

# Considerations for Safely Accepting and Handling Empty Returns

## 1.0 INTRODUCTION

The safe handling of empty beverage containers and packaging, ORBIS bins, PECCs, Gaylords, and palletized empty returns is the responsibility of anyone involved in the collection of empty containers in Ontario. This document shares some suggested guidelines for the handling, storage and staging for transport of empty containers received that are part of either The Beer Store's deposit return system and the Ontario Deposit Return Program (ODRP) including industry standard bottles and other refillable bottles, as well as non-refillable bottles, cans, Tetra, and PET Containers. This document does not contain legal advice and all return system participants should carefully consider all applicable regulatory and contractual obligations, seeking professional advice as needed.

## 2.0 APPLICABILITY

The considerations outlined in this document may assist employees of the holder of a Grocery Store License issued by the Alcohol and Gaming Commission of Ontario (AGCO) that requires the holder to engage in collection of empty deposit bearing beverage containers and packaging.

## 3.0 DEFINITIONS

**Bottle Breaker** – powered mechanical equipment designed to break empty glass ODR or non-refillable beer containers into smaller pieces with metal hammers and dispense into an ORBIS bin.

**Contamination** – contaminated empties could contain garbage, refuse, debris, biohazardous or hazardous materials (gas, oil, paint thinner etc.) Contaminated empties could also contain containers that are not part of the ODR/TBS Return Programs (food cans, pop cans, etc.)

**Designated Bin** – a bin or bins at each store that has been designated for use with returned empty cans. The designated bin(s) are to be kept behind the counter in the empty sorting area to empty clear bags of cans into prior to dumping into PECC. They can be brought out to the lobby for customers to utilize if cans are brought back in non-clear bags and, then once the customer is finished, the bin is returned to the empty sorting area to be dumped into the PECC.

**Grocery Store** – the holder of a Grocery Store License issued by the Alcohol and Gaming Commission of Ontario that requires the holder to engage in collection of empty deposit bearing beverage containers and packaging

**Industry standard bottle** – long neck brown glass bottle used by multiple brewers and reused multiple times.

**Non-standard refillable bottles** - separated by brewer and returned to the original brewery for reuse.

**Ontario Deposit Return Program (ODRP)** – empty beer, liquor, wine and spirit containers that are sold only outside the TBS system and then returned by customers to a Grocery Store for recycling.

**TBS** – Brewers Retail Inc. operating as the Beer Store.

## 4.0 POTENTIAL RESPONSIBILITIES & ACCOUNTABILITIES

### 4.1 Managers and Supervisors

1. Ensure requirements of any Acceptance and Handling Empty Returns policy are implemented to reduce risk associated with the handling, sorting, processing and staging for transportation of empty returns;
2. Ensure workers are provided adequate training to meet requirements to safely accept and handle empty containers;
3. Advise workers on the existence of potential or actual hazards of which they are aware;
4. Ensure an adequate supply of Personal Protective Equipment (PPE) that is required or optional (where requested) for handling empty returns;
5. Ensure that workers are wearing all required PPE when handling empty returns and enforce compliance;
6. Ensure an adequate amount of supplies are available and initiate communication with appropriate contacts to request additional supplies or TBS empties pick-ups;

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7. Ensure ORBIS bin and PECC maximum weights are not exceeded (see Appendix A);
8. Ensure that workers maintain a controlled and safe pace and maintain a safe working environment. Store Managers are to work with District Manager to establish an emergency site-specific policy to re-establish a safe working environment. This procedure must be communicated to workers; and
9. Communicate non-conformities to health & safety policies to Corporate Health and Safety.

## 4.2 Workers

1. Ensure requirements of any Acceptance and Handling of Empty Returns policy are upheld;
2. Ensure PPE requirements are fulfilled as referenced in any PPE policy. Mandatory PPE (such as safety gloves, safety glasses & hearing protection) should be worn when completing any task in the empty returns area or surrounding area, this includes but is not limited to, sorting and dumping ODR containers into ORBIS bins, sorting and dumping cans into PECC bin and disposal of broken-down cardboard into PECC bin;
3. Visually inspect all empty container returns received from customers at the empties POS station prior to transferring containers to the empties sorting area;
4. Complete sorting of non-contaminated empty returns.
5. Inspect all ORBIS bins, gaylords and PECCs prior to use; identify defective ODRP and TBS supplies and remove from service where applicable;
6. Immediately report suspected contamination of ODRP and/or TBS containers of a biohazardous or hazardous substance to Manager/Supervisor;
7. Work at a safe and controlled pace as to avoid injury. If workers require time to re-establish a safe working environment, workers are to contact their Manager/Supervisor for direction; and
8. Report all non-conformities to health & safety policies to their immediate Manager/Supervisor.

