



## STAFF REPORT

---

**DATE:** January 30, 2023

**FILE:** 0540 - BOARD

**TO:** Chair and Directors,  
Regional Board

**FROM:** David Leitch  
Chief Administrative Officer

**RE:** REMOTE COMMUNITY ACCESS TO RECYCLING PROGRAMS

### **PURPOSE/PROBLEM**

To consider forwarding a resolution to the 2023 Association of Vancouver Island and Coastal Communities (AVICC) annual convention in relation to enhanced access to Extended Producer Responsibility (EPR) recycling programs.

### **EXECUTIVE SUMMARY**

At its January 19, 2023 meeting the Comox Strathcona Waste Management (CSWM) Board asked the staff to consider any applicable resolutions for the upcoming spring AVICC meeting since no CSWM Board meetings were scheduled before the February 9, 2023 AVICC resolution deadline. In lieu of a CSWM Board resolution, the Comox Valley Regional District (CVRD) passed a Board resolution at its January 24, 2023 meeting. The CVRD has provided a copy of its resolution, which includes background information which addresses the potential impact on residents within Strathcona Regional District.

The CVRD is asking for a resolution of support from the Strathcona Regional District for its sponsored resolution to the AVICC.

### **ALTERNATIVES**

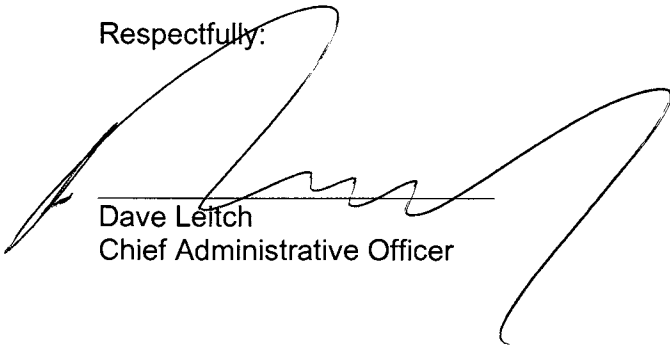
Option A – THAT the Strathcona Regional District support the sponsored resolution of the CVRD regarding improved access to recycling for remote communities as set out in the January 27, 2023 letter from the CVRD to the AVICC.

Option B - THAT the Strathcona Regional District decline to support the sponsored resolution of the CVRD regarding improved access to recycling for remote communities as set out in the January 27, 2023 letter from the CVRD to the AVICC.

### **RECOMMENDATION**

THAT the report from the Chief Administrative Officer be received.

Respectfully:



Dave Leitch  
Chief Administrative Officer

## BACKGROUND

One of the key requirements of BC's Recycling Regulation is for Extended Producer Responsibility (EPR) programs to provide "reasonable and free consumer access to collection facilities or collection services." The standard for accessibility of EPR services is set out in the *Stewardship Agencies of British Columbia's Guidance on Accessibility of Stewardship Programs*. Under that standard, rural (or non-urban) communities are considered 'served' as long as they are within a 45-minute drive requirement to the next closest depot location. The entire CSWM population falls within that parameter; it does not seem a reasonable standard where residents such as those of Area D of the SRD and Area C of the CVRD can purchase all their consumer goods within their community yet are expected to drive a 90-minute return trip to drop off recyclables. The requirement based on "drive" time does not consider public transportation times or whether public transportation to an adjacent community even exists. Residents relying on public transit or multi-family residents that do not receive collection from a Recycle BC face a significant barrier to participating in EPR programs.

Not having reasonable and free consumer access to collection facilities or collection services is a huge barrier for most residents, resulting in residents resorting to disposing of their recyclables in the garbage stream, defeating the goals of the recycling mandate. Establishing a base level of service where residents who pay into these EPR programs when they purchase goods, have access to EPR programs within or close to the community in which they live.

For remote communities, which includes Sayward, Gold River, Tahsis, Zeballos, Strathcona Electoral Areas A, B and C, Denman and Hornby Islands, comprising approximately 8,300 residents, the situation is even more dire as they are only committing to providing collection service 'where practical'. Example include:

- **Denman Island**

Under the Tire Stewardship program, they are required to collect tires, but the Guidance on Accessibility does not stipulate the volume of material that a depot can accept, the frequency of collection and the number of customers that the facility can safely accommodate. To that end, Denman depot stored over 2,400 rimmed tires before the program was willing to pick them up at the cost of \$5/tire to the service (as deemed outside of their program). These are not quantities that any facility should have to handle and only get picked up 'where practical.'

