

## Final Summary of 2018 Changes to Membership Agreements, Rules and Policies

- Following a review by each program of their respective Membership Agreements, Rules and Policies, a number of proposed changes were shared with stewards in October for consultation and feedback.
- After considering steward comments, questions and input, the program boards determined that most of the proposed changes will take effect on January 1, 2018 (Voluntary Steward provisions have already been implemented).
- The proposed policy for Parallel Importation and the proposed policy Reporting and Deductions have been deferred and will NOT be implemented for 2018. The scope of the proposed policy for Administration Fees, Interest and Penalties has been revised to exclude administrative fees.
- The below table summarizes the changes by subject or program, along with next steps for stewards.
- Additional information and guidance about the changes will be available early in 2018. Changes that affect reporting will be considered in detail as part of the annual reporting webinar in early March.
- National Steward Services is available to assist with any questions: **1-888-980-9549** or [stewards@cssalliance.ca](mailto:stewards@cssalliance.ca).

Nature of Change	Next steps
<p><b>Voluntary Stewards</b> Voluntary steward notification date changed from Dec 31<sup>st</sup> to Dec 1<sup>st</sup></p>	<ul style="list-style-type: none"> <li>- New Policy and Agreements for each program (effective as of December 1, 2017) are <a href="#">available here</a>.</li> </ul>
<p><b>Primary Contacts</b> New policy requires that primary contacts be appointed by a senior officer within their organization who has the authority to bind their organization</p>	<ul style="list-style-type: none"> <li>- New stewards registering on the WeRecycle Portal will be required to provide confirmation that the person appointed as the Primary Contact (PC) has been authorized by a senior person (who has authority to bind the organization) to submit reports</li> <li>- National Steward Services will reach out to new stewards directly to confirm the PC information and authorization</li> </ul>

Nature of Change	Next steps
<p><b>Affiliated organizations</b> Affiliated organizations who wish to report separately must first seek approval from the stewardship programs</p>	<ul style="list-style-type: none"> <li>- New stewards who elect to report their affiliated organization(s) under separate steward accounts, must contact National Steward Services and provide detailed information on affiliated/parent organizations after completing registration on the WeRecycle Portal</li> <li>- Existing stewards who already report affiliated organization(s) under separate steward accounts should have details on affiliated/parent organizations available upon request</li> </ul>
<p><b>Steward-Initiated Adjustments</b> Minor revisions to the existing steward adjustment policy</p>	<ul style="list-style-type: none"> <li>- The process for requesting an adjustment has not changed for 2018</li> <li>- The policy is <a href="#">available here</a></li> <li>- The form for requesting adjustments is available <a href="#">here</a> and should be submitted to <a href="mailto:adjustments@cssalliance.ca">adjustments@cssalliance.ca</a></li> <li>- The adjustment policy applies to all programs and to all adjustment requests made as of January 1, 2018</li> <li>- National Steward Services is available to assist with any questions about the adjustment process</li> </ul>
<p><b>Onboarding</b> New onboarding policy harmonized for all programs</p>	<ul style="list-style-type: none"> <li>- The process for onboarding of new stewards has not changed for 2018</li> <li>- The Onboarding Policy is <a href="#">available here</a> and confirms all the key steps for new stewards and clarifies that: <ul style="list-style-type: none"> <li>o stewards must report and/or pay fees for all periods in which they are obligated; and</li> <li>o first reports can be based on estimates (as data from a prior year is not typically available)</li> <li>o National Stewards Services is available to assist stewards when joining a new program</li> </ul> </li> </ul>
<p><b>Dispute Resolution</b> Harmonized Dispute Resolution Policy (DRP) for all programs that simplifies the steps</p>	<ul style="list-style-type: none"> <li>- The process for initiating a dispute is now harmonized across all programs</li> <li>- The new policy is <a href="#">available here</a> and outlines the key steps of resolving disputes between stewards and programs: <ul style="list-style-type: none"> <li>o Disputes that cannot be resolved at the staff level must be documented in an email and submitted by the steward to <a href="mailto:disputes@cssalliance.ca">disputes@cssalliance.ca</a></li> <li>o The dispute is then escalated to senior managers of the two organizations</li> <li>o If required, arbitration can be initiated as the final step of the resolution process with costs being born equally by stewards and the program(s)</li> </ul> </li> </ul>
<p><b>Parallel Importation Policy</b></p>	<ul style="list-style-type: none"> <li>- This policy change has been deferred for 2018</li> </ul>
<p><b>Reporting and Deductions Policy</b></p>	<ul style="list-style-type: none"> <li>- This policy change has been deferred</li> <li>- Additional information will be requested from all stewards claiming deductions from their 2018 reports to support further analysis</li> <li>- This information will support further analysis and to guide future policy development</li> </ul>