## 4.3 Grocery Store / Corporate Health & Safety

1. Review any Accepting and Handling Empty Returns policy periodically / annually and update as required; and
2. Monitor and evaluate health & safety policies to ensure compliance and effectiveness.

## 5.0 PERSONAL PROTECTIVE EQUIPMENT (PPE)

To handle customer empty returns safely, PPE should be available and used at all locations. All PPE should be ordered from approved supplier list or approved by Corporate Health and Safety. TBS can assist with supplies and suppliers. Mandatory PPE (such as safety gloves, safety glasses & hearing protection) must be worn when completing any task in the empty area or surrounding area, this includes but is not limited to, sorting and dumping ODR containers into ORBIS bins, sorting and dumping cans into PECC bin and disposal of broken-down cardboard into PECC bin. Managers and Supervisors are responsible for ensuring worker compliance and reporting any instances of non-compliance.

**Mandatory PPE** - These items should be available and used by all employees assigned to handle empties:

- Cut-Resistant Gloves (Safety Gloves)
- Safety Glasses
- Hearing Protection

## 6.0 SUGGESTED REQUIREMENTS & PRACTICES

At TBS accepting, handling, and recycling empty containers is a cornerstone of what we do. It demonstrates our core value of Sustainability Leadership by keeping most of what is sold out of landfills, and exceptional customer service by assisting service providers and customers with a safe return of empty containers for a deposit refund. We are happy to consult with Grocery Stores on emerging and best practices on an ongoing basis.

### 6.1 Safely Accepting Empty Returns

1. Workers must inspect customer empty returns during each transaction at an empties POS before accepting the returns.

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2. A visual inspection must be completed to confirm the empty returns are not contaminated. In addition to a visual inspection, odour can be an indicator of a hazardous substance or contamination, i.e. gas, oil, paint thinner, etc. Contaminated empties could contain garbage, refuse, debris, liquid, or biohazardous or hazardous material.
3. When a Grocery Store employee identifies that a customer is attempting to return contaminated empties or believes there is a safety concern, the worker should respectfully inform the customer that contaminated or non-ODR/TBS program material cannot be accepted. However, the customer should be given the opportunity to return acceptable containers while keeping any contaminated containers or non-ODR/TBS materials separated. Any unacceptable items shall be taken back by the customer to be disposed of.
4. Grocery Store employees should not accept empties in bags. Employees should politely inform the customer that all returns in bags or unidentified empties must be placed by the customer into a bin or other safe means of transportation within a Grocery Store.
5. If a bag is brought in but found to contain containers not eligible for the ODR/TBS Program (pop cans / food cans etc), ODR/TBS containers must be placed by the customer into a bin, and non-ODR/TBS containers must be taken back by the customer.
6. In the event that contaminated empties are mistakenly accepted, or contaminants are later identified, please isolate the contaminated empties, inform a store manager and refer to Appendix B.

## 6.2 Cans

1. Aluminum / Steel Program cans should only be accepted in original packaging (box) or a customer's reusable container. They must be free of visible contamination and contain only TBS/ODR approved containers, see section 6.1, point # 2
2. Cans in bags must be emptied into bins by the customer.
3. **If a Grocery Store accepts clear plastic bags of cans from customers**
  - a. Clear bags should be cut open in the back of a Grocery Store at ground level, and dumped into a designated bin and then into PECCS to save space at the store level.
  - b. Using a safety cutter approved by Corporate Health & Safety, cut top off bag. Avoid ripping bags or untying knots. *Hold knot in one hand, with bag resting on or in designated bin, use approved safety cutter to cut the top of the bag, OR using approved safety cutter, turn bag upside down, resting in designated bin and cut along bottom seam of bag;*
  - c. Carefully dump bag into designated bin, then dump container into PECC,
  - d. To reduce risk of MSD injury, as well as facial contact with empties, it is highly recommended that safety step or stool always be utilized to dump the designated bin into the PECC. All stores should have a corporate approved step stool available for use.
4. Clean cans brought in by a customer in a reusable bin, cardboard box or similar, can be taken directly to the back and dumped directly into PECC or into designated bin, and then into PECC.

