a) a description of the proposed methods for recycling beverage containers, including information respecting all storage, collection, transportation, processing, and disposal facilities and their locations.

(b) information on the beverage container return system to be used by the public, including return facilities and a description of the manner in which existing facilities have been considered to maximize the return of beverage containers.

PROVINCE-WIDE UBC COLLECTION SYSTEM

As the designated PRO for the BCSP, Encorp will be responsible for recovering deposit-bearing beverage containers on behalf of beverage producers. UBC recovery will continue to be carried out through PEI's current network of beverage container depot locations. At these depots, consumers will receive full deposit refunds for returning empty UBCs in acceptable condition to be reused or recycled. These depots will store all received UBCs on-site between regular pickups.

For the transportation, storage, and processing of all non-refillable UBCs collected at depots, Encorp intends to enter into a service agreement with the following service provider:

- Label Construction & Sanitation

From this service provider's processing centre, the collected materials will be sent to various end-markets. Unprocessed materials will also be stored until they can be bailed and shipped to end-markets.

For refillable glass, Encorp believes it will be essential to maintain the traditional system for managing refillable glass beer bottles and their related packaging. This process has long been coordinated with other Maritime provinces to maximize efficiency. Encorp will aim to have an agreement in place between itself and Beer Canada member brewers using refillable glass beer bottles in PEI – same as it does in NB – to maintain this collaboration, consistency and efficiency across provincial borders. Encorp will serve as the PRO and oversee the administration of refillable containers, while the collection, transportation, and processing of these containers will remain independently managed by Molson Coors. **For the transportation, storage, and processing of all refillable glass (beer) containers and packaging (cardboard cases/boxes) for refillable glass collected at depots, Encorp will thus work with Molson Coors to contract the services of the following service provider:**

- Armour Transportation Systems

From this service provider's processing centre, refillable beer containers will be shipped for reuse to various Beer Canada member wash/sterilization facilities, and packaging for refillable beer containers will be sent to recycling

facilities. Similarly, this service provider will be responsible for storing all collected refillable glass containers and packaging between shipments to processing facilities.

Furthermore, Encorp will also seek collaboration with Island Waste Management Corporation in Charlottetown, PEI, regarding the recovery and reporting of deposit-bearing beverage containers collected at curbside.

More information on Encorp's service providers, as well as end-markets, can be found in Appendix E (*Contracted Service Providers*) and Appendix F (*End-Markets*). Encorp will keep the Minister of Environment, Energy and Climate Action advised of any changes in its methods used to recover and process deposit-bearing UBCs throughout the duration of this Plan.

UBC RECOVERY – BEVERAGE CONTAINER DEPOTS

Encorp is already familiar with the current network of beverage container depot operators in PEI, having been contracted by the province since 2008 to process data and payments to operators.

Encorp thus intends to continue working with these operators as the designated return facilities for beverage containers following the transition to EPR. Encorp will aim to sign service agreements with these operators to solidify a strong business-to-business relationship within the BCSP. (See Appendix D – *Depots*).

Depots with signed service agreements with Encorp will thus continue to be official return facilities for consumers seeking their deposit refund on empty deposit-bearing beverage containers post April 1, 2026. Encorp will also strive to investigate other opportunities to enhance consumer access and convenience that will facilitate increased UBC recovery rates (see *Future Research & Development* section).

As detailed in their agreements, depot operators will receive a set service fee from Encorp for their role in accurately counting, sorting, storing, and preparing collected UBCs for shipment to processing facilities. Encorp will also offer depots with lower volumes (less than 3M containers per year) an annual presence fee to help ensure that even smaller/rural centres can remain operational and financially viable. Encorp will make regular payments to depot operators through Electronic Funds Transfer. This process will be facilitated with Encorp's proprietary chain-of-custody system (*EnSys*) and point-of-sale (POS) system, *EnSys-Connex*, which Encorp intends to install free of charge in all depots (see *Future Research & Development* section).

UBC RECOVERY – CURBSIDE RECYCLING

In PEI, curbside recycling is currently managed by Island Waste Management Corporation. Encorp recognizes this existing system and will seek to establish a collaboration with Island Waste Management Corporation regarding tracking, recovering and reporting on deposit-bearing beverage containers collected curbside.

