

General Questions

1.	I'm the new Primary Contact (PC) for our company. What do I do if I discover there were errors in previous years' reports that the former PC submitted?	If a steward has identified errors in a previously submitted report, the program must be notified within 30 days of discovering the errors. National Steward Services can help determine how the Adjustment Policy would apply to situations of under or over reporting.
2.	Gross annual revenue - Can you confirm that this is by province please? (exemptions and small business slide)	Revenue thresholds for exemptions and small businesses include only revenues earned in that province.
3.	We registered in 2018, when do we report?	As per the Rules and Membership Agreements, stewards have 60 days after registration to file their first report. The year of the first report is subject to when you first supplied PPP material to that particular program. For new stewards, there is often a catch-up required before achieving the standard reporting cycle. National Steward Services is available to assist with the specifics of your situation.
4.	Where do we go to download the tip sheets?	The tip sheets can be found on the 2018 Reporting Resources page on the CSSA website, within the Material Guidance section.
5.	Can you host these webinars in the middle of the month instead of month-end? This is the busiest time for administrative staff.	Thank you for your suggestion. CSSA will consider this for future webinars.
6.	How can I update/correct data that has been submitted prior to May 31 and after May 31?	If your report has been submitted before or after May 31 and you need to make amendments, please contact National Steward Services and they will assist.
7.	Will Stewardship ON continue to provide supplemental calculators?	Yes. Calculators are available for all four programs, including a calculator that covers reporting using the national material list. If you would like to request supplemental calculators, please contact National Steward Services.
8.	Do you recommend third-party reporting services for companies who do business in all provinces?	CSSA does not make any recommendations pertaining to third-party reporting services. You may want to speak to your business association for further guidance.

Reporting		
9.	<p>Please confirm:</p> <ol style="list-style-type: none"> 1. Year 1 data 2. Submit in year 2 3. Pay in year 3 <p>Is that Correct?</p>	<p>Yes, that is the standard cycle. When stewards are submitting their reports, they are using data from the prior year and receive their invoice the following year. For example, a 2018 report is based on 2017 data. The steward will then receive their invoice in 2019.</p>
10.	<p>Is the May 31st deadline for the 2018 or the 2019 reporting period? Note, I have already paid an invoice for the 2018 reporting period.</p>	<p>The upcoming May 31st deadline is for your 2018 report. The invoices you received in 2018 are based on your 2017 report.</p>
11.	<p>I understood that a steward is not obligated if they produce less than 15,000 kg of PPP in a year, but the "Exemptions and Small Businesses" slide says that, for Stewardship Ontario, there are no tonnage exemptions. Have I confused two different rules?</p>	<p>For Stewardship Ontario, if a steward's gross annual revenue exceeds \$2 million but they supply less than 15,000 KG, they are obligated to submit a report but that report will not generate an invoice.</p>
12.	<p>I thought Ontario had a 15 MT threshold (if below threshold, exempt from reporting)?</p>	<p>A steward reporting to Stewardship Ontario that has gross revenue exceeding \$2 million and reports less than 15,000kg, still has an obligation to submit a report, but will not receive an amount owing on their invoice.</p>
13.	<p>What are acceptable methodologies for determining carry out percentage in the absence of (Point of Sale) POS tracking?</p>	<p>There are various methods available for your calculations. Please contact National Steward Services for guidance on your specific situation.</p>
14.	<p>What happens if you've been doing business for over 20 years - do you have to report all the years?</p>	<p>Provided you've been a resident in that province for those 20 years, your obligation would likely be from the beginning of the program. A steward is obligated from the time they begin supplying PPP into the province. National Steward Services is available to assist with determining the details of your reporting obligation.</p>
15.	<p>Yogurt exemption removal-If we are a business that caters a proportion of our sales to non-consumers (directly to food service), which is considered the industrial sector; we can still continue deducting that portion from the yogurt weight, even though we are not a restaurant?</p>	<p>When reporting, you do not need to include the portion of products that are being supplied to the food service industry and not to consumers. This would be an example of exclusion - IC&I is excluded material that you do not need to report.</p>

