Technical Memo #10: Improving Residential Access and Convenience to Diversion

February 27, 2025

Comox Strathcona Waste Management

TO:	Comox Strathcona Waste Management Board of Directors	TO RSWAC:	March 2025
FROM:	Sarah Willie, Manager of Solid Waste Planning and Policy Development	TO BOARD:	February 27, 2025
COMPANY:	Staff Authored	FILE:	5360-30 SWMP

Background

The Comox Strathcona Waste Management (CSWM) service set an ambitious target in 2012 of achieving a 70 per cent diversion rate by 2022. Improvements have been made over the decade to encourage diversion through increased access to recycling programs at CSWM depots and construction of an organics composting facility; however, significant resources were dedicated to regulatory and environmental protection measures through landfill closures, new landfill gas and leachate capture and treatment systems, and facility improvements. The diversion rate has consequently stagnated around 50 per cent and the annual waste generation rate is not trending down but rather hovering between 500 and 550 kg per person. The service needs to improve residential diversion to extend the life of the engineered regional landfill and to achieve our desired waste diversion targets.

How Convenience Drives Diversion

Extended producer responsibility (EPR) programs are the backbone of recycling programs in British Columbia and include programs for recycling of everyday food packaging, any items with a battery or cord, paint, tires and more. Since 1971, BC has led the way in North America with EPR programs developed to reduce waste and eliminate hazardous materials from the environment. With the addition of an EPR program for printed paper and packaging (typical ‘blue box’ materials) in 2014, local governments were no longer the decision makers in determining the level of service for these familiar materials as program funding shifted from taxpayers to the producers and Recycle BC. While packaging is the material most often associated with recycling, there are many other products out there that the CSWM wants their residents to be diverting from landfill and managing through these

EPR programs to reduce waste. Establishing convenient and accessible ways for proper management of all divertible materials is critical to the success of achieving our diversion goals.

Consumer awareness and participation are critical factors in running an efficient system that yields a high quantity and quality of recycled content. Collection systems for packaging waste under an EPR program require comprehensive geographical coverage and access for everyone. While a collection system must address the challenges of urban settings, a high-performing EPR program must also include convenient solutions for rural and remote areas. The 2021 Provincial five-year action plan to address EPR developments further acknowledges that rural and remote communities have unique challenges in accessing recycling services and markets, resulting in considerable volumes of these materials going to landfill[1].

Resident Expectations

During Step 1 of the Solid Waste Management Plan (SWMP renewal process, the public was asked about their level of satisfaction with their local recycling drop-off facilities. More than 1,100 responses were received and identified distance from residence as having the lowest level of satisfaction out of the following factors: customer experience, materials accepted, hours of operation, parking and distance.

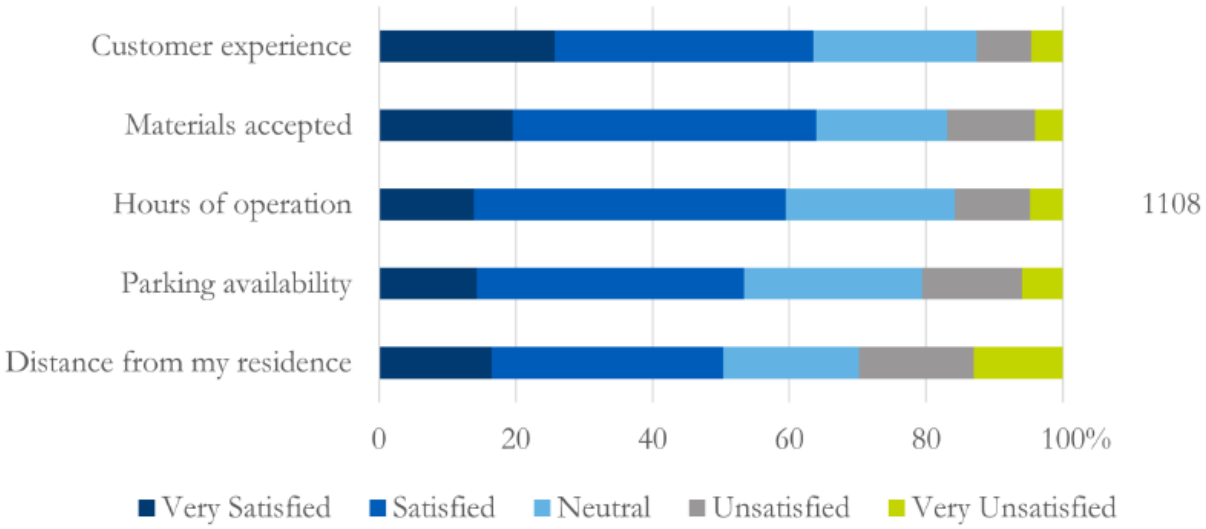


Figure 1: Satisfaction with Local Recycling Drop-Off Facility

When more detailed analysis was undertaken to see if the level of satisfaction varied by community type, it was clear that residents within distinct remote communities and those living on our smaller islands were mainly satisfied with their depot commute, and that the residents of urban and particular rural areas, were least satisfied.

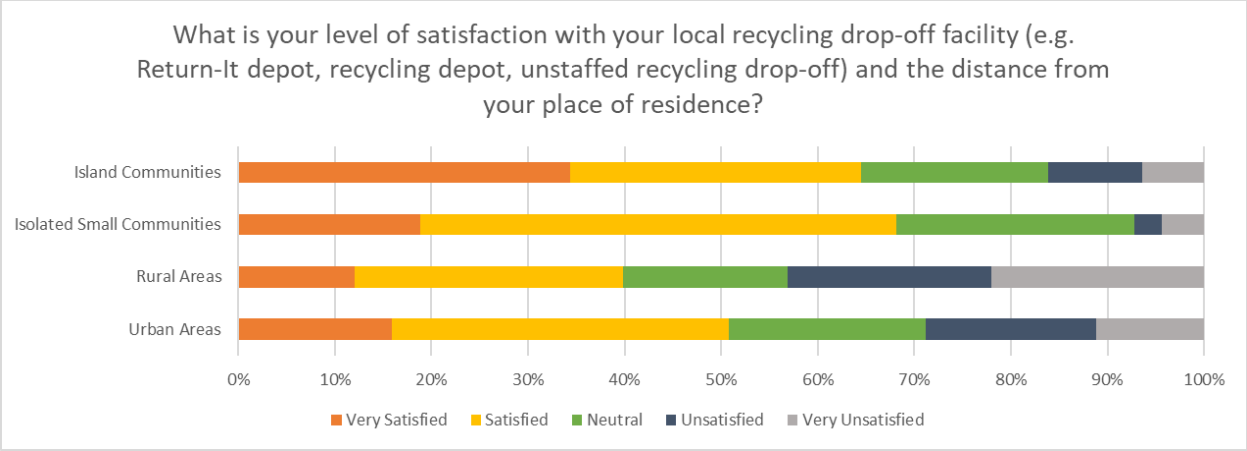


Figure 2: What is your level of satisfaction with your local recycling drop-off facility and the distance from your place of residence?

Getting even more granular, you can see Comox Valley Regional District (CVRD) Puntledge – Black Creek (Electoral Area C) residents were the only ones to express a majority level of satisfaction with their facility of the four densely populated rural areas on Vancouver Island.

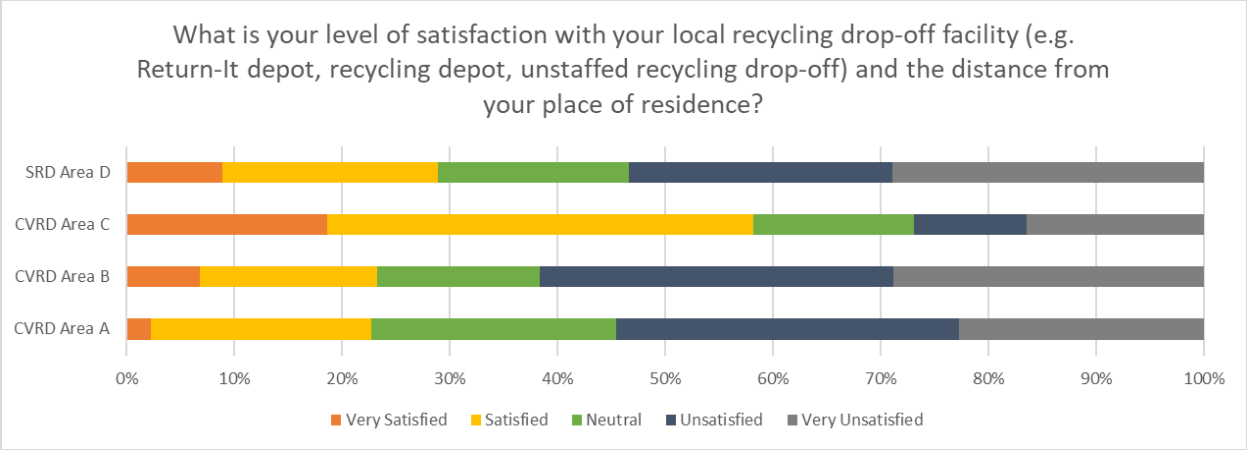


Figure 3: What is your level of satisfaction with your local recycling drop-off facility and the distance from your place of residence? Electoral Areas

Increasing the density of depots within rural communities is one avenue to address residents' dissatisfaction and encourage participation in diversion.

Another is through the delivery of an expanded user-pay roadside collection service which includes recycling and garbage, and potentially food waste.

This is a contentious proposal which has been a divided conversation in the rural areas of the CVRD and brought forward for consideration by the residents first in 2013 through a referendum and then in 2021 through the alternative approval process. Both public assent processes indicated insufficient support for the proposed service to move forward. An initial survey of over 3,000 residents in 2020 had 74 per cent of respondents in favour of a collection service, but an equal number came out in 2021 through the AAP to indicate their opposition. Reasons for opposing a service included a strong preference for choice in selecting their service provider and frequency of service, many happy with their current way of managing waste and from those households creating very little waste, not wanting to pay the same as others generating more than they were.

Interestingly those without curbside recycling are only slightly more likely to take items to the recycling depot than those with curbside recycling, and all are more willing to participate in curbside recycling than to take materials to a depot. This reveals the general population's belief that curbside is more convenient than driving to a depot to divert. Results from the City of Courtenay reinforce the effectiveness of diversion through curbside collection. Recent changes to the City of Courtenay's curbside program included adding food waste, shifting garbage pick-up to bi-weekly and introducing carts which resulted in a 40 per cent reduction in garbage sent to landfill and a 54 per cent increase in organic waste diversion from 2023 to 2024.

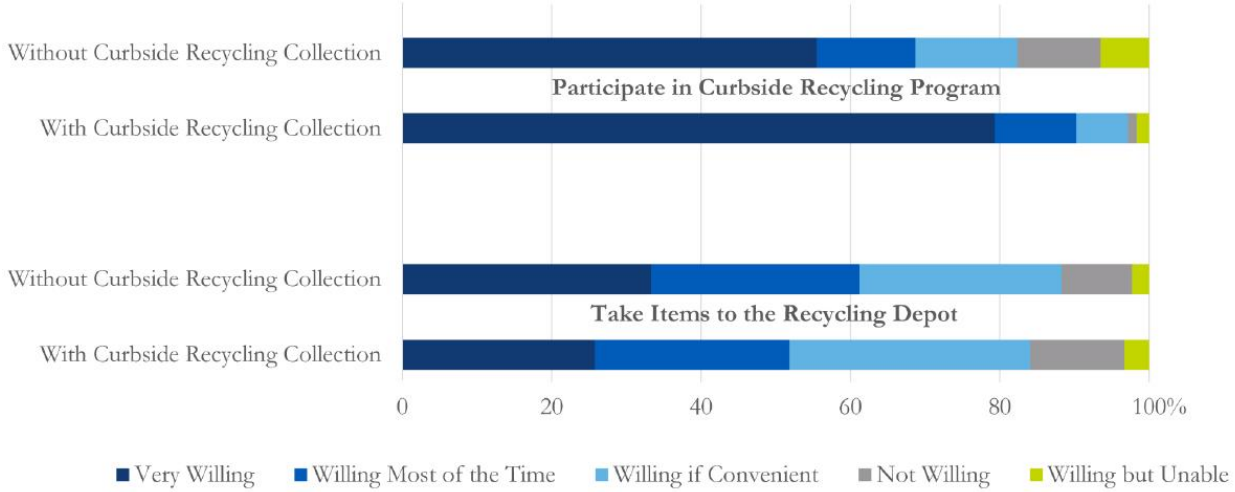


Figure 4: What is your willingness to participate in curbside recycling?

No suggested path forward will be without its challenges and nor will everyone be happy. Themes of what people found as barriers to their participation in diversion were summarized in the Step 1 survey as:

- High cost of driving, or lack of access to vehicles;
- Concern for attracting wildlife in bins;
- Lack of nearby facilities and services to divert;
- Personal accessibility issues, such as an inability to lift or drive; or
- Storage issues at residence.

Residents within the municipal boundaries as well as some Electoral Area residents have funded improved access and convenience through there delivery of curbside collection of recycling and in some cases also organics. This additional utility fee reduces the number of customers coming to regional waste management centres and has eliminated the need for CSWM funding of drop-off recycling points within the urban areas.

The most significant population without curbside waste, recycling or yard waste service are the electoral area residents of the eastern side of Vancouver Island south of Campbell River to Deep Bay. These residents number over 26,000 and represent 22 per cent of the CSWM population. Options for residents to contract directly with a hauler for the pick-up of waste are available from Waste Management Canada, Waste Connections and Strathcona Recycling and Disposal. Only Strathcona Recycling and Disposal is offering recycling pick-up at this time to residents and recycling subscription levels are indicated to be much lower than waste according to the 2020 survey results. Cost increases to subscription services have driven more households to self-haul their waste and subsequently increased the use of the Campbell River Waste Management Centre (CRWMC) and Comox Valley Waste Management Centre (CVWMC) by rural residents, now averaging more than 50 customers a day.



The increase in facility use, as shown below, has not come without additional costs to the service as more staff and equipment have been required to manage the traffic volumes. The increased cost to the service has been $460,000 per year. It

has also coincided with an increase in use of the recycling facilities at each facility and a doubling of Recycle BC material collected.