HEALTH & SAFETY

Since UBCs collected at depots will be manually sorted, bulked, and shipped for recycling, Encorp will set clear environmental and safety requirements for depot operators.

- Containers must be empty, clean, identifiable, and unbroken. Depots must reject contaminated, altered, or non-recyclable items (see Appendix C).
- Encorp's service provider will supply bulk bags (1 m³ with grab handles) and rigid tubs for non-refillable glass, plus pallets and cartons for refillable bottles. Heavy bags should be palletized; glass must remain in bags/tubs. Damaged or contaminated refillables should be palletized separately as "junk."
- Depots must have equipment (pallet jack or forklift) to move heavy bags/tubs and stacked pallets.
- Depots will be instructed to follow appropriate waste disposal procedures if they find contaminants or hazardous waste items in containers after a customer has left the premises, and to be vigilant so that such items are not placed in bulk bags/tubs with the UBCs being shipped to processing facilities.
- Since depots are independently owned businesses, it will be each individual depot operator's responsibility to ensure their business conforms to all applicable laws, regulations and Occupational Health and Safety Standards. This requirement will also be stated in the service agreements Encorp signs with each operator.
- Encorp will require all current and future service providers handling UBC collection, transportation, storage, and processing to operate in compliance with all applicable laws, regulations, and Occupational Health & Safety Standards, and to maintain all necessary permits, licences, and certificates. Providers will need to supply proof of compliance to Encorp and show that every collection vehicle is equipped with a hazardous substance spill kit.

FUTURE RESEARCH AND DEVELOPMENT

111.05 (2) An applicant shall submit with an application made under subsection (1) a detailed written proposal outlining

(c) information on current developments related to beverage container recycling and return systems, including planned activities in new innovations, technology or improvements for public accessibility and convenience.

Encorp's Business Development Strategy is focused on improving the efficiency of UBC collection, transportation, and processing, while also supporting depots in offering more accessible and convenient UBC return options for consumers.

Drawing on over 30 years of experience in New Brunswick, Encorp's predecessor, Encorp Atlantic Inc., introduced its *EnSys-Connex* POS system in 2022 to help redemption centres (RCs) better manage their operations and improve transparency in UBC return/redemption transactions. In 2024, this POS system was adopted province-wide as part of the new EPR Beverage Containers Program. It continues to evolve based on feedback from operators.

Encorp plans to offer the same POS system to PEI depots at no cost, as part of service agreements. The goal is to provide a helpful tool that supports depot operations and enhances service quality.

To further improve public convenience, Encorp Atlantic Inc. also conducted an eight-year research initiative (2014–2022) that explored consumer-friendly return models. The *Re-Centre* pilot project in Moncton demonstrated strong public support for the bag-drop concept, which allows for quick and easy UBC returns while helping depots optimize labour.

Encorp is currently exploring an updated version of this self-serve bag-drop system in NB, with potential for future rollout in PEI. This express service would allow consumers to drop off UBCs at retail-based locations and manage refunds through online accounts, making recycling more convenient while complementing existing depot services.



Illustrated concepts: (top) Encorp's EnSys-Connex POS system, (bottom) express recycling drop & go stations.

QUALITY ASSURANCE/QUALITY CONTROL

111.05 (2) An applicant shall submit with an application made under subsection (1) a detailed written proposal outlining

(f) the quality control and assurance aspects of the program, including tracking and auditing mechanisms.

COLLECTION SYSTEM

As detailed in the *Future Research and Development* section, Encorp will utilize its specially designed POS system, *EnSys-Connex* and chain-of-custody system, *EnSys*, to record and track UBCs and related packaging materials managed from the point of collection to processing facilities for shipment to end-markets.

Furthermore, Encorp will implement the same quality assurance/quality control (QA/QC) measures with depots in PEI as it currently uses in NB. These measures help safeguard accuracy and integrity across the system while reducing the risk of added costs from reporting discrepancies. Randomized blind recounts of bulk bags of UBCs collected from depots will be conducted, with results validated and analyzed by an independent statistician who helped develop Encorp's QA/QC model (see Appendix D – *Contracted Service Providers*). Each depot will receive a confidential monthly *Accuracy Trend Report* by email, showing their accuracy trend over time to help identify and address under- or over-reporting early.