Nature of Change	Next steps
<p><b>Penalty and Interest Policy</b> Harmonized for all programs</p>	<ul style="list-style-type: none"> <li>- For 2018, proposed administrative fees have been removed and the new Penalty and Interest Policy is <a href="#">available here</a></li> <li>- Stewards who report accurately and on time will not be affected by the new policy</li> <li>- Stewards who are non-compliant (e.g. submitting late or inaccurate reports) will be subject to the application of interest charges and/or penalties (in accordance with each program's Rules, MA and/or Program Plan).</li> </ul>
<b>Recycle BC and MMSW only</b>	
<p>References to <b>Policies</b> included in Membership Agreements</p>	<ul style="list-style-type: none"> <li>- The new Membership Agreements are available here: <ul style="list-style-type: none"> <li>o <a href="#">Recycle BC</a></li> <li>o <a href="#">MMSW</a></li> </ul> </li> </ul>
<p>May 1<sup>st</sup> <b>exit process</b> clarified in the Membership Agreements</p>	<ul style="list-style-type: none"> <li>- Stewards who exit Recycle BC or MMSW prior to May 1<sup>st</sup> must pay any remaining invoices for that year within 30 days of exit</li> <li>- There is no financial obligation for future years</li> <li>- Stewards who exit after May 1<sup>st</sup> will be obligated under the terms of the agreement to submit an annual report by the May 31<sup>st</sup> deadline</li> </ul>
<b>MMSM and SO only</b>	
<p>New <b>index</b>, headings and plain language used throughout Rules</p>	<ul style="list-style-type: none"> <li>- New Rules are available here <ul style="list-style-type: none"> <li>o <a href="#">MMSM</a></li> <li>o <a href="#">Stewardship Ontario</a></li> </ul> </li> </ul>
<p><b>Not-for-profit</b> organizations, including charities, now have access to the same de minimis thresholds as for-profit organizations</p>	<ul style="list-style-type: none"> <li>- Not-for-profit organizations should check the applicable Rules or consult National Steward Services to determine if they are eligible for de minimis exemption thresholds in Manitoba and Ontario</li> <li>- There is no change to existing exemption for charities in Recycle BC and MMSW</li> </ul>
<p>A new provision obligates <b>non-resident franchisors</b> for the PPP generated by their resident franchise system, thereby capturing all PPP supplied by all franchisees.</p>	<ul style="list-style-type: none"> <li>- Non-resident franchisors with franchise systems in Manitoba and/or Ontario will be contacted by National Steward Services and supported to meet their stewardship obligations on behalf of their franchisees in the province(s).</li> </ul>

Nature of Change	Next steps
Removal of <b>proxy reports</b> in the MMSM and SO programs for late/non-reporters to align with other programs	<ul style="list-style-type: none"> <li>- There is no change for 2018 <u>invoicing</u> <ul style="list-style-type: none"> <li>o Existing stewards who were late or who did not submit 2017 reports will receive an invoice for 2018</li> </ul> </li> <li>- The following changes apply for 2018 <u>reporting</u> <ul style="list-style-type: none"> <li>o Stewards who are either late or who do not submit 2018 reports will be contacted and supported to submit their reports</li> <li>o Stewards who do not report by the timeframes outlined in the Penalty and Interest Policy will be escalated for compliance and subject to penalties and interest.</li> </ul> </li> </ul>
<b>MMSM only</b>	
New requirement for stewards to <b>notify</b> MMSM of changes occurring within its organization	<ul style="list-style-type: none"> <li>- Organizations that experience a business change such as a merger, acquisition or any other change outlined in the new 2018 Rules, are required to contact National Steward Services within 30 days of the change so information can be updated</li> <li>- This requirement is already in place Recycle BC, MMSW and SO programs</li> </ul>
<b>SO only</b>	
Introduction of January 1 <sup>st</sup> <b>billing cycle</b> for Stewardship Ontario to harmonize with other programs	<ul style="list-style-type: none"> <li>- If you opted to receive quarterly invoices when you submitted your 2017 reports on the WeRecycle Portal, all four invoices will be issued on January 1 and they will be due: <ul style="list-style-type: none"> <li>o January 31</li> <li>o April 30</li> <li>o July 31</li> <li>o October 31</li> </ul> </li> <li>- Stewards who selected to receive one annual invoice will receive it on January 1 and it will be due January 31.</li> </ul>