## 6.3.1 Glass Bottles

1. Industry standard bottles, non-standard private mould (proprietary) refillable bottles (PMB), and non-refillable bottles (NRB) may be sorted into cases or knockdown trays by the employee and assembled on a pallet. Select ODR bottles may be sorted into cases or knockdown trays by the employee and assembled on a pallet.
2. Maximum empty piling height is 7 cases. To secure the load for transport and stacking, the pallet must be tied with twine around the 4th and 7th tiers. All PMB and NRB pallets are required to be secured using plastic wrap.
3. Only 24 or 28 pack cases may be used on the corners of the pallet to achieve stability. Small cases or knockdowns are never to be used on the corners of the pallet.
4. Damaged cases including wet cardboard must be repacked into a knockdown tray to ensure a stable load for pick up by TBS. Plastic, garbage, and bottle caps found in cases must also be removed.

## 6.4 Liquor, Wine & Spirits

1. All ODRP liquor, wine and spirit containers will be placed by the customer into totes, boxes or bins provided by the Grocery Store or customer's reusable container.

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2. Grocery Store employees must separate by clear and coloured glass and plastic will be separated from glass. Any Suspected ceramic containers must be removed from the glass stream and placed in a box marked "CERAMIC".
3. Grocery Store employees who assist customers in placing empties into totes should ensure that all bottle necks are pointing up, and all bottles are flat on the bottom of the tote. No bottles should be placed in upside down to fit more containers in a tote, as this makes the tote heavy and more likely to have bottles fall out.
4. Totes/boxes/reusable containers with bottles are taken to the back of a Grocery Store, where they will be dumped into ORBIS Bins labelled for clear or coloured glass. A bottle breaker may be used at Grocery Store locations to save storage space.
5. To alleviate special concerns, stores may opt to palletize ODR where possible. ODR Containers will be placed in like sized boxes or ODR knockdowns to ensure stability when placed on the pallet. Once a row is completed, it will be secured either by shrink wrap or twine. A maximum stack of 5 rows per pallet must be adhered to.
6. Plastic bottles and Tetra-packs will be placed into designated bins or PECCs to keep them together.

## 6.5 Mixed Returns

1. Any mixed returns brought in bags should be placed into totes or bins by the customer. Customer may place empty returns into totes – Grocery Store employees can then sort the containers in the back of the Grocery Store. Grocery Store employees SHOULD NOT reach into any type of bag.
2. Any mixed returns brought in a reusable bin, cardboard box, or similar **with a verified count** could be sent directly to the back of the Grocery Store. Grocery Store employees can then sort the containers in the back of the Grocery Store and return a reusable container to customer or recycle boxes as necessary.
3. Any mixed returns brought in a reusable bin, cardboard box, or similar **without a verified count** should be sorted by Grocery Store employees in the presence of the customer utilizing totes, knockdowns etc. Grocery Store employees could complete this after a visual inspection indicates no sign of contamination. Cut Resistant Gloves (Safety Gloves) should be worn.
  - o If contamination is evident, customer should be asked to place acceptable material into totes or bins provided while keeping any contaminated containers and non-ODR/TBS materials separated to be taken back by the customer.

## 6.6 PET, Tetras, Wine Bladders, Shrink Wrap, Plastic Rings, Original Packaging, Bottle Caps & Ceramics

1. The items in this section 6.6 are the additional approved items TBS will take back that aren't listed above. Grocery Store managers, in consultation with TBS, should determine how these items are handled (with the exception of ceramics see 6.6.2 below) at each Grocery Store location.
2. Any suspected ceramic containers **must be removed** from the glass stream and placed in a box marked "CERAMIC". **Ceramics are a contaminant that significantly degrades the value of glass.** TBS will pass on the economic damage of any such degradation to the Grocery Store supplying any glass loads found to be contaminated with ceramics.

## 6.7 Black ODR Totes (Optional Supply)

1. Grocery Stores may source optional black ODR totes directly from TBS at cost.
2. Grocery Stores employees may then provide the standard black ODR totes to be used by customers to sort returns and may wish to maintain a sufficient supply of clean totes in an empty container sorting and return area in the Grocery Store for customer use.
3. Prior to returning used totes from the empties sorting area in the Grocery Store, Grocery Store employees should ensure that totes are clean and free of contamination. Any contaminated totes should be placed in a designated area to be cleaned with soap and water when time allows.
4. The preferred method of returning totes to the sorting / return area would be to place into small stacks and then rolled back to the sorting / returns area via a dolly. If this is not possible, employees could be restricted to carrying a stack of totes not exceeding 7 totes back to the sorting / return area by hand.

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5. Instruct Grocery Store employees not to attempt to push a large stack of totes across the Grocery Store floor as this presents a significant tipping hazard that could result in injury.
6. All totes should be inspected prior to sending back to the sorting / return area as broken totes pose a significant hazard to both employees and customers.

