

General Questions		
1.	Will yesterday's presentation and today's be uploaded somewhere on CSSA's website or sent to the stewards?	Yes, the presentation is available on the CSSA website. Please see the following link http://www.cssalliance.ca/rules2018/
2.	As these policies are coming into effect January 1, 2018, will these policies be in place for Q1 reporting (Q4 data) or will this come into effect for Q1 data (Q2 reporting)?	If approved, these policies will be effective for Q1 reporting (Q4 data).
3.	Will there be changes in the Reporting and Payment datelines for MHSW?	No, the quarterly reporting and payment deadlines are not changing for MHSW.
4.	Which stewardship program looks after bottled alkane fuel? (Straight fuel, not a fuel/oil blend).	Currently no stewardship organization has been appointed by MOECC for the management of flammables in Ontario.
5.	How are MHSW and AMS related?	MHSW and AMS are unrelated organizations. To provide overall cost efficiencies, the MHSW and AMS programs share a single supply chain which is operated by AMS.
6.	Are you encouraging all members to make the change to the Automotive Materials Stewardship	All automotive stewards are being informed of their options and reminded that AMS offers published and predictable fees as well as HST savings. Automotive stewards who remain with MHSW will see their Steward Share Assessments increase as more stewards continue to transition to AMS. SO is providing stewards with the relevant information so they can make informed decisions.
7.	If you find an error 90 days after the submission, are you still eligible for an adjustment?	Stewards have two years from the quarterly report submission deadline to make an adjustment request, in accordance with the adjustment policy.
8.	You mentioned that we need to notify SO 30 days after a company finds an error. What if it takes you longer to report an error, how is this 30 days notification enforced if you are still able to do an adjustment for 2 years?	Stewards are required to advise SO within 30 days of discovering an error in their report. They still have two years within which to submit an adjustment request.

<p>9.</p>	<p>One of the questions today was about 30 days to report error versus 2 years Adjustment request, can I get clarification ? a. Does this mean that if Stewards discover an error in reporting on the 50th day after reporting for one of the Quarter is not eligible to request for Adjustment ?</p>	<p>If a steward discovers an error in their report, they must notify the program of that error within 30 days of discovering it, not within 30 days of submitting the report.</p> <p>This means that if you submit your report on May 31st, or day 1, and then discover an error in your report on day 100, you must report the error to the program before day 130.</p> <p>After a steward has notified the program of the error, they then have two years from the report submission deadline (day 1) to seek an adjustment as outlined in the Steward Initiated Adjustment Policy.</p>
<p>10.</p>	<p>Where can we find a registered list of MHSW stewards? Can you please provide a link or is it available on the website? We cannot find it on the Orange drop resource list.</p>	<p>We are currently reviewing an option to publish a list of registered stewards on the website on a quarterly basis. In the meantime, stewards can get a list of registered stewards on the WeRecycle Portal. Once you are logged in, use the 'Steward Search' tab in the navigation menu on the left side of the screen. Please call National Steward Services if you need assistance with getting access.</p>
<p>11.</p>	<p>Where can we find a list of all registered brand owners for MHSW materials?</p>	<p>We are currently reviewing an option to publish a list of registered stewards on the website on a quarterly basis. In the meantime, stewards can get a list of registered stewards on the WeRecycle Portal. Once you are logged in, use the 'Steward Search' tab in the navigation menu on the left side of the screen. Please call National Steward Services if you need assistance with getting access or guidance about how to use the list.</p>

<p>12.</p>	<p>These rules apply to those registered stewards that are compliant, yet concerns over what is being done to capture those who are not yet part of the SO program and selling production the Ontario market?</p>	<p>Stewardship Ontario uses a number of methods to seek out companies that supply obligated materials but who have not registered with the program.</p> <ul style="list-style-type: none"> • an anonymous web submission page available here for anyone to submit the name of a company who may be an unregistered steward; • dedicated program resources to review new business entrants, identify program prospects and ensure that they are registered • escalation of unregistered stewards to RPRA for compliance action.
<p>13.</p>	<p>How is Stewardship Ontario actively seeking out "free-riders" in these programs?</p>	<p>Stewardship Ontario uses a number of methods to seek out companies that supply obligated materials but who have not registered with the program including:</p> <ul style="list-style-type: none"> • an anonymous web submission page available here for anyone to submit the name of a company who may be an unregistered steward; • dedicated program resources to review new business entrants, identify program prospects and ensure that they are registered • escalation of unregistered stewards to RPRA for compliance action.

