

General Questions

1.	Can reports be submitted any time before May 31?	Yes, reporting early is encouraged and the We Recycle Portal is available for you to report in January of each year. Please submit your report as soon as you have your data ready.
2.	Are there any packaging laws and requirements in other provinces other than the four being discussed today? What about Quebec?	CSSA supports stewardship programs in BC, SK, MB and ON. Please contact Eco Entreprises Quebec (EEQ) about your potential stewardship obligations in Quebec. Some other provinces are looking at EPR programs for packaging and paper products (PPP) but there are no EPR regulations for PPP in any other provinces at this time.
3.	This report is for BC, Saskatchewan, Manitoba and Ontario only is that correct? It does not include NB, NS, PEI or Alberta?	That is correct. The programs being covered today are the four you have identified.
4.	What is the timing of reporting? Is it based on the 2018 calendar year or fiscal year?	For an existing steward it is best to maintain your historical practice for reporting – whether that is a calendar year or a fiscal year. For new stewards it is best to consult the Onboarding policy and discuss with National Steward Services
5.	Some of our customers are charging us for stewardship fees when we are already paying. Is that not double - dipping?	CSSA doesn't get involved in the business relationships between stewards but there should only be one steward, the company who is the brand owner and/or first importer or the franchisor that is reporting and paying on materials.
6.	What do you mean by new steward? I'm covering for maternity leave so I continue to report as usual?	Yes, you continue to report as in the past for your company. This webinar is designed for either companies reporting for the first time or for individuals with existing stewards who are new to reporting.
7.	What are the potential penalties and how are they calculated? What is your recommendation how to avoid them?	Penalties occur if a steward is late in registering with a program, is late in submitting their report, does not pay an invoice on time, or does not respond to substantiation requests. For more information on penalties, please review our 2019 Penalty and Interest Policy . You can avoid penalties by registering, reporting and paying invoices on time.
8.	Is tomorrow's webinar going to be available online afterwards if we can't attend tomorrow?	Yes, the webinar given on February 27 th for more experienced reporters is available to view by visiting the Information Sessions tab on the CSSA website or visiting here .

Reporting and Using the WeRecycle Portal

9.	How can we get more details on flat fee process?	Flat fees are available for the Recycle BC and MMSW programs only. Please refer to their websites: Recycle BC Flat Fees and MMSW Flat Fees for more information on determining if you are eligible for flat fees for these programs. Alternatively, please contact NSS who will help you determine your eligibility.
10.	If I have to complete reports for multiple years, do I start with the most recent year or the oldest year?	If you are a steward that is reporting for multiple years, please start with the oldest year and continue filing reports up to the current year.
11.	I would like to know I get started as this is a huge undertaking with hundreds of vendors and thousands of SKUs? Should I start with vendors or with sales categories?	<p>We acknowledge that getting started can be challenging but our NSS team is available to help you. We suggest you start by:</p> <ul style="list-style-type: none"> • Preparing a list of your SKUs and the vendors for those SKUs. • The vendors can help by providing information on the packaging materials and their weights. • Once you have compiled your list of SKUs and material weights, multiply the weighted for each material by the total units sold. • For those SKUs you cannot get weight information, you might consider using the ABOM method for reporting which can simplify the process. <p>If you are not a brand owner, please ensure that you consult the steward list to ensure you do not report on any materials for which another steward is responsible. Please also consider if your supplier is resident in the province -- if so do not report on their PPP.</p>
12.	Can you update a report already submitted?	Yes, please contact NSS to assist you with this. Depending on which reporting period you are referring to, you may be able to update your report or you may need to do a steward-initiated adjustment. For more information please consult the Steward Initiated Adjustment Policy .
13.	Where can I access my previous year's report?	You can access a previous year's report by logging into the WeRecycle Portal . Once you have logged in, please click on the Print Report section.

