

GENERAL QUESTIONS		
1.	When is the 2018 report deadline?	The deadline for the 2018 Annual Steward Report is May 31, 2018.
2.	I filed a report last year and have not received an invoice yet. Should I log in to find this? I don't want any additional fees.	If you reported in 2016 and have not received a 2017 invoice please contact National Steward Services. If you filed a 2017 report by May 31 of this year, invoices will be issued in January 2018.
3.	Is the 2017 fee schedule applicable to the 2016 sales data that will be reported in 2017?	<p>The 2017 fee schedule is based on the 2016 reports submitted last year, based on 2015 data. To clarify further, using this year as an example:</p> <ul style="list-style-type: none"> <li>- Stewards submitted their 2017 Reports by May 31, 2017.</li> <li>- Those 2017 Reports included 2016 Data</li> <li>- Those 2017 Reports were validated in the summer, and fee rates for 2018 calculated</li> <li>- The 2018 fee schedule was shared with stewards at the end of October as part of the Annual Steward Meeting</li> <li>- Your 2018 Invoices (with 2018 fee rates) will be issued January 1<sup>st</sup> 2018 and based on 2017 Reports, 2016 Data</li> </ul> <p>Please contact National Steward Services if you need further explanation.</p>
4.	Do the changes take effect for reporting the 2017 data in 2018, or for reporting the 2018 data in 2019?	<p>If approved, the new Rules, MAs and Policies will be effective January 1, 2018, and will impact your 2018 report and 2019 fees.</p> <p>The proposed changes will have no impact on 2018 steward fees or 2018 steward invoices.</p>
5.	When will the SO fee be set for 2018 Obligation year?	2018 fee rates were presented to stewards at the Annual Steward Meeting on October 31, 2017.
6.	Will there be any coming reduction or increase in the rates/fees of Printed Paper, Paper Packaging and Plastic Packaging for 2018 and 2019?	The fee rates for 2018 have been published and are not impacted by these proposed changes to the Rules, MAs or Policies. The 2018 fees were set on the basis of the annual reports submitted by May 31, 2017,. Fees for 2019 will be calculated based on steward reports filed by May 31, 2018.
7.	When will the List of Registered Stewards be published for 2018 reporting?	The steward list will be published in early 2018. We will notify all stewards when lists are available.

8.	Do we have to register in every program because we sell our product in all provinces?	If you have residency in a province and are supplying obligated PPP to consumers, you are obligated to register, report and pay fees. If you do not have residency in a particular province, then it would be the first importer in that province who is obligated to report the PPP associated with your products. However, if you are a Brand Owner, you also have the option to become a Voluntary Steward. Please contact National Steward Services directly for further information on your particular situation.
9.	Is the residency requirement based on the report year or the data year? For example, if a steward is a not a resident of BC in 2018, do they still have to submit a report for MMBC?	A steward is obligated under British Columbia's stewardship regulation, as soon as they begin supplying obligated PPP and they have British Columbia residency. Please contact National Steward Services if you need additional assistance understanding what reports you are required to submit.
10.	Does PPP such as cups, straws and lids for beverages supplied to employees at an office require reporting?	Any PPP associated with products <u>purchased by an employer and supplied to employees or employer's clients for consumption in the workplace</u> are not obligated materials. These are IC&I materials. They are, therefore, excluded from steward reports.
11.	Are there any changes in fees to incentivize stewards to use more sustainable /non-toxic PPP?	The Four-Step Fee Methodology recently adopted by Recycle BC, MMSW and MMSM (pending approval for Stewardship Ontario) allows for the inclusion of budgeted cost for a material category when the category requires investment to improve its recycling performance – i.e. to conduct research to determine why a material cannot be collected or why is it difficult to recycle or to develop recycling end markets to improve a material's performance.
12.	I've heard in Quebec there will be an expansion into charging recycling fees for packaging sold as products (sandwich bags, aluminum foil, etc.). Does CSSA have any plans to expand into this?	Each program determines its designated materials. In the amended Ontario Blue Box Program Plan, there will be a webinar for stewards that will address these "packaging like" products that are indistinguishable from packaging.

