

Questions and Answers to Items Raised during the SABC Accessibility Webinar (May 19, 2021)

The questions identified below are reproduced as provided.

1. **Will we see the study results from RCBC that was mentioned?**

The RCBC study is available on the [BC Recycles](#) website.

2. **Will the guidance document be sent to us?**

The draft SABC Accessibility Framework document is available on the [BC Recycles](#) website.

3. **Can a copy of the RCBC report to you on accessibility be provided to BCPSC?**

The draft SABC Accessibility Framework document is available on the [BC Recycles](#) website.

4. **What are the urban communities in BC?**

The draft SABC Accessibility Framework identifies “urban communities” as urban areas within a Census Metropolitan Areas (CMA) as defined by [Statistics Canada](#).)

5. **CMAs while well defined, can have arbitrary boundaries that are not aligned with the communities within them. The 'Courtenay' CMA for example includes Hornby and Denman islands. How will you address island communities within CMAs?**

The CMA is only used to define what constitutes an urban community in SABC’s Accessibility Framework and does not apply to Courtenay (in the example above). At present the only CMAs in BC are Vancouver, Victoria, Kelowna and Abbotsford/Mission.

Locations with specific or unique needs should contact Stewardship Programs directly.

6. **Where in the Recycling Regulation does it state that if collection is hard, or more expensive, you don't have to do it?**

At the end of a product's life, a consumer has choices to make: litter, store, landfill or place the product in a blue box (or return to a recycling facility). Since the Environmental Management Act obligates the consumer to properly dispose of their refuse, it is fair to assume they will blue box or recycle it.

To further support the consumer's proper disposal, the Recycling Regulation requires Stewardship Programs to provide "reasonable access". Reasonable access means that Stewardship Programs pick up stewarded products when the consumer drops them in a blue box or at a collection facility. The intent of the SABC Accessibility Framework is to further define, for a wide range of products and product characteristics, how Stewardship Programs may set out collection networks to better meet this reasonable access.

In the literature review completed by RCBC, one of the academic papers touched on the concept "Centrality" that was based on the reasonable expectation of the public. The paper concluded that the public understands that less frequent services will have more "Centrality" – or in this case "less accessibility". From a Producer's perspective, that means that consumers expect to have more accessibility for high use or ubiquitous products and to have less accessibility for long-lived or low use products.

As with the provision of any service, there is a balance between the characteristics of the product, the expectations of the consumer and the cost of the program to deliver in urban, rural and remote communities that must be considered.

7. **The guideline doesn't appear to consider public transportation. Is everyone supposed to own a car to manage end of life materials?**

Consumers are able to purchase products using multiple mechanisms, including by car or public transit.

The SABC Accessibility Framework identifies what constitutes reasonable access to a facility. How consumers access these facilities will be at their discretion. In most instances, consumers are able to take similar action at the time of return as they did at the time of purchase.

8. **Would like certain terms more defined: what is considered participation from communities?**

Participation, similar to the notion of 'reasonable access', will vary based on a community's circumstances and specific Stewardship Program requirements.

For example, all communities have some form of waste management system. For remote and small communities, the community may consider establishing a location within the community where stewarded products can be marshalled and prepared for pick-up.

Locations with specific or unique needs should contact Stewardship Programs directly.

9. How is the cost for those types of community collection addressed? If RDs/Communities are expected to do round up events on behalf of stewards is the monetary compensation?

Regional districts and communities are not expected to do round up events on behalf of Producers or Stewardship Programs. However, if communities wish to run events to supplement collection in their area, Stewardship Programs are willing to participate although that participation might not be in the form of direct compensation.

10. If a remote community collects an amount of stewarded materials, what is the reasonable time frame for collection?

The timing for collection will depend on numerous factors including the logistics of the transportation networks available in the area, and community specific requirements. For example, the small First Nation community near Chilko Lake collects small amounts of stewarded products and drives them 190km to Williams Lake on their regular monthly trip to Williams Lake to get supplies for the community. Other remote communities will need to have enough stewarded materials to fill a backhaul trailer.

Where the collection is coordinated with the stewardship program(s) in advance, collection is generally available very shortly after the community is ready for a pickup.

11. For the collection service standard of 15 km for urban areas, what is it 15 km from? a residence? municipal boundary? The document isn't really specific.

For this calculation, 15 km circles are drawn around depots in the urban area and the population covered within those circles would have reasonable access to the identified depot.

In some instances, collection services may be available to consumers within the defined distance circles even though not in the community directly.

12. Why is this framework being presented without any consultation with local governments? If you want our participation, and we are partners in collecting this material, why did you feel this was a cooperative approach?

The SABC Accessibility Framework has been developed as a result of previous efforts put forward collaboratively between SABC and BCPSC.

To further amplify and elevate the discussion, SABC determined that funding RCBC to undertake a background study and prepare a draft framework was the most efficient way to meaningfully engage both Local Government and the BC Ministry of Environment.

13. Does this guideline need approval of MOE?

The MoE will have an opportunity to review the SABC Accessibility Framework and provide feedback, as will other stakeholders, but do not provide approval of the SABC Accessibility Framework.

However, since the SABC Accessibility Framework provides guidance to Stewardship Programs in the development of Accessibility Targets that are included in Stewardship Plans, it is approved by the BC MoE within that context.

14. There is a lot of discussion about the imagined role of regional districts in organizing stewardship recycling programs. However, what is the role of the supply chain in getting the recycling material back to the producer?

Additional feedback is necessary to better understand how this applies to the discussion concerning the framework.

It should be noted that most Stewardship Programs include information specific to the circular economy, and the management of materials to reach this goal, within their respective Stewardship Plans and annual reports.

In addition, some programs have reverse distribution as part of their retail recovery network in urban and rural communities. In remote communities, backhauls are used to transport a mixed load of stewarded products to a common recycling point.

15. Why is there is no reference to the formal feedback provided by RD's to SABC in February 2018, and the four included recommendations made at that time? None of these recommendations have been addressed.

The feedback provided will be referenced in the next draft of the framework.

16. So the expectation is we will provide feedback and SABC will consider and respond?

SABC appreciates all provided feedback and incorporates it where possible.

Accessibility is a complex topic because of the geographic features of BC, transportation routes and the wide range of stewarded products. In instances where the feedback is specific to a Stewardship Program it should be directed to the Program.

17. If products are sold in a community, why are they not always collected in that community by stewards?

There are a variety of reasons why products may not be collected within a community. The most obvious may relate to the economics of establishing a formal collection site in a community that may be too small to support one. In addition, there may be other collection options that fall outside a formal collection location that need to be considered, for example return-to-retail, mailback, or events.

The SABC Accessibility Framework identifies the parameters that are used in determining where location sites are established.

Questions related to specific products should be directed to stewardsassociationbc@gmail.com