

Restarting Bottle Deposit Takeback Best Practices and Requirements

Michigan Department of Treasury [Guidance on Phase 1](#):

Beginning June 15, 2020, all grocery stores, supermarkets and other retailers with bottle return facilities located at the front of the store or housed in a separate area and serviced exclusively by reverse vending machines (RVM) requiring minimal or no person-to-person contact must re-open their bottle return facilities and resume the collection of returnable beverage containers and refund of customer bottle deposits.

Retailers re-opening their bottle return facilities during Phase 1 must ensure that those facilities comply with all state-mandated safety protocols and restrictions, including the most recent state-mandated safeguards to protect workers (See [Executive Orders 2020-114](#) and [2020-109](#)).

In addition, retailers may, at their discretion, take any or all of the following steps:

- Limit the number of beverage containers that may be returned by a single individual per day to a deposit refund amount of \$25, pursuant to [MCL 445.572\(10\)](#).
- Establish special or limited hours of operation for bottle return facilities.
- Limit the number of available and operating reverse vending machines.
- Periodically close bottle deposit facilities as needed for cleaning and supply management.
- Implement such other procedures or restrictions as each retailer may determine are necessary or advisable to promote safety and/or efficiency.

During each week of Phase 1, retailers must limit the volume of weekly returned beverage containers to no more than 140% of their average weekly collection volume for the period April and May 2019.

FAQS:

Q: Can retailers with RVMs in the back of the store start accepting returns of bottles and cans prior to June 15, 2020?

A: Retail grocers with RVMs located inside the store or at the back of the store without a separate entrance may start takeback early but are not required to. A best practice would be to queue takeback lines outside of the store, limiting the amount of takeback materials inside the sales space at a time.

Q: Can retailers without RVMs start accepting returns of bottles and cans?

A: No, if takeback requires person-to-person contact to count and sort cans, it cannot be restarted in phase 1. If the store implements a procedure that eliminates person-to-person contact, it may be feasible.

Best practices for retailers to consider:

Your first concern should be the health and safety of your retail employees and customers. The last bullet point in Treasury's guidance allows retailers to adopt other procedures or restrictions that they determine as necessary to promote safety and or efficiency. Read this liberally and consider the following:

- Communicate with distributors/UBCR on when you are resuming bottle deposit takeback, when and how often they will be picking up containers, and consider asking them to pick up any remaining containers you currently have to start fresh.
- Create signage informing customers of changed hours, social distancing practices, limits on returns, where/how to queue for returns.
- Adopt social distancing measures appropriate for the takeback area and regular cleaning to keep employees and customers safe.
 - o Employees must have appropriate protective equipment when handling machines, customers returned containers, and any other item that has come into contact with returned containers.
 - o If a retailer is unable to obtain or maintain an appropriate level of protective equipment, they shall suspend takeback activity until they are able to obtain proper equipment for employees.
 - o Consider closing every other machine or placing plexiglass or other physical barriers between machines.
 - o Consider policies to ensure social distancing but allow household members to enter as a group for more efficient takeback.
- Consider adopting a right to refuse containers if they are not clean or have other substances inside the cans/bottles.
- Consider limiting customers use of grocery carts to transport cans and bottles from their cars to the return area unless there are dedicated carts for that purpose
 - o If a customer needs that accommodation closely monitor the cart usage to ensure the cart has been sanitized before and after use to remain in compliance with [E.O. 2020-109](#).
- Upon reaching the store's maximum takeback capacity (whether this is 140% or less) the retailer is permitted to pause takeback activity until containers are picked up by UBCR or distributors.
- Close retail return locations early, just as stores do and perhaps even earlier, to allow for deep cleaning overnight.