13.	Is the residency requirement based on the steward's office location or the steward's parent company's office locations?	The residency of an organization is determined by whether it has a permanent establishment in a province that has regulated stewardship obligations. This can include an office, a workshop, a factory, a warehouse or even an employee's home office. Because determining residency status can sometimes be challenging, please check the Guidebook or call National Steward Services for additional guidance.
14.	My question is regarding sales of let's say 10L plastic bottles or 205L drums to municipal governments. Do you need to report these?	As this PPP is supplied to the IC&I sector and is never supplied to consumers, then it is not obligated in any of the programs and should be excluded from the report. Please contact National Steward Services if you require additional guidance.
15.	Sending quarterly invoices in a single batch at the beginning of the year doesn't reflect normal business practice. This causes problems for companies, particularly those outsourcing accounting service, in the management of due dates.	All the programs now issue quarterly invoices at the beginning of the year as a single batch with future due dates, so that stewards are aware of their financial liability for the remainder of the year. If you require assistance with managing your invoicing, the CSSA finance team supports all the PPP programs and can provide additional guidance.
16.	When (exact date) in January 2018 will the reporting portal be open?	The reporting portal will be open for reporting in early January, 2018. Stewards will be notified by email as to the precise date.
17.	When is the anticipated date for the new 2018 steward lists to be published? If the reporting portal is opened in January, we would hope to have the steward list at the same time at least to be useful to reporting. Due to the complexity of reporting, it would be helpful to be able to work on the reporting early in the year.	The Steward list will be published in early 2018. We will notify all stewards when lists are available.
18.	Arbitration will be regulated by who please? Federal government? Which specific body please? It would be 4 hours of lawyer cost that would be split?	In the event that a dispute proceeds to arbitration, a third-party independent arbitrator, often a retired judge, would serve as the arbitrator. The arbitrator's decision is binding on both parties. The steward and the program would split the costs associated with the arbitrator. If the steward hires a lawyer, it would be at the steward's own expense.
19.	If we already have a Membership Agreement(s), do we need to re-apply for a new one by December 1 <sup>st</sup> ?	No. The Membership Agreement(s) will continue until you notify the program(s) of your intent to exit the program(s).

20.	Do you need any action from steward to sign any document on the changes in 'RULES' if approved by Board by 1st Jan 2018 for any of the provinces?	Unless the steward's status changes (e.g., a franchisor who would be obligated for its franchise system in a province), stewards will not be required to sign any additional new documentation arising from the revised Rules or MAs.
21.	Is there any red-line (indicating changes) in Agreements for SK and BC that we can review? Will the approved changes in Agreement after 1st Jan 2018 require steward to sign a new amended Agreement for BC and SK?	All stewards were provided with access to a track changes version of the Membership Agreements on the <a href="#">CSSA website</a> and on program websites. As a continuing member of Recycle BC and MMSW you will not be required to sign an amended MA because the terms are automatically renewed to reflect any changes.
22.	Are these four programs the only PPP programs in Canada at this time?	In addition to the PPP programs in British Columbia, Saskatchewan, Manitoba, and Ontario, there is also a PPP program in Québec. Éco Entreprises Québec (ÉEQ) manages the program in Québec. There are currently no other PPP programs in Canada.
23.	If separate divisions of our company have reported separately due to our company structure, for several years, do we still have to get approval to report in this manner? If so, what is the process to obtain approval?	At this time, the new provision would apply to new steward accounts. However, if you wish to continue reporting as separate divisions, please contact National Steward Services to provide information required to update your account.
24.	Are there more details surrounding the changes to the onboarding process for new stewards?	Please contact National Steward Services directly if you have questions about your specific onboarding situation.
25.	Does the primary contact need to be a senior officer of the company, or do they just need to be authorized by a senior officer?	The primary contact would not need to be a senior officer. The primary contact only needs to be appointed and authorized by a senior officer.
<b>REPORTING AND DEDUCTIONS</b>		
26.	Are there any deductions or allowances for bio-degradable packaging?	No, currently there are no deductions for biodegradable packaging. Packaging is obligated regardless of whether it is disposed of in the garbage, the recycling box, or the compost bin.