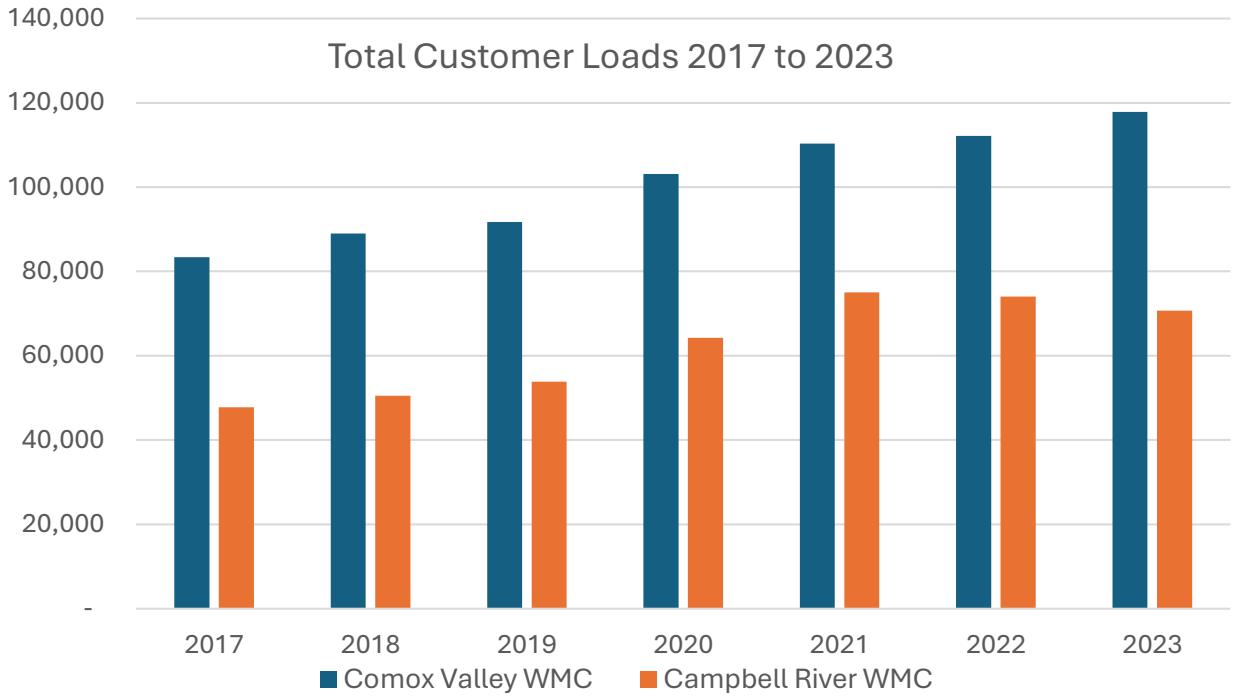


Figure 5: Total Customer Loads at the CV and CR Waste Management Centres 2017-23

Consolidated loads, whether they come from a transfer station or are delivered by a commercial hauling company, put significantly less strain on facilities than individual loads. Reviewing the incoming waste from users identifying as originating in Electoral Areas Strathcona Regional District (SRD) D, CVRD C, CVRD B and CVRD A (excluding Royston, Hornby and Denman) there were:

- 19,692 trips to CVWMC or CR WMC
- 4 largest commercial haulers were on average 41 per cent of waste and 4.3 tonnes per load
- Cash customers while also 41 per cent of waste, on average brought only 150 kg per load.

An expansion of the use of subscription waste collection would also result in a reduction in vehicle traffic, however, only if aligned with a requirement for all residents to separate their recycling and organics would some increase in diversion be likely, and results would be lower than a mandatory service for both recycling and waste, or all three streams with organics. This option would allow for residents to maintain their choice on frequency, service provider and allow for

them to elect to pay for pick-up, to compost, or to deliver the waste, recycling and or organics directly to a facility. Under this scheme residents would not benefit from a funded recycling pick-up option as it does not qualify under the Recycle BC program. Enforcement of waste separation would be more difficult to undertake with this approach.

To align with the Recycle BC program standards for depots brought into force in 2014 the CSWM service has been strategically removing unstaffed recycling bins from the community which were the focus of the CSWM recycling program in the early 2000s. Material accepted at these bins is known to be highly contaminated with unacceptable materials and is not accepted through the Recycle BC EPR program. Consequently, the CSWM service is only funding two remaining unstaffed facilities which fill identified gaps in the service area for access and convenience, at the Oyster River and on Quadra Island. These two well used facilities collect over 700 tonnes of paper, cardboard, metal and plastic packaging a year at an expense of $245,000 a year.

The replacement of these two facilities is underway and will provide the nearby households in the CVRD and SRD with an expanded level of diversion for materials beyond the paper, cardboard, metal and plastic packaging incorporating other EPR materials such as batteries and electrical devices as well as plastic bags and glass jars. Annual operating costs for these staffed facilities with an expanded service level will be lower than the cost to haul and process the recycling accepted now. This excludes the cost to purchase the land at Oyster River, and to construct the facility on Quadra Island. An investment of just over one million dollars is needed to support the development of these two facilities.

These two facilities filled identified gaps in our CSWM network of depots. However, understanding that a roadside collection service would be directly user pay, and that recent investments in depots and their operating costs have been a CSWM service shared cost primarily a discussion about equity is necessary. Recent pressures on the CSWM service to expand and provide additional facilities or higher service levels has resulted in a need to define for ourselves what level of service for recycling and organics is appropriate to meet our diversion goals within each community.

Examples include:

- the closure of the private bottle depot within the Town of Comox, and a request from residents to replace that facility with a publicly funded depot;
- the removal of 24-hour unstaffed recycling bins in Gold River resulting in an increase to operating hours at the staffed depot;
- the request from residents in the south end of Campbell River for improved depot services;
- decrease in funding for Cortes Island curbside collection of recycling;
- the desire for higher levels of service in CVRD Electoral Area A; and
- the transition of drop-off bins on Quadra and in Oyster River into staffed facilities.

This need brings forward the desire to agree on a **Convenience Level Standard** for the entire CSWM service area to address **Goal 6**: *To ensure that the CSWM solid waste service is financially sustainable and delivered equitably across the region, recognizing and leveraging the unique challenges and cultures of our rural and remote communities*.

Convenience Level Standard

The purpose of the **Convenience Level Standard** concept is to identify a commitment level of diversion services for each community or region identified, and for that to be the level funded collectively by all users of the CSWM service. That for regions or communities that desire a higher standard of service, such as increased hours of operation, additional waste events or acceptance of a unique waste stream those can be funded exclusively by the users of that facility or service. This concept considers the principles of the Unified Transportation Model which was the Board approved concept that once ownership is assumed at transfer stations or landfills by the CSWM, then all handling, transportation and long-term care of waste is the legal responsibility of the CSWM.

Standards of Accessibility in BC

Over the past decades there have been many iterations of non-binding policy documents attempting to define what is “reasonable access” for the residents of BC to participate in recycling. Each attempt has been well meaning but none have the intimate knowledge of the CSWM communities required to curate a standard for convenience for this region. The BC *Recycling Regulation* section 5(c)(iii) requires that for an extended producer responsibility plan to be approved by the director, that they must be satisfied that the plan adequately provides for “reasonable and

free consumer access to collection facilities or collection services." The province has never defined what "reasonable access" is as a result EPR agencies have established their own criteria, essentially letting them write their own rules. The absence of a standard or guideline leads to varying criteria across programs, which can create confusion among consumers and potentially limit equity.

In an effort to define what "reasonable access" is in 2022, the province contracted with Eunomia Research and Consulting Inc. (Eunomia) to examine accessibility for EPR collection services in BC. In 2024 Eunomia summarized their research and interviews and developed a proposed framework for consumer access in BC's EPR system. The findings of that study will inform policy development work by staff in the Ministry of Environment and Parks on what is reasonable consumer access. That work is underway and expected to be presented sometime in 2025. It will hold the EPR programs to a standard for delivering their collection programs to meet their obligations under the *Recycling Regulation*; however, there is no guarantee that this standard will meet the expectations of CSWM communities due to misalignment on the unique geography of the CSWM service area. Undertaking this work will help to inform the province in understanding the unique characteristics of our region and identify potential limitations of a one size fits all solution.

Building off of the work done for the province will allow for this standard to align most closely with what could be the future standard for EPR programs. The Eunomia framework was reviewed with the Regional Solid Waste Advisory Committee (RSWAC) over the course of three meetings in 2024 and 2025 and modified based on feedback from the diverse group. Discussed below are the alterations made to better fit our communities and geography. For an in-depth review of the Eunomia methodology please refer to Appendix A.

Community Types

The Eunomia framework suggests relying on a Statistics Canada value called an Index of Remoteness, an improvement upon the traditional urban/rural divide relied upon by previous standards. Statistics Canada calculates an Index of Remoteness number for each census subdivision (CSD) in Canada. This index takes into account the distance of a community from different population centres as well as the population size of those centres. This allows communities to be categorized into five distinct groups based on their level of accessibility: easily accessible, accessible, less accessible, remote, and very remote community types. Below is

how each of the CSDs within the CSWM were categorized by Statistics Canada and the Eunomia Community Type.

Table 1: Community Types

Community	Index of Remoteness	Eunomia Category	Adjusted Category
Village of Tahsis	0.517	Remote	Remote
Village of Zeballos	0.516	Remote	Remote
Village of Gold River	0.428	Less Accessible	Less Accessible
Village of Sayward	0.409	Less Accessible	Less Accessible
SRD A – West	0.399	Less Accessible	Very Remote
SRD A - Sayward Valley			Less Accessible
SRD B - Cortes Island	0.356	Accessible	Less Accessible
SRD C - Quadra Island	0.315	Accessible	Less Accessible
SRD C - Discovery Islands			Very Remote
City of Campbell River	0.310	Accessible	Accessible
SRD D - Oyster	0.298	Accessible	Accessible
CVRD C - Merville	0.293	Accessible	Accessible
Town of Comox	0.288	Accessible	Accessible
CVRD B - Lazo	0.288	Accessible	Accessible
Village of Cumberland	0.287	Accessible	Accessible
CVRD A - Baynes Sound- VI	0.287	Accessible	Accessible
CVRD A - Hornby Island		Accessible	Less Accessible
CVRD A - Denman Island		Accessible	Less Accessible
City of Courtenay	0.286	Accessible	Accessible

Reviewing the communities within the CSWM it was identified that the CSD areas are aligned with the municipal and electoral area boundaries, and that they did not consider the challenging nature of gravel roads or limitations posed by ferry travel. This feedback has been provided to the province. Taking into account the characteristics of the Sayward Valley, the Outer Discovery Islands, Hornby and Denman Islands and the vastness of SRD Electoral Area A, staff propose the above adjusted categories for our community groupings.

- It is suggested that water access communities requiring personal or private watercraft, and lacking BC Ferries vehicle service would be considered Very Remote.
- Any island community (off of Vancouver Island) which requires BC Ferry access would be at a minimum Less Accessible.

Product Factors

The Eunomia report considered the characteristics of the materials being collected and grouped them based on the:

- frequency of purchase – the need for disposal relates to the lifespan and number of items in circulation, pop cans compared to air fryers.
- the product size and weight – influences a consumer's ability to carry and return a product, as well as the facility needs to store and manage it.
- the hazard level of the material – these materials are most important to keep out of the waste stream, but also have requirements for accepting, storing, and transporting at an added cost.

This rational is sound and was expanded to include materials not accepted within EPR programs such as propane tanks, mattresses, drywall and yard waste. These are items that are not treated as waste within the CSWM and opportunities for diversion need to be considered.

Population Targets

The CSWM cannot afford to provide services to every single household. Some residents choose to live in beautiful, inaccessible and faraway places, tucked away from the bustle of commercial activity and tourism. To provide flexibility, recognizing that there may be barriers in some areas that limit the capacity to provide service, Eunomia suggested a percentage of the population to be provided reasonable access by Community Type. These targets were adjusted based on input from the RSWAC. By strengthening the definition of reasonable access, CSWM can anchor decision making around how services are determined.

Table 2: Proposed Percentage of Population with Reasonable Access

Community Type	Percentage of Population with Reasonable Access Eunomia	Percentage of Population with Reasonable Access Proposed
Easily Accessible	95%	95%
Accessible	90%	95%
Less Accessible	85%	90%
Remote	50%	90%
Very Remote	25%	75%

Collection Service Type

Eunomia identified four collection service types that could be utilized for providing convenient opportunities for a household to divert:

- Single Family Curbside / Multi-family Collection / Direct Pick-up
- Permanent Facility (e.g. depot or return to retail)
- Temporary Facilities and Events (e.g. pop-up depot or collection event)
- Mail-back Collection.

Considering the product factors such as hazard and frequency, they proposed appropriate service types for each, as well as identifying mandatory primary factors and secondary factors to choose from. The primary factors adopted in the proposed CSWM Convenience Level Standard are Drive Time and Frequency. The secondary factor proposed is Operating Hours.

Drive Time

Drive time to a collection facility is currently used by EPR agencies to evaluate accessibility and is therefore already a widely accepted factor for measuring consumer access to recycling services. In addition to being an established factor for measuring access, drive time is also correlated with recycling rates. The time it takes consumers to drive to recycling collection sites is directly linked to accessibility, as longer drive times can be perceived as a challenge to recycling. Several studies[2] have shown that proximity to a recycling drop-off location increases the likelihood of people recycling their materials.

Drive time analysis was undertaken by Comox Valley Regional District GIS staff and provided for review by the RSWAC and CSWM staff. Discussion of drive time by material type was completed and adjusted with input from the RSWAC. The

distance ranged from 20 minutes to 60 minutes depending on material and community type. If a material is not collected at a permanent collection facility, an event, pick-up or temporary collection facility can be arranged instead.