14.	Retailers don't always know who are stewards and who are not. How are you overseeing retailers' participation and awareness of these programs?	Stewardship Ontario uses a number of methods to oversee retailers' participation in and awareness of these programs, by seeking out "free riders", though: <ul style="list-style-type: none">- an anonymous web submission page available here for anyone to submit the name of a company who may be an unregistered steward;- a full-time resource dedicated to reviewing available information regarding new business entrants, to seek out unregistered stewards and ensure that they are registered- escalation of unregistered stewards to RPRA for compliance action.
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<p>15.</p>	<p>What is SO doing to "level out" the billing inconsistencies by quarter, we see huge swings in billing and fees. Very unpredictable.</p>	<p>Most of the concern about invoice amounts can be attributed to the requirements of Regulation 11/12 that governs MHSW fee setting. The regulation requires that SO calculates each steward's Steward Share Assessment (SSA) each quarter, by dividing the quantity of a material that each steward supplies, by the quantity of that material supplied by all stewards during that quarter. The quarterly costs for managing that material incurred in the prior quarter are multiplied by your SSA to arrive at your quarterly fee amount.</p> <p>Over the course of four quarters, program costs by material can significantly fluctuate for several reasons including the seasonality of waste generation and collection. To accommodate these fluctuations, MHSW Rules also allow for an Annual True-Up of steward accounts to manage individual SSAs being disproportionately high or low.</p> <p>Since the introduction of various ISPs, Stewardship Ontario has adjusted MHSW common program costs as stewards have exited the MHSW programs (e.g. paint, fertilizers and automotive materials). However, many common costs are fixed and must be shared amongst a diminishing number of stewards remaining with Stewardship Ontario.</p>
<p>16.</p>	<p>When will there be a harmonization of reporting timeline for Ontario batteries like the rest of CSSA packaging?</p>	<p>If we understand your question correctly, you are asking if MHSW will go to an annual reporting cycle similar to the PPP programs. Ontario Regulation 11/12 determines the quarterly cycle for MHSW so Stewardship Ontario has no plans to move to annual reporting.</p>
<p>17.</p>	<p>Why are new rules being issued when SO will be transitioning these programs to a full producer responsibility framework soon?</p>	<p>The rules and policies we discussed at the MHSW webinar relate to MHSW materials not Blue Box printed paper and packaging. There is no anticipated amended MHSW plan at this time.</p>

<p>18.</p>	<p>What is being done to harmonize policies across provinces with recycling legislation? There are products coming across provincial borders into Ontario because Ontario insists on a different model which provides incentives to collectors and processors?</p>	<p>We understand your question to be a reference to batteries and the methods, such as incentives to collectors and processors, which are used to ensure that Stewardship Ontario's single-use battery program achieves target. Incentives have been key to raising the battery recycling rate from 5% when the program began in 2008 to 49% in 2016 when the collection target was achieved for the first time. With respect to batteries coming across provincial borders, we are aware of your concern, and as suggested at our most recent meeting with battery stewards, we welcome any information or data that provides evidence that this is happening and encourage you to share it with us.</p>
<p>19.</p>	<p>When will there be a plan for transition of the MHSW program?</p>	<p>Stewardship Ontario has not received any information from the MOECC or RPRA as to when it is expected that MOECC will direct SO to wind down the MHSW program.</p>
<p>20.</p>	<p>Will there be a need to sign the amended Agreement if the proposed changes have been approved?</p>	<p>There is no agreement for stewards in the MHSW program as it is governed by Rules for Stewards. However, if you are referring to the Voluntary Reporter Agreement, you do not need to sign a new one.</p>
<p>21.</p>	<p>Sometimes the first importer is a consumer via internet sales - sometimes that can be up to 40% of sales for some product lines. And these sales/products belong to non-stewards today.</p>	<p>You are correct that where the seller is not resident and supplying obligated material directly to residential consumers through Internet sales, there are challenges in ensuring that this material is stewarded. All EPR programs, both in Canada and internationally, are struggling to adapt their programs to address internet sales. Stewardship Ontario continues to explore opportunities to address internet sales directly to residential consumers.</p>
<p>Administrative Fee, Interest and Penalty Policy</p>		
<p>22.</p>	<p>Where do we obtain the penalties or fees rates for the proposed Adjustment, late reporting and payment fee?</p>	<p>All the policies are posted on the SO website in the news section, available here</p>