27.	Can you deduct PPP sold to IC&I sector (i.e. to restaurants, hospitals, etc.)?	Under the new policy, PPP sold to the IC&I sector (e.g. hospitals) which is never subsequently supplied to a consumer would not be obligated, and is, therefore, excluded from steward reports. PPP supplied to restaurants which is never supplied to consumers is also IC&I. Where the restaurant supplies PPP to consumers, the proposed Reporting and Deductions Policy allows restaurant stewards to request a deduction for PPP supplied to consumers which is managed by the restaurant's on-premise waste management system.
28.	Is reduction of gross weights for returns an allowed exception to reporting gross weights?	In accordance with the draft Reporting and Deductions Policy, consumer returns (except for plastic bags in MMSM program) would no longer be permitted as a deduction. However, the Boards will be considering steward feedback with respect to the deductions policy, and will make a final decision at their next board meetings as to whether to proceed with or modify the proposed Rules and Policies regarding deductions.
29.	If a retailer steward can provide proof of packaging being returned and recycled, is this a deduction or an exclusion and what is required starting in 2018?	Please see the response to question 28.
30.	Product returns that can be verified were permitted in previous years, why not for next year? What has changed?	Please see the response to question 28.
31.	Return to retail bags - does this exclude BC?	Retailers who are members of the Recycle BC Program can operate return-to-retail programs for bags but have never been permitted to exclude that PPP from their reports in accordance with the existing Membership Agreement. If the new Deductions and Reporting Policy is approved, the only province within which return-to-retail for plastic bags will be permitted as a deduction will be Manitoba.
32.	Can I subtract returned products that are then resold to another customer? Otherwise they will be counted twice.	Products are only reported the first time they are sold to prevent double reporting. As a result, products that are returned and re-sold are only reported the first time they are sold.
33.	If an Ontario retailer has a take back program for bags, how come they are not allowed to deduct these from what they supply? This has been allowed in Ontario for 10 years. They are taking on the cost of managing them yet have to pay for PPP fees as well.	Other than in Manitoba, where return to retail for plastic bags is specifically permitted in the approved Program Plan, such deductions have never been permitted in Recycle BC or MMSW and if the new Policy and Rules are approved will no longer be permitted in Ontario.

<p><b>34.</b></p>	<p>I had asked a question yesterday as to whether returns were an exception to reporting gross weights. To clarify we do accept returns from our customers (i.e. pharmacy retailer) and this is what I was referring to. These are quantities that never make it to the end consumer and thus do not enter the residential waste stream. Please advise if this is an allowable exception to reporting gross weights.</p>	<p>It has always been the case that if a Brand Owner sells product to a retailer, or any other business, and the retailer returns it without supplying it to a consumer, that product would be excluded from the Brand Owner's steward report because it is IC&amp;I material.</p>
<p><b>35.</b></p>	<p>I would like to clarify a point made during the October 17th webinar regarding reporting gross weights. If a company in Ontario uses deductions, for example from return-to-retail plastic bag quantities, in 2018 this company will need to first request approval to use the past deduction? How long will the process take and what will it involve? Could you provide the reason why is Ontario moving away from this deduction but Provinces, like Manitoba, are keeping it?</p>	<p>If the proposed Reporting and Deductions Policy is approved, deductions for return-to-retail plastic bags will no longer be permitted in Ontario. In Manitoba, return-to-retail for plastic bags is specifically permitted in the approved Program Plan.</p>
<p><b>36.</b></p>	<p>To clarify the rule for gross weight, if a retailer sells to a food service business is there any deduction allowed to the retailer?</p>	<p>Under the proposed Reporting and Deductions Policy, only the food service business ("Restaurant") would be able to request deductions for packaging supplied to consumers but disposed of by the restaurant in its own onsite waste management system. However, the Boards will be considering steward feedback with respect to the deductions policy, and will make a final decision at their next board meetings as to whether to proceed with or modify the proposed Rules and Policies regarding deductions.</p>
<p><b>37.</b></p>	<p>Is the deduction request form a new requirement? Will this request be due in advance of final report?</p>	<p>Yes. The deduction form would be made available early in the new year for 2018 reporting. Deduction request forms would be submitted at the same time you submit your report. The deadline for the Annual Report is May 31, 2018.</p>
<p><b>38.</b></p>	<p>Can you clarify the change regarding the reporting of the first importer vs the brand owner? If a manufacturer in MB ships its brand to a customer outside of MB (e.g. BC), the customer in BC is now responsible for reporting/paying fees regardless of brand?</p>	<p>It has always been the case that if the Brand Owner is not:</p> <ul style="list-style-type: none"> <li>• Resident in BC; and</li> <li>• Is not a Voluntary Steward in BC</li> </ul> <p>then the first importer in BC is the obligated steward.</p>