FINANCES

Encorp will engage third-party auditors to review the financial statements it prepares for the PEI BCSP. These audited statements, which include the handling of deposits and CRFs for deposit-bearing containers, will be submitted annually to the Minister of Environment, Energy and Climate Action along with Encorp's annual reports.

Furthermore, Encorp will require all its registered producers to submit an Annual Independent Verification to Encorp regarding their sales of deposit-bearing containers in PEI to verify the accuracy of their remittance payments (deposits and CRFs).

COMMUNICATIONS PLAN

111.05 (2) An applicant shall submit with an application made under subsection (1) a detailed written proposal outlining

(d) a communication plan to inform the public about the beverage container stewardship program including an education and awareness component that includes information about

- i. the beverage container stewardship program, specifying products accepted by the program,
- ii. how and when consumers can return beverage containers,
- iii. the environmental benefits of participating in the beverage container stewardship program, and
- iv. a description of any fee collected from consumers as it relates to the recycling of beverage containers.

The overall goal for Encorp's communications strategies and tactics for PEI's BCSP will be to increase public knowledge and participation in the Program. This will be done through continued education on beverage container recycling, ad campaigns featuring Program improvements and any other types of incentives that make it more enticing for consumers to return and redeem their UBCs, as well as Encorp's community outreach *Recycling Hero* programming, which aims to foster lifelong anti-litter and pro-recycling habits, particularly among younger generations.

The following are some of the key public education elements that Encorp plans to integrate into its communications regarding the PEI BCSP.

EDUCATION ON BEVERAGE CONTAINER RECYCLING

WEBSITE

Encorp's website—currently home to consumer information at **encorpatl.ca/recycle**—will be expanded to include two sections, both directing to their own dedicated mini external websites: one for PEI residents with detailed information about the BCSP, and the other focused on NB. Similar to the current content aimed at NB residents, the new PEI consumer education website will include an interactive map of UBC return locations on the island, clarifications on which types of beverage products are deposit-bearing, and instructions for preparing empty containers for recycling. The website will also provide information about Encorp's current *Recycling Hero* public space recycling programs, which will be made available for schools, organizations, and community groups across PEI to join. As the PEI BCSP evolves, the website will continually be updated with more information, engaging infographics, and educational videos to highlight the Program's positive environmental impact.



Encorp's website will be revamped to direct consumers to either PEI or NB mini sites for information regarding returning/redeeming UBCs.

SOCIAL MEDIA

Encorp will create new accounts aimed at educating consumers on various social media platforms specifically for the PEI BCSP, such as Facebook, Instagram & YouTube. Encorp will utilize this social media presence to feature information on UBC return locations, accepted Program products, how to properly prepare recyclables, and other targeted ads/promotions in line with planned communication campaigns. Encorp will also utilize social media to promote community partnerships by sharing success stories from schools, organizations, and community groups across PEI that participate in its *Recycling Hero* programs.



CONSUMER INFORMATION IN DEPOTS

Encorp will deliver consumer-facing materials, such as posters and handouts, to all depots in PEI. These materials will feature information on accepted Program products, deposits and refunds, how to properly prepare recyclables, and other relevant details deemed necessary to have readily available in return facilities.



Examples of consumer-facing posters currently in NB redemption centres.

Encorp will develop similar posters and handouts for the network of depots in PEI.

CONSUMER INFORMATION AT RETAIL

To support retailers in educating consumers about beverage container recycling, Encorp will create materials such as shelf-talkers and posters that retailers can display. Encorp will also pursue ad placements to run audio messages on PA systems in select PEI retail locations.

Encorp will develop shelf-talkers and posters, similar to those created for NB's EPR Beverage Containers Program (shown on the left) and make them available to retailers who wish to display consumer education materials on deposits/refunds and UBC recycling.



