

BEST PRACTICE REPORTING TIPS

These best practice reporting tips have been aggregated from the most common questions received when stewards are preparing their reports. If you have further questions, please contact Steward Services.

COMMON QUESTIONS		REPORTING TIPS	RELEVANT SECTORS			
			ALL	RETAILERS	BRAND OWNERS	SERVICES
Designated materials						
1.	Can you please explain why I need to report materials that are not collected in the recycling system?	Provincial regulations define the designated materials on which stewards pay fees, not the stewardship programs. All the current Recycling Regulations in BC, Manitoba, Saskatchewan, and Ontario require stewards to pay fees on all materials distributed to consumers including those that are not currently collected for recycling.	X			
2.	Do I report transportation packaging?	<p>Where a steward supplies PPP to the industrial, commercial, or institutional (IC&I) sector and the material is not disposed of in the residential waste stream, this constitutes material which is <u>not</u> designated by the programs. It can include corrugated or boxboard shipping cases, plastic pallet wrap, or any other material used for the delivery of the product to a retail outlet but is disposed of or recycled through the commercial waste stream and is never provided as packaging to the consumer.</p> <p>Stewards must be able to demonstrate with auditable data that the packaging was supplied only to ICI customers and never supplied to residential consumers and was never managed in the residential waste stream. Stewards must retain all supporting documentation regarding any materials excluded from their report as they may be required to substantiate the exclusion of this material by providing auditable data upon request.</p>	X			

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3.	What do I do if I supply the same product to both commercial and residential consumers?	<p>If you supply the same product to residential consumers and commercial customers, the PPP associated with the product supplied to commercial (IC&I) customers should be excluded from your report if the commercial customer never re-supplies the material to a residential consumer and disposes of the PPP through its commercial waste management services.</p> <p>Stewards must report all PPP associated with products supplied to residential consumers. Stewards must be able to demonstrate with auditable data that the PPP excluded from their report was supplied to commercial customers for their consumption and does not enter the residential waste stream.</p> <p>Stewards must retain supporting documentation regarding any exclusions as you may be required to substantiate the exclusion. Please note that PPP supplied to home offices is not a permitted exclusion. Please see section 2.3.1 of the Guidebook for Stewards for more information on exclusions.</p>	X			
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4.	I distribute free promotional material to consumers. Do I need to report that?	If you supply brochures, coupons or promotional materials to your residential consumers please include that printed material in your steward report under <i>Other Printed Materials, Non-CNA/ OCNA Members- Newsprint, or Newsprint</i> (inserts and circulars) dependent on the material composition of the promotional material.	X			
5.	Do I have to report HR documents distributed to my employees?	Printed paper documents such as T4s, Records of Employment and all other HR related documents are designated materials and should be reported under <i>Other Printed Materials</i> .	X			
6.	Am I required to include business cards in my steward report?	Business cards supplied to residential consumers are designated and should be included in your steward report under <i>Other Printed Materials</i> .	X			

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7.	How do I report envelopes?	<p>If your business supplies printed material such as statements, bills, or annual reports in an envelope to your residential customers in BC, SK, MB and/or ON, both the envelope and the printed material need to be included in your steward report and reported under <i>Other Printed Materials</i>.</p> <p>However, blank envelopes sold as a product are a designated material in BC and SK only. If you sell blank envelopes to consumers in those two provinces, please report them under <i>Purchased Posters, Calendars, Greeting Cards and Envelopes</i>.</p>	X			
8.	The boxboard box that holds a board game will not be thrown out for a very long time. Do I have to report it?	<p>There are a few types of packaging, which would include the box used to contain a board game, that are referred to as Durable Packaging. Durable Packaging has a useful life of at least five years, is intended to facilitate longer term storage of the product and remains with the product throughout its useful life. Where only a portion of the packaging is considered integral to the long-term use or storage of the product, this portion may be excluded from your steward report because it is not designated PPP. Stewards must retain all supporting documentation regarding any materials excluded from their report as they may be required to substantiate the exclusion of this material by providing auditable data upon request.</p>		X	X	