14.	When can deductions be applied?	Deductions can be applied when packaging or paper product is being supplied to consumers but disposed of outside the residential waste stream. In order to have a deduction applied against your report you must complete a Deduction Declaration Form which can be found on the Portal and is also available on the Reporting Resources page of the CSSA site under What's New.
15.	What if the deadline is missed for submitting a steward report?	If a steward fails to file their report by the May 31 st reporting deadline, they may be subject to penalties. Please refer to the 2019 Penalty and Interest Policy for more information.
16.	If we don't have the weights of packaging materials, can we report based on Sales by Province?	No, you must prepare your report using the material weights of all components of the packaging or paper products you distribute to consumers. Fees are calculated based on both the type and weight of materials distributed into the marketplace. If total weights need to be allocated to different programs, provincial sales can be used.
17.	What happens when products are in liquid form (for instance ml) how do we report in kilograms? Is our report based on sales?	Your Annual Steward Report is based on the packaging or paper products you distribute to consumers, not on the product. Your report should include all PPP supplied to consumers.
18.	We are a food service operator and we have locations in all provinces where stewardship is mandated. Is it suggested that we use the National Material list for reporting?	Stewards can choose to use either the provincial lists or the national list however, if you are reporting in all four programs, it may be easier to use the National List and report for all four programs in one report.
19.	I would like to know who I should be getting an accurate SKU list from as the former primary contact is no longer with our company. I was told to reach out to the sales team but they do not have any awareness of this program.	We suggest you consult internally about how to obtain the SKU list for your company. Unfortunately, this is not something CSSA is able to assist with. You may also wish to review the Methodology section of your past reports for some insight on how your former primary contact completed your reports.

<p>20.</p>	<p>What if the packaging of our product is not consistent? Example, the size of the box, and thus the weight, might not always be the same.</p>	<p>Some companies will have a wide variety of packaging and paper product materials of various types, sizes and weights. When filing their report, stewards are required to provide the weights for each packaging material. For stewards with a large number of SKUs it may not be feasible to obtain the packaging weights by material type for each and every SKU. Instead, stewards can prepare an Average Bill of Materials (ABOM) for groups of SKUs with like-packaging. Please refer to Part 2.2 of the Guidebook for Stewards for more information on preparing ABOM groups, or National Steward Services can assist you.</p>
<p>Designated Materials</p>		
<p>21.</p>	<p>What if none of our materials actually go to the consumer? For example, if at the retail store, all the materials are stripped before the consumer takes the product home?</p>	<p>Stewards are obligated to report on the packaging and paper product that is supplied to the residential consumer. If the packaging remains at the retail location and is managed through the commercial waste or recycling stream (for example transportation packaging that might include corrugate cardboard or overwrap) it is not designated and should not be included in your report. However if the packaging is removed upon delivery to the consumer, for example; large appliance delivery, this would be a deduction that would require substantiation and documentation via the Deduction Declaration Form submitted at the same time as your annual report.</p>
<p>22.</p>	<p>Are biodegradable/compostable materials considered PPP and must I include these materials in my report?</p>	<p>Biodegradable and compostable packaging is designated and must be included in your report. If you have any difficulty identifying the material category to report this material please contact NSS who will assist you.</p>
<p>23.</p>	<p>Are sales to hospitals excluded?</p>	<p>Products supplied to hospitals for use by patients staying in the hospital are excluded because the PPP associated with those products will not be taken home and managed in the residential waste stream. However, products that are supplied to patients and taken home (sales at an on-site pharmacy for example) are designated and must be included in your steward report.</p>