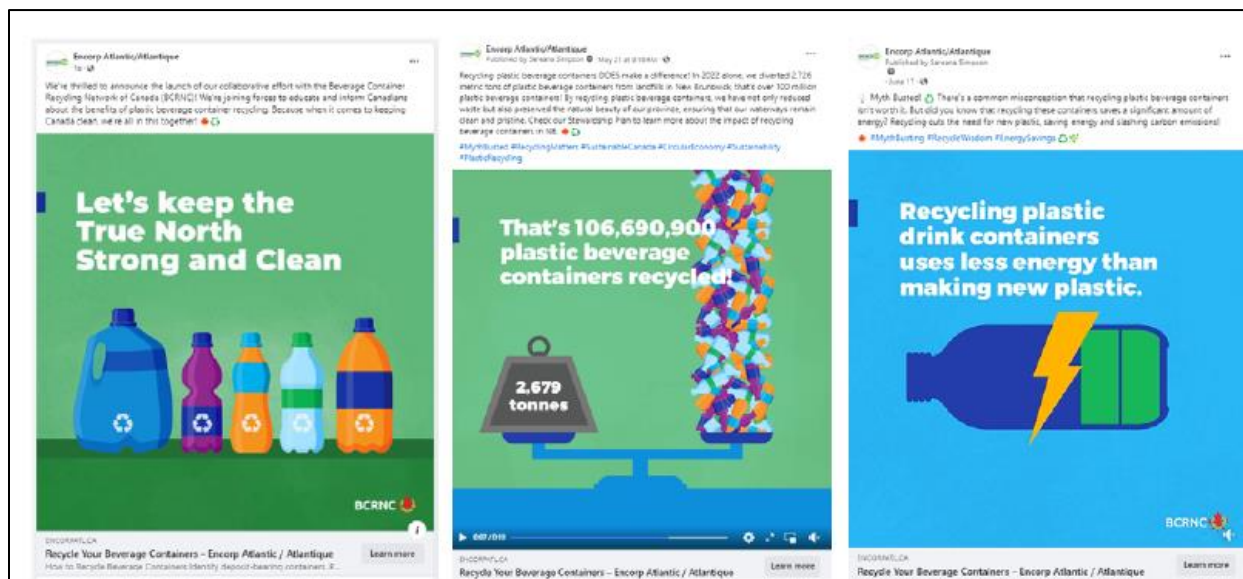
AD CAMPAIGNS

In NB, since 2024, Encorp, as the PRO for that province's EPR Program related to beverage containers, has delivered annual ad campaigns focused on Program improvements that make UBC returns more convenient, accessible, and appealing for consumers. For the PEI BCSP, Encorp plans to create and execute yearly ad campaigns of a similar nature tailored to the specific realities of returning and redeeming UBCs in PEI, with the aim of boosting participation in recycling and increasing UBC recovery rates.



Sample ad from Encorp's successful "Recycling Matters. Full Refunds Add Up" campaign used in NB. Encorp will create and tailor yearly similar ad campaigns focused on Program improvements or other incentives that can make UBC return/redemption more enticing for PEI residents.

Encorp is also part of the Beverage Containers Recycling Network of Canada (BCRNC), which unites recycling affiliates across Canada. The network's communications committee collaborates on national marketing campaigns to address key recycling issues through public education. Encorp will expand the promotion of these national marketing campaigns as they arise to consumers in PEI.



Example social media posts from the BCRNC shared by Encorp in NB in 2024. Encorp will expand the promotion of BCRNC consumer education content to new social media channels created for the PEI BCSP.

RECYCLING HERO SPECIAL PROGRAMMING (ANTI-LITTER/PRO-RECYCLING EDUCATION)

111.05 (2) An applicant shall submit with an application made under subsection (1) a detailed written proposal outlining

(e) a plan for the prevention and reduction of the littering of empty beverage containers.

“*Recycling Hero*” is a strategy Encorp currently uses in NB to promote recycling habits in public spaces. It encourages consumers to become *Recycling Heroes* by always choosing to recycle their UBCs rather than leaving them behind as litter. The branding is featured in Encorp’s public outreach and education programs, particularly those targeting schools and community groups. With a strong focus on youth engagement, *Recycling Hero* is a fun, youth-oriented initiative aimed at fostering lifelong anti-litter and pro-recycling habits. The goals of all *Recycling Hero* programs spearheaded by Encorp are to:

- Encourage beverage consumers to stop littering with UBCs while out and about;
- Increase awareness and use of public space recycling bins;
- Promote anti-littering and pro-recycling education among children and youth through school programs and partnerships; and
- Increase positivity surrounding UBC recycling through empowering community/grassroots environmental leadership.