Obligated Steward		
16.	As a first time voluntary steward – can I have someone walk me through the process?	Absolutely- please contact National Steward Services and a representative will be able to assist you with any questions about being a voluntary steward.
17.	If a report has to be submitted by May 31st 2018, how can you submit your numbers for new businesses for 2018 since it is only May of that year?	If you started supplying PPP on January 1 of 2018, you have 60 days to register to the applicable program(s). That would be March 1. Then you have another 60 days to file your first report. That would be April 30, 2018. That report is your 2017 report to inform a 2018 invoice. Your report for 2018 that will inform your obligation for 2019 will be due on May 31, 2018. Onboarding can be complicated for new stewards and National Steward Services is available to assist with any questions.
18.	To clarify, if we input 6 months of data (Jun-Dec), this will be extrapolated to determine an annual fee?	If, in your first year of business, you operate for only 6 months, your first invoice will be based on a report of 6 months' supply. In your second year of business, you will likely operate for a full year. As such, you can use the same 6 months' kg, and extrapolate it to represent a full 12 months for your second year report.
19.	We are a business in Montreal that would have to report as a voluntary steward in Ontario. Please clarify if the under \$2 million gross revenue is related to QC or ON.	The under \$2 million revenue de minimus only applies to resident businesses and not voluntary stewards. If you do not have residency in Ontario, you are not required to report. As a voluntary steward, you have assumed responsibility for reporting and paying stewardship fees for your PPP in Ontario. For further information, please review the Voluntary Steward Policy located in the resource section of the CSSA website.
20.	How do we correct PPP materials and weight submitted by our retailers on behalf of a supplier?	Please inform the party that submitted the report, as they will need to request an adjustment through National Steward Services.
21.	Our company distributes products to Saskatchewan (however we don't have an office or employee in Saskatchewan). Are we exempted from the reporting obligation?	If your organization does not have any residency in Saskatchewan, then you are not obligated to register and report. If however, you would like to remove the reporting obligations from the first importers in that province, you are able to register as a voluntary steward so long as you meet the requirements in the Voluntary Steward Policy. The Voluntary Steward Policy can be found in the resource section of the CSSA website.

22.	Can you go back to the example of a new steward starting operations in June 2017? Why should he report for 2016 obligation year?	The onboarding process ensures that stewards are paying during the time they are supplying materials. If you were in operation in June 2017, you would need to receive a 2017 invoice and in order to do so, you would be required to submit a 2016 report in the WeRecycle Portal to generate a an invoice for those seven months of 2017. For more information, please refer to our Onboarding Policy or contact NSS.
23.	If a new steward began operations in June 2017, the data year is June - Dec 2017. Wouldn't the report be 2018, and the first invoice would be 2019?	This situation is specific to new stewards that are obligated in accordance with our Onboarding Policy . In order to generate a 2017 invoice, a 2016 report needs to be submitted in the Portal. The Policy allows for the use of available or estimated data when required. For further information, please review the Onboarding Policy, which is available in the resource section of the CSSA website, or contact NSS.
24.	We do not sell to households, but we sell to supermarkets products we do not manufacture. Should we report on these products?	If you are not the brand owner but the first importer, and have residency in the province, then you (not the retailer) would be obligated to report on that material. Please contact National Steward Services to for further assistance with this question.
25.	We are a manufacturer that is selling to a business that in turn sells to the retailer - are we obligated to report?	If you are the resident brand owner and supply products to consumers, you would be obligated to report for the PPP supplied, even if you ship to a distributor or retailer within the province for which you are resident.
26.	We are a distributor and registered as a steward. If the supplier, who should be registered with CSSA, does not register with CSSA, are we as the first importer obligated to report on their behalf?	If the supplier you are referring to is resident in that specific province, then you do not need to report on their behalf. If they do not have residency (and have not opted to register as a voluntary steward for that program), then you would be obligated if you are a first importer of their products. Please contact National Steward Services for further assistance.
27.	What year did this service start so I know how far to go back?	Each program had different start dates. Please contact National Steward Services for the exact program start dates for British Columbia, Saskatchewan, Manitoba and Ontario and to confirm how far back you need to report based on when you first started supplying PPP in that province.
28.	Should the distributor be responsible to report and pay for material of a small vendor who is exempt from reporting?	If your resident vendor is exempt, you do not need to report on their behalf. So, in this example, if the distributor and the vendor are in the same province, and the small vendor is exempt, the distributor does not need to include that material.

