

## 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; and/or
  - (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, 2019, 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;
  - (b) Multi-Material Stewardship Western (MMSW);
  - (c) Multi-Material Stewardship Manitoba (MMSM); and

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



(d) Stewardship Ontario (Blue Box Program) (SO).

4. This policy does not apply to organizations that qualify for a program's Revenue exemption or Tonnage exemption. Stewards who were previously exempt and are now required to report 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 designated materials (the "Obligation Date<sup>2</sup>").
6. Stewards who do not meet deadlines are subject to the Penalty and Interest Policy [[Click here](#)].
7. Stewards must register with each applicable stewardship program 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 delivery of a Membership Agreement (by uploading the executed Membership Agreement on the WeRecycle Portal).
8. **Scenario: Newly Obligated<sup>3</sup>**

This scenario covers stewards who are newly obligated. Given that stewards are required to file their Annual Report in the year prior to the year in which that report is invoiced, newly obligated stewards must file two reports. The 'First Report' will establish the basis for invoicing for the year in which the steward became obligated. The second report will allow the steward to become 'Current' with their reporting status.

a. *Steward's First Report*

- i. New stewards are required to register within 60 days of becoming obligated.

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<sup>2</sup> Ontario Stewards are obligated from the date they were notified of the Stewardship Ontario Rules. As of Jan 1, 2016, all Ontario Stewards are deemed to have been notified as a result of the Stewardship Ontario Rules being posted on Stewardship Ontario's Website, and are obligated to report and pay from the moment they began supplying obligated materials. Ontario Stewards that were notified of the Rules by email or mail prior to 2016 are obligated from the date of that notice. Recycle BC, MMSW and MMSM Stewards are obligated from the time they began supplying obligated material in those provinces.

<sup>3</sup> New Stewards are those who become obligated for the first time in a stewardship program.

- ii. New stewards are required to file their first Annual Steward Report (First Report) within 60 days of registration. The First Report should be based on the number of months of operation for the obligation year and will be used to generate an invoice for the current year.
  - iii. Stewards may need to use estimates such as sales forecasts, historical data, or such other information acceptable to the program to generate the First Report.
- b. *Steward's Current Report*
- i. New stewards are required to File their current Steward Report by May 31, or within 60 days of registration, whichever is later.
  - ii. This current report will generate an invoice for the upcoming year. This report should be representative of a full year of operation. Stewards may extrapolate the data they used in their first report to represent a full 12 months using steward's sales forecasts, historical data, or such other information acceptable to the program to generate the report.

## 9. Scenario: Previously Obligated

This scenario covers stewards who were obligated prior to the current year, but did not register with the stewardship program for one or more prior years. The Penalty and Interest Policy applies to Stewards who have not registered in accordance with the timelines in the applicable program Rules or Membership Agreement(s).

- a. *Steward's Outstanding Reports*
- i. Stewards are required to register within 60 days of becoming obligated.
  - ii. Stewards are required to file all outstanding reports within 60 days of registration for all years in which the steward had an obligation to report and/or pay fees. Steward's Reports may be informed by actuals or estimates using the steward's sales trends, historical data, or such other information acceptable to the program.
  - iii. These outstanding reports will generate invoices for all prior years and the current year.
- b. *Steward's Current Report*
- i. New stewards are required to file their current Steward Report by May 31, or within 60 days of registration, whichever is later.
  - ii. The current report will generate an invoice for the upcoming year.
  - iii. The current report should be representative of a full year of operation. Stewards may extrapolate the data they used in their first report to represent a full 12 months using



steward's sales forecasts, historical data, or such other information acceptable to the program to generate the report.

#### 10. **Scenario: Changes to Business**

Steward obligations may be subject to change because of acquisitions, mergers and divestitures, including 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:

- a. obligated material that is being supplied must be stewarded; and
- b. stewards must notify all impacted stewardship programs regarding acquisitions, mergers and divestitures according to the prescribed timelines in Rules and/or Membership Agreements to enable the National Steward Services and Compliance teams to implement appropriate onboarding.