- **Oyster River Depot**

Recycle BC will not recognize this as an approved depot, nor will it be considered a satellite depot because it is within a 45-minute drive to the next closest depot. Therefore, when we get this depot up and running (pending sale), it will be at a cost to the CSWM service to transport, which should be covered under the CSWM Recycle BC Depot Statement of Work.

Recycle BC is currently undergoing a mandatory 5-year review of its program. They are proposing community eligibility criteria which will significantly reduce depot services. If approved, the proposed update will significantly impact local governments, who will be expected to 'fill the gaps'

if Recycle BC does not fund depots. Existing CSWM Depots at risk if their proposed plan is approved include:

- **Sayward** – Does not meet the proposed small community criteria, catchment area (30 min drive) population is under 1,000 population.
- **Tahsis** – Does not meet the proposed small community criteria, catchment area (30 min drive) population is under 1,000 population.
- **Zeballos** – Does not meet the proposed small community criteria, catchment area (30 min drive) population is under 1,000 population.
- **Comox Valley Waste Management Centre** – Does not meet the proposed >2k criteria. Under 15km from a 10K municipality and a principal depot.
- **Comox Return Centre (Private)** – Does not meet the proposed 10K criterion.

Per definition by the *Environmental Management Act*, regional districts plan for the management of municipal solid waste and recyclable materials under the Solid Waste Management Plan process; however, it is not a regional district's obligation to manage any part of the end-of-life of EPR products as that responsibility lies with the EPRs.

Since 2014, elected officials have been sold on investing capital upgrades to depots and staffing expenses to meet Recycle BC's requirements for inclusion in the program. At no time was it made apparent that these previously approved depots would become 'unapproved' at the whim of Recycle BC.

If the draft Plan is approved, removing these newly 'unapproved' depots would cause a serious backlash in the community it used to serve, and one can surmise it would not go over well politically. This financial burden would be downloaded yet again on local governments at the expense of the very same taxpayers that fund Recycle BC. Local governments cannot operate on this level of uncertainty. This is a precedent for EPR programs that puts the financial viability of compliant private depots and the trust of the public and elected officials at risk.

***Prepared by*** Sheena Fisher, Engineering Services Coordinator

Attachments: CVRD Staff Report – RE: AVICC Resolution for Enhanced Access to Extend Producer Responsibility  
CVRD Resolution to AVICC  
CVRD AVICC Backgrounder on ERP Accessibility

**Tom Yates**

---

**Subject:** FW: AVICC resolution from CSWM meeting

---

**From:** Marc Rutten <[mrutten@comoxvalleyrd.ca](mailto:mrutten@comoxvalleyrd.ca)>

**Sent:** January 20, 2023 4:16 PM

**To:** Wolfgang Parada <[wparada@srd.ca](mailto:wparada@srd.ca)>

**Cc:** Vivian Schau <[vschau@comoxvalleyrd.ca](mailto:vschau@comoxvalleyrd.ca)>; Russell Dyson <[rdyson@comoxvalleyrd.ca](mailto:rdyson@comoxvalleyrd.ca)>

**Subject:** AVICC resolution from CSWM meeting

**NOTICE:** This email is from an external source.

Good afternoon Wolfgang, hope you are doing well.

At yesterday's CSWM board meeting the board asked for staff to consider any applicable AVICC resolutions for the upcoming spring AVICC meeting. Unfortunately the deadline for resolutions is coming up quickly on February 9<sup>th</sup> and there is no time to bring suggested resolutions back through the CSWM board before this date.

Staff feel that the board should forward a resolution to AVICC related to equal access to recycling for all residents. We are preparing this resolution now and will provide it to our CVRD board for consideration next week. At the same time we will share it with you so that you can provide it to the SRD board at their next meeting.

If you have any questions or would like to discuss please give me a call.

Thanks,  
Marc

**Marc Rutten, P. Eng.**

General Manager of Engineering Services Branch

Comox Valley Regional District

Tel: 250-334-6080

**DATE:** January 23, 2023**FILE:** 5380-02**TO:** Chair and Directors  
Regional District Board**FROM:** Russell Dyson  
Chief Administrative OfficerSupported by Russell Dyson  
Chief Administrative Officer**R. Dyson****RE:** AVICC Resolution for  
Enhanced Access to Extended Producer Responsibility Programs**Purpose**

To present a draft resolution related to enhanced access to Extended Producer Responsibility (EPR) recycling programs for forwarding to the 2023 Association of Vancouver Island and Coastal Communities (AVICC) annual convention.