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9.	Do I report grouped or secondary packaging?	If you supply products sold in bulk, for example multi-packs of tissue boxes to consumers, please report the multipack packaging around the products. You would also report the individual product packaging such as the boxboard tissue boxes.	X			
10.	Do I need to report the reusable bags that I provide to my customers at the cash register? Does it make a difference if I sell the bags or give them out for free?	<p>The bags you sell to your consumers that are durable and reusable (often sold by retailers to reduce the use of single-use carry-out bags) do not need to be included in your steward report - these types of bags are considered to be a product.</p> <p>Complimentary reusable bags that you supply to residential consumers must be reported in all 4 programs because they are service packaging. Single-use bags you supply to your customers at the cash are considered to be service packaging and do need to be reported in all four programs. There are some differences between the four programs in how to report carry-out bags that are supplied (not sold) to residential consumers as follows:</p> <ul style="list-style-type: none"> • In Ontario, if you supply your consumers with complimentary <u>textile-only</u> bags at point of sale, this material will be reported under <i>Natural and Synthetic Textiles</i>. • In all other provinces, woven or non-woven plastic bags intended for more than one use should be reported under <i>Plastic Laminates – Non-Beverage</i>. 		X		X

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11.	I supply my branded products to quick-service restaurants, where some of my products are consumed on site and not taken home. How do I prepare my report accordingly?	<p>A steward may deduct packaging from products supplied to consumers that are consumed at the steward's on-site premises when the packaging and/or paper products associated with the product is disposed of at the steward's business premises. For example, at quick service food establishments, a portion of customers eat in the restaurant and dispose of their waste at the restaurant.</p> <p>Other customers may have the food delivered to their residence or pick up the food and remove the associated packaging and paper from the restaurant and dispose of it at their residence. The portion of PPP that is disposed of on-site at the steward's business premises may be deducted in the steward's annual report. Stewards must ensure that they do not claim deductions for PPP which is removed by consumers from their premises.</p> <p>For example, if a steward is supplying ketchup packages to a quick service restaurant, the only packages that can be deducted from the total supplied quantities are those that are disposed of onsite at the restaurant. The rest must be reported. A deduction may only be made if it is substantiated through the completion of a Deduction Declaration Form, supported by appropriate validation data (applied to SKU-level information) and the steward describes their methodology for calculating the deduction in the methodology section of their annual report. Please see Section 2.3.2 of the Guidebook for Stewards for more information on deductions.</p>	X			
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12.	I am a quick-service restaurant, where some of my products are consumed on site and not taken home. How do I prepare my report accordingly?	Please see above.				X
13.	Not all my customers take their cash receipt with them and I dispose of them in my store. Do I have to report them?	Provided that you complete the Deduction Declaration Form, you can deduct the portion of receipts that are not taken by your consumers, provided that you have adequate supporting documentation for your deduction. This might include a portion of sales receipts or ATM receipts which are disposed of at your place of business. In order to access the portion of this material to deduct from your report you may rely on systems data, mail service data or studies undertaken by your company or your industry association. Please make sure you retain the data which supports the deduction of this material from your report and make note of it in your methodology. When considering the portion of material to deduct from your steward report (such as sales receipts or ATM receipts), please be sure to include all material taken home by the consumer which includes but is not limited to receipts that you believe will be retained by the consumer for historical reference. All that material will eventually be disposed of in the residential waste stream (even if at a later date) and so it must be included in your report.		X		X