## **7.0 CONSIDERATIONS FOR ACCEPTING EMPTIES AT A LOADING DOCK OR BACK DOOR**

As an additional option to help alleviate congestion in the empty sorting / returns area, large bulk returns may be accommodated via a Grocery Store's loading dock / back door. TBS does not recommend or endorse acceptance of empties at a loading dock or back door, but if a Grocery Store wishes to explore this option below are some safety considerations:

1. A recommendation to a customer who wishes to return a substantial number empty containers could be to schedule a bulk return at the closest TBS Distribution Centre. If the customer rejects this recommendation consider the following:
2. A Grocer Store Manager/Supervisor should be made aware if a store agrees to accept empties at the loading dock or back door regardless of how often it occurs. Such Manager may wish to work with Grocery Store loss prevention / asset protection / security in setting up this process and anticipated occurrences of this practice;
3. Appointments may need to be pre-arranged in advance with date/time and may be restricted from being scheduled after dark or after store close;
4. A Manager may wish to approve appointments and amount of empty returns to ensure adequate empty staff and supplies are available for this time;
5. Loading docks should be clear of trucks and any pending deliveries during an appointment time;
6. Customers may be asked to remain outside and NOT to enter the warehouse portion of the Grocery Store;
7. A Manager may insist on being present at all times during the process;
8. A record of empties return may be required to be maintained that outlines all empties accepted during the transaction and agreed upon by both the Grocery Store Manager or employee and Customer when completed.
9. Customer could then be asked to enter the Grocery Store via the front door to accept empty refund as per normal business operations;
10. Empties refunds could be processed via a POS with customer present as per normal loss prevention / security procedures
11. Two receipts may be printed, both to be signed by the Grocery Store Manager or employee and the other by the customer;
12. One Receipt can be provided to customer while the other duplicate receipt kept with the record of empties for Grocery Store records as confirmation of the applicable deposit paid to the customer.

### **Further considerations while completing the empty return procedure at the loading dock or back door:**

1. Customers should ensure their vehicle is in park and turned off, prior to them unloading empty returns.
2. Grocery Store employees should wear a reflective vest throughout the process and wear all other required PPE for handling & sorting empties.
3. Grocery Store employees should clearly outline their expectations and procedures to customers prior to commencing the return. Employees may also explain how the settlement of payment works to the customer for full transparency.
4. Whether using the loading dock or a pedestrian door, the customer should be responsible to place empty returns either on the loading dock, or just inside the pedestrian door. Employees will then take from there and move or sort appropriately.
5. If using the loading dock, it is suggested that employees position a pallet on the loading dock where the customer can then place empty returns.
6. Employees should not assist in unloading of a customer's vehicle, this includes but is not limited to: reaching into a car, entering the back of a van, standing on the back of a pick-up truck bed etc.

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7. Employees should not jump from the loading dock to the ground or from the ground up the loading dock under any circumstance.
8. Customers should be advised not to throw any container of empties up onto the loading dock at any time. Employees should not attempt to catch thrown containers of empties from the customer at any time.
9. When all containers are secured in the store, the employee should advise the customer to move their vehicle from the loading dock (ensure employees and customers are clear of the vehicle) and enter the store via the front door to accept empty refund as necessary.

A Grocery Store may wish to post applicable instructions / policies in the loading dock area or by the back door of the Grocery Store.

## **8.0 TRAINING**

Grocery Store employees should be required to review applicable policies, including health & safety requirements at minimum annually and may be requested to complete additional reviews by the Grocery Store Manager as required. A annual record of training completion is recommended to be maintained by the Grocery Store Manager at the store for review upon request.

## **9.0 NON-COMPLIANCE**

In the event that any Grocery Store fails to comply with established TBS policies and procedures, including those pertaining to health and safety, an investigation will determine appropriate action, which may include reporting to the AGCO and the potential for a suspension or termination of the Grocery Store's authorization to retail liquor products.

# Safely Accepting and Handling Empty Returns

## ODRP/TBS Supplies Use/Stacking/Moving/Loading

### Appendix A

#### DEFINITIONS:

**Gaylord bin** - large cardboard bins that are placed on a pallet and used to hold empty plastic or glass ODR containers.

**ORBIS bin** - Black plastic bin with folding walls used for storage and transport of glass ODR containers.

**PECC (Plastic Empty Can Container)** – Green plastic bin used by placing on a pallet and filled with empty cans, cardboard, or mixed plastic for recycling.

#### ODRP/TBS Supplies

1. Supplies can be requested through the TBS beer for business portal, the Grocery Store's servicing TBS Distribution Centre (DC) or TBS Customer Service.
2. Grocery Stores are asked to only order the required supply to prevent shortages at other locations especially during times of peak volume. ODRP/TBS supplies are shared throughout Ontario.
3. Contact your applicable TBS DC Manager for assistance if required.