Parallel Importation Policy		
23.	Parallel Importation Question, if ABC batteries has distribution in China would that be included or excluded? It stands to reason that they would know what is going on through all their channels if a retailer has made an order with them.	<p>The proposed parallel importation policy addresses distribution which is outside of the brand owner's distribution network.</p> <p>As a result, if:</p> <ul style="list-style-type: none"> • ABC Batteries has a distribution network which operates out of China to supply Ontario, and • ABC Batteries is a registered steward, then <p>ABC Batteries, as the resident brand owner, will be reporting on the supply of batteries from China, because it is part of its regular distribution network.</p>
24.	Is this program dependent on a company being resident in Ontario?	Yes – stewards must have residency in Ontario.
25.	So retailers who brand/private label products are also considered stewards, correct?	Yes, retailers who also have their own brand or private label products are also considered stewards for those branded/private label products.
26.	If, as a steward, I bought my batteries from the normal ABC distribution circuit, do I have to report them and prove that they are not from parallel importation or I'm not in the obligation of reporting them?	If ABC Batteries is resident in Ontario, and you bought them from ABC's distribution network, then you would not need to report those batteries. For audit purposes, you would need to provide evidence of purchasing from ABC's network.
27.	Sometimes a local seller gets an order and ships it from different warehouse outside Ontario.	This scenario would still be considered part of the regular distribution network.

<p>28.</p>	<p>Would you please confirm that If we (a retailer) buy from a local seller we are not under parallel import policy even if the local seller ships from China.</p>	<p>As this is a complex matter, this answer may only partially address the situation. If the assumptions and answer below do not sufficiently address your concerns, please submit more details about this scenario to stewardfeedback@cssalliance.ca.</p> <p>Assuming that the local seller is resident in Ontario, and they imported goods from China, they are considered the first importer and therefore the obligated party. Assuming the goods were supplied <u>outside</u> of the brand owner’s known distribution network, they report that PPP.</p> <p>If the goods were supplied <u>within</u> the brand owner’s known distribution network, the local seller must have substantiation that the goods were supplied from the known distribution network (such as a Purchase Order or a Distribution Agreement with the brand owner).</p>
<p>29.</p>	<p>For parallel importation audits, would a purchase order made to ABC batteries be considered sufficient?</p>	<p>It is not possible to provide a definitive answer based on the limited amount of information supplied in the question. However, if a retailer had an ABC purchase order as substantiation that the ABC batteries were supplied directly from ABC, that should be sufficient.</p>
<p>30.</p>	<p>If all batteries are purchased from a registered brand owner, the steward does not have to report these batteries, correct? If they don't have to report these battery sales- then do they still have to register with MHSW and report zero sales each quarter?</p>	<p>If you are purchasing batteries from the registered brand owner’s Ontario distribution network, you do not have to report on them. Only obligated stewards must register with the MHSW program.</p>

<p>31.</p>	<p>I just participated in a MHSW webinar where a few rule changes effective January 1, 2018 were covered. One of the rule changes is on parallel importation. Now, we must verify that our products are in the distribution knowledge of our brand owner vendor, who is also a registered member, and if not, report on it ourselves. Is AMS going to follow the same set of rules?</p>	<p>This webinar was hosted by Stewardship Ontario to discuss the Rules for Stewards, which are required under the Waste Diversion Transition Act. In contrast, AMS enters into a membership agreement with stewards wishing to participate in the ISP. There are no changes to the AMS membership agreement for 2018. The membership agreement is posted on the AMS website. For information on AMS please contact info@autostewardship.ca</p>
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