29.	How do you answer the obligation questions for non-revenue generating institutions (e.g, post-secondary educational)?	As per section 19 of the Stewardship Ontario Rules , the revenue question does not apply to institutions. A Steward that is a not-for-profit entity, (including registered charities, not-for-profit corporations, educational institutions, municipalities and provincial agencies) is required to file an Annual Steward Report and pay Stewardship Fees.
30.	For a manufacturer based in Ontario, if the products are sold in other provinces, is the Steward obligated to report for other provinces?	Obligation is primarily determined based on residency. If an Ontario manufacturer also has residency in British Columbia, Saskatchewan or Manitoba, then they would be required to meet their obligations in those provinces. If they do not have residency, then the obligation falls on the first importer in each province, unless the manufacturer has opted to register as a voluntary steward for that program.
31.	When a small vendor is exempt due to volume, is the distributor who supplies this particular small vendor material into province also exempt?	If the resident vendor is the obligated steward and they qualify for a small business exemption in that province, the distributor in that same province would not be required to report for the small vendor's PPP.
32.	We are a non-obligated Steward simply due to low PPP amounts. At what point would we become obligated?	Tonnage exemptions vary by program. Should your supplied PPP increase above the applicable exemption level, please contact National Steward Services for guidance.
33.	To be a considered a resident of a province, we only need to have a sales representative there, correct?	If an organization or company has salaried individuals (i.e., employees or agents who are acting on the organization or company's request) who can contract (i.e., authorized to sign) on the organization's or company's behalf in a province with stewardship obligations, then it has residency in that province. Please review section 1.7 of the Guidebook for further information.
34.	Are online retailers obligated to report and remit fees?	If an online retailer supplies PPP and has residency in a province, they are obligated and must report, subject to any exemptions. If they do not have residency in that province, they are currently not obligated by the rules or regulations. CSSA continues to work with the programs to address concerns about un-stewarded material from online retailers.
Revenue Exemption		
35.	With regard to Ontario, if our gross annual revenue is under \$2 million, then we don't have to report?	That is correct. As per the regulation, if your gross revenue in Ontario is under \$2 million, you do not have an obligation to report.

36.	Gross revenue includes USA and Canadian revenue?	Your gross revenue is province specific and does not include your revenue from outside of that province. So, if you are operating in the US and in Canada, you would use your gross revenue for each province to determine if you're obligated to report in that province.
37.	We are located in Ontario but our sales within Ontario are less than the \$2 million. Are we still required to report?	You are not required to report in Ontario if your gross annual revenue in Ontario is below \$2 million.
38.	We are a small company. Our annual income is below \$1 million. Can we request that our report be waived?	We would require further information to determine your exemption eligibility, such as whether you have submitted a report and which province you are referring to. Please contact National Steward Services for assistance.
39.	When you say revenue less than \$1 million, do you mean revenue from the products we are reporting or just revenue in general? Our revenue is not really relevant to what we are reporting. We are reporting more marketing items that are not reflected in our revenue.	Your total annual revenue for that specific province would determine whether you fall under any of the de minimus thresholds for registering and reporting.
40.	When we report annual revenue, is it only for our brand in our province of residency?	Province-specific revenue is only considered for program exemptions. The obligation to report would be for all of the supplied PPP your organization is the brand owner or first importer for in that province.
Obligated Materials		
41.	If the weight of one of the components of your product is so small that it has no weight, how do we report it? Can it be part of the bigger component even if it is different material?	You are able to include the weight of that small component under the material category of the main component. We used the example of a pickle jar that includes a metal lid, paper label and glass container – in this case the weight of the label can be included with the weight of the glass. For further details, please consult the Component Threshold Rule in section 2.4.1 of the Guidebook .
42.	If HR documents are obligated, does this also include the marketing material for retail companies?	If any marketing materials are supplied to consumers, they would be obligated material in all programs and should be included in reports.