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14.	How do I prepare my report if I distribute confectionary products, and I know that a portion of the packaging for my products is disposed of outside the residential waste stream?	<p>If a steward has research that indicates that a portion of its confectionary products are consumed away from consumers' homes and believes therefore that a portion of the packaging may be managed outside of the residential waste stream, it may claim a deduction for that portion of packaging disposed of away from home.</p> <p>To support a deduction of a portion of wrappers from the steward's annual report, the steward must conduct a valid study which shows:</p> <ul style="list-style-type: none"> • disposal patterns of single serve confectionary products (as distinct from consumption patterns), • ensure the study is a reflection of the steward's consumers, • ensure the study is supported by validation data <p>Once this type of research is conducted and the results are known, the steward may apply the results against their SKU level data. The Steward will complete and submit the Deduction Declaration Form as part of their Annual Steward Report.</p>		X	X	
15.	I sell seasonal items. How do I report that material?	If your product line changes throughout the year because you supply seasonal products, we suggest that you consult your sales data in order to determine the packaging or paper products associated with those seasonal items that are supplied to residential customers. Please include this material in your steward report.	X			

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16.	I am a retailer registered in all 4 programs and we offer a return-to-retail program for plastic carry-out bags. Sometimes other retailers carry out bags are returned to us. A private contractor manages the end of life of these bags. Am I able to deduct this tonnage from my report as it will not end up in the residential waste stream?	MMSM and Stewardship Ontario are the only programs in which stewards may claim a deduction for plastic bags which are returned to retail as part of a return to retail program for plastic bags. A Deduction Declaration Form must be completed and submitted on the WeRecycle Portal by all stewards in Manitoba and Ontario that report a reduced quantity of their total plastic bags supplied due to their return to retail program. Stewards that commingle their plastic bag returns with other plastic such as overwrap must ensure that the deducted quantity for plastic bags does not include other plastic material. As is generally the case, all stewards claiming a deduction for plastic bags may be required by the Program to provide supporting documentation to validate their deduction.		X		
17.	My products are sold with instruction manuals and product warranty information. Do I report that material?	Please include in your steward report all printed paper materials that are supplied with your products to the consumer. This could include instruction manuals, safety, or warranty information. While this material may be retained by the consumer for a period of time, it will eventually be disposed of in the residential waste stream and so this material must be included in your report under <i>Other Printed Materials</i> .	X			

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Obligated party					
18. I manufacture private label products for another company. Do I report this product or does my customer report it?	The obligated steward for private label brands is the brand owner and not the manufacturer.	X			
19. I purchase non-branded packaging from a wholesaler. I am not putting my brand name on it. The packaging manufacturer's name is on the bottom of the bag. Who is obligated to report this?	You would be the obligated steward to report this material. Even though you are purchasing packaging as a product from a manufacturer whose brand is on the packaging, you are then distributing this material to consumers as 'service packaging' containing your product. This makes you the obligated steward for this material.		X	X	
20. I am a distributor, and I would like to elect to become a voluntary steward. Am I eligible?	If your company is resident in Canada, you may be eligible to become a Voluntary Steward for brands for which you are the brand owner or you hold the exclusive license to sell the product. If you meet the <u>voluntary steward criteria</u> , you may be eligible to become a voluntary steward for those brands in the provinces where you are not resident.			X	

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21.	I received a letter from one of my business partners, who is telling me they won't do business with my company anymore if I don't sign up as a voluntary steward. I do not meet the criteria to become a Voluntary Steward. What do I do?	If your business meets the criteria to become a voluntary steward, you have the option to register as a voluntary steward. Unfortunately, if you do not meet the criteria outlined in the Voluntary Steward Policy, you are not eligible to become a voluntary steward. In this case, the obligation would fall on the resident first importer.			X	
22.	Some calendars need to be reported and some don't — how do I report calendars?	For all programs, complimentary calendars distributed to consumers for promotional or informational purposes need to be included in your steward report under <i>Other Printed Paper</i> . In Ontario and Manitoba, calendars which are sold as a product are not designated and should not be reported. However, in BC and SK, calendars sold as a product are designated and need to be included in your steward report under <i>Purchased Posters, Calendars, Greeting Cards and Envelopes</i> .	X			
23.	I ship to a distribution centre and I don't know the final destination of my product. What do I do?	If you ship products to a third party's distribution centre and are uncertain of the final destination of your products, the best approach is to work with your customers to secure data about the 'sold to' parties. If however this information is not available, you may estimate the quantities of PPP supplied to each province (and sold to consumers) by referencing Statistics Canada Population Percentage data as provided in Part Two of the Guidebook.	X			