24.	Are stewards required to report and pay fees on transport packaging?	Stewards are not required to report or pay fees on transportation packaging which might include corrugate cardboard cases or shrink wrap used to transport product to a retailer but is never provided to the consumer. Any transport packaging that you may include as part of on-line sales would need to be included in your report as it is going directly to the consumer.
25.	What about lids from glass jars? Do we have to include those in our reports?	All lids and closures, if a designated material and supplied to residential consumers, must be included in your report.
26.	Do we report all products we sell to all retailers?	If you are a brand owner, and are resident or have elected to become a voluntary steward in a stewardship program, you are required to report for all packaging and paper that is supplied to residential consumers through all retail outlets. Please do not report the transportation packaging (such as corrugate cases) in which you ship product to the retailer and is managed by the retailer's commercial waste company.
27.	If our products are sold with warranty and product information does that have to be reported as well?	Yes, printed paper materials which might include instruction manuals or warranty information distributed to consumers is designated material and must be included in your report. While a consumer may retain this information for a period of time it will eventually be disposed of in the residential waste stream.
28.	We are a business that supplies garment bags to protect merchandise we sell to our customers. It is not part of the merchandise packaging - therefore are we expected to report on this material?	Garment bags that are provided to consumers and are made of a designated material such as plastic, must be included in your steward report, this is referred to as service packaging provide at point of sale. Garment bags made of a non-designated materials, such as fabric, should not be reported.
29.	If we purchase product from a registered steward and that packaging is then provided to take-out customers at our restaurants, do we still report or would that be double-reporting?	Your organization would be the obligated steward to report the take-out containers at your restaurant because you are supplying the container as service packaging. If for example your restaurant also distributes branded water bottles or pop cans to your consumers and the brand owner is resident in the province where your organization files your annual steward reports you would not be required to report on this PPP.

30.	Does our company logo need to appear on the PPP in order to be included on our report?	No, your logo does not need to appear on the PPP in order to be included as designated material. Many times, service packaging does not have a logo but is the responsibility of the steward who supplies that packaging to the consumer.
31.	Can you please confirm that we need to report on PPP distributed only in the four provinces of: BC, SK, MB and ON?	Yes, those are the four packaging and paper product stewardship programs that CSSA supports. You may have stewardship obligations in the province of Quebec if you sell your products there and you may want to contact EEQ for more information about any reporting requirements for that program.
32.	If napkins are provided at a retail site but will not be taken home to a consumer's residence, should they be reported?	Napkins are not a designated material because they are considered a product and not packaging.
33.	If I am a brand owner based in BC, do I only report on volumes of product sold in BC but not on the volume sold to customers in the other provinces?	If your business only has residency in BC and not in the other three provinces you are only required to report and pay fees on the PPP supplied to consumers in BC. If you supply PPP in any of the other provinces and you have not elected to be a voluntary steward in those provinces, the first importer of your products is the responsible party.
34.	We accept our empty containers back from our customers and then pay a fee to a waste management company for the recycling of this material. How do I get a deduction for this material which is returned to us?	Please include this in the Deduction Declaration form, however you cannot amend any prior reports as this does not meet our list of allowable adjustments for previous reports. Please note that this type of deduction cannot be applied for the Recycle BC or MMSW programs.
35.	We sell parts to auto dealers in provinces with stewardship regulations but we are not a resident steward. Our dealers can sell our products over the counter directly to consumers, but they also use our parts to make repairs to vehicles in their shops. Is the packaging material for the parts that are used by the shop to be included in our report? And if not, how would we be able to determine the portion that we can exclude from our report?	The packaging material associated with the parts used on-site by the auto shop should not be included in your report. Please contact National Steward Services for assistance if you are a voluntary steward who does report their PPP on behalf of the dealers in order to determine the portion of materials that should be excluded from your report. Generally anything used by an auto shop in a repair would be considered an exclusion.