**Recommendation from the Chief Administrative Officer:**

THAT the following requested action be forwarded to the 2023 Association of Vancouver Island and Coastal Communities annual convention for consideration:

WHEREAS reasonable and free consumer access to recycling collection facilities or collection services is the cornerstone of British Columbia's recycling framework;

AND WHEREAS the 2021 Accessibility Framework within the Stewardship Agencies of British Columbia's Guidance on Accessibility of Stewardship Programs will not provide for the service levels expected within many remote communities in British Columbia, as Extended Producer Responsibility programs are only provided "where practical" which excludes many island and west coast based communities within the Comox Strathcona Waste Management service area;

THEREFORE BE IT RESOLVED THAT the Association of Vancouver Island Coastal Communities and the Union of BC Municipalities advocate for improved access to recycling for remote communities with tiered and funded solutions based on the remoteness index and developed in collaboration with local governments.

**Executive Summary**

One of the key requirements of BC's Recycling Regulation is for EPR programs to provide for "reasonable and free consumer access to collection facilities or collection services". The Stewardship Agencies of British Columbia (SABC) is an informal alliance of industry product stewardship organizations representing over 20 EPR programs which are typically funded through the collection of fees on the purchase of products or packaging, and are run by not-for-profit organizations that manage the programs as directed by a Board made up of companies which manufacture and sell the products, with a focus on the cost effectiveness of the delivery of their programs while meeting their regulatory requirements.

SABC's *Guidance on Accessibility of Stewardship Programs* (Guidance on Accessibility) offers a series of principles which outlines the positions of stewardship agencies as it relates to accepted materials based on accessibility. Unfortunately, what is considered "reasonable" is not clearly defined and this causes challenges when residents and local governments advocate for expanded services for EPR programs, such as depots, collection events, curbside programs or direct pick-up. These services cost money for EPR programs and the cost is much higher for rural and remote collection services, often with very small amounts of materials collected.

While the Comox Strathcona Waste Management (CSWM) service recognizes the Guidance on Accessibility is not a standard, nor a regulatory requirement under the Recycling Regulation, and therefore does not hold regulatory standing, nor is it subject to Ministry of Environment and Climate Change Strategy (Ministry) approval. The CSWM does take this document quite seriously, as in our experience Stewardship Agencies will refer to these "standards" in their Program Plans and have a propensity for citing this "standard" for accessibility when evaluating service levels for our residents. As a local government, we see the benefit to having well defined expectations for service from SABC programs, it is imperative for clear communication to manage expectations from residents, and well as from a budgeting perspective.

Per definition by the *Environmental Management Act*, regional districts plan for the management of municipal solid waste and recyclable materials under the Solid Waste Management Plan process; however, it is not a regional district's obligation to manage any part of the end-of-life of EPR products as that responsibility lies with the EPRs.

The recommended action within this report aims to encourage the Province of BC to improve the accessibility framework to provide "reasonable and free" access to EPR programs by providing a level of service expected within our communities and by our residents. The attached Appendix A provides further context and information.

Prepared by:

***V. Schau***

---

Vivian Schau  
Senior Manager of CSWM Services

Concurrence:

***M. Rutten***

---

Marc Rutten, P.Eng.  
General Manager of Engineering Services

Attachment: Appendix A – British Columbia Context

## APPENDIX A

### British Columbia Context

At a high level, regional districts should be able to determine through their Solid Waste Management Plans (SWMP) and their understanding of communities and consumer behaviors in their service areas where depots or collection events are needed to meet their targets in their plans. Extended Producer Responsibility (EPR) programs should then be required to meet that criteria, which will best serve the public interest and can be defended by local governments by the robust consultation required for a SWMP approval.

The Guidance on Accessibility by The Stewardship Agencies of British Columbia (SABC) proposes definitions for urban, non-urban and remote communities in BC.