Frequency

This is the most widely used standard for measuring access to single family curbside / multi-family collection / direct pick-up services. The CSWM has not previously funded collection services from individual households or businesses from Bylaw 1822 being the "Regional Solid Waste Plan Local Service Establishment Bylaw, 1996." If a collection service from households takes place it is to be directly funded by the users of that service, and arranged either as a distinct service under Bylaw 1822 or delivered by a municipality. Development of a standard for the frequency and materials to be accepted for collection at the household level is part of the decision making by the Board on strategies to address diversion in rural areas.

Frequency of collection is also the distinguishing feature for events and direct pick-up services. The proposed Frequency of Events within the **Convenience Level Standard** are summarized below and included within Appendix B:

- Very Remote – One larger event every other year, one event every year to include transportation of household waste from a consolidation point
- Remote – One event every year if no depot service provided
- Less Accessible – Twice a year event if no depot service provided, annual collection for hazardous materials
- Accessible – No events anticipated
- Very Accessible - No events anticipated

Operating Hours

The hours during which a facility is open or an event is held directly affect a resident's ability to use the service and divert products, but it is also directly related to the cost of operating and needs to be balanced. Eunomia has provided a percentage of facilities meeting the minimum hours which is not relevant to our communities as in most cases residents will only have convenient access to one facility. The minimum weekday hours and weekend hours suggested are not unreasonable, but they do require some flexibility as not all facilities are 'staffed' in the same way.

Some CSWM recycling facilities are very low use and allow for staff to be paid to open or unlock bins, close bins and to spend time reviewing materials and removing contamination at the end of the day. The facility hours are not representative of the staffed hours keeping costs lower and convenience higher. These facilities are also complemented by curbside waste collection and do not accept waste on site. Due to the relatively low usage contamination can be managed without full time supervision.

Operating hours are proposed to be grouped based on Community Type and provide for further flexibility in meeting community needs than proposed by Eunomia. Specified are the number of days of the week, the number of weekend days, and the total hours per year the facility would be open at a minimum. Some communities have a seasonal influx of residents in the summer and increase operating hours to accommodate this, others align operations with municipal public works schedules.

A summary of the current CSWM recycling facilities and private multi-product depots hours of operation is provided in Appendix C. The proposed Hours of Operation within the **Convenience Level Standard** are:

- Very Remote – No permanent facilities
- Remote - 2 days a week, one on a weekend, 100 hours a year
- Less Accessible - 4 days a week, one on a weekend, 200 hours a year
- Accessible - 6 days a week, one on a weekend, 300 hours a year
- Very Accessible - 6 days a week, one on a weekend, 350 hours a year

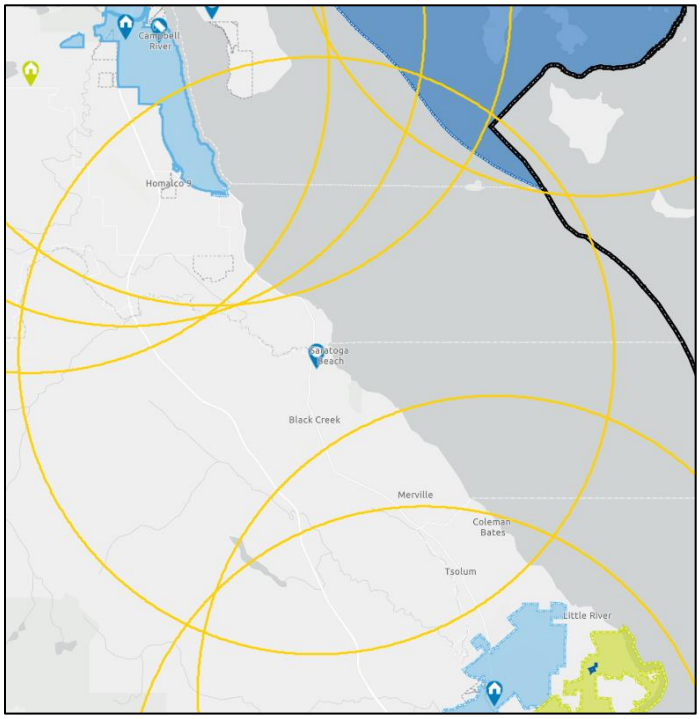
Gap Analysis

There are three population areas that fall outside of the proposed Convenience Service Level Standard and would require additional funding from CSWM to fill the service gap.

The first is the Very Remote Communities of the Outer Discovery Islands (SRD Area C) and the boat access residents of SRD Area A. The CSWM has provided a refund for transportation costs of waste from Walter's Island to the SRD four times a year. Collection events for recycling have not been held consistently for either population.

Events to be held on Quadra Island (to support Outer Discovery Island residents) and for SRD Area A would cost between $5,000 and $7,000 per event. Tipping fees for any waste generated would need to be funded by residents contributing to the event.

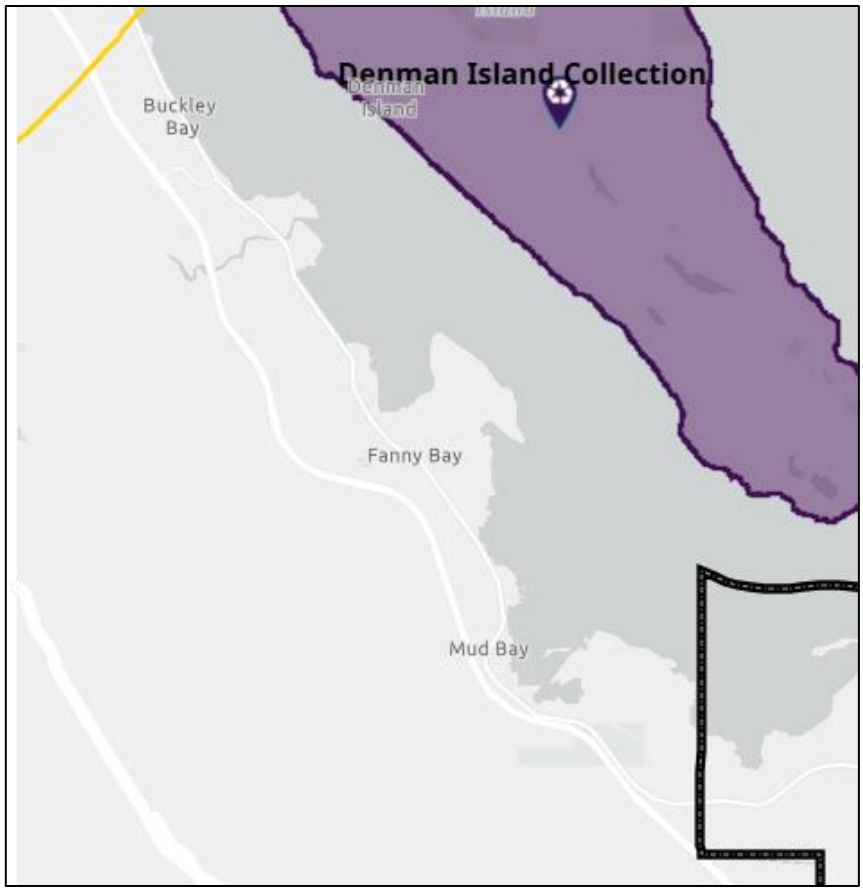
The second are the households which are in proximity to the Oyster River Recycling Drop-Off facility, which border the CVRD and SRD boundary. Converting this facility to accept more EPR program materials, scrap metal and expanded packaging will provide residents in this area a facility meeting the Convenience Service Level standard and that work is underway.



The third is the southern most portion of CVRD Electoral Area A, from Buckley Bay south to Mud Bay. Assuming they are not prepared to travel to the Denman Island Recycling Depot then they are outside of the proposed 20-minute drive time for many materials. Siting a permanent depot within this region would address this gap but would come with additional cost implications and challenges.

Consultation in the summer of 2024 provided suggested locations of Ships Point, Fanny Bay, near Buckley Bay ferry, Union Bay Fire Station, store or community hall.

Assuming the right property was identified and became available to lease or purchase development costs are expected to be in the range of $300-400,000 plus any land purchase costs.



Equity Issues

Should this Convenience Level Standard be adopted by the Board, the current funding model for the operation of the Denman Island Recycling Depot and Hornby Island Recycling Depot should be considered. Both of these facilities are funded exclusively by the residents of their respective populations as separate services of the CVRD. They are not funded by the entire population of the CSWM as all of the other CSWM facilities are including the six depots in the SRD, and the two Regional Waste Management Centres.

Hornby residents fund their depot operations and waste disposal (tipping fees) with a tax requisition of $400,000 a year. Tipping fees would not be eligible and are $63,500 of the $400,000 a year. Service levels at the facility also exceed that of the **Convenience Level Standard** and some may be considered outside the scope of funding. The assets at the Hornby site have been funded by CSWM and it is a Crown leased site.

Denman residents fund their Bottle Depot, Recycling Depot and curbside waste collection service through profits generated from EPR programs including bottle collection, and a tax requisition of $138,305. Tipping fees are around $19,000 a year, and waste collection is $47,300 per year. This depot has building repair needs for assets not owned by CSWM.

Both facilities are operated and have their budgets set by their respective Resident Associations annually. They then request the funds through the CVRD and their residents are taxed accordingly. In exchange for funding the CSWM Board would likely want CSWM staff to have more input on operations to be accountable.

Conclusion

This **Convenience Level Standard** is proposed to be reflected upon when individual communities or Board representatives advocate for diversion services within their jurisdiction and to achieve **Goal 6**: *To ensure that the CSWM solid waste service is financially sustainable and delivered equitably across the region, recognizing and leveraging the unique challenges and cultures of our rural and remote communities*. Through Board approval, variance from this standard could be approved for funding by the CSWM service.

Options for Implementation

10a. CSWM Funded Depots

Review the Convenience Level Standard and pursue development of depots or events to meet the access requirements necessary for the CSWM service. Service level would be dictated by the location, Community Type and need. These would be contractor operated and would increase demands on existing staff for operation, compliance and asset management.

Cost implications are related to the number and type of depots or events required. Gap analysis indicates the increase to CSWM operations could be in the range of $400,000 to $500,000 plus any land purchase or lease fees. Annual operating costs for the depot would be in the range of $50,000 to $100,000.

10b. CSWM Funded Depots and Exploration of Future User Pay Waste Drop-off

Reducing traffic at regional waste management centres will only be effective if self-haul customers have alternative facilities, subscribe to pick-up or have an organized collection service. Exploration of user pay drop-off of bagged household garbage, small quantities only, in clear waste bags could be considered. This type of service is dependent on property use (zoning) and that no waste is stored outside or put on the ground. Clear bags would be necessary to enforce diversion and additional resources required would be entirely funded by users of the waste disposal program. Assume that any bins would be provided as part of the hauling contract.

A larger property would be necessary to accommodate this approach, and it could lead to higher traffic volumes. Having waste disposal and diversion at an equivalent level of convenience, i.e. both taken to same location, will lead to higher participation. Annual operating costs would be higher but offset by user fees paid by waste disposal.

10c. Regional Roadside Collection Service

Proposed bi-weekly pick-up of garbage, bi-weekly pick-up of recycling and consideration for inclusion of organics collection. A regional roadside collection program created under the Solid Waste Service Establishment Bylaw (1822) through the Solid Waste Management Plan approval process by the Minister. All decisions related to the administration and operation of the program would be voted on using the weighted stakeholder vote, whereby only the Electoral Area (EA) directors representing jurisdictions that participate in the program would be entitled to vote, and each EA director is assigned a specific number of votes based on the population of the jurisdiction the EA director represents.

Staff understands that this issue has sparked differing opinions in the rural communities and are committed to reflecting on the feedback from consultation and past public assent processes to ensure that all concerns are considered, with a goal of creating a service that has the flexibility to reduce household waste generation. As a strategy to achieving higher levels of diversion it is the strongest of the options presented here and was supported by many members of the RSWAC. Recycling collection would also be eligible for Recycle BC funding under a local government contract.

The service would be provided under contract to one or more private haulers and be automated collection to allow for users to pay based on waste generation volumes and to take advantage of innovations such as AI which can automatically identify contamination and provide individualized feedback to residents.

This approach is user pay but would require an additional 0.8 full time equivalent employee to oversee the successful operation of the contract, and contract support to launch the program for the first 6 months. Additional staff are in the range of $60-80,000 per year and a contract value of $40,000 for the first year.

10d. Reliance on Free Market and Policy Options

This strategy focuses on enhancing existing waste diversion practices without introducing a new collection service or development of depot facilities. It would

rely on the implementation of the previously introduced strategies of mandatory source separation for all residential, institutional, commercial and industrial (ICI) properties into three streams but not mandate a pick-up service. If layered with disposal bans for divertible materials private haulers would have a better business model with which to offer recycling and organics pick-up to residential customers, rather than just offering waste pick-up. Pick-up would not be mandatory however, and some mismanagement of waste is likely to continue (burning, dumping in public bins). To strengthen waste diversion efforts, clear bags would be required to make it easier to identify recyclable and compostable materials at the tipping wall and landfill face, improving enforcement. Subscription services for recycling pick-up would not be eligible for Recycle BC funding if contracted individually.

This approach allows for improved compliance and transparency while minimizing disruption to current waste management practices. However, there is some uncertainty among RSWAC members regarding its potential effectiveness in achieving diversion goals.

Table 3: Summary of Strategies

Strategy	Diversion Potential	Ops. & Staffing	Capital Cost	Comments
10a. CSWM Funded Depots	Low	$50,000 to $100,000 in operating costs	$400k-$500k plus land	
10b. Depots with User Pay Waste Options	Low	$50,000 to $100,000 net revenue from user fees	None	
10c. Regional Roadside Collection Service	Medium	$60-80,000/yr and a contract value of $40,000 for the first year.	None	
10d. Free Market Policy Options	Low if from rural residents only	See strategy 6b	None	

Appendices

Appendix A: Presentation to BC Product Stewardship Council, Eunomia Research & Consulting Inc., March 2023, for BC Ministry of Environment and Climate Change Strategy, Enhancing Consumer Access to Recycling Services Under EPR.