36.	Do "consumers" include business customers (such as a business to business sales relationship, when product packaging is sold to a restaurant as part of an install service?)	Product packaging that is supplied through a business-to-business transaction and will never be provided to a consumer is not designated material and should not be included in your report. Please contact National Steward Services to discuss your specific situation.
37.	If we sell products to large national retailers in BC, SK, MB or ON, do we include this PPP in our report given that some retailers already require us to complete a packaging scorecard.	Yes, regardless of any other packaging reports or scorecards that might be required through a vendor relationship, all the PPP that you provide to a retail partner that will be supplied to consumers in the four provinces must be included in your steward report if you are a resident/voluntary steward in that province.
38.	We are in the Cannabis industry selling recreational and medical cannabis to consumers in BC. We provide a glass jar to first time customers. The glass jar is for the customer to use while consuming the cannabis product. The glass jar is not to be disposed of. Therefore, am I correct that the glass jar should not be reported and is not subject to stewardship fees?	If the glass jar contains your product when sold to the consumer it is packaging and therefore a designated material and should be included in your report. Even though the jar may be used to consume cannabis and retained by the consumer for a period of time, it will eventually be disposed of in the residential waste stream so is subject to stewardship fees. If the jar is supplied to the consumer empty as a product, then it should not be included in your report as it is a product and not packaging.
Obligated Stewards and Voluntary Stewards		
39.	Our business had a fire in June 2017. We are just getting back in business and so have nothing to report for 2018. Do I still have to submit a report and put zero indicating nothing to report in 2018?	If your organization didn't supply any PPP during the 2018 calendar year, please confirm your status as "not obligated" in 2018 in the reporting portal.
40.	Please confirm that brands that have a store location or are the importer of record in the province we are reporting in are excluded from a business' responsibility?	The obligation for reporting falls on the brand owner who has residency in the province. Having a store location in the province would constitute residency. If the brand owner does not have residency the obligation falls on the first importer of that brand assuming the brand owner has not elected to become a voluntary steward. You can also refer to Part 1.10 of the Guidebook for Stewards called: How do I Determine if my Business or Organization is Responsible as the Brand Owner, Franchisor or First Importer? If you have more specific questions on determining the products for which you are required to report, please contact National Steward Services.

41.	Where do I find voluntary steward list?	The voluntary steward list can be found on the CSSA website under Reporting Resources . Click on National List and Change Log where you can download the steward list as an Excel spreadsheet. Voluntary stewards are indicated with the letter V under the program I which they have elected to be a voluntary steward.
42.	We have signed up as a voluntary steward this year but we have provided materials in previous years in obligated provinces. Do we have to report for past years as well?	No, you are only required to report for the year(s) when you are registered as a voluntary steward. You can review the 2019 Rules & Policies is available on the Reporting Resources page of the CSSA site under What's New .
43.	If company A sells branded product to an Ontario retailer and that retailer then ships some of the product to Manitoba and sells it to consumers in Manitoba, does Company "A" report all of that product for Ontario?	If your company "A" does not have residency in Manitoba, and has not elected to become a voluntary steward in Manitoba, the first importer in Manitoba would be responsible for reporting the volume of your product that is sold to MB consumers. If you have residency in Manitoba you have responsibility to report all of the PPP supplied to the Ontario-based retailer regardless of whether it is sold in ON or MB. For accurate reporting purposes, you should try to determine with the retailer, the portion of material that is sold to Ontario consumers and the portion that is sold to consumers in Manitoba. If you are unable to determine the quantities of product supplied to residential consumers in two different provinces, you may use the Statistics Canada Population Percentages as provided by Statistics Canada and available here to estimate the distribution of your products in Ontario and Manitoba. Another method would be to you can assign a percent of sales by province based on store count.
44.	What is the difference between a resident and a voluntary steward?	A resident steward has a permanent establishment in a province with stewardship obligations. A permanent establishment (whether owned, rented or leased) could refer to any of the following: an office, workshop, factory, warehouse, machinery or any type of fixed place of business such as a home office. You can find more information on how residency is determined in Part 1.7 of the Guidebook for Stewards . A voluntary steward is a non-resident brand owner who supplies PPP into a regulated province (BC, SK, MB, ON) and has elected to assume responsibility for reporting and paying stewardship fees for their designated PPP materials.

45.	Do voluntary stewards report PPP?	Yes, voluntary stewards report and pay fees on the PPP for all brands that it owns or for which it holds the exclusive licensing agreement, and that it supplies to consumers in the province in which they have elected to become a voluntary steward.
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