As part of PEI’s BCSP, Encorp will make all current *Recycling Hero* resources and programs available across PEI, as well as any future initiatives – if applicable – under the *Recycling Hero* brand.

RECYCLING HEROES IN SCHOOL

Encorp will expand its popular *Recycling Heroes in School* program, currently offered in NB, to schools in PEI. This program will partner public schools with depots to help them collect and return deposit-bearing beverage containers for recycling. Similar to the NB program, schools that enroll in this Encorp spearheaded program will receive recycling bins for classrooms, cafeterias, and hallways, along with educational posters and fun *Recycling Hero* promotional items for students. At the end of each school year, top-performing schools will be rewarded to encourage competition and motivate schools to collect and return as many UBCs as possible, including through community bottle drives. Encorp will aim to launch its school program in PEI in the fall of 2026 and continue to expand it by enrolling new schools every year until the vast majority of the province’s public schools are enrolled.



Encorp’s *Recycling Heroes in School* program asks schools to appoint a group of “Recycling Ambassadors”—often a class or eco-team—to lead recycling efforts. They educate peers, manage bins, and prepare UBCs for pickup. With staff support, they also decide how to use the funds earned, making recycling a hands-on entrepreneurial project.

RECYCLING HERO COMMUNITY CLEANUP GRANTS

Every spring, Encorp makes a limited number of community cleanup grants available to *Recycling Heroes* – schools and community groups – to help them organize a beach sweep, park cleanup or cleanup of other public outdoor spaces. Encorp will aim to expand these grants to make some available to PEI schools and community groups as of 2027. Encorp will link each grant recipient to a local depot, so that deposit-bearing beverage containers found during their community cleanup event can be returned for recycling.



Encorp's Community Cleanup Grants support youth-led initiatives that aim to promote anti-littering awareness while fostering environmental stewardship in the next generation.

RECYCLING HERO EVENT SPONSORSHIP

As part of its events sponsorship program, Encorp is able to provide UBC collection tools and supplies to event organizers who want to be *Recycling Heroes* by ensuring that beverage containers from their events are collected on-site. Available supplies include large outdoor UBC collection bins and sandwich board signs for public education at events. Organizers are responsible for ensuring UBCs collected at their event are sent to the return facility of their choice. Encorp plans to start offering public space event sponsorships in PEI as of 2027, aiming to spread its *Recycling Hero* messaging to community event attendees in a variety of outdoor and indoor public spaces across the province.



UBC collection bins and education signs currently used at events sponsored by Encorp in NB. Encorp will create some to be used in PEI

REPORTING COMMITMENTS

Encorp will meet with the Department of Environment, Action and Climate Change on a bi-annual basis or more frequently as required to review the BCSP and discuss performance. An annual report on the reporting commitments below will be submitted to the Minister before June 30 of each year, or on or before the date set by the Minister. Once approved, the report will be publicly available via posting on Encorp's website.

Key Performance Indicator (KPI)	Reporting Commitment
Collection	• Number of collection facilities. • Total quantity of beverage containers collected during the previous calendar year. • Recovery rate (by units for beverage containers and by weight for related packaging).
Management of materials/environmental impact	• Types of processes used to reuse and recycle the beverage containers. • Location of any long-term containment or final treatment and processing facilities for beverage containers. • Records showing that the Program adheres to established industry vendor qualification standards, or information demonstrating that the beverage containers collected are managed in a manner that employs environmental and human health and safety standards that meet or exceed applicable federal, provincial and local regulations.
Awareness	• Percentage of PEI residents aware that beverage containers have a deposit and that empty containers can be returned to a beverage container depot for a full deposit refund.
Financials	• Annual financial statements, as prepared by an independent auditor.
Obligated Producers	• Aggregate information specifying the total amount of beverage containers distributed by beverage container producers during the previous calendar year. • List of producers having appointed Encorp as their agent/PRO.