39.	Gross weight for PPP excludes the net content of product contained within the PPP (e.g. cream inside plastic tube)?	Correct. Stewards only report on the weight of the PPP, and have never been required to report the weight of product inside the packaging
40.	Regarding the new policy on limiting deductions to only materials consumed at an IC&I location and eliminating the deductions for PPP that end up in public spaces, compost, garbage, etc., is there a direction from CSSA to pay a portion of municipal costs to manage other waste stream? Your reasoning now means the other waste streams outside of the Blue Box are a form of managing the PPP.	Each of the programs is based on the fundamental premise that all obligated PPP which is supplied to a consumer must be reported, regardless of whether it is disposed of in the compost, the garbage, the recycling bin, or at any other location. Stewardship fees contribute to the cost of recycling PPP and are not used to fund other waste management systems.
41.	Is packaging that must be removed by retailers prior to sale to the consumer still exempt?	As long as the packaging is removed prior to being supplied to a consumer, then it is non-obligated material that is excluded from the programs, and does not need to be reported by the steward
42.	We have promotional materials for our clients. A portion of these paper materials are taken by the clients and may end up in recycling and a portion are not taken up by the clients and thus recycled internally through our private hauler. We cannot determine whether the promotional material was provided to the client or disposed of internally by the private hauler.	Stewards have always been responsible for developing reasonable methods to determine the amount of PPP that is supplied to consumers (i.e. obligated) versus that which is never supplied to consumers (excluded as it is not obligated). If the steward is unable to determine this, the steward is required to report all PPP as having been supplied to a consumer. However, if the steward can demonstrate with appropriate data that part of the promotional material was never supplied to a consumer, that portion remains IC&I and is <u>excluded</u> (i.e. never reported to the program).
43.	The language in this meeting and in your resource documents state that materials that enter the residential waste stream are obligated for reporting. So with that how does your comment "where it is disposed of is irrelevant" to remove the deduction?	Each of the Programs is based on the fundamental premise that PPP which is supplied to a consumer is obligated, regardless of whether it is disposed of in the compost, the garbage, the recycling bin, or at any other location.
44.	You mentioned that deductions are different from exemptions. Can you please briefly explain the difference between these, and provide examples of each?	Excluded material (which you refer to as "exemptions") is <u>PPP that is not obligated</u> under any of the jurisdictions' regulations or program plans – this includes materials supplied to IC&I and durable packaging. A deduction refers to <u>obligated PPP</u> that is allowed to be deducted from your steward report in limited situations. The Guidebook will be updated to provide additional guidance on the difference between deductions and exclusions.