Appendix B: The Proposed Convenience Level Standard for CSWM Communities

Appendix C: Recycling Facilities Hours of Operation

Sources

1. BC Government, 2021. Advancing Recycling in BC, Extended Producer Responsibility Five-Year Action Plan 2021-2026. https://www2.gov.bc.ca/assets/gov/environment/waste-management/recycling/recycle/extended_producer_five_year_action_plan.pdf
2. Eunomia Research & Consulting Inc., March 2023, for BC Ministry of Environment and Climate Change Strategy, Enhancing Consumer Access to Recycling Services Under EPR.

Ministry Overview

- The Ministry of Environment and Climate Change Strategy contracted Eunomia Research and Consulting, Inc. to examine accessibility for extended producer responsibility (EPR) collection services in B.C., considering the diverse population spread across the province.
- Through research and interviews, Eunomia Research and Consulting, Inc. developed a framework for consumer access in B.C.'s EPR system.
- The findings of the study will inform policy development on reasonable consumer access.
- The ministry will continue reviewing the framework and finalizing policy, providing updates throughout the process.

Enhancing Consumer Access to Recycling Services Under EPR in British Columbia

May 2023



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Presentation Overview

The objective is to explain the process and result of the EPR accessibility framework

The topic is complex, and time is limited but there is will time for questions

Please ask any questions in the chat and a member of the team will respond in the chat or we will answer at the end

Current Status

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British Columbia Recycling Regulation

Under the authority of the **Environmental Management Act**, the Recycling Regulation requires producers, or an agency acting on their behalf, to "provide for reasonable and free consumer access to collection facilities or collection services" throughout B.C.

Currently, there is **no overarching standard or guideline in B.C. that defines what constitutes 'reasonable access.'**

As a result, EPR agencies have established their own criteria.

The absence of a standard or guideline leads to varying criteria across programs, which can create confusion among consumers and potentially limit equity.

Current Challenges

- Inconsistent community group categories and definitions
- Lack of granularity in community groups
- Inconsistent standards for reasonable access
- Standards for reasonable access are limited and modest

Challenge 1: Inconsistent community group categories and definitions

Current State

Different EPR agencies use various terms to determine community groupings, while others use the same terms with different definitions.

E.g. Urban/Rural, CMA, or one standard for the whole population.

This leads to inconsistent standards, as a community may be categorized differently by different EPR agencies.

Impact

This can create confusion for ministry staff tasked with reviewing accessibility standards or verifying whether the standard was met.

Additionally, it can cause confusion for residents and regional districts trying to understand what level of service they should expect if they are considered ‘rural’ under one definition but not under another.

Challenge 2: Lack of granularity in community groups

Current State

Standards are set for either the entire population or just two groups, urban/rural.

When EPR agencies report on the accessibility of their programs, most report a single percentage for the entire population, rather than disaggregated data for different community groups. For example, an EPR agency may have different accessibility standards for urban and rural areas, but rather than report accessibility levels for each of these community types, it will report one number for the entire B.C. population.

Impact

This lack of granularity presents challenges to the ministry or interested parties in understanding how access in certain community types could be improved and ensuring that the requirements of the Recycling Regulation are being met across different community types.

Additionally, the lack of granularity enables EPR agencies to meet accessibility targets even if there is limited to no access in certain community types (i.e., more remote areas).

Example: If 80% of B.C.'s population is living in urban areas and 20% in rural areas, and an EPR agency has set an overall population target of 90%, it could technically meet that target by providing access to collection services to 100% of those living in urban communities and to only 50% of those living in rural communities.

Challenge 3: Inconsistent standards for reasonable access

Current State

Different EPR agencies evaluate consumer access to collection services based on a different set of factors.

These include drive time to return location, distance to return location, total number of return locations, and the ability to return materials via mail.

Impact

The fact that different programs interpret reasonable access differently makes it challenging to compare accessibility levels across programs and to ensure that similar programs provide similar levels of service.

Challenge 4: Standards may not result in reasonable access for all communities

Current State

Most EPR agencies evaluate reasonable access using only one factor, such as drive time or number of return locations.

This limited evaluation scope does not consider other factors that may impact an individual consumer's ability or likelihood to return a product.

Additionally, the standards set are modest, which may result in some communities still lacking reasonable access.

Impact

If the agencies' interpretation of reasonable access leads to a modest standard, many people may not have reasonable access to recycling services. Furthermore, a modest standard with high rates of access creates very little incentive to improve accessibility moving forward, as there is close to universal access according to the standard.

For those who still return their products even when they live beyond where the EPR program is providing access or when standards are modest, significant time is spent on the product returns, which contributes to the unpaid economy of work.

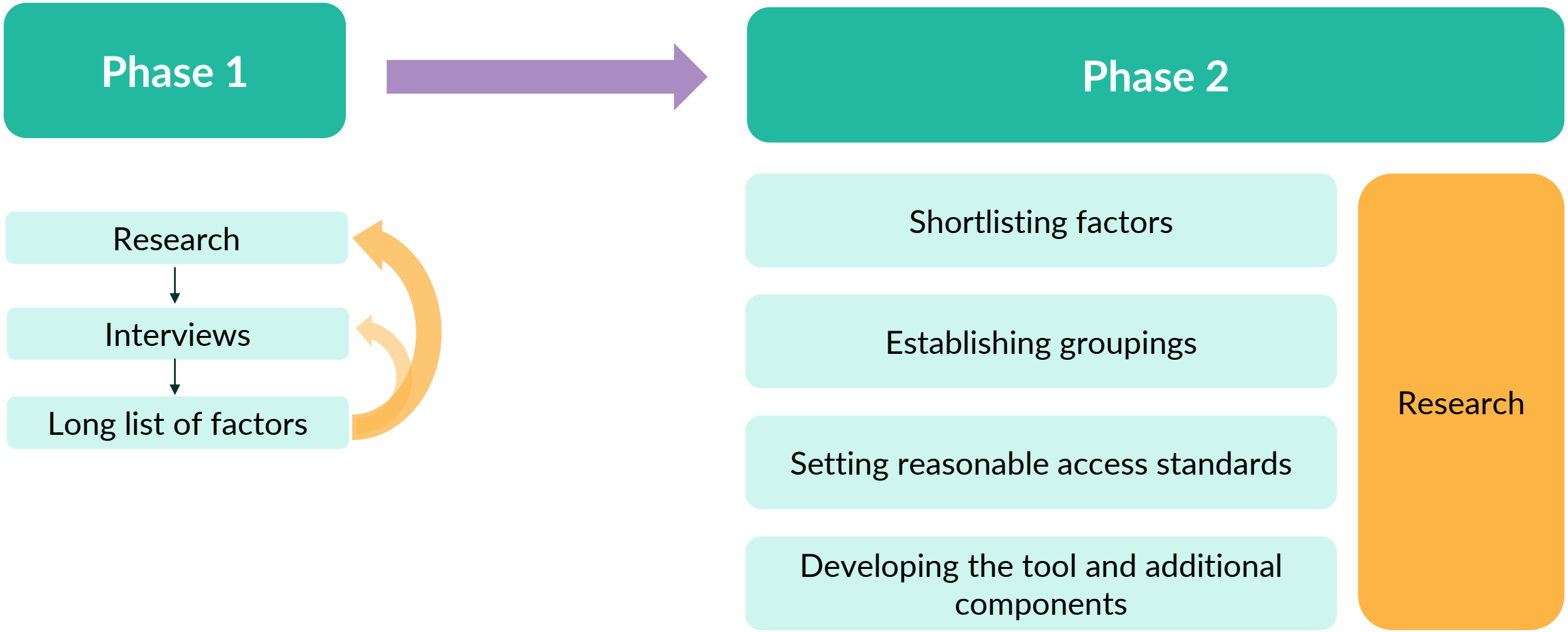
Our Approach

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Project Objectives

- Establish a hierarchy of service level requirements to optimize consumer access to collection services for regulated products, with consideration for different community types and the products being collected
- Develop a framework to direct EPR agencies in developing required consumer accessibility commitments in EPR plans
- Develop objective criteria for ministry staff to evaluate accessibility commitments in EPR plans

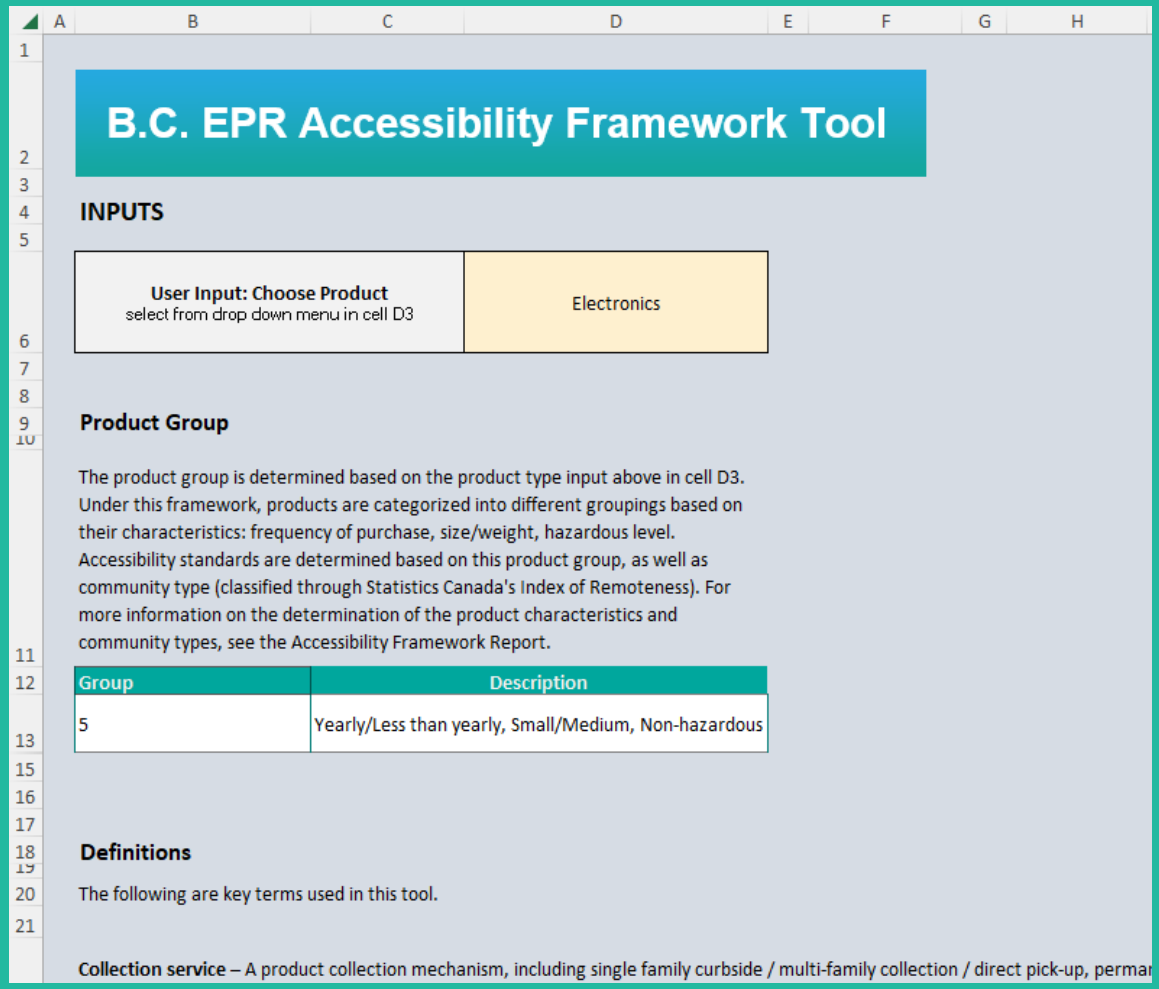
Overview of Process



The Tool

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Tool Demonstration



B.C. EPR Accessibility Framework Tool

INPUTS

User Input: Choose Product select from drop down menu in cell D3	Electronics

Product Group

The product group is determined based on the product type input above in cell D3. Under this framework, products are categorized into different groupings based on their characteristics: frequency of purchase, size/weight, hazardous level. Accessibility standards are determined based on this product group, as well as community type (classified through Statistics Canada's Index of Remoteness). For more information on the determination of the product characteristics and community types, see the Accessibility Framework Report.

Group	Description
5	Yearly/Less than yearly, Small/Medium, Non-hazardous

Definitions

The following are key terms used in this tool.

Collection service – A product collection mechanism, including single family curbside / multi-family collection / direct pick-up, perma

The Framework

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Framework Approach

Product Factors

- Regulated products have different characteristics that could impact a consumer's desire or ability to return them, as well as an EPR program's ability to collect them.
- The framework standards are set per category, so that similar products have the same requirements, and products with different characteristics have different requirements

Community Factors

- Communities have different characteristics that may influence a program's approach to collect products and may justify different collection standards (e.g., for instance, a community's size, whether there is reliable infrastructure [i.e., roads]).
- These groupings establish clear delineation for agencies to understand what service standards they need to meet in specific areas.

Collection Service Factors

- There are several ways to return and collect products
- Each of these approaches have different features that can influence reasonable access. The framework considers how the same level of access could be met through different collection methods.

Shortlisted Factors and Service Types

Product Factors

- Frequency of Purchase
- Product Size and Weight
- Hazard Level

Community Factors

- Level of Remoteness

Collection Service Options and Factors

- Single Family / Multi-family Collection / Direct Pick-up
  - Frequency of Collection
- Permanent Facility
  - Drive Time
  - Consumer Satisfaction
  - Operating Hours
  - Ability to Return Other Materials
- Temporary Facilities and Events
  - Drive Time
  - Frequency
  - Operating Hours
  - Ability to Return Other Materials
- Mail-back
  - Drive Time

Shortlisted Product Factors

Frequency of Purchase

Frequency of purchase is relevant to accessibility because products that are purchased often require different return infrastructure for access to be considered reasonable

Products are grouped by daily, weekly, and yearly/less than yearly purchase frequencies

Product Size and Weight

A product's size/weight is relevant to accessibility because it influences a consumer's ability to carry and return a product

The Canada Occupational Health and Safety Regulations (SOR/a86-304) on Manual Handling of Materials 14.36-49 state that an employee must be trained if they are responsible for lifting anything over 10 kg

Products are grouped by small (less than 1 kg), medium (1 kg – 10 kg), and large (greater than 10 kg) based on their weight

Product Hazard Level

B.C. Hazardous Waste Regulation specifies unique collection requirements for hazardous materials that must be taken into account when establishing an accessibility framework for EPR programs.