APPENDIX A

IDENTIFYING OBLIGATED PRODUCERS

The following efforts, led by Encorp, will help enforce producer registration with Encorp, proper labelling of containers, as well as identification of deposit-bearing products at retail, while also minimizing the potential impact of unregistered or non-compliant producers.

- Encorp will conduct retail visits across PEI to monitor the types of beverage products being sold, confirm that deposits are being correctly applied, and identify any brand holders meeting the “producer” definition in the Regulations that may not be registered. If unregistered products are found, Encorp will follow up directly with the brand holder to determine if they qualify as obligated producers under the Regulations and initiate the registration process where appropriate.
- In addition to retail visits, Encorp will work with major retailers in the province to obtain vendor lists. These lists detail the beverage products being sold, allowing Encorp to cross-reference vendors against its registry to identify gaps in compliance. This collaborative approach will help ensure that producers operating within the province are adhering to deposit and CRF requirements.
- Encorp will also receive valuable input from depot operators. Depot staff will be encouraged to report unfamiliar or unrecognized beverage containers, prompting Encorp to investigate further and identify the responsible producer. This frontline insight is essential for detecting new or imported products that may not yet be registered.
- Finally, all registered producers will be required to submit their deposit-bearing beverage product lists annually. This will help Encorp verify that producers – and subsequently, retailers – are identifying the correct types of products as deposit-bearing.

APPENDIX B

PRODUCERS WITH DEPOSIT-BEARING BEVERAGE PRODUCTS PACKAGED IN REFILLABLE GLASS CONTAINERS

Encorp's agreements with the following producers (6 in total) to act as their designated PRO for the BCSP will include provisions for administering their industry standard bottles (ISBs) or proprietary bottles as refillables. The collection, transportation and processing of all refillable glass beer bottles in PEI will be managed under Encorp by these Beer Canada member brewers through a collaborative effort led by Molson Coors



INDUSTRY STANDARD BOTTLE (ISB)

GARRISON BREWING CO.

- Irish Red
- Tall Ship

LABATT BREWING CO.

- Budweiser
- Bud Light
- Keiths
- Labatt Blue
- Michelob Ultra
- Oland Schooner

MOLSON COORS

- Coors Light
- Coors Original
- Molson Canadian
- Miller Lite
- Molson Ultra
- Rickard's Red
- Rickard's Taster Pack

PROPELLER BREWING CO.

- Propeller IPA



PROPRIETARY BOTTLE (CLEAR)

SLEEMAN BREWERIES

- Sleeman Clear

MOLSON COORS

- Miller Genuine Draft

LABATT BREWING CO.

- Corona Extra
- Corona Sunbrew

APPENDIX C

NON-ACCEPTABLE BEVERAGE CONTAINERS

In addition to rejecting deposit refunds on containers for beverage products that do not fit the definition of “beverage” in the Regulations, some containers will be non-acceptable to Encorp under the BCSP due to being broken, contaminated, unidentifiable, or having an unacceptable material type, etc.

BROKEN CONTAINERS

- Container is shattered into tiny pieces – can no longer identify the container.

CONTAMINATED CONTAINERS

- Container is filled with organic or hazardous waste (ex: dirt, garbage, sand, mud, rocks, needles, cigarette butts, dead mice, bodily fluids, etc.).
- Container is covered in excessive dirt, paint, or other significant residues.
- Container was modified for other uses (ex: drug pipe).
- Container is altered in a way that makes it unrecyclable.

UNIDENTIFIABLE CONTAINERS

- Container has had its label removed (cannot identify any markings or see the *Return for Refund* message).
- Container is flattened (cannot identify any markings or see the *Return for Refund* message).

OUT-OF-PROVINCE CONTAINERS

- How to identify them:
 - The label may lack a *Return for Refund* message
 - Content volume may be only in imperial measurement (i.e., ounces), not metric (ml or L).

NON-BEVERAGE CONTAINERS

- Container is not intended for a beverage (ex : chicken/beef broth, pasta sauce, olive oil, vinegar, vanilla extract, etc.)