45.	Are deductions in regards to items that have intended use longer than 3 + years still in effect?	Durable packaging, which is intended to be used for 5 years or more, such as the box containing a game or puzzle, is not obligated to report.
46.	There have been deductions for food and beverage products because it is understood that a percentage of these products are consumed away from home. Why don't the new rules for deductions take this distinction into account?	Each of the programs is based on the fundamental premise that PPP which is supplied to a consumer is obligated, regardless of whether it is disposed of in the compost, the garbage, the recycling bin, or at any other location. However, the Boards will be considering steward feedback with respect to the deductions policy, and will make a final decision at their next board meetings as to whether to proceed with or modify the proposed Rules and Policies regarding deductions.
47.	If a product is delivered to a consumer's home and removed by the delivery company, does a steward report and pay fees on the PPP?	The Boards will be considering steward feedback with respect to the deductions policy, and will make a final decision at their next board meetings as to whether to proceed with or modify the proposed Rules and Policies regarding deductions.
48.	Basically, if I understand this correctly, no deduction is allowed for retailers in the future. Only food service location has a specific program for deduction.	If the new policy is accepted by the boards at their next board meetings, this statement is correct.
49.	Why is the CSSA proposing to expand what is considered an Obligated Material under the new consumer definition when it will now include reporting of waste that is disposed of in the IC&I sector? Shouldn't the focus be on the residential waste stream?	The Programs are not expanding the definition of obligated materials. Each of the programs is based on the fundamental premise that PPP which is supplied to a residential consumer is obligated, regardless of whether it is disposed of in the compost, the garbage, the recycling bin, or at any other location. The focus of the proposed changes is to support this fundamental principle and to help ensure a level playing field for stewards.
50.	The fees that a steward pays are associated with costs incurred by the municipality in each jurisdiction. How is it fair if a package has two fees associated with the disposal - one at an ICI and one through the program?	While the fees are paid on all PPP supplied to consumers, they are used only to cover the costs of the provincial recycling program. No portion of stewardship fees are used to pay for PPP managed through the IC&I waste stream.
51.	How does reporting with "Gross weight" versus "Net weight" affect computer manufacturers? What we report is the weight of the packaging per the category, we have never even obtained any gross or net weight but they are just 'weight' in kilogram.	If the Brand Owner was already reporting 100% of the weight of PPP supplied to consumers, without deduction, then the proposed changes to the Rules, MAs and Policies requiring stewards to report on the "gross weight" will not have any impact on these stewards.



52.	We have promotional materials for our clients. A portion of these paper materials are taken by the clients and may end up in recycling and a portion are not taken up by the clients and thus recycled internally through our private hauler. We cannot determine which is which.	You need to report on all PPP that is supplied to consumers. This includes promotional materials available at your retail and/or service locations. If you cannot determine how much of the promotional material stays on premises and how much leaves your premises (with a consumer) then you are obligated to report it all as obligated PPP supplied to consumers.
53.	Working in the food manufacturing sector, a certain percentage of product is considered "food service" and sold directly to wholesalers, businesses and restaurants.	PPP associated with products sold to restaurants and other businesses that are used by those businesses and never supplied to consumers is considered IC&I material that is not obligated. It is therefore excluded from the programs and not included in steward reports.
54.	For IC&I can we deduct PPP sold to all Restaurants or is the deduction applicable only to Restaurants where there is on site commercial recycling? Will we have to investigate all of our Restaurants customers?	Under the proposed policy, only restaurants with an on-site waste management system would be permitted to take deductions. There would be no deductions for Brand Owners or other businesses that supply to restaurants. The Boards will be considering steward feedback with respect to the deductions policy, and will make a final decision at their next board meetings as to whether to proceed with or modify the proposed Rules and Policies regarding deductions.
<b>PARALLEL IMPORTATION POLICY</b>		
55.	What does "purchased outside of a normal distribution network" mean?	Purchased outside of a normal distribution network typically means the product is purchased offshore and imported into Canada, and is outside of the resident Brand Owner's known supply chain.
56.	I thought the retailer was responsible for PPP fees, not the distributor (John's Toys).	This was just one scenario from the webinar. Depending on each situation it could be a retailer or distributor. Please contact National Steward Services if you have a question regarding your specific obligation status.
57.	If the Brand Owner is based in Ontario but it ships from China is that included or excluded?	If the Ontario resident Brand Owner ships its own products and the associated PPP from China and supplies it to consumers in Ontario as part of its regular distribution network, then the resident Brand Owner would know about the PPP being supplied in Ontario and would be required to report on it.