Products in the accessibility framework are considered as hazardous or non-hazardous based on the B.C. Hazardous Waste Regulation definition.

Product Groupings

Product Group	Product Examples
1: Daily, Small, Non-Hazardous	(a) Packaging and Paper Products (b) Packaging and Paper Products (flexibles and glass)
2: Weekly, Small, Non-Hazardous	Beverage Containers Including Milk, Beer Containers
3: Yearly/Less than yearly, Small/Medium, Hazardous	Paint, Pesticides, and Flammable Liquids, Used Motor Oil, Filters, Containers and Antifreeze, Medications
4: Yearly/Less than yearly, Large, Hazardous	Auto Batteries/Lead Acid Batteries
5: Yearly/Less than yearly, Small/Medium, Non-Hazardous	Electronics, Light Bulbs, and Light Fixtures, Small Appliances, Alkaline and Rechargeable Batteries, Smoke Alarms, Carbon Monoxide Detectors, Telecommunication Equipment, Thermostats, Cell Phones
6: Yearly/Less than yearly, Large, Non-Hazardous	Outdoor Power Equipment, Tires, Large Appliances

Challenge mitigated: Inconsistent standards for reasonable access

Shortlisted Community Factor

Index of Remoteness

Statistics Canada calculates an Index of Remoteness number for each census subdivision (CSD) in Canada. This index, takes into account the distance of a community from different population centres as well as the population size of those centres. CSDs are Inconsistent standards for reasonable access Inconsistent standards for reasonable access into one of five categories:

- Easily Accessible Area
- Accessible Area
- Less Accessible Area
- Remote Area
- Very Remote Area

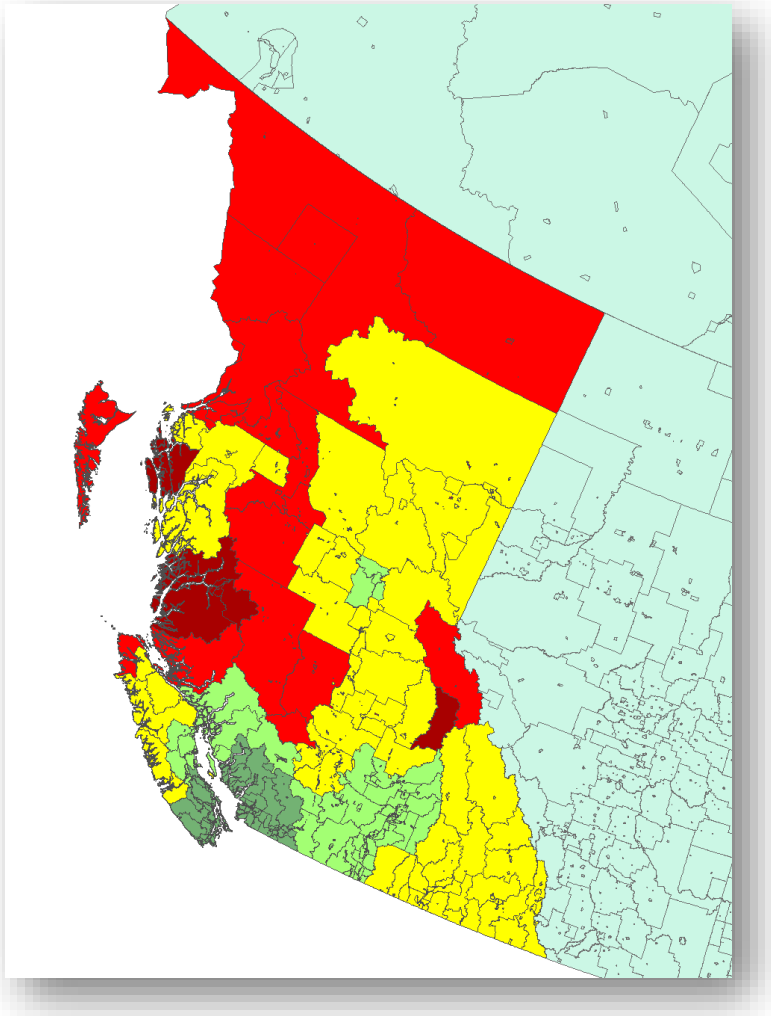
Community Groupings

K-Means Method

This method has the highest proportion of the population living in easily accessible and accessible areas, providing a clear approach for determining community groups and understanding access requirements in accordance with methods used by Statistics Canada

	# of B.C. CSDs	% of B.C. Population*
Easily Accessible Area	174	74.2%
Accessible Area	144	16.7%
Less Accessible Area	268	8.1%
Remote Area	137	0.9%
Very Remote Area	20	0.1%
Total	743	99.9%

Challenges mitigated: Inconsistent community group categories and definitions
Lack of granularity in community groups



Population Targets

- If adopted, requires EPR agencies to meet minimum population targets by community type
- Set below 100% to provide flexibility to EPR agencies, recognizing that there may be barriers in some areas that limit the capacity to provide service
- Set by community type to improve the equity of EPR access province-wide
- Targets do not vary by product type
- If all population targets are met 93% of the total population will have reasonable access with minimum thresholds in each group

Community Type	Percentage of Population With Reasonable Access
Easily Accessible Area	95%
Accessible Area	90%
Less Accessible Area	85%
Remote Area	50%
Very Remote	25%

Collection Service Types

Reasonable access can be met through one or multiple of these collection service options

Single Family Curbside / Multi-family Collection / Direct Pick-up

A type of collection service provided to single-family and multi-family buildings. For single-family households, this includes materials set out at the curb for pickup. For multi-family households, there is typically collection from a central location in buildings with five or more residential units. Direct pick-up is often used to refer to on-demand collection from industrial and commercial waste generators and is included in this phrase as it is tangential to single family curbside and multi-family collection.

Permanent Facility

A type of collection service that is a permanent place (e.g., a depot or retail location) where consumers can return regulated products for proper end-of-life management. This type of collection facility is established by the producer or identified in an approved plan.

Temporary Facilities and Events

A type of collection service that is a temporary location (e.g., a collection event) where consumers can return regulated products for proper end-of-life management. This type of collection facility is operated and/or funded by the producer.

Mail-back Collection

A type of collection service that allows consumers to return their products through regular mail service.

Collection Service Factors

Primary Factors

- Specific to each service type
- If adopted, need to be met in order to count towards population target

Secondary Factors

- Specific to each service type
- Do not count towards population target
- Multiple secondary factors provide options for EPR agencies to choose from

Challenges mitigated: Inconsistent standards for reasonable access
Standards for reasonable access are limited and modest

Collection Service Primary Factors

Single Family Curbside / Multi-family Collection / Direct Pick-up

Frequency of Collection

Temporary Facilities and Events

Frequency

Drive Time to Collection Site

Permanent Facility

Drive Time to Collection Facility

Mail-back

Drive Time to Mail Drop Off Location

Collection Service Secondary Factors

Permanent Facility (meet 1 of 3)

% of Facilities Open at Minimum Hours (weekdays and weekends)

% of CSDs With the Minimum Number of Universal Return Locations in a Community

% of Users Meeting Use Experience Satisfaction Requirement

Temporary Facilities and Events (meet 1 of 2)

% of Facilities Open at Minimum Hours

% of Collection Facilities and Events Where Minimum Number of EPR Programs Are Collaborating

Single Family Curbside / Multi-family Collection / Direct Pick-up

No secondary factors

Mail-back

No secondary factors

Single Family Curbside / Multi-family Collection / Direct Pick-up Factors (Primary)

Primary Factor: Frequency of Collection

Justification

This is the most widely used standard for measuring access to single family curbside / multi-family collection / direct pick-up services.

Residential collection services are mandated for packaging and paper products under the recycling regulation, and thus the primary distinction between service levels across different communities is frequency of collection.

Frequency of collection is also the distinguishing feature for direct pick-up services for nonresidential locations

Product Group	Community Type	Frequency Standard for Reasonable Access
Daily, Small, Non-Hazardous (excluding flexibles and glass)	Easily Accessible Area	Weekly/Biweekly
	Accessible Area	Weekly/Biweekly
	Less Accessible Area	Biweekly
	Remote Area	Monthly
	Very Remote Area	Monthly
Daily, Small, Non-Hazardous (including flexibles and glass)	Easily Accessible Area	Weekly/Biweekly
	Accessible Area	Weekly/Biweekly
	Less Accessible Area	Biweekly
	Remote Area	Monthly
	Very Remote Area	Monthly
Weekly, Small, Non-Hazardous (beverage containers)	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	Not Accessible
	Remote Area	Not Accessible
	Very Remote Area	Not Accessible
Yearly/Less than yearly, Small/Medium, Hazardous	Easily Accessible Area	6 times per year
	Accessible Area	4 times per year
	Less Accessible Area	2 times per year
	Remote Area	Once per year
	Very Remote Area	Once per year
Yearly/Less than yearly, Large, Hazardous	Easily Accessible Area	6 times per year
	Accessible Area	4 times per year
	Less Accessible Area	2 times per year
	Remote Area	Once per year
	Very Remote Area	Once per year
Yearly/Less than yearly, Small/Medium, Non-Hazardous	Easily Accessible Area	6 times per year
	Accessible Area	4 times per year
	Less Accessible Area	2 times per year
	Remote Area	Once per year
	Very Remote Area	Once per year
Yearly/Less than yearly, Large, Non-Hazardous	Easily Accessible Area	6 times per year
	Accessible Area	4 times per year
	Less Accessible Area	2 times per year
	Remote Area	Once per year
	Very Remote Area	Once per year

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Accessibility Framework for Single Family Curbside Multi-family Collection / Direct Pick-up

Product Group	Product Examples	Community Type	Population Target	Primary Factor Reasonable Access Frequency of Collection
Daily, Small, Non-hazardous	Packaging and Paper Products	Easily Accessible Area	95%	Weekly/Biweekly
		Accessible Area	90%	Weekly/Biweekly
		Less Accessible Area	85%	Biweekly
		Remote Area	50%	Monthly
		Very Remote Area	25%	Monthly
	Packaging and Paper Products (Flexibles and Glass)	Easily Accessible Area	95%	Weekly/Biweekly
		Accessible Area	90%	Weekly/Biweekly
		Less Accessible Area	85%	Biweekly
		Remote Area	50%	Monthly
		Very Remote Area	25%	Monthly
Weekly, Small, Non-hazardous	Beverage Containers including Milk, Beer Containers	Easily Accessible Area	95%	Not Accessible
		Accessible Area	90%	Not Accessible
		Less Accessible Area	85%	Not Accessible
		Remote Area	50%	Not Accessible
		Very Remote Area	25%	Not Accessible
Yearly/Less than yearly, Small/Medium, Hazardous	Paint, Pesticides, and Flammable Liquids, Used Motor Oil, Filters, Containers and Antifreeze, Medications	Easily Accessible Area	95%	6 times per year
		Accessible Area	90%	4 times per year
		Less Accessible Area	85%	2 times per year
		Remote Area	50%	Once per year
		Very Remote Area	25%	Once per year

Accessibility Framework for Single Family Curbside Multi-family Collection / Direct Pick-up

Product Group	Product Examples	Community Type	Population Target	Primary Factor Reasonable Access Frequency of Collection
Yearly/Less than yearly, Large, Hazardous	Auto Batteries/Lead Acid Batteries	Easily Accessible Area	95%	6 times per year
		Accessible Area	90%	4 times per year
		Less Accessible Area	85%	2 times per year
		Remote Area	50%	Once per year
		Very Remote Area	25%	Once per year
Yearly/Less than yearly, Small/Medium, Non-hazardous	Electronics, Light Bulbs and Light Fixtures, Small Appliances, Alkaline and Rechargeable Batteries, Smoke Alarms, Carbon Monoxide Detectors, Telecommunication Equipment, Thermostats, Cell Phones	Easily Accessible Area	95%	6 times per year
		Accessible Area	90%	4 times per year
		Less Accessible Area	85%	2 times per year
		Remote Area	50%	Once per year
		Very Remote Area	25%	Once per year
Yearly/Less than yearly, Large, Non-hazardous	Outdoor Power Equipment, Tires, Large Appliances	Easily Accessible Area	95%	6 times per year
		Accessible Area	90%	4 times per year
		Less Accessible Area	85%	2 times per year
		Remote Area	50%	Once per year
		Very Remote Area	25%	Once per year

Permanent Facility Factors (Primary)

Primary Factor: Drive Time

Justification

Drive time to a collection facility is used by SABC and other EPR agencies to evaluate accessibility, and is therefore already a widely-accepted factor for measuring consumer access to recycling services.

In addition to being an established factor for measuring access, drive time is also correlated with recycling rates. The time it takes consumers to drive to recycling collection sites is directly linked to accessibility, as longer drive times can be perceived as a challenge to recycling.

Several studies have shown that proximity to a recycling drop-off location increases the likelihood of people recycling their materials.

Product Group	Community Type	Reasonable Access for Drive Time to Permanent Collection Facility
Daily, Small, Non-Hazardous (excluding flexibles and glass)	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	15 minutes
	Remote Area	20 minutes
	Very Remote Area	30 minutes
Daily, Small, Non-Hazardous (including flexibles and glass)	Easily Accessible Area	10 minutes
	Accessible Area	10 minutes
	Less Accessible Area	15 minutes
	Remote Area	20 minutes
	Very Remote Area	30 minutes
Weekly, Small, Non-Hazardous	Easily Accessible Area	10 minutes
	Accessible Area	10 minutes
	Less Accessible Area	15 minutes
	Remote Area	20 minutes
	Very Remote Area	30 minutes
Yearly/Less than yearly, Small/Medium, Hazardous	Easily Accessible Area	15 minutes
	Accessible Area	20 minutes
	Less Accessible Area	30 minutes
	Remote Area	40 minutes
	Very Remote Area	45 minutes
Yearly/Less than yearly, Large, Hazardous	Easily Accessible Area	15 minutes
	Accessible Area	20 minutes
	Less Accessible Area	30 minutes
	Remote Area	40 minutes
	Very Remote Area	45 minutes
Yearly/Less than yearly, Small/Medium, Non-Hazardous	Easily Accessible Area	15 minutes
	Accessible Area	20 minutes
	Less Accessible Area	30 minutes
	Remote Area	40 minutes
	Very Remote Area	45 minutes
Yearly/Less than yearly, Large, Non-hazardous	Easily Accessible Area	15 minutes
	Accessible Area	20 minutes
	Less Accessible Area	30 minutes
	Remote Area	40 minutes
	Very Remote Area	45 minutes

Justification Continued

Theoretical ideal 15 minute city: most daily necessities and services are located within a 15-minute walk or bike ride.