#### ORBIS Bin Use:

1. Safety Gloves, Safety Glasses and Hearing Protection may be required for Grocery Store employees while opening/setting-up an ORBIS Bin.
2. When retrieving an empty ORBIS bin from a stack, use of mobile equipment may be required to destack, lower a folded bin to ground level and place in a safe area to open.
3. While opening, complete an inspection to ensure bin is in good condition; this includes: no visible cracks or broken plastic, inside and outside walls free of glass, side walls must snap together securely, and all feet are securely attached with no visible damage.
4. Slowly open each wall one at a time towards yourself while walking around the bin. Do not lean across the ORBIS bin to attempt to open the other walls. Firmly click into place, walk around the bin again looking for any damage.
5. Defective bins may be labeled and returned to TBS Logistics for exchange. **See "ORBIS Bins – Defective/Damaged"**
6. Use of mobile equipment may be required to move bins to desired working location, **it is recommended to not allow Grocery Store employees to push bins along the floor as this could cause a side to collapse resulting in an injury.**
7. ORBIS bin lids must be in place before use. The bin lid opening allows bottles to pass through and the guard prevents glass from bouncing out. Ensure the guard is stable and in good condition. Flaps must be in place and no visible gaps along the side of the ORBIS bin. Do not remove the bin lid until the bin is completely full.
8. Damaged ODR supplies including lids, flaps, and totes may be segregated into an empty ORBIS bin and sent back to the supplying TBS DC to be recycled.

#### ORBIS Bins - Defective / Damaged

1. Defective/Damaged ORBIS must be clearly labeled on all four sides with a Defective Bin sticker or appropriate marking to ensure it is removed from service.
2. For Defective/Damaged ORBIS bins that have not been assembled, remove from service and place a Defective Bin sticker on all sides of the bin for increased visibility. Wrap with plastic wrap.
3. For Defective/Damaged ORBIS bins that were not identified to be defective until after filled with glass secure with plastic wrap to ensure adequate stability. Never include a damaged or defective bin in a stack. Label all four sides with defective bin sticker,
4. Write details on the Defective Bin sticker including a store number and a brief description of the issue i.e. broken side wall, missing foot, cracked plastic, etc.
5. For further information, refer to the TBS Defective ORBIS Bin Policy.

## **ORBIS Bins - Capacity**

1. Bottle Breakers: ORBIS bin capacity for broken TBS/ODR glass from a Bottle Breaker is 1100 bottles and must not exceed 1350lb.
2. Unbroken bottles: ORBIS bins capacity for unbroken TBS/ODR glass must not exceed the fill line and must not exceed 800lb. The fill line is visible on the inside plastic mold of the ORBIS bin.

## **PECC/Gaylord Bins**

1. PECC and Gaylord bins are to be used for storage and transport of empty cans, plastic bottles, cardboard, or mixed plastic items for recycling as required. *When ORBIS Bin supplies are low, Gaylords may be used for glass TBS/ODR Containers, however Gaylord use is not preferred.*
2. PECC and Gaylord bins are to be stored securely when not in use and must be assembled and placed on a pallet before use.
3. Flat PECC/Gaylord bins stored on their side must be secured with a device such as a bungee cord, chain, or foothold. Bins cannot be leaned against a wall or racking unsecured.
4. Flat PECC/Gaylord bins stored on a pallet or racking must be safely accessible for workers following mobile equipment and safe lifting requirements.
5. The condition of PECC and Gaylords bins must be inspected by Grocery Store employees when assembling for use.
6. Damaged or defective bins may include rips or tears and should be removed from service, labelled and sent back to DC for recycling.
7. In the event a defective/damaged bin is assembled and filled with recyclables the bin must be secured in plastic wrap and identified as a defective before transport with mobile equipment.
8. Plastic bin liners must be used inside PECC and Gaylord bins filled with cans and other containers but are not required when used for cardboard recycling.
9. Maximum PECC/Gaylord capacity is 260 dozen cans per bin (approx. 200lbs). Overfilling causes the sides of the PECC/Gaylord to bow and when placed on the truck excess containers will fall out of the bin.

