

# ONBOARDING POLICY

## KEY FEATURES:

- Stewards are obligated to pay fees for all periods in which they supply obligated material
- To ensure fairness, each steward will be assessed by National Steward Services upon registration to help stewards meet their reporting and payment obligations

### I. Overview

1. This policy outlines stewards' reporting and payment obligations when:
  - (a) joining one or more of the stewardship programs;
  - (b) there are mergers, acquisitions, or divestments within the steward's business

### II. Purpose

2. The Onboarding Policy promotes fairness for all stewards and enables stewardship programs to operate in a cost-effective manner by:
  - (a) applying a set of consistent principles for stewards joining a program for the first time; and
  - (b) ensuring stewards pay fees for all periods for which they are obligated.

### III. Scope

3. This policy is effective January 1, 2018 for all new and existing stewards<sup>1</sup> meeting their regulatory stewardship obligations with one or more of the following programs:
  - (a) Recycle BC (formerly MMBC);
  - (b) Multi-Materials Stewardship Western (MMSW);
  - (c) Multi-Material Stewardship Manitoba (MMSM); and
  - (d) Stewardship Ontario (Blue Box Program) (SO).
4. This policy does not apply to organizations that qualify or have previously qualified for a program's:
  - (a) Revenue exemption; or
  - (b) Tonnage exemption

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<sup>1</sup> Management of Voluntary Stewards is outlined in the Voluntary Steward Agreements

These stewards must contact National Steward Services as soon as there is a change in their exemption status to manage their onboarding process.

#### IV. Policy

5. Stewards are obligated to pay stewardship fees from the day they begin supplying obligated material (the “Obligation Date”).
6. Stewards must register on the WeRecycle Portal (the “Portal”) within 60 days of becoming obligated in the applicable province. For Recycle BC and MMSW, registration will include the execution and uploading of a Membership Agreement.

##### **(a) Scenario 1: Newly Obligated<sup>2</sup>**

7. New stewards are required to File an Annual Steward Report within 60 days of registration to create an invoice for the current year.
8. New stewards are required to File an Annual Steward Report (due by May 31 of the current year, or within 60 days of registration, whichever is later) to create invoices for the following year.
9. For a new steward’s first Annual Steward Report, the Report may be informed by estimates using the steward’s sales forecasts, historical data, or such other information acceptable to the program. National Steward Service representatives can provide guidance with respect to estimates.

##### **(b) Scenario 2: Previously Obligated<sup>3</sup>**

10. This scenario covers stewards who were obligated prior to the current year, but did not register with the stewardship program in relation to one or more prior years.
11. Previously obligated stewards will be required to:
  - (a) File an Annual Steward Report (due by May 31 of the current year, or within 60 days of registration, whichever is later) to create invoices for the following year

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<sup>2</sup> New Stewards are those who become obligated for the first time in a stewardship program.

<sup>3</sup> Previously obligated stewards are those stewards who were resident in the province and were supplying obligated material in the province, but failed to register at the time that they began supplying these materials.

- (b) File all outstanding Annual Steward Reports (due within 60 days of registration) for all years in which the steward had an obligation to report and/or pay fees.

12. Annual Steward Reports may be informed by estimates using the steward's sales forecasts, historical data, or such other information acceptable to the program. National Steward Service representatives can provide guidance with respect to estimates.
13. Payment for prior years' reports will be due within 30 days of the invoice date and shall be filed in accordance with program-specific requirements. Prior years' reports are subject to the Administrative Fees, Penalties and Interest Policy [\[insert link\]](#).

### **(c) Scenario 3: Changes in Obligation**

This scenario applies to stewards whose stewardship obligations are subject to change because of acquisitions, mergers and divestitures.

14. When one steward exits and either:

- (a) one or more existing or new stewards acquire the exiting business; or
- (b) one or more stewards merge with an existing business creating a new steward entity,

onboarding will be managed according to the following principles:

- (i) obligated material that is being supplied must be stewarded; and
- (ii) stewards must notify all impacted stewardship programs regarding acquisitions, mergers and divestitures according to the prescribed timelines in Rules and or Membership Agreements of any changes in their status, such as acquisitions, mergers and divestitures to enable the National Steward Services and Compliance teams to implement appropriate onboarding.