How to define daily necessities?

From RCBC Report
"The services for the accessibility analysis are chosen to represent at least three levels of centrality (Lower is more accessible):

- low centrality: pharmacies and primary schools
- medium centrality: railway stations, hospitals and secondary schools
- high centrality: airports, highway entrances and facilities of tertiary education."

Current Access in BC

Access to Different Services in British Columbia Based on StatCan Study

	CMA	CA	Rural
Within 1 km of grocery store	63.2%	26.5%	16.1%
Within 1 km of pharmacies	75.9%	38.7%	20.1%
Within 3 km of a health care facility	99.2%	91.6%	62.3%
Within 1.5 km of primary education	85.4%	55.3%	26.9%
Within 1.5 km of secondary education	76.1%	47.1%	26.1%
Within 1.5 km of childcare	91.7%	68.5%	25.5%
Within 1 km of public transit	93.6%	53.5%	20.5%
Within 1.5 km of a library	39.1%	17.0%	20.3%
Within 1 km of a neighborhood park	89.1%	63.1%	35.5%

Permanent Facility Factors (Secondary – 1 of 3 needs to be met)

Secondary Factor: Operating Hours

Justification

The hours during which a facility is open directly affect a consumer's ability to use the service and return products to the facility.

To return a product, the consumer needs to be available when the collection facility is open and accepting returns.

Product Group	Community Type	% of Facilities Meeting Minimum Hours	Minimum Weekday Hours Open	Minimum Weekend Hours Open
Daily, Small, Non-Hazardous (excluding flexibles and glass)	Easily Accessible Area	Not Accessible	Not Accessible	Not Accessible
	Accessible Area	Not Accessible	Not Accessible	Not Accessible
	Less Accessible Area	80%	20	5
	Remote Area	80%	20	5
	Very Remote Area	80%	20	5
Daily, Small, Non-Hazardous (including flexibles and glass)	Easily Accessible Area	80%	45	16
	Accessible Area	80%	32	8
	Less Accessible Area	80%	20	5
	Remote Area	80%	20	5
	Very Remote Area	80%	20	5
Weekly, Small, Non-Hazardous	Easily Accessible Area	80%	45	16
	Accessible Area	80%	32	8
	Less Accessible Area	80%	20	5
	Remote Area	80%	20	5
	Very Remote Area	80%	15	4
Yearly/Less than yearly, Small/Medium, Hazardous	Easily Accessible Area	80%	40	12
	Accessible Area	80%	32	6
	Less Accessible Area	80%	30	5
	Remote Area	80%	15	4
	Very Remote Area	80%	10	2
Yearly/Less than yearly, Large, Hazardous	Easily Accessible Area	80%	40	12
	Accessible Area	80%	32	6
	Less Accessible Area	80%	20	5
	Remote Area	80%	15	4
	Very Remote Area	80%	10	2
Yearly/Less than yearly, Small/Medium, Non-Hazardous	Easily Accessible Area	80%	40	12
	Accessible Area	80%	32	6
	Less Accessible Area	80%	20	5
	Remote Area	80%	15	4
	Very Remote Area	80%	10	2
Yearly/Less than yearly, Large, Non-Hazardous	Easily Accessible Area	80%	32	8
	Accessible Area	80%	20	5
	Less Accessible Area	80%	20	5
	Remote Area	80%	12	4
	Very Remote Area	80%	8	2

Permanent Facility Factors (Secondary – 1 of 3 needs to be met)

Secondary Factor: Ability to Return Other Covered Products

Justification

With a variety of regulated products in B.C., it may be more accessible for consumers to be able to return more than one product at the same location, rather than having to travel to different locations for different products.

Additionally, with the increasing number of EPR programs, it is important to ensure not only that individual programs have reasonable access, but that the system as a whole provides reasonable access.

A Universal Return Location refers to any permanent collection facility that accepts all the products that can be returned within a specific census subdivision through permanent return facilities, provided that the products are of the same hazard level.

Product Group	Community Type	% of CSDs With At Least One Universal Return Location
Daily, Small, Non-Hazardous (excluding flexibles and glass)	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	80%
	Remote Area	80%
	Very Remote Area	80%
Daily, Small, Non-Hazardous (including flexibles and glass)	Easily Accessible Area	80%
	Accessible Area	80%
	Less Accessible Area	80%
	Remote Area	80%
	Very Remote Area	80%
Weekly, Small, Non-Hazardous	Easily Accessible Area	80%
	Accessible Area	80%
	Less Accessible Area	80%
	Remote Area	80%
	Very Remote Area	80%
Yearly/Less than yearly, Small/Medium, Hazardous	Easily Accessible Area	80%
	Accessible Area	80%
	Less Accessible Area	80%
	Remote Area	80%
	Very Remote Area	80%
Yearly/Less than yearly, Large, Hazardous	Easily Accessible Area	80%
	Accessible Area	80%
	Less Accessible Area	80%
	Remote Area	80%
	Very Remote Area	80%
Yearly/Less than yearly, Small/Medium, Non-Hazardous	Easily Accessible Area	80%
	Accessible Area	80%
	Less Accessible Area	80%
	Remote Area	80%
	Very Remote Area	80%
Yearly/Less than yearly, Large, Non-Hazardous	Easily Accessible Area	80%
	Accessible Area	80%
	Less Accessible Area	80%
	Remote Area	80%
	Very Remote Area	80%

Permanent Facility Factors (Secondary – 1 of 3 needs to be met)

Secondary Factor: Consumer Satisfaction

Justification

While there are other factors to consider when evaluating reasonable access, not all consumers may find them equally important.

Even when a facility may meet the primary factor (drive time) the conditions of the facility may limit a consumers accessibility and willingness to use the location.

Measuring overall satisfaction with the accessibility of the return network and individual locations can provide insight into the quality of the service and areas for improvement.

Product Group	Community Type	% of Consumers Satisfied With Permanent Collection Facility Network
Daily, Small, Non-Hazardous (not including flexibles and glass)	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	80%
	Remote Area	80%
	Very Remote Area	80%
Daily, Small, Non-Hazardous (including flexibles and glass)	Easily Accessible Area	80%
	Accessible Area	80%
	Less Accessible Area	80%
	Remote Area	80%
	Very Remote Area	80%
Weekly, Small, Non-Hazardous	Easily Accessible Area	80%
	Accessible Area	80%
	Less Accessible Area	80%
	Remote Area	80%
	Very Remote Area	80%
Yearly/Less than yearly, Small/Medium, Hazardous	Easily Accessible Area	80%
	Accessible Area	80%
	Less Accessible Area	80%
	Remote Area	80%
	Very Remote Area	80%
Yearly/Less than yearly, Large, Hazardous	Easily Accessible Area	80%
	Accessible Area	80%
	Less Accessible Area	80%
	Remote Area	80%
	Very Remote Area	80%
Yearly/Less than yearly, Small/Medium, Non-Hazardous	Easily Accessible Area	80%
	Accessible Area	80%
	Less Accessible Area	80%
	Remote Area	80%
	Very Remote Area	80%
Yearly/Less than yearly, Large, Non-Hazardous	Easily Accessible Area	80%
	Accessible Area	80%
	Less Accessible Area	80%
	Remote Area	80%
	Very Remote Area	80%

Accessibility Framework for Permanent Collection Facilities

			Primary Factor	Secondary Factors				
Product Group	Product Examples	Community Type	Population Target	Drive Time to Permanent Collection Facility	% of Facilities Meeting Minimum Hours	Minimum Weekday Hours Open	Minimum Weekend Hours Open	% of CSDs With At Least One Universal Return Location	% of Consumers Satisfied With Permanent Collection Facility Network
Daily, Small, Non-hazardous	Packaging and Paper Products	Easily Accessible Area	95%	Not Accessible	Not Accessible	Not Accessible	Not Accessible	Not Accessible	Not Accessible
		Accessible Area	90%	Not Accessible	Not Accessible	Not Accessible	Not Accessible	Not Accessible	Not Accessible
		Less Accessible Area	85%	15 minutes	80%	20	5	80%	80%
		Remote Area	50%	20 minutes	80%	20	5	80%	80%
		Very Remote Area	25%	30 minutes	80%	20	5	80%	80%
	Packaging and Paper Products (Flexibles and Glass)	Easily Accessible Area	95%	10 minutes	80%	45	16	80%	80%
		Accessible Area	90%	10 minutes	80%	32	8	80%	80%
		Less Accessible Area	85%	15 minutes	80%	20	5	80%	80%
		Remote Area	50%	20 minutes	80%	20	5	80%	80%
		Very Remote Area	25%	30 minutes	80%	20	5	80%	80%
Weekly, Small, Non-hazardous	Beverage Containers including Milk, Beer Containers	Easily Accessible Area	95%	10 minutes	80%	45	16	80%	80%
		Accessible Area	90%	10 minutes	80%	32	8	80%	80%
		Less Accessible Area	85%	15 minutes	80%	20	5	80%	80%
		Remote Area	50%	20 minutes	80%	20	5	80%	80%
		Very Remote Area	25%	30 minutes	80%	15	4	80%	80%
Yearly/Less than yearly, Small/Medium, Hazardous	Paint, Pesticides, and Flammable Liquids, Used Motor Oil, Filters, Containers and Antifreeze, Medications	Easily Accessible Area	95%	15 minutes	80%	40	12	80%	80%
		Accessible Area	90%	20 minutes	80%	32	6	80%	80%
		Less Accessible Area	85%	30 minutes	80%	20	5	80%	80%
		Remote Area	50%	40 minutes	80%	15	4	80%	80%
		Very Remote Area	25%	45 minutes	80%	10	2	80%	80%

Accessibility Framework for Permanent Collection Facilities (cont.)

			Primary Factor		Secondary Factors				
Product Group	Product Examples	Community Type	Population Target	Drive Time to Permanent Collection Facility	% of Facilities Meeting Minimum Hours	Minimum Weekday Hours Open	Minimum Weekend Hours Open	% of CSDs With At Least One Universal Return Location	% of Consumers Satisfied With Permanent Collection Facility Network
Yearly/Less than yearly, Large, Hazardous	Auto Batteries/Lead Acid Batteries	Easily Accessible Area	95%	15 minutes	80%	40	12	80%	80%
		Accessible Area	90%	20 minutes	80%	32	6	80%	80%
		Less Accessible Area	85%	30 minutes	80%	20	5	80%	80%
		Remote Area	50%	40 minutes	80%	15	4	80%	80%
		Very Remote Area	25%	45 minutes	80%	10	2	80%	80%
Yearly/Less than yearly, Small/Medium, Non-hazardous	Electronics, Light Bulbs and Light Fixtures, Small Appliances, Alkaline and Rechargeable Batteries, Smoke Alarms, Carbon Monoxide Detectors, Telecommunication Equipment, Thermostats, Cell Phones	Easily Accessible Area	95%	15 minutes	80%	40	12	80%	80%
		Accessible Area	90%	20 minutes	80%	32	6	80%	80%
		Less Accessible Area	85%	30 minutes	80%	20	5	80%	80%
		Remote Area	50%	40 minutes	80%	15	4	80%	80%
		Very Remote Area	25%	45 minutes	80%	10	2	80%	80%
Yearly/Less than yearly, Large, Non-hazardous	Outdoor Power Equipment, Tires, Large Appliances	Easily Accessible Area	95%	15 minutes	80%	32	8	80%	80%
		Accessible Area	90%	20 minutes	80%	20	5	80%	80%
		Less Accessible Area	85%	30 minutes	80%	20	5	80%	80%
		Remote Area	50%	40 minutes	80%	12	4	80%	80%
		Very Remote Area	25%	45 minutes	80%	8	2	80%	80%

Temporary Facilities and Events Factors (Primary)

Primary Factor: Frequency

Justification

Temporary collection facilities, including events, are only open for certain periods of time.

Therefore, the frequency of their occurrence can determine their accessibility and whether they provide equivalent access to other service options.

Product Group	Community Type	Reasonable Access Frequency for Temporary Collection Facilities and Events
Daily, Small, Non-Hazardous (excluding flexibles and glass)	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	Not Accessible
	Remote Area	Not Accessible
	Very Remote Area	Not Accessible
Daily, Small, Non-Hazardous (including flexibles and glass)	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	Not Accessible
	Remote Area	Not Accessible
	Very Remote Area	Not Accessible
Weekly, Small, Non-Hazardous	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	Not Accessible
	Remote Area	Not Accessible
	Very Remote Area	Not Accessible
Yearly/Less than yearly, Small/Medium, Hazardous	Easily Accessible Area	6 times per year
	Accessible Area	4 times per year
	Less Accessible Area	2 times per year
	Remote Area	Once per year
	Very Remote Area	Once per year
Yearly/Less than yearly, Large, Hazardous	Easily Accessible Area	6 times per year
	Accessible Area	4 times per year
	Less Accessible Area	2 times per year
	Remote Area	Once per year
	Very Remote Area	Once per year
Yearly/Less than yearly, Small/Medium, Non-Hazardous	Easily Accessible Area	6 times per year
	Accessible Area	4 times per year
	Less Accessible Area	2 times per year
	Remote Area	Once per year
	Very Remote Area	Once per year
Yearly/Less than yearly, Large, Non-Hazardous	Easily Accessible Area	6 times per year
	Accessible Area	4 times per year
	Less Accessible Area	2 times per year
	Remote Area	Once per year
	Very Remote Area	Once per year

Temporary Facilities and Events Factors (Primary)

Primary Factor: Drive Time

Justification

As with permanent collection facilities, the time it takes for consumers to drive their recyclables to temporary collection site or event is directly linked to accessibility.

