



**FREDERICTON
CHAMBER
OF COMMERCE**
— The Voice of Business —

364 York Street, Suite 200
Fredericton, NB
E3B 3P7



26 February 2021

Mark Miller
Department of Environment and Local Government
Marysville Place
P. O. Box 6000
Fredericton, NB
E3B 5H1

Via email: mark.miller@gnb.ca

Dear Mr Miller

Re: Proposed Amendments to the *Beverages Containers Act*

Thank you for reaching out to the business community regarding proposed changes to the *Beverages Containers Act*. The Fredericton Chamber of Commerce has reached out to our members that may be affected by *the Act*. From our discussions, it appears that there was a high level of satisfaction with the current system.

Overall, the feedback we've received falls into three themes:

- Unclear why the change is needed / what is the specific problem that the amendments are seeking to address?
- How it will improve overall efficiency.
- Concern that the costs are not known and what their future liabilities may be.

These themes were summarized by one member:

"At the basic level, it seems like ANBL is off-loading some cost onto producers, improving their own productivity but resulting in a loss of productivity for the provincial economy overall. This is a trend. I can't see how one consolidated plan that worked well for everyone is worse than a model that requires hundreds of plans."

Some specific comments received include:

- How does transferring responsibility for the management of alcohol beverages in the province to individual producers/distributors will "result in better alignment of the management of all the beverage containers included in the program and may enable long term program efficiencies."



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- Is something currently not working right? Are there missed opportunities? Does this make things better for the environment? If it's broken, what is wrong with it?
- How does downloading the responsibility to 100+ local producers will gain any form of efficiency?
- ANBL has a monopoly on alcohol retail sales, which includes MAS (manufacturer's agency stores – aka each local producers' on-site store) so it is a natural component of their business and the service they provide to New Brunswickers.
- ANBL is the retailer – they collect deposits, they have the sales data and as such indicated that if they change goes through, they'd continue to provide administrative support to report to individual producers on those sales and deposits collected – pushing it back to local producers adds a step in the redemption process – so, if they need to report anyway, why download the responsibility and add a step?
- If there are any issues regarding the “environmental friendless” aspect of a beverage container, it should be addressed separately.

Finally, we are also concerned about the timing of the proposed changes. The financial damage and long-term consequences of the pandemic are still unfolding, and it is important to understand that the economic crisis will lag behind the public health crisis. At the same time, ANBL is in the process of implementing new rules and regulations that will negatively impact craft alcohol producers across the province. Adding any new burdens or obligations to business at this time will further hurt their ability to cope with the pandemic and their ability to recover - no matter how well-intentioned.

Sincerely,

Krista Ross, CEO, Fredericton Chamber of Commerce

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