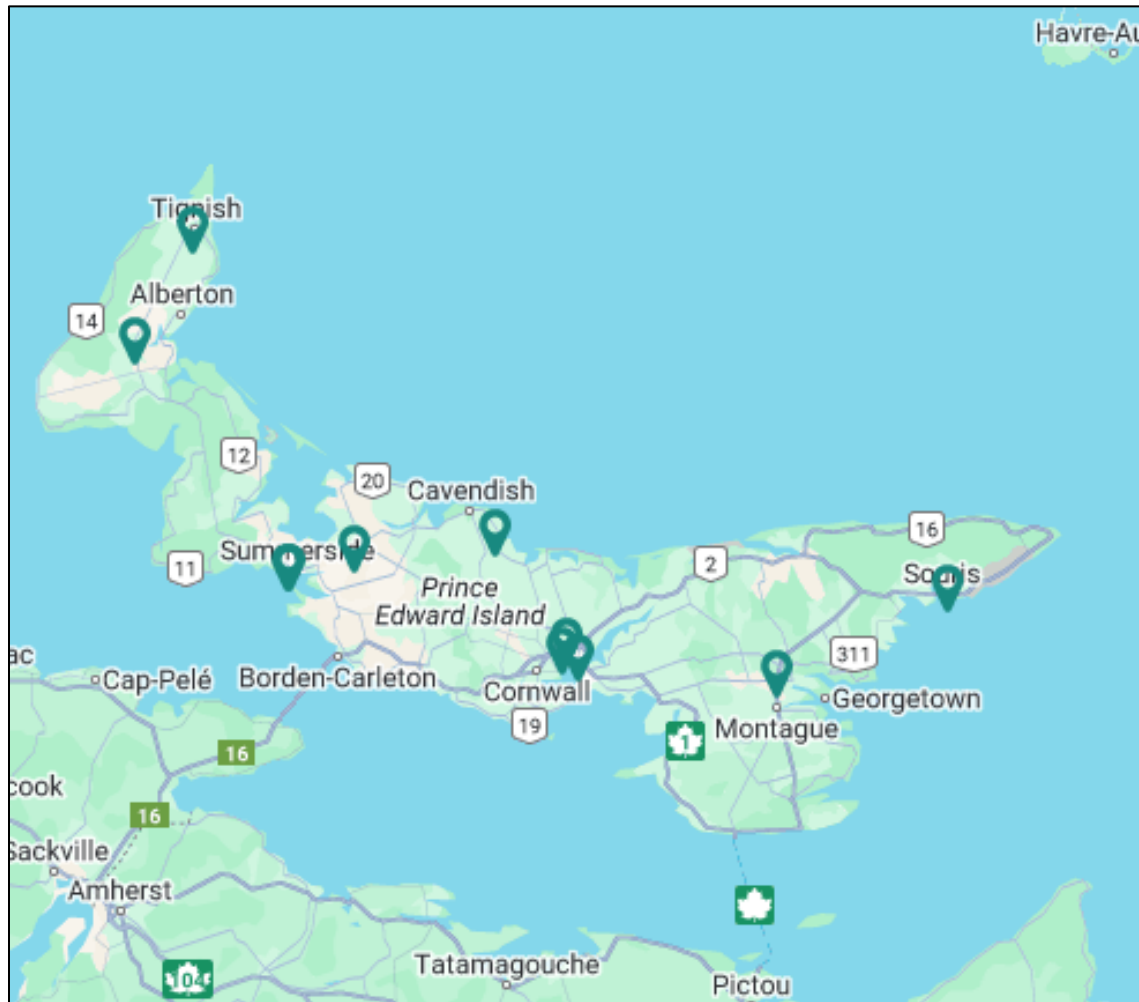
CONTAINERS OVER 5 L

- Container’s volume is larger than 5 L (only beverage containers 5 L and under are deposit-bearing).