Product Group	Community Type	Reasonable Access Drive Time for Temporary Collection Facilities and Events
Daily, Small, Non-Hazardous (excluding flexibles and glass)	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	Not Accessible
	Remote Area	Not Accessible
	Very Remote Area	Not Accessible
Daily, Small, Non-Hazardous (including flexibles and glass)	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	Not Accessible
	Remote Area	Not Accessible
	Very Remote Area	Not Accessible
Weekly, Small, Non-Hazardous	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	Not Accessible
	Remote Area	Not Accessible
	Very Remote Area	Not Accessible
Yearly/Less than yearly, Small/Medium, Hazardous	Easily Accessible Area	15 minutes
	Accessible Area	20 minutes
	Less Accessible Area	30 minutes
	Remote Area	40 minutes
	Very Remote Area	45 minutes
Yearly/Less than yearly, Large, Hazardous	Easily Accessible Area	15 minutes
	Accessible Area	20 minutes
	Less Accessible Area	30 minutes
	Remote Area	40 minutes
	Very Remote Area	45 minutes
Yearly/Less than yearly, Small/Medium, Non-Hazardous	Easily Accessible Area	15 minutes
	Accessible Area	20 minutes
	Less Accessible Area	30 minutes
	Remote Area	40 minutes
	Very Remote Area	45 minutes
Yearly/Less than yearly, Large, Non-Hazardous	Easily Accessible Area	15 minutes
	Accessible Area	20 minutes
	Less Accessible Area	30 minutes
	Remote Area	40 minutes
	Very Remote Area	45 minutes

Temporary Facilities and Events Factors (Secondary 1 of 2 needs to be met)

Secondary Factor: Operating Hours

Justification

Similar to permanent collection facilities, the hours during which a temporary collection facility (including collection events) is open directly affects a consumer's ability to use the service and return products.

Product Group	Community Type	Minimum Operating Hours
Daily, Small, Non-Hazardous (excluding flexibles and glass)	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	Not Accessible
	Remote Area	Not Accessible
	Very Remote Area	Not Accessible
Daily, Small, Non-Hazardous (including flexibles and glass)	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	Not Accessible
	Remote Area	Not Accessible
	Very Remote Area	Not Accessible
Weekly, Small, Non-Hazardous	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	Not Accessible
	Remote Area	Not Accessible
	Very Remote Area	Not Accessible
Yearly/Less than yearly, Small/Medium, Hazardous	Easily Accessible Area	16
	Accessible Area	10
	Less Accessible Area	8
	Remote Area	8
	Very Remote Area	8
Yearly/Less than yearly, Large, Hazardous	Easily Accessible Area	16
	Accessible Area	10
	Less Accessible Area	8
	Remote Area	8
	Very Remote Area	8
Yearly/Less than yearly, Small/Medium, Non-Hazardous	Easily Accessible Area	16
	Accessible Area	10
	Less Accessible Area	8
	Remote Area	8
	Very Remote Area	8
Yearly/Less than yearly, Large, Non-Hazardous	Easily Accessible Area	16
	Accessible Area	10
	Less Accessible Area	8
	Remote Area	8
	Very Remote Area	8

Temporary Facilities and Events Factors (Secondary 1 of 2 needs to be met)

Secondary Factor: Ability to Return Other Covered Products

Justification

Similar to permanent collection facilities, consumers may find it more accessible if they can return multiple regulated products at the same location.

Product Group	Community Type	% of Temporary Collection Facilities and Events Where At Least Two Other EPR Programs Are Collaborating
Daily, Small, Non-Hazardous (excluding flexibles and glass)	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	Not Accessible
	Remote Area	Not Accessible
	Very Remote Area	Not Accessible
Daily, Small, Non-Hazardous (including flexibles and glass)	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	Not Accessible
	Remote Area	Not Accessible
	Very Remote Area	Not Accessible
Weekly, Small, Non-Hazardous	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	Not Accessible
	Remote Area	Not Accessible
	Very Remote Area	Not Accessible
Yearly/Less than yearly, Small/Medium, Hazardous	Easily Accessible Area	50%
	Accessible Area	50%
	Less Accessible Area	50%
	Remote Area	50%
	Very Remote Area	50%
Yearly/Less than yearly, Large, Hazardous	Easily Accessible Area	50%
	Accessible Area	50%
	Less Accessible Area	50%
	Remote Area	50%
	Very Remote Area	50%
Yearly/Less than yearly, Small/Medium, Non-Hazardous	Easily Accessible Area	50%
	Accessible Area	50%
	Less Accessible Area	50%
	Remote Area	50%
	Very Remote Area	50%
Yearly/Less than yearly, Large, Non-Hazardous	Easily Accessible Area	50%
	Accessible Area	50%
	Less Accessible Area	50%
	Remote Area	50%
	Very Remote Area	50%

Accessibility Framework for Temporary Collection Facilities and Events

Product Group	Product Examples	Community Type	Population Target	Primary Factors		Secondary Factors		
				Reasonable Access Frequency for Temporary Collection Facility	Reasonable Access Drive Time for Temporary Collection Facility	% of Facilities Meeting Minimum Hours	Minimum Hours Open	% of Temporary Collection Facilities Where At Least Two Other EPR Programs Are Collaborating
Daily, Small, Non-hazardous	Packaging and Paper Products	Easily Accessible Area	95%	Not Accessible	Not Accessible	Not Accessible	Not Accessible	Not Accessible
		Accessible Area	90%	Not Accessible	Not Accessible	Not Accessible	Not Accessible	Not Accessible
		Less Accessible Area	85%	Not Accessible	Not Accessible	Not Accessible	Not Accessible	Not Accessible
		Remote Area	50%	Not Accessible	Not Accessible	Not Accessible	Not Accessible	Not Accessible
		Very Remote Area	25%	Not Accessible	Not Accessible	Not Accessible	Not Accessible	Not Accessible
	Packaging and Paper Products (Flexibles and Glass)	Easily Accessible Area	95%	Not Accessible	Not Accessible	Not Accessible	Not Accessible	Not Accessible
		Accessible Area	90%	Not Accessible	Not Accessible	Not Accessible	Not Accessible	Not Accessible
		Less Accessible Area	85%	Not Accessible	Not Accessible	Not Accessible	Not Accessible	Not Accessible
		Remote Area	50%	Not Accessible	Not Accessible	Not Accessible	Not Accessible	Not Accessible
		Very Remote Area	25%	Not Accessible	Not Accessible	Not Accessible	Not Accessible	Not Accessible
Weekly, Small, Non-hazardous	Beverage Containers including Milk, Beer Containers	Easily Accessible Area	95%	Not Accessible	Not Accessible	Not Accessible	Not Accessible	Not Accessible
		Accessible Area	90%	Not Accessible	Not Accessible	Not Accessible	Not Accessible	Not Accessible
		Less Accessible Area	85%	Not Accessible	Not Accessible	Not Accessible	Not Accessible	Not Accessible
		Remote Area	50%	Not Accessible	Not Accessible	Not Accessible	Not Accessible	Not Accessible
		Very Remote Area	25%	Not Accessible	Not Accessible	Not Accessible	Not Accessible	Not Accessible
Yearly/Less than yearly, Small/Medium, Hazardous	Paint, Pesticides, and Flammable Liquids, Used Motor Oil, Filters, Containers and Antifreeze, Medications	Easily Accessible Area	95%	6 times per year	15 minutes	80%	16	50%
		Accessible Area	90%	4 times per year	20 minutes	80%	10	50%
		Less Accessible Area	85%	2 times per year	30 minutes	80%	8	50%
		Remote Area	50%	Once per year	40 minutes	80%	8	50%
		Very Remote Area	25%	Once per year	45 minutes	80%	8	50%

Accessibility Framework for Temporary Collection Facilities and Events (cont.)

			Primary Factors				Secondary Factors	
Product Group	Product Examples	Community Type	Population Target	Reasonable Access Frequency for Temporary Collection Facility	Reasonable Access Drive Time for Temporary Collection Facility	% of Facilities Meeting Minimum Hours	Minimum Hours Open	% of Temporary Collection Facilities Where At Least Two Other EPR Programs Are Collaborating
Yearly/Less than yearly, Large, Hazardous	Auto Batteries/Lead Acid Batteries	Easily Accessible Area	95%	6 times per year	15 minutes	80%	16	50%
		Accessible Area	90%	4 times per year	20 minutes	80%	10	50%
		Less Accessible Area	85%	2 times per year	30 minutes	80%	8	50%
		Remote Area	50%	Once per year	40 minutes	80%	8	50%
		Very Remote Area	25%	Once per year	45 minutes	80%	8	50%
Yearly/Less than yearly, Small/Medium, Non-hazardous	Electronics, Light Bulbs and Light Fixtures, Small Appliances, Alkaline and Rechargeable Batteries, Smoke Alarms, Carbon Monoxide Detectors, Telecommunication Equipment, Thermostats, Cell Phones	Easily Accessible Area	95%	6 times per year	15 minutes	80%	16	50%
		Accessible Area	90%	4 times per year	20 minutes	80%	10	50%
		Less Accessible Area	85%	2 times per year	30 minutes	80%	8	50%
		Remote Area	50%	Once per year	40 minutes	80%	8	50%
		Very Remote Area	25%	Once per year	45 minutes	80%	8	50%
Yearly/Less than yearly, Large, Non-hazardous	Outdoor Power Equipment, Tires, Large Appliances	Easily Accessible Area	95%	6 times per year	15 minutes	80%	16	50%
		Accessible Area	90%	4 times per year	20 minutes	80%	10	50%
		Less Accessible Area	85%	2 times per year	30 minutes	80%	8	50%
		Remote Area	50%	Once per year	40 minutes	80%	8	50%
		Very Remote Area	25%	Once per year	45 minutes	80%	8	50%

Mail-back Collection Factors (Primary)

Primary Factor: Drive Time

Justification

Although EPR agencies do not have authority to influence the location of postal services, like other collections service options, the time it takes consumers to drive their recyclables to postal locations is directly related to accessibility. As such is must be demonstrated that these services meet access standards.

Product Group	Community Type	Reasonable Access Drive Time for Mail-back Returns
Daily, Small, Non-Hazardous (excluding flexibles and glass)	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	Not Accessible
	Remote Area	Not Accessible
	Very Remote Area	Not Accessible
Daily, Small, Non-Hazardous (including flexibles and glass)	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	Not Accessible
	Remote Area	Not Accessible
	Very Remote Area	Not Accessible
Weekly, Small, Non-Hazardous	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	Not Accessible
	Remote Area	Not Accessible
	Very Remote Area	Not Accessible
Yearly/Less than yearly, Small/Medium, Hazardous	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	Not Accessible
	Remote Area	Not Accessible
	Very Remote Area	Not Accessible
Yearly/Less than yearly, Large, Hazardous	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	Not Accessible
	Remote Area	Not Accessible
	Very Remote Area	Not Accessible
Yearly/Less than yearly, Small/Medium, Non-Hazardous	Easily Accessible Area	15 minutes
	Accessible Area	20 minutes
	Less Accessible Area	30 minutes
	Remote Area	40 minutes
	Very Remote Area	45 minutes
Yearly/Less than yearly, Large, Non-Hazardous	Easily Accessible Area	Not Accessible
	Accessible Area	Not Accessible
	Less Accessible Area	Not Accessible
	Remote Area	Not Accessible
	Very Remote Area	Not Accessible

Accessibility Framework for Mail-back Collection

Product Group	Product Examples	Community Type	Population Target	Primary Factor Reasonable Access Drive Time for Mail-back Collection Facility
Daily, Small, Non-hazardous	Packaging and Paper Products	Easily Accessible Area	95%	Not Accessible
		Accessible Area	90%	Not Accessible
		Less Accessible Area	85%	Not Accessible
		Remote Area	50%	Not Accessible
		Very Remote Area	25%	Not Accessible
	Packaging and Paper Products (Flexibles and Glass)	Easily Accessible Area	95%	Not Accessible
		Accessible Area	90%	Not Accessible
		Less Accessible Area	85%	Not Accessible
		Remote Area	50%	Not Accessible
		Very Remote Area	25%	Not Accessible
Weekly, Small, Non-hazardous	Beverage Containers including Milk, Beer Containers	Easily Accessible Area	95%	Not Accessible
		Accessible Area	90%	Not Accessible
		Less Accessible Area	85%	Not Accessible
		Remote Area	50%	Not Accessible
		Very Remote Area	25%	Not Accessible
Yearly/Less than yearly, Small/Medium, Hazardous	Paint, Pesticides, and Flammable Liquids, Used Motor Oil, Filters, Containers and Antifreeze, Medications	Easily Accessible Area	95%	Not Accessible
		Accessible Area	90%	Not Accessible
		Less Accessible Area	85%	Not Accessible
		Remote Area	50%	Not Accessible
		Very Remote Area	25%	Not Accessible

Accessibility Framework for Mail-back Collection (cont.)

Product Group	Product Examples	Community Type	Population Target	Primary Factor Reasonable Access Drive Time for Mail-back Collection Facility
Yearly/Less than yearly, Large, Hazardous	Auto Batteries/Lead Acid Batteries	Easily Accessible Area	95%	Not Accessible
		Accessible Area	90%	Not Accessible
		Less Accessible Area	85%	Not Accessible
		Remote Area	50%	Not Accessible
		Very Remote Area	25%	Not Accessible
Yearly/Less than yearly, Small/Medium, Non-hazardous	Electronics, Light Bulbs and Light Fixtures, Small Appliances, Alkaline and Rechargeable Batteries, Smoke Alarms, Carbon Monoxide Detectors, Telecommunication Equipment, Thermostats, Cell Phones	Easily Accessible Area	95%	15 minutes
		Accessible Area	90%	20 minutes
		Less Accessible Area	85%	30 minutes
		Remote Area	50%	40 minutes
		Very Remote Area	25%	45 minutes
Yearly/Less than yearly, Large, Non-hazardous	Outdoor Power Equipment, Tires, Large Appliances	Easily Accessible Area	95%	Not Accessible
		Accessible Area	90%	Not Accessible
		Less Accessible Area	85%	Not Accessible
		Remote Area	50%	Not Accessible
		Very Remote Area	25%	Not Accessible

Additional Components

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Backstop Service

What happens when EPR service is interrupted due to external forces?