58.	We have distribution centres in three provinces then we ship the product from those three distribution centres all over the country. So does the first importer pay for all products into the provinces (Ont. and MB) even though we ship out of province?	Resident Brand Owners are required to report and pay for all PPP supplied to consumers in a particular province. If there is no resident Brand Owner, and the non-resident Brand Owner has not registered as a Voluntary Steward, then the first importer is obligated. In the scenario provided in this question, the distribution centre would constitute residency for you. Therefore, you are responsible for reporting that the quantity of PPP supplied to consumers in each of those provinces.
59.	First Importer-How is a steward for a large corporation supposed to know looking at the sales data, if a product is first imported or not? This will definitely create double reporting.	Retailers have always been responsible for ensuring they can identify those products for which they are obligated as the first importer. Many retailers use the published Steward Lists to help them determine whether Brand Owners are registered either as a resident Brand Owner, or as a non-resident Voluntary Steward. Other stewards have their own in-house systems based on commercial agreements they have with their suppliers to help them validate their reporting obligations. The proposed new provisions regarding “parallel importation” place additional responsibility on first importers to ensure that PPP which they intend to exclude from their annual report was purchased from a distribution network supplied by the resident Brand Owner or Voluntary Steward.
60.	Is the new regulation of parallel importation the same as it is already applied in Quebec?	At this time, EEQ does not have a parallel importation policy in place.
61.	In this era of multiple parallel tier of distributorship, there is no real "regular" distributor network --- catalogs buy from a second or third customer. I still do not understand how you would define material from parallel importation.	In some circumstances, parallel importation may be a complex issue. For the purposes of the stewardship programs, a parallel import refers to goods supplied outside of the Brand Owner’s regular distribution network. Usually, this involves products purchased outside of Canada. The responsibility would rest with the First Importer to ensure they have sufficient substantiation (such as a Purchase Order or Distribution Agreement with the Brand Owner) for audit purposes to show that they have received goods from the Brand Owner’s network.
62.	We have customers who purchase our product in Manitoba where we do not have a location but we are a Voluntary Steward. They ship the product nationally across Canada. Who would be responsible?	If the Brand Owner’s PPP material is supplied to consumers in any province where the Brand Owner is either resident or registered as a voluntary steward, the Brand Owner would be responsible for reporting this PPP. Otherwise, the First Importer would be responsible.

63.	If a retailer sells products from a brand which has retail locations of their own in the province (we bought it through their normal distribution network) can we exclude that brand from our reporting?	Yes, you may exclude that brand if the Brand Owner is a registered steward in that province and you acquired the goods and associated PPP from the Brand Owner's distribution network. Please ensure that in the case of an audit, you have substantiation to show that the goods were purchased from the Brand Owner's distribution network in the province in question.
64.	If the Brand Owner is a resident of Ontario and the First Importer is also a resident of Ontario, who is obligated?	The resident Brand Owner is the obligated party, provided that the First Importer purchased the goods from the Brand Owner's distribution network (i.e. the First Importer did not import via parallel importation from outside of the Brand Owner's distribution network).
65.	How does a company identify a brand owner's distribution network?	Sales orders, distribution agreements or other commercial agreements typically identify the source of the products purchased.
66.	If I purchase from the Brand Owner that is in another province, is that still not considered being within the brand owner's network? If so, why do I still have to report?	If you purchase product from a Brand Owner in province A and you import it into province B where the Brand Owner a) does not have residency and b) is not a Voluntary Steward, then your organization is the First Importer and obligated to report the associated PPP.
67.	A parallel import is anything ordered other than with the official brand owner, correct? Say Retailer A orders products with Brand X Canada and other Brand X products through a foreign wholesaler, only the Brand X Canada orders count as Brand X? If the same products are ordered through Brand X Canada and a wholesaler located in Canada, this would mean Retailer A would have to verify whether the wholesaler is a business in the province or acts as voluntary steward. If it doesn't, Retailer A has to report for those.	A parallel import is typically a product imported from another country. If the foreign wholesaler has the permission from Brand X to supply their goods into Canada, then Brand X would know about this supply of PPP into Canada and would be responsible for reporting it. If the foreign wholesaler is not part of Brand X's distribution network, then Brand X would have no knowledge of these products being imported and would have no way to include associated PPP in their reports. In this situation Retailer A is obligated to report that PPP. Additional guidance is being prepared to clarify reporting obligations.
<b>FRANCHISOR</b>		