- ***For Urban communities, collection within 15 kilometres***
  - “Urban” is proposed to consist of Census Metropolitan Areas (CMAs) as defined by Statistics Canada, which within BC only includes four communities:
    - Vancouver, Victoria, Kelowna and Abbotsford-Mission.
- ***For Non-Urban communities, collection within 60 kilometres***
  - For the CSWM service, this equates to our entire population along the east coast of Vancouver Island of around 100,000 people
    - This would include Campbell River, Strathcona Electoral Area D, Comox Valley Electoral Areas A (excluding islands), B and C, Courtenay, Comox and Cumberland
- ***For Remote communities, collections service where practical***
  - “Remote” communities are defined as “situated far from main centers of population; without reliable infrastructure (roads); or those that need to be accessed using alternate mechanisms”.
  - With “Remote” not well defined we cannot say for sure which areas within the Comox Strathcona Waste Management (CSWM) service would be considered “Remote” but we are assuming it is all ferry accessible communities, and those with populations isolated greater than 60 kilometres from another populated centre.
    - Sayward, Gold River, Tahsis, Zeballos, Strathcona Electoral Areas A, B and C, Denman and Hornby Islands comprising approximately 8,300 residents
    - An additional 700 residents of First Nations communities within the CSWM

The CSWM service is very familiar with the challenges of providing waste services to urban, non-urban, rural and remote populations. The level of service and solutions for each community is not the same across the board, but in all of these communities we work with our local government partners to provide for the collection, transport and or disposal of municipal solid waste and to provide opportunities for recycling.

The CSWM Board does not believe that the 2021 Accessibility Framework within the Guidance on Accessibility is reasonable to provide for the service levels expected within our communities and by our residents.

### Distance and Level of Effort

The use of ‘distance circles’ drawn around locations is not an adequate measure of the level of effort for a resident to access a facility. Current mapping programs using Environmental Systems Research Institute (ESRI) tools, or the Google Distance Matrix Application Programming Interface (API) are available to provide travel distance and time for a matrix of origins and destinations using the road network and real user data.

*Population and Number of Depots*

Not addressed within the Guidance on Accessibility is the volume of materials that a depot can accept, the frequency of collection and the number of customers that the facility can safely accommodate. With the expansion of EPR programs, especially the addition of printed paper and packaging (PPP), private depots within our region have outgrown their facilities and parking areas, causing nuisance to their neighbours and increased complaints. In addition, for the collection of PPP from residents without curbside recycling collection the demands on a depot are significantly higher than for areas entirely served by curbside collection of PPP. Having a single depot within a certain driving distance does not equate to an adequate service level, population served and their access to curbside recycling services must also be considered. For example, a single depot could not adequately serve a population of 200,000 people, even if they are within a 15 km drive distance, but that is not addressed within this proposal.

Finding new locations for depots in urban areas can be very difficult as they have become subject to objection due to a reputation for traffic congestion, being noisy, accumulating litter, and being frequented by the economically depressed population generating income through refundables.

*Alternative - Remoteness Index*

In Canada, population centres and statistical area classifications are widely used to distinguish urban and rural communities and have been referred to within the SABC proposal. However, neither of these classifications precisely classify Canadian communities into urban, rural and remote areas. Recognizing the limitations of working with CMAs and Census Agglomerations in understanding the need for services in communities, a group of researchers at Statistics Canada developed an alternative tool called the “remoteness index” (RI) to measure the relative remoteness of Canadian census subdivisions (CSD).

The remoteness index is a more effective tool in determining levels of service required to meet a communities needs as it takes into consideration the proximity to centres of economic activity, the challenges of non-road access, and reflects the use of urban facilities and resources by nearby rural residents. It provides a value for each CSD between zero and one; the higher the RI the more remote the community. This range can be used to determine levels of recycling service required, depending on the program considerations at end-of-life.

The remoteness index was also compared to selected retail services within the economic and retail context of small communities for correlation: Motor vehicle and parts dealers; Electronics and appliance stores; Building material and garden equipment and supplies dealers; Gasoline stations; and General merchandise stores. The RI was found to have a high correlation with this group of selected retail services which in the context of EPR, is particularly relevant. The use of the RI instead of the proposed urban, non-urban and remote community definitions proposed would more closely match recycling services with the communities where the original products are purchased.

*Considerations for Remote Communities*

The CSWM does not agree with the SABC statements that:

- “it is not possible to provide service to every location within the province”
- “Stewardship Programs should provide collection service to a specified percentage of the BC population”
- SABC members are only committed to provide service to remote communities “where practical”.



Local governments are acutely aware of the costs of managing waste streams in remote communities. We pay to staff facilities, to transport waste and to fund environmentally sound landfills for Municipal Solid Waste (MSW). Where residents have access to MSW facilities they should expect to have access to EPR programs, diversion and recycling facilities. That is how we will work together to meet the Ministry's municipal solid waste disposal rate target of 350 kg/capita/year. Where there is no opportunity for diversion of EPR products, there is no diversion of EPR products.