APPENDIX D

DEPOTS

NAME	ADDRESS	CITY/TOWN/VILLAGE
Aubrey's Bottle Exchange	29 Garfield Street	Charlottetown
Bertha's Bottle Exchange (Bloomfield)	28 Griffin Drive	Bloomfield
Bertha's Bottle Exchange (Tignish)	194 Dalton Avenue	Tignish
Cash in Hand Bottle and Metal Inc.	33 Thompson Drive	Charlottetown
Cash-In-Depot	4393 Alleys Mill Road	Cardigan
Charlottetown Bottle and Metals Ltd.	4 MacAleer Drive	Charlottetown
Don's Bottle Exchange	601 Notre Dame Street	Summerside
Eastern Feed and Seed Ltd	461 St. Catherine's Road	Souris
Highland Bottle & Metal Exchange	578 Notre Dame Street	Summerside
Pineau's Bottle Exchange	42 Timber Lane	North Rustico
Trailside Recycling Depot	25001 Route 2	Kensington



APPENDIX E

CONTRACTED SERVICE PROVIDERS

COLLECTION, TRANSPORTATION, STORAGE, PROCESSING & QUALITY CONTROL (NON-REFILLABLES)

Label Construction & Sanitation, Charlottetown, PEI

COLLECTION, TRANSPORTATION, STORAGE, PROCESSING & QUALITY CONTROL (REFILLABLE GLASS & PACKAGING)

Armour Transportation Systems, Charlottetown, PEI

QA/QC & STATISTICAL MONITORING

Label Construction & Sanitation, Charlottetown, PEI

Atlantic Statistical Analysis, Dieppe, NB

FINANCES & AUDITS

KPMG, Moncton, NB

RESEARCH & COMMUNICATIONS

Narrative Research, Halifax, NS

AppEco Inc., Montreal, QC

Dunne Group, Charlottetown, PEI

APPENDIX F

END-MARKETS

ALUMINUM

Shupan, Kalamazoo, MI

PET & HDPE TRANSLUCENT

Evergreen, Amherst, NS

NON-REFILLABLE GLASS (GREEN, CLEAR & BROWN)

Rayan Environmental Solutions, Moncton, NB

REFILLABLE GLASS (BEER)

Industry-standard bottles (ISBs) will be sent for cleaning and reuse to:

- The Oland Brewery in Halifax, NS
- Molson Coors Canada brewery in Toronto, ON
- Molson Coors Brewery in Montreal, QC

Proprietary Labatt refillable clear glass bottles will be transported to the Oland Brewery in Halifax, NS.

Proprietary Sleeman refillable clear glass bottles will be sent to Sleeman's brewery in Guelph, ON.

Proprietary Molson Coors refillable clear glass bottles will be sent to Molson Coors Canada's brewery in Toronto, ON.

Broken glass resulting from or related to the transportation and processing of refillable glass containers will be sent to Rayan Environmental Solutions, Moncton, NB or other glass recycling facilities.

CARTONS (POLYCOAT CONTAINERS & WINE BOXES)

Scotia Recycling, Dartmouth, NS

STEEL

Scotia Recycling, Dartmouth, NS

PLASTICS (OTHER) / POUCHES

Evergreen, Amherst, NS

PACKAGING (BOXES) FOR REFILLABLE GLASS

Scotia Recycling Ltd., Kentville, NS

D R Recycling, Moncton, NB

2M Resources, Saint-Jean-sur-Richelieu, QC

Baleforce, Milton, ON

BULK BAGS (USED)

Island Waste Management Corporation, Charlottetown, PEI

APPENDIX G

SORT LIST (MATERIALS)

The following is Encorp's materials Sort List, which will be used at depots as of April 1, 2026.

SORT LIST	
MATERIAL TYPE	SORT/SKU
METALS	ALUMINUM 9
	STEEL 8
PLASTICS	PET / HDPE TRANSLUCENT (NON-ALCOHOL) 3 PET HDPE TRANSLUCENT
	PET (ALCOHOL) 10 PET
	ALL OTHER PLASTICS / POUCHES 11 HDPE PP PS OTHER LDPE
GLASS	GREEN GLASS + 12
	GREEN GLASS (ALCOHOL > 500 ml) 22
	CLEAR GLASS + 13
	CLEAR GLASS (ALCOHOL > 500 ml) 20
	BROWN GLASS + 14
	BROWN GLASS (ALCOHOL > 500 ml) 18
	REFILLABLE GLASS (BEER) 27
CARTONS	CARTONS 28
+ SHARE SAME BULK BAG/TUB	