68.	Would you please review the changes for franchisees? Who is obligated to submit information?	Currently, in the Stewardship Ontario and MMSM PPP programs, franchisors resident in the province are required to report the PPP for all of their franchisees in the provincial franchise system. The proposed change only relates to franchisors which do not have a business location in the province, other than their franchisees' locations. In these circumstances, the non-resident franchisor would be obligated to report and pay fees on all PPP supplied by its resident franchisees in the province.
69.	As a franchisor, how do we calculate non-branded PPP that the individual franchise stores acquire from sources other than the franchisor or its authorized distributors? For example, a franchisee buys cash register tape from a big box outlet.	The franchisor will need to gather this information from its franchisees. National Steward Services can help individual franchise owners create templates for the franchisees to report their PPP to the franchisor. The franchisor will then aggregate the data and report to the program.
70.	If a franchisor has signed a voluntary agreement, do they now have to sign a new agreement because of the changes to make non-resident franchisors obligated	If a franchisor has signed a Voluntary Steward Agreement, this would need to be cancelled as the franchisor would now be the obligated steward.
71.	If a franchisor is non-resident in a province, how is the obligation to report on behalf of the franchisees enforceable under provincial regulations	Each province has its own legislation and regulation. For British Columbia and Saskatchewan, the regulations are very specific. In Manitoba non-resident franchisors are considered to be carrying on business through their franchise system and would, therefore, be obligated. In Ontario under the Blue Box Program Plan, franchisors are obligated for their Ontario franchisees.
72.	A franchisor has signed a voluntary agreement because they were a non-resident. Now with the new changes they are obligated regardless, therefore do they have to sign a new/different agreement?	Going forward, franchisors would be the obligated steward regardless of where they are located, and would be required to report on all PPP supplied to consumers through their resident franchise system. Depending on each franchisor's residency in each PPP program, they may need to change the type of agreement they have signed, or change their status from Voluntary Steward to a registered Resident Steward. As each scenario will be different, please contact National Steward Services to ensure you are registered and reporting correctly.

73.	We bill our franchise stores for their share of our overall PPP costs, based on sales volume. If we ask them to report their outsourced PPP, how do we know they will be accurate, since we are responsible?	Franchisors are the obligated steward and required to report on all PPP supplied to consumers by franchisees in their franchise system. National Steward Services can assist franchisors in developing templates to help coordinate data collection with their franchisees – once all the franchisees have reported to the franchisor, they can in turn report all PPP to the respective program(s).
74.	Is a future model possible where franchisees could qualify/participate in small business exemption programs (i.e. weight-based exemption, single retail location exemption, annual revenue exemption) while keeping the Franchisor as the responsible steward?	The provincial governments in British Columbia and Saskatchewan have provided policy statements confirming that franchisors (whether resident or non-resident in those provinces) are responsible for reporting on and paying for all of the obligated PPP generated by their franchisees in their provincial franchise systems. The proposed MMSM and SO Blue Box Rules would harmonize with Recycle BC and MMSW programs based on each program’s regulation and/or Program Plan. The stewardship programs in British Columbia, Saskatchewan, Manitoba or Ontario are not aware of any current plans to extend the de minimis threshold exemptions to individual franchisees.
<b>VOLUNTARY STEWARDS</b>		
75.	As a Voluntary Steward will I be grandfathered in for the new year without having to register again each year?	Voluntary Stewards do not need to re-register each year.
76.	What's the difference between a Steward and a Voluntary Steward?	A steward is a resident business in a particular province which is obligated under the province’s regulations. A Voluntary Steward is a non-resident Brand Owner that has <u>no obligation to participate in a stewardship program</u> but chooses to take on the responsibility for reporting and payment of stewardship fees. The Voluntary Steward Policy outlines the criteria to become a Voluntary Steward and the guidebook has additional guidance.
77.	As a Voluntary Steward, am I required to renew agreements with each province or will it automatically roll over until I request a stop?	Once you have registered as a Voluntary Steward in each individual province and your Voluntary Steward Agreement (VSA) has been approved, your status as a Voluntary Steward automatically rolls over in each province unless you notify the program before December 1st that you wish to cancel your VSA.
78.	Are there any threshold changes for Voluntary Stewards for 2018 per province?	The thresholds in the Voluntary Steward Policy remain the same for 2018.