This framework provides up to four options for collection services, providing ample flexibility for programs to operate within the standard for what is reasonable in the event of drastic, unexpected circumstances. Therefore, the backstop service level that EPR agencies must provide is equivalent to what they were providing, but through a different service method.

For example, if a community in a *remote area* is receiving service for electronics through a permanent collection facility that is closed due to a natural disaster, the agency could then choose to either provide single family curbside / multi-family collection / direct pick-up once per year, or a temporary return service such as a collection event once per year within 40 minutes drive time, or mail-back services within 40 minutes drive time.

Backstop Service (cont.)

For product groups with minimal service options

There are two product groups that do not have multiple collection service options: *daily*, *small*, *non-hazardous*; and *weekly*, *small*, *non-hazardous*. The current standard defines only one or two service types as accessible for these product groups; therefore, an additional backstop service level option for temporary return facilities and events is provided and shown below:

Product Group	Community Type	Reasonable Access Frequency for Temporary Collection Facility	Drive Time to Collection Site	Minimum Hours Open
Daily, Small, Non-hazardous and Weekly, Small, Non-hazardous	Easily Accessible Area	Biweekly/Monthly	15 minutes	16 hours
	Accessible Area	Biweekly/Monthly	20 minutes	10 hours
	Less Accessible Area	Bimonthly	30 minutes	8 hours
	Remote Area	Bimonthly	40 minutes	8 hours
	Very Remote Area	Bimonthly	45 minutes	8 hours

Greater than Reasonable Access

- **Increase population target**
- **Set more ambitious travel time requirements**
- **Develop more universal return locations**
- **Evaluate what waste services are currently provided**
- **Evaluate additional standards for access** (time spent at collection facilities, primary service of collection facility, physical requirements at collection facility, sorting requirements, parking availability)



Thank You

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App. B: Proposed Convenience Level Standard		CSWM Very Remote Communities				CSWM Remote Communities				CSWM Less Accessible Communities				CSWM Accessible Communities				
Grouping of Communities	**Material or Product**	**Depot**	**Suggested Local Government Curbside Collection**	**Collection Event or Special Curbside Service**	**Other**	**Depot**	**Suggested Local Government Curbside Collection**	**Collection Event or Special Curbside Service**	**Other**	**Depot**	**Suggested Local Government Curbside Collection**	**Collection Event or Special Curbside Service**	**Other**	**Depot**	**Suggested Local Government Curbside Collection**	**Collection Event or Special Curbside Service**	**Other**	**Material or Product**
Proposed Very Remote Communities	**Household Garbage**	-	-	Annual Collection	Transport from consolidated point.	-	Bi-Weekly	-	-	-	Bi-Weekly	-	-	-	Bi-Weekly	-	-	Household Garbage
	Packaging and Paper	-	-	Annual Collection	-	20 minutes	Bi-Weekly	-	-	20 minutes	Bi-Weekly	-	-	20 minutes	Bi-Weekly	-	-	Packaging and Paper
SRD Elec. Area C - Discovery Isl.	Yard Waste	-	-	-	Backyard Composting	-	-	Annual Collection	Backyard Composting	60 minutes	-	-	Backyard Composting	30 minutes	Weekly (Muni's Only)	-	Backyard Composting	Yard Waste
SRD Elec. Area A - West	Food Scraps	-	-	-	Backyard Composting	20 minutes	-	-	Backyard Composting	20 minutes	-	-	Backyard Composting	20 minutes	Weekly	-	Backyard Composting	Food Scraps
	Clean Wood Waste	-	-	-	-	-	-	-	-	60 minutes	-	-	-	30 minutes	-	-	-	Clean Wood Waste
Proposed Remote Communities	Drywall	-	-	-	-	-	-	-	-	60 minutes	-	-	-	30 minutes	-	-	-	Drywall
	Major Appliances	-	-	Biennial Collection	-	-	-	Annual Collection	-	60 minutes	-	Twice a Year*	*If no depot access	30 minutes	-	-	-	Major Appliances
Village of Zeballos	Mattresses	-	-	Biennial Collection	-	-	-	Annual Collection	-	60 minutes	-	-	-	30 minutes	-	-	Return to Retailer	Mattresses
Village of Tahsis	Scrap Metal	-	-	Biennial Collection	-	20 minutes	-	-	-	20 minutes	-	Twice a Year*	*If no depot access	20 minutes	-	-	Private Collectors	Scrap Metal
	Tires	-	-	Biennial Collection	-	-	-	Annual Collection	-	60 minutes	-	Twice a Year*	*If no depot access	30 minutes	-	-	Return to Retailer	Tires
Proposed Less Accessible Communities	Cooking Oil	-	-	Biennial Collection	-	-	-	Annual Collection	-	60 minutes	-	-	-	30 minutes	-	-	-	Cooking Oil
	Fire Extinguishers	-	-	Biennial Collection	-	-	-	Annual Collection	-	60 minutes	-	Twice a Year*	*If no depot access	30 minutes	-	-	-	Fire Extinguishers
Cortes Island	Household Hazardous Waste	-	-	Biennial Collection	-	-	-	Annual Collection	-	60 minutes	-	Annual Collection*	*If no depot access	30 minutes	-	-	-	Household Hazardous Waste
Quadra Island	Lead Acid Car Batteries	-	-	Biennial Collection	-	20 minutes	-	-	Return to Retailer/Dealer	20 minutes	-	Twice a Year*	*If no depot access	20 minutes	-	-	-	Lead Acid Car Batteries
Denman Island	Motor Oil, Antifreeze and Containers	-	-	Biennial Collection	-	20 minutes	-	-	Return to Retailer/Dealer	20 minutes	-	Twice a Year*	*If no depot access	20 minutes	-	-	-	Motor Oil, Antifreeze and Containers
Hornby Island	Propane Tanks (inc. single use)	-	-	Biennial Collection	-	-	-	Annual Collection		20 minutes	-	-	-	30 minutes	-	-	-	Propane Tanks (inc. single use)
SRD Elec. Area A - Sayward Valley	**Beer Containers (with a deposit)**	-	-	Annual Collection	No deposit provided.	20 minutes	-	Annual Collection	*No deposit. If no depot access	20 minutes	-	Twice a Year*	*No deposit. If no depot access	20 minutes	-	-	-	Beer Containers (with a deposit)
Village of Sayward	**Beverage Containers (with a deposit)**	-	-	Annual Collection	No deposit provided.	20 minutes	-	Annual Collection	*No deposit. If no depot access	20 minutes	-	Twice a Year*	*No deposit. If no depot access	20 minutes	-	-	-	Beverage Containers (with a deposit)
Village of Gold River	Clothing and Textiles	-	-	-	-	For Donation	-	-	Free Stores, Charity Collection	For Donation	-	-	Reuse	For Donation	-	-	Reuse	Clothing and Textiles
	Electronics, Cell Phones, Modems etc.	-	-	Biennial Collection	-	20 minutes	-	-	-	20 minutes	-	Twice a Year*	*If no depot access	20 minutes	-	-	-	Electronics, Cell Phones, Modems etc.
Proposed Accessible Communities	**Film Plastics**	-	-	Annual Collection	-	20 minutes	-	-	-	20 minutes	-	Twice a Year*	*If no depot access	20 minutes	-	-	-	Film Plastics
	Foam	-	-	Annual Collection	-	20 minutes	-	-	-	20 minutes	-	Twice a Year*	*If no depot access	20 minutes	-	-	-	Foam
CVRD Electoral Area A (VI)	**Glass Jars**	-	-	Annual Collection	-	20 minutes	-	-	-	20 minutes	-	Twice a Year*	*If no depot access	20 minutes	-	-	-	Glass Jars
CVRD Electoral Area B	**Household Batteries**	-	-	Annual Collection	-	20 minutes	-	-	-	20 minutes	-	Twice a Year*	*If no depot access	20 minutes	-	-	-	Household Batteries
CVRD Electoral Area C	Light Bulbs and Fixtures	-	-	Biennial Collection	-	-	-	Annual Collection	-	60 minutes	-	Twice a Year*	*If no depot access	30 minutes	-	-	-	Light Bulbs and Fixtures
SRD Electoral Area D	Small Appliances	-	-	Biennial Collection	-	20 minutes	-	-	-	20 minutes	-	Twice a Year*	*If no depot access	20 minutes	-	-	-	Small Appliances
Village of Cumberland	Smoke and CO Alarms	-	-	Biennial Collection	-	20 minutes	-	-	-	20 minutes	-	Twice a Year*	*If no depot access	20 minutes	-	-	-	Smoke and CO Alarms
Town of Comox	Thermostats	-	-	Biennial Collection	-	20 minutes	-	-	-	20 minutes	-	Twice a Year*	*If no depot access	20 minutes	-	-	-	Thermostats
City of Courtenay	Outdoor Power Equipment	-	-	Biennial Collection	-	20 minutes	-	-	-	20 minutes	-	Twice a Year*	*If no depot access	20 minutes	-	-	-	Outdoor Power Equipment
City of Campbell River	Pesticides	-	-	Biennial Collection	-	-	-	Annual Collection	-	60 minutes	-	Annual Collection*	*If no depot access	30 minutes	-	-	-	Pesticides
	Flammables	-	-	Biennial Collection	-	-	-	Annual Collection	-	60 minutes	-	Annual Collection*	*If no depot access	30 minutes	-	-	-	Flammables
	Paint	-	-	Biennial Collection	-	-	-	Annual Collection	-	60 minutes	-	Annual Collection*	*If no depot access	30 minutes	-	-	-	Paint
	Prescription Medications	-	-	-	Return to Pharmacy	Pharmacies Only	-		Return to Pharmacy	Pharmacies Only	-	-	Pharmacy	Pharmacies Only	-	-	-	Prescription Medications
	Books	-	-	-	-	For Donation	-		Charity Collection and Free Stores	For Donation	-	-	Reuse	For Donation	-	-	-	Books
	Marine Debris - Added	-	-	Biennial Collection	If supported by Ocean Legacy	-	-	-	Ocean Legacy	-	-	-	Ocean Legacy	-	-	-	Ocean Legacy	Marine Debris - Added
	Little Lithium Ion Batteries - Added	-	-		-	-	-	-	-	20 minutes	-	-	-	30 minutes	-	-	Return to Retailer	Little Lithium Ion Batteries - Added
	Bulky Items - Added	-	-		No vehicles, solar panels	-	-	-	-	-	-	-	-	-	-	-	-	Bulky Items - Added

Additional Group Comments						All local depot items should be at the regional as well.	Garbage convenience should match diversion. Relative danger to the size of the items (i.e. batteries) Convenience for smaller high toxic/HHW items

Appendix C: Summary of Recycling Facility Hours of Operation

Regional District	Recycling Facility	Hours of Operation	Hours Open per Year	Days open per year	Open on a Weekend?	Hours per Week Open	Days per Week Open	Community Type	Accept Garbage?	Minimum Hours of Operation Proposed
	CSWM Facilities									
SRD	Tahis Landfill	Wed 8:00 am - 3:30 pm Sat 10:00 am - 3:30 pm	676	104	Yes	13	2	Remote	Yes	
SRD	Tahis Recycling Depot	Tue to Sat 8:00 am - 3:30 pm Contamination Management	1950	260	Yes	37.5	5	Remote	No	**2 days a week one on a weekend 100 hours a year**
SRD	Zeballos Landfill	Wed 1:00 pm - 3:00 pm Sat 12:00 pm - 3:00 pm	260	104	Yes	5	2	Remote	Yes	
SRD	Zeballos Recycling Depot	Mon to Sat 8:30 am - 4:30 pm Contamination Management	2496	312	Yes	48	6	Remote	No	
SRD	Gold River Waste Management Centre	Wed to Sun 9:00 am - 3:45 pm	1755	260	Yes	33.75	5	Less Accessible	Yes	
SRD	Quadra Island Recycling Drop-off	Currently Accessible All the Time 4 d, 30 hr a week proposed	8760 1560	365 208	Yes	30	4	Less Accessible	No	
SRD	Cortes Island Waste Management Centre	Thu to Sun 9:00 am - 1:00 pm	832	208	Yes	16	4	Less Accessible	Yes	**4 days a week one on a weekend 200 hours a year**
SRD	Sayward Recycling Depot	Thu to Sun 9:00 am - 5:00 pm Contamination Management	1664	208	Yes	32	4	Less Accessible	No	
CVRD	Denman Island Recycling Depot	Wed and Thu 2:00 pm - 6:00 pm Sat 9:00 am - 5:00 pm	832	156	Yes	16	3	Less Accessible	No	
CVRD	Hornby Island Recycling Depot	Fri to Sun 9:00 am - 1:00 pm Summer Thu 9:00 am - 1:00 pm	704	208	Yes	12 - 16	3 - 4	Less Accessible	Yes	
SRD	Campbell River Waste Management Centre	Mon to Sun 8:30 am - 5:30 pm Closed on Stats	3186	354	Yes	48	6	Accessible	Yes	
CVRD/SRD	Oyster River Recycling Drop-off	Currently Accessible All the Time	8760	365	Yes	168	7	Accessible	No	**6 days a week one on a weekend 300 hours a year**
CVRD	Comox Valley Waste Management Centre	Mon to Sun 8:00 am - 5:30 pm Closed on Stats	3363	354	Yes	66.5	7	Accessible	Yes	
	Multi-Product Private Facilities									
SRD	Island Return-It Campbell River	Tue to Sat 9:30 am - 5:00 pm Closed on Stats	1950	260	Yes	37.5	5	Accessible	No	
CVRD	Courtenay Return-It Depot	Mon to Sat 9:00 am - 5:00 pm Closed on Stats	2496	312	Yes	48	6	Accessible	No	None can be imposed
CVRD	Encorp Express & Go - Comox	Mon to Sun 7:00 am - 10:00 pm Unstaffed	5475	365	Yes	105	7	Accessible	No	