## **Stacking / Transporting ORBIS Bins and Palletized Empties**

1. Palletized cases of empty bottles and full ORBIS bins must be inspected to ensure load stability before transporting or stacking with mobile equipment. Any concerns regarding stacking requires leaving the pallet or bin on the floor. Any incidents of instability should be reported to the Grocery Store Manager immediately.
2. The physical layout of the Grocery Store and overhead clearance will determine the maximum pallet stacking heights. Grocery Store Managers should determine maximum allowable stacking height due to ceiling height and other factors, i.e. light fixtures, gas lines, space considerations, etc.
3. ORBIS bins and pallets of empty bottles must be stacked in such a manner that they will not tip, collapse or fall and can be safely transported with mobile equipment.
4. Stacks of empties should keep like items with each other.
5. In the event palletized empties or ORBIS bins appears to be unstable, or a mobile equipment operator (TBS or Grocery Store employee) is not comfortable maneuvering, the load must be left on the floor and the Grocery Store Manager notified immediately to determine next steps. TBS Corporate Health & Safety must then be contacted immediately by the Grocery Store Manager to provide guidance and next steps to ensure safe pick up. Subsequently, an accident or incident report may be required with an investigation to determine the root cause of instability.

### Palletized Cases of Empty Bottle Returns

1. Palletized cases of empty bottles may be stacked maximum 3 high dependent on overhead clearance.
  - a. The palletized glass must be stacked to achieve maximum stability. In order to do so, it is always preferable to have Industry Glass as the base pallet, followed by PMB pallets and then NRB pallets.
  - b. NRB Pallets should only ever be stacked to a maximum of two.
  - c. Never stack palletized glass on top of ORBIS, PECC, or Gaylord. Never stack ORBIS or Gaylords (with ODR) on top of a stack palletized glass.

2. One PECC or Gaylord (containing cardboard, plastic, or cans) may be placed on top of maximum 2 palletized cases of empty bottle returns.

#### ORBIS Bins:

1. ORBIS bins containing broken glass (Bottle Breaker) and unbroken bottles may be stacked maximum three high. ORBIS bins with broken glass must always be stacked on the bottom. ORBIS bins used with the Bottle Breaker and filled with broken glass must never be stacked on top of unbroken glass.
2. Full ORBIS Bins may be transported with mobile equipment maximum two high and must be securely decked. Defective ORBIS bins must never be decked.
3. When loading full ORBIS bins on to a truck or trailer, bins may be decked maximum two high. Bins must have all supports and rest together in a stable manner.
4. When not in use, ORBIS bins should be folded and stacked. Folded ORBIS Bins can be stacked a maximum of 10 high.
5. Empty and folded ORBIS bins can be transported with mobile equipment maximum four high. If ORBIS bins are received 5 high on a delivery, the operator may transport a stack of 5 bins off the truck or trailer if it is safe to do so. Immediately after exiting the truck or trailer, the operator must place the stack of 5 ORBIS bins on the floor and then destack to four or less for further transport within the warehouse area of the Grocery Store.

#### Palletized ODR:

1. Palletized ODR must be secured as to prevent from tipping, collapsing, or falling.
2. It is recommended that Palletized ODR not be stacked on top of each other or with any other palletized glass as it is hard to achieve consistent piling heights.
3. A palletized ODR pallet may be stacked on top of a single ORBIS Bin.
4. If stable, a PECC may be placed on top of palletized ODR.

#### PECC/Gaylord Bins

1. PECC/Gaylord bins must not be stacked on top of one another
2. One PECC/Gaylord bin may be stacked on top of ORBIS bins stacked maximum 3 high.
3. PECC/Gaylord bins may be stacked on top of pallets of empty bottle return cases maximum 2 high.
4. Full PECCs/Gaylord bins must be transported on their own with mobile equipment.
5. The mobile equipment operator must ensure load and stacking stability. The PECC/Gaylord must sit flat and level on the lower pallet. Any concerns regarding stacking or load stability should result in an immediate stop, leave the load on the floor and immediately notify the Grocery Store Manager.

# Safely Accepting and Handling Empty Returns Sharps, Hazardous Materials & Needlestick Prevention Appendix B

## DEFINITIONS:

**Sharps:** articles capable of causing wounds or puncture including needles and syringes used for injection drug use or medical treatments, or other items received in customer empty returns that could cause a puncture, cut or abrasion including lancets, scalpels, tweezers, knives or scissors. Used sharps may be contaminated with biohazardous infectious or hazardous agents including human tissue, blood, body fluids, residual drugs, etc.