The most significant costs for waste management from remote communities is the labour for facilities with fixed hours, and the transport of materials. Many EPR programs fund the collection of their materials based on the tonnage or amount accepted. In small communities of a few hundred people, this is an insignificant amount of money they are effectively not funding the labour portion of EPR collection for remote communities. Commitment to co-locating EPR programs with garbage facilities and matching recycling services with garbage services in remote communities would be a more acceptable proposal for accessibility.

If SABC members were to work collaboratively with each other to fund transportation of their materials from remote communities, cost savings for their programs would be achieved. They have used this model before to service First Nations and boat only accessible communities. Alternatively, a commitment to refunding local governments 100 per cent of cost for coordinated transportation of EPR products out of remote communities would be a suitable alternative.

We agree that for smaller communities service levels will not match those in more urban communities, but we would like to see more commitment for remote communities with tiered and funded solutions based on the remoteness index developed in collaboration with local governments.

### **Path Forward**

This proposed resolution, if adopted, would encourage the Province of British Columbia, working in partnership with the local governments, and SABC members to find an accessibility criteria that we can defend to our common stakeholders, and that we can use to bring accountability and economic stability to EPR programs to provide reasonable and convenient access to the residents of British Columbia.

## Resolution

### Enhanced Access to Extended Producer Responsibility Programs

*WHEREAS reasonable and free consumer access to recycling collection facilities or collection services is the cornerstone of British Columbia's recycling framework;*

*AND WHEREAS the 2021 Accessibility Framework within the Stewardship Agencies of British Columbia's Guidance on Accessibility of Stewardship Programs will not provide for the service levels expected within many remote communities in British Columbia, as Extended Producer Responsibility programs are only provided "where practical" which excludes many island and west coast based communities within the Comox Strathcona Waste Management service area;*

*THEREFORE BE IT RESOLVED THAT the Association of Vancouver Island Coastal Communities and the Union of BC Municipalities advocate for improved access to recycling for remote communities with tiered and funded solutions based on the remoteness index and developed in collaboration with local governments.*

## Background

### BC's Recycling Regulation for Extended Producer Responsibility Programs Key Requirements

- One of the key requirements of BC's Recycling Regulation is for Extended Producer Responsibility (EPR) programs to provide for "reasonable and free consumer access to collection facilities or collection services".
- The Stewardship Agencies of British Columbia (SABC) is an informal alliance of industry product stewardship organizations representing over 20 EPR programs which are typically funded through the collection of fees on the purchase of products or packaging, and are run by not-for-profit organizations that manage the programs as directed by a Board made up of companies which manufacture and sell the products, with a focus on the cost effectiveness of the delivery of their programs while meeting their regulatory requirements.
- SABC's Guidance on Accessibility of Stewardship Programs (Guidance on Accessibility) offers a series of principles which outlines the positions of stewardship agencies as it relates to accepted materials based on accessibility. Unfortunately, what is considered "reasonable" is not clearly defined and this causes challenges when residents and local governments advocate for expanded services for EPR programs, such as depots, collection events, curbside programs or direct pick-up. These services cost money for EPR programs and the cost is much higher for rural and remote collection services, often with very small amounts of materials collected.
- While the Comox Strathcona Waste Management (CSWM) service recognizes the Guidance on Accessibility is not a standard, nor a regulatory requirement under the Recycling Regulation, and therefore does not hold regulatory standing, nor is it subject to Ministry of Environment and Climate Change Strategy (Ministry) approval, the CSWM does take this document quite seriously, as in our experience Stewardship Agencies will refer to these "standards" in their Program Plans and have a propensity for citing this "standard" for accessibility when evaluating service levels for our residents.
- As a local government, the CSWM sees the benefit to having well defined expectations for service from SABC programs, it is imperative for clear communication to manage expectations from residents, and well as from a budgeting perspective.
- Reasonable and free consumer access is key to meeting the Ministry's municipal solid waste disposal rate target of 350 kg/capita/year.

- Not having reasonable and free consumer access to collection facilities or collection services is a huge barrier for most residents, resulting in residents resorting to disposing of their recyclables in the garbage stream, defeating the goals of our recycling mandate. Where there is no opportunity for diversion of EPR products, there is no diversion of EPR products.
- Per definition by the *Environmental Management Act*, regional districts plan for the management of municipal solid waste and recyclable materials under the Solid Waste Management Plan process; however, it is not a regional district's obligation to manage any part of the end-of-life of EPR products as that responsibility lies with the EPRs.
- Improving accessibility framework to provide "reasonable and free" access to EPR programs by providing a level of service expected within our communities and by our residents is critical to the success of our waste management strategy.