OTHER		
<b>79.</b>	Will the supplier to the brand owner be protected from the brand owner passing the charges to the supplier/manufacturer that is also non-resident?	The programs cannot comment on commercial relationships between businesses in the fulfilment of their stewardship obligations. Resident Brand Owners and First Importers (distributors and retailers) are the obligated parties in each jurisdiction. However, non-resident Brand Owners can also assume responsibility for their brands by registering as a voluntary steward with any one or all of the stewardship organizations (MMBC, MMSW, MMSM and Stewardship Ontario) assuming they meet the requirements of the policy. Please contact National Steward Services if you have additional questions.
<b>80.</b>	Do I report PPP where a portion is used by the buyer and a portion is sold by the buyer as retail?	Where a Brand Owner supplies PPP, some of which: <ul style="list-style-type: none"> <li>• is supplied to consumers; and</li> <li>• is utilized by the purchaser as part of its IC&amp;I business and is never supplied to a consumer,</li> </ul> the Brand Owner must report on the PPP supplied to consumers. PPP which is supplied to IC&I and is never supplied to consumers is excluded material, because it is IC&I which is not obligated material. The Brand Owner is not required to report on this excluded material.
<b>81.</b>	Why is the retailer who is also the brand owner billing us the importer when it is the obligation of the brand owner to declare and pay? How can we safeguard our business?	The programs cannot comment on commercial relationships between businesses in the fulfilment of their stewardship obligations. Resident Brand Owners and First Importers (distributors and retailers) are the obligated parties in each jurisdiction. However, non-resident Brand Owners can also assume responsibility for their brands by registering as a voluntary steward with any one or all of the stewardship organizations (MMBC, MMSW, MMSM and Stewardship Ontario) assuming they meet the requirements of the policy.



<p><b>82.</b></p>	<p>If a cup is supplied to a consumer and then disposed of in an office, the disposal cost is paid for by building management and the disposal cost is included in the program ... as such double cost reporting. Fair?</p>	<p>The programs understand that some stewards have been taking deductions on this basis in the past. Under the new Reporting and Deductions Policy, this would not be permitted. Each of the programs is based on the fundamental premise that PPP which is supplied to a consumer is obligated, regardless of whether it is disposed of in the compost, the garbage, the recycling bin, or at any other location. The purpose of the change is to support a fairer system and enhance auditability of the stewards' reports.</p>
<p><b>83.</b></p>	<p>Based on the requirements in Ontario, does the CSSA consider the rule changes it is proposing to be "material changes" to the Blue Box Program Plan?</p>	<p>The changes proposed in the Stewardship Ontario Rules align to the existing Ontario Blue Box Program Plan. Only the Minister of Environment can determine what constitutes "material changes."</p>
<p><b>84.</b></p>	<p>If I am first importer and distributor to wholesale marketplace, do I still need to report if I am not selling directly to the consumer?</p>	<p>If you fit within the definition of First Importer, you are required to report on and pay fees associated with all PPP which is ultimately supplied to consumers, whether directly by you, or by another participant in the supply chain. Please contact National Steward Services to ensure that your unique situation is correctly managed.</p>
<p><b>85.</b></p>	<p>Will the penalty for late reporting increase in 2018 compared to 2017?</p>	<p>The only program that previously had a penalty for late reporting is MMSM and its penalty rate is not increasing. The penalties for late reporting for all programs are reflected in the proposed Administrative Fees, Penalties, and Interest Policy and are the same for all programs - 10% of fees owing once the report is filed.</p>
<p><b>86.</b></p>	<p>What is the % penalty for making adjustments, or late payment or late reporting? Please provide the proposed changes in dollar \$ or percentage %?</p>	<p>This is addressed in the proposed new policy regarding Administrative Fees, Penalties, and Interest. Stewards who seek an adjustment to a previously filed Annual Steward Report must follow the Adjustment Policy and would be subject to the following:</p> <ul style="list-style-type: none"> <li>• a flat fee of \$100 per program, which will be applied to the invoice/credit for the Adjustment Request;</li> <li>• staff time required to assess the adjustment will be billed at \$120 per hour after the first hour; and</li> <li>• where a third-party review is necessary, the Steward would be responsible for the cost of the third party review (which has always been the case).</li> </ul>