## Handling Sharps / Biohazard Containers

1. All Grocery Stores should ensure a puncture proof Biohazard/Sharp Collection Bin and an appropriate tool for handling sharps are available in the store. A tool, or device should be used to handle sharps, i.e. tongs, garbage picker, etc. to avoid direct contact.
2. Needle stick injuries caused by used hypodermic needles/sharps may cause exposure to blood borne pathogens including hepatitis and HIV, and/or exposure to contaminants inside used sharps, i.e. illicit drugs or prescription medication. Grocery Stores should carefully consider health & safety policies for preventing needlestick injuries from occurring.
3. For any sharps received in empties, try to identify the customer and have the Grocery Store Manager address with them if possible. Grocery Store Managers may consider a trespass policy for individuals who repeatedly bring in sharps.
4. For sharps found around the Grocery Store exterior encourage employees to ensure an appropriate tool is used to remove the sharp and safely deposit in the biohazard bin. Bringing a biohazard bin and tool to the exterior may assist in safely disposing of sharps.
5. At locations where this is a common occurrence consider controls needed to be implemented to eliminate drug use on Grocery store property, i.e. install fence, change lighting, etc.
6. When handling any material with potential contamination from biohazardous materials safety gloves should be required. Items should be handled with extreme caution utilizing an appropriate tool where possible. Bare hands should not be used. Corporate approved safety gloves should be required for handling customer empty returns.
7. Consider requiring placement of all suspicious sharp objects in a Bio-Hazardous container. If an empty container is received from a customer with a sharp inside, place the entire container in the biohazard bin. Large size biohazard bins allow a bottle to be placed through the opening if a container is received with sharps inside.
8. Never attempt to remove a sharp from a container, i.e. needle in beer bottle, ODR bottle, etc. Place the entire container in the biohazard bin. Never attempt to put a cap back on a needle or bend the needle.
9. When a biohazardous container is ½ full arrange for pick-up by an appropriate vendor and request a new bin or if an employee feels the bin needs to be picked-up and it is less than half full. If there is a risk that the bin may tip or spill, request a pick-up.

## Hazardous Materials or Suspicious Substances

In the event an accident or incident occurs where hazardous materials enter the Grocery Store or contaminates an ORBIS/PECC/Gaylord bin, i.e. gasoline, diesel, kerosene, engine oil, etc., the following must be completed:

1. **Recognize:** Decline acceptance of contaminated empty returns to customer if possible. If contaminated empties have already been received and deposited in an ODR bin complete the following steps.
2. **Restrict Access:** Instruct workers in the immediate area to stop filling the contaminated bin.
3. **Assess**
  - a) Immediately contact [AccidentIncidentRetail@thebeerstore.ca](mailto:AccidentIncidentRetail@thebeerstore.ca)
  - b) In order to assess accurately and properly determine next steps, you may be required to close the Grocery Store temporarily.

- c) TBS Corporate Health & Safety may assist in determining risk potential and developing an action plan to remediate.
  - d) Evacuate the Grocery Store and initiate an emergency response plan if deemed necessary.
  - e) If evacuation is deemed necessary, call 911 – do not reenter Grocery Store until emergency services deem reentry safe.
4. **Report**
- a) TBS Corporate Health & Safety and Loss Prevention will be notified through the above email distribution list. Call TBS Corporate Health & Safety directly if immediate assistance is required.
5. **Control**
- a) For contaminated bins, cover loosely with can bin liners and remove from service. Place a sign on the bin clearly identifying as a contaminated bin. Place the contaminated bin away from workers and move outside if possible. Workers on site must be notified that a contaminated bin is present.
  - b) For spills on the floor utilize a spill clean-up kit if required and safe to do so.
  - c) Attempt to prevent environmental contamination if possible to do so safely, i.e. Prevent hazardous materials from entering floor drains, storm drains, sewers, water ways, etc.
  - d) For large contaminations, or if the containers cannot follow the usual pick up for recycling through TBS the Grocery Store Manager may contact the TBS Stewardship and Distribution departments to confirm an alternative means of disposal. An environmental remediation company may need to attend the Grocery Store if deemed necessary.
  - e) TBS Corporate Health and Safety can assist in contacting a third party company to arrange contaminated clean up.
6. **Follow-up**
- a) Identify the customer that returned the contaminated empties if applicable and Grocery Store Manager should address with them during their next visit to the store.
  - b) Consider whether internal Grocery Store reporting is necessary for situations that have a potential to become a commercial insurance claim.