43.	Do the HR documents that go home with the employee need to be reported for the province that the employee is located in?	Yes. For each program, all HR documentation should be included in your steward reports for all the employees that live in the same province.
44.	For an aerosol manufacturing company, are they obligated to report for the paper used for any company business, i.e. for invoices, shipping documents etc,?	If you are selling your products directly to a business and not to a consumer, then you would not need to include these materials in your reports they are supplied to IC&I. Alternately, PPP would need to be reported if it is supplied to consumers.
45.	Is cardboard that stays at retailer level required to be reported?	Cardboard that stays in the retail location and is disposed of by the retailer is considered IC&I and is not obligated.
46.	Does the cardboard that goes to the end user, homeowner, need to be reported?	Yes, this would be obligated for either the first importer or the brand owner of the PPP.
47.	With regard to weight, do we have to put in the exact measurement or can we use best judgement?	Exact measurements and precision are always preferred to estimates. If you have this information readily available, please use the exact measurement. If you don't, estimates based on an average bill of materials or average weights of similar products can be used. Please refer to Section 2 of the Guidebook for Stewards.
48.	Our products go to the retailer, not the consumer... do we need to report? You just said that marketing materials to a retailer are not included.	If the marketing materials are only B2B (business-to-business) then they would not be obligated. However, if you are the brand owner and you supply your product to a retailer where consumers can purchase your products, you would be obligated to the PPP supplied.
49.	Where is the best place to find out all information about IC&I?	Please consult Section One of the Guidebook for further information on exclusions.
50.	If a pair of shoes comes in a cardboard box from a supplier, would the box be obligated as PPP or only the shopping bag given to the customer?	The cardboard box would be obligated PPP so long as it is supplied to the consumer. Further information on obligated PPP is available in the Reporting Resources section of the CSSA website, which includes our Guidebook and Sector Specific Reporting Tips.
51.	Other than private label brands as an example, can you give some other typical exemptions that someone in the grocery business could utilize?	Please review the 2018 Reporting Resources page of the CSSA website which includes Sector Specific Tips Sheets. NSS is also available to assist with any specific questions around exemptions.

52.	We are a college. We also provide food services at the campuses. Do we report based on third party run food services too?	You would not need to include data for these food service locations in your report, because it is a cafeteria and stays onsite.
53.	We manufacture in Ontario and ship across North America to retailers. Is it correct that we should be reporting the boxes and packaging, as well as instruction manuals? Also, are we to report -sales by province only (i.e., Ontario sales in Ontario, BC sales in BC, etc.)?	Resident stewards are obligated to report for all of the designated PPP that is supplied in each province. This includes boxes, packaging and instruction manuals and other PPP. You would not be reporting sales – rather, you would be reporting the kilograms of the PPP supplied in each province.
54.	Are posters, banners, and store signage considered PPP and obligated material?	No –such materials would not be considered obligated as they are not supplied to a consumer.
55.	If we are obligated to report for prior years but are not able to determine quantities of non-inventoried items (such as promotional materials or business cards) for previous years, how do we submit a report?	There are methodologies you can apply to determine this PPP. Please contact National Steward Services to determine the best option for your situation.
56.	For Recycle BC, what material(s) do I need to report for trays that are packed in a cardboard box with one liner bag?	If you are the obligated steward, the tray and the liner would be reported so long as they are being supplied to the consumer. Sector specific reporting tips may provide further information, or contact NSS.
57.	Are User Manuals for devices that have expiry dates of at least 5 years exempt from reporting? Please clarify.	While durable packaging is not obligated, this only applies to packaging and not to printed paper. User manuals would be obligated and should not be excluded or deducted from your report.
58.	We are an insurance broker and distribute very little paperwork directly from our office. Do we only have to report paper that will end up in the residential blue boxes?	You would be obligated for any packaging and printed paper supplied to consumers. You would also be responsible for any HR documents provided to your employees.
Billing & Fees		
59.	Is the 2018 fee schedule applied to the 2017 report?	Yes, that is correct. The 2018 fee schedule pertains to the 2017 report. The 2018 report that you're filing for May 31, 2018 will be used to inform the fee schedule for 2019.
60.	Once an invoice is paid, do stewards get a paid in full notice?	Our system does not generate receipts. Once your annual obligation has been paid, you will not receive notification of your payment. Please contact our accounting department if you'd like to receive written

		confirmation that you're up to date on your payments.
61.	Where can we find the material fees?	The material fee rates can be found on each of the programs' websites, as well as in the Report to Stewards from the Annual Steward Meeting held in October 2017, which details the fee rates that are used for 2018 invoices. Material fee rates for 2019 will be informed by 2018 reports.
62.	What are the penalties for incorrectly submitting info?	If information was not intentionally submitted incorrectly, no penalty would be applied. Please contact National Steward Services as soon as you're aware of any reporting errors.