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24.	Why are stewards required to update the Methodology section on an annual basis?	<p>It is recommended that stewards review and update their methodologies on an annual basis in order to validate their approach to reporting each year and to ensure their data collection processes remain current for their organization.</p> <p>Stewards are also required to update the brands/affiliates section of their reports each year with the most accurate information, which includes brands for which they are the brand owner or the obligated first importer. Changes in either of these areas will affect quantities reported year over year. During the report validation process, variances may be identified in one or more material categories. If the methodology section clarifies the reason for those variances, it makes the report validation process more efficient for staff and stewards.</p>	X			
25.	How do I use the Component Threshold Rule?	<p>If you supply packaging that consists of multiple material categories (e.g., a bottle made of one type of plastic, with a lid made of a second type of plastic) you may be able to simplify your reporting by using the Component Threshold Rule. If the packaging component or ancillary packaging makes up a small percentage (less than 5%) of the total packaging weight, you can report that component under the material category that represents the majority of the package's weight. For practical examples and more information on the Component Threshold Rule, please refer to section 2.4.1 of the Guidebook.</p>	X			

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26.	<p>I'm a CBCRA member in Manitoba, where do I report beverage containers?</p>	<p>If you are a CBCRA member in Manitoba, please report all designated beverage containers (and the associated secondary packaging) supplied to consumers in Manitoba in the CBCRA section of the WeRecycle portal.</p> <p>The tonnage you report in this section is not included in the fee calculation for MMSM materials – it is managed separately by CBCRA. When you report in the CBCRA section, it ensures that your CBCRA materials are covered by the fees you submit monthly to CBCRA and avoids the need for any adjustments.</p> <p>Please remember to report both the tonnage and units for the CBCRA materials which you supply into the residential waste stream. If you supply beverage containers in Manitoba and are not a registered member of CBCRA, please report all non- alcoholic beverage containers to MMSM. Please review CBCRA's program information to determine whether you are required to become a CBCRA member.</p> <p>This information can be found on CBCRA's website: www.cbcr-aacrb.org/.</p>	X			
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27.	How do I use the steward list?	It is important that you only report the materials for which you are the resident brand owner, resident first importer or franchisor. Each year, CSSA publishes a list of registered and voluntary stewards for each program. We recommend that you consult this list prior to preparing your steward report – that way you can be sure that you do not report any material that is the responsibility of another steward. Please note that the data in the list is based on information provided by stewards.		X		X
28.	Can affiliated companies report separately or do all affiliates/ subsidiaries need to file under one steward report?	Affiliated companies are required to file a single report for all PPP supplied to residential consumers in BC, SK, MB and ON. Reporting under one account ensures all supplied PPP is captured and reduces the risk of un stewarded material. Please note that affiliated companies do not qualify for the small business exemptions outlined in Section 1.11 of the Guidebook unless the quantity of PPP supplied by all related corporations, in aggregate, is less than the small business threshold in a particular province.				
29.	Why are some materials designated in some provinces but not in others and how can I simplify my reporting?	The designated materials for each program are determined by the provincial governments. To streamline the reporting process for stewards who report across multiple programs, CSSA developed a standardized WeRecycle Material List. Program Material Lists are also available, and the portal allows stewards to choose their preferred method of reporting (either utilizing one harmonized material list or individual program specific lists) Please note that if you do use the WeRecycle Material List, all the material categories map directly to the program specific material lists.				

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30.	Are the fees for simplified reports (flat fee or low volume reports) representative of all material categories? If I choose to file a simplified report where I pay a flat fee, can I change my reporting option to file a detailed report after the fees are determined?	The flat fee reporting option provides convenience for stewards with the fee amount calculation based on a representative sample of all materials and fee rates. Once a flat fee report has been filed the Terms and Conditions prohibit filers from switching to detailed reports. Please note that flat fee reports are reviewed as part of the normal report verification process but are not eligible for steward-initiated adjustments.	X	X	X	X
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