#### British Columbia and CSWM Context

- At a high level, regional districts should be able to determine through their Solid Waste Management Plans (SWMP) and their understanding of communities and consumer behaviors in their service areas where depots or collection events are needed to meet their targets in their plans.
- EPR programs should then be required to meet that criteria, which will best serve the public interest and can be defended by local governments by the robust consultation required for a SWMP approval.
- The Guidance on Accessibility by The Stewardship Agencies of British Columbia (SABC) proposes definitions for urban, non-urban and remote communities in BC.
  - For Urban communities, collection within 15 kilometres
    - "Urban" is proposed to consist of Census Metropolitan Areas (CMAs) as defined by Statistics Canada, which within BC only includes four communities:
      - Vancouver, Victoria, Kelowna and Abbotsford-Mission.
  - For Non-Urban communities, collection within 60 kilometres
    - For the CSWM service, this equates to our entire population along the east coast of Vancouver Island of around 100,000 people
      - This would include Campbell River, Strathcona Electoral Area D, Comox Valley Electoral Areas A (excluding islands), B and C, Courtenay, Comox and Cumberland
  - For Remote communities, collections service where practical
    - "Remote" communities are defined as "situated far from main centers of population; without reliable infrastructure (roads); or those that need to be accessed using alternate mechanisms".
    - With "Remote" not well defined we cannot say for sure which areas within the Comox Strathcona Waste Management (CSWM) service would be considered "Remote" but we are assuming it is all ferry accessible communities, and those with populations isolated greater than 60 kilometres from another populated centre.
      - Sayward, Gold River, Tahsis, Zeballos, Strathcona Electoral Areas A, B and C, Denman and Hornby Islands comprising approximately 8,300 residents
      - An additional 700 residents of First Nations communities within the CSWM

- The CSWM service is very familiar with the challenges of providing waste services to urban, non urban, rural and remote populations. The level of service and solutions for each community is not the same across the board, but in all of these communities we work with our local government partners to provide for the collection, transport and or disposal of municipal solid waste and to provide opportunities for recycling. The CSWM Board does not believe that the 2021 Accessibility Framework within the Guidance on Accessibility is reasonable to provide for the service levels expected within our communities and by our residents.
- For remote communities in particular, the most significant costs for waste management from remote communities is the labour for facilities with fixed hours, and the transport of materials. Many EPR programs fund the collection of their materials based on the tonnage or amount accepted. In small communities of a few hundred people, this is an insignificant amount of money they are effectively not funding the labour portion of EPR collection for remote communities. Commitment to co-locating EPR programs with garbage facilities and matching recycling services with garbage services in remote communities would be a more acceptable proposal for accessibility.
- CSWM recognizes that for smaller communities service levels will not match those in more urban communities, but we would like to see more commitment for remote communities with tiered and funded solutions based on the remoteness index developed in collaboration with local governments.

#### Proposed Solution

- In Canada, population centres and statistical area classifications are widely used to distinguish urban and rural communities and have been referred to within the SABC proposal. However, neither of these classifications precisely classify Canadian communities into urban, rural and remote areas.
- Recognizing the limitations of working with CMAs and Census Agglomerations in understanding the need for services in communities, a group of researchers at Statistics Canada developed an alternative tool called the “remoteness index” (RI) to measure the relative remoteness of Canadian census subdivisions (CSD).
- The remoteness index is a more effective tool in determining levels of service required to meet a communities needs as it takes into consideration the proximity to centres of economic activity, the challenges of non-road access, and reflects the use of urban facilities and resources by nearby rural residents. It provides a value for each CSD between zero and one; the higher the RI the more remote the community. This range can be used to determine levels of recycling service required, depending on the program considerations at end-of-life. The remoteness index was also compared to selected retail services within the economic and retail context of small communities for correlation: Motor vehicle and parts dealers; Electronics and appliance stores; Building material and garden equipment and supplies dealers; Gasoline stations; and General merchandise stores. The RI was found to have a high correlation with this group of selected retail services which in the context of EPR, is particularly relevant. The use of the RI instead of the proposed urban, non-urban and remote community definitions proposed would more closely match recycling services with the communities where the original products are purchased.