**Information on using a spill kit to clean up bodily fluids, biohazardous materials or hazardous materials can be sourced through third party companies. TBS can make recommendations.**

**IN THE EVENT OF A NEEDLE STICK INJURY CONSIDER IMMEDIATELY REQUIRING THE FOLLOWING:**

1. **Bleed**: Encourage bleeding at the site of the needle stick injury puncture.
2. **Water**: Hold needlestick wound under cool running water for several minutes. Blood borne pathogens could be expelled from the wound and washed away.
3. **Wash**: Wash the wound. After the wound has been bled, gently wash with plenty of soap and warm water. **DO NOT** scrub the wound as this could make the injury worse. **NEVER** suck the wound with your mouth. If the contents of the needle splashed to nose, mouth, face or other skin areas, rinse with water and wash thoroughly with soap. Use the eyewash unit if needed, flush eyes with saline, clean water or sterile swabs.
4. **Bandage**: Dry and cover the wound with a bandage from the first aid kit.
5. **Emergency: CALL 911** immediately if there are concerns that a needle stick injury has exposed a worker to drugs or medication resulting in a negative physical reaction. This could include allergies, drug overdose, etc. Follow instructions provided by 911.
6. **Secure**: Health care personnel may test the needle to determine if there are blood born pathogens or contaminants of concern to the injured worker. Safely dispose of needle in a biohazard bin or place in a single glass bottle for transport to the hospital. Advise co-workers of the needle location.
7. **Report**: Report the injury to the Grocery Manager immediately. The Grocery Store Manager should complete an accident incident report and provide appropriate medical documents, which may include modified work plans, to the Grocery Store employee prior to leaving for medical attention.
8. **Medical**: Seek medical attention as soon as possible. An explanation of the circumstances of the injury will likely be required. Blood may be tested to determine whether further treatment is needed. Safely

provide the needle to health care professional for testing if required. What an employee may have been exposed to may not be known because you do not have the needle or know who used it. A tetanus shot may be required. Blood samples may be required and based on severity further tests at monthly intervals may be required before full medical clearance is received.

## **SUGGESTIONS FOR ATTEMPTING TO AVOID NEEDLE STICK INJURIES**

1. **PPE**: Always require health and safety department approved safety gloves when dealing with empty returns. Needle stick injuries are most likely to occur when receiving or sorting returns.
2. **Customer Bags**: Non-clear bags of empties should not be accepted. Request the customer removes their empties from bags and places into black tote bins or another designated container. If you are handling clear bags of empties hold the lip or handle of the bag and keep it away from your body.
3. **Material Handling**: Avoid reaching into bags or cases if you cannot clearly see inside. Avoid putting fingers into the tops of bottles or cans.
4. **Follow-up**: Identify customers who have brought back sharps and request the Grocery Store Manager to address if the customer returns to the store to prevent reoccurrence.
5. **Report**: Report all needle stick injuries and if needles are regularly received at your store please advise TBS Corporate Health & Safety so that adequate controls can be implemented

# Safely Accepting and Handling Empty Returns

## Customer Care for Empty Returns

### Appendix C

#### **Returning Empties:**

Customers should be encouraged to bring back all containers in their original packaging, or in a reusable tote/bin or a sturdy cardboard box that can be recycled or returned for reuse if requested. TBS customer facing materials may be requested from TBS Stewardship.

#### **Customer Requirements:**

**All Returns:** All returns and packaging must be free of contamination; chemicals, garbage, debris, non-returnable containers, other material, etc.

**Beer Bottles:** encourage return in original packaging or in a reusable tote/bin or a sturdy cardboard box that can be recycled or returned for reuse. Loose bottles will be transferred into black totes or knockdowns provided by The Beer Store.

**Wine & Spirits:** encourage return in a reusable tote/bin or a sturdy cardboard box that can be recycled or returned for reuse. Loose bottles may be transferred into totes provided by the Grocery Store.

**Aluminum Cans:** encourage return in original packaging or in clear plastic bags with an accurate count and ensure bag is free of debris, contamination, and other materials. Loose cans can be returned in a reusable tote/bin or sturdy cardboard box that can be recycled or reused. Loose cans can be transferred into totes or designated bins provided by the Grocery Store.

**Plastic Bottles:** return in a reusable tote/bin or a sturdy cardboard box that can be recycled or returned for reuse. Loose bottles will be transferred into totes provided by the Grocery Store.

**All Other Material:** Place loose material into totes provided by the Grocery Store.

\*When placing items into totes provided, keep all bottle necks / tops facing up and bottoms of bottles flat against bottom of tote. Do not overfill tote, use as many totes as required. If there is a broken container, please bring it to the attention of the Grocery Store Manager or employees as soon as possible for safe disposal.

#### **Bulk Empty Returns / Bottle Drives:**

While every effort should be made to serve all customers in an efficient manner, it may be advisable that customers with a large volume of empty returns (240 containers or more), contact their local Beer Store or logistics warehouse in advance to discuss and schedule a safe and efficient return. TBS reserves the right to refuse or defer unscheduled bulk returns; whereby health & safety or operational issues may arise as a result.