



VERIFICATION PROCEDURES FOR SINGLE-USE PRODUCTS, PACKAGING AND PAPER PRODUCTS (PPP)



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ARTICLE 1 DEFINITIONS

1.1 In this policy, the following terms shall have the following meanings:

- (a) "Advanced Chemical Recycling" has the same meaning as in the Regulation;
- (b) "Authority" means the Alberta Recycling Management Authority;
- (c) "CCS" means Common Collection System, as defined in the Regulation;
- (d) "Community" has the same meaning as in the Regulation;
- (e) "Designated Material" means single-use products, packaging, packaging-like products and paper products as designated materials for the purposes of sections 1 to 11 and Part 1 of the Regulation pursuant to section 13 of the Regulation;
- (f) "Disposed" means taken to a landfill that meets the definition in section 1(z) of the *Waste Control Regulation*, AR 192/96;
- (g) "Downcycled" means downcycling as defined in the Regulation;
- (h) "Inspections" has the same meaning as in Section 12.1 of the PPP Bylaws;
- (i) "PPP Bylaws" means the Extended Producer Responsibility Single-use Products, Packaging and Paper Products Bylaws for the Authority;
- (j) "PPP Collection Service Standard" means the standard for the collection of single-use products, packaging, and paper products as amended by the Authority from time-to-time in support of the collection requirements in Sections 16, 17 and 18 of the Regulation;
- (k) "PRO" means a producer responsibility organization as defined in the Regulation;
- (l) "Processing Facility" means a facility or person that receives Designated Materials for Recycling, Downcycling, Treatment or Disposal, or that is an

exporter of Designated Materials to a jurisdiction outside Alberta for Recycling, Downcycling, Treatment or Disposal;

- (m) "Producer" means a person determined to be the producer of a Designated Material under section 14 of the Regulation for the purposes of Part 1 of the Regulation, and excluding persons listed under section 15 of the Regulation;
- (n) "Recycle" and "Recycled" mean reclaiming materials to replace raw materials in the production of products and packaging;
- (o) "Registered" means with respect to a Producer, PRO, Processing Facility or a Community, any of the foregoing that is registered with the Authority;
- (p) "Regulation" means the *Extended Producer Responsibility Regulation*, AR 194/2022, as amended or replaced from time to time;
- (q) "Secondary Processor" means a facility or person that receives materials derived from Designated Materials collected in Alberta for the purpose of Recycling, Downcycling, or Treatment;
- (r) "Supply" has the same meaning as in the Regulation;
- (s) "Treatment" and "Treated" means treat as defined in the *Environmental Protection and Enhancement Act*, RSA 2000, c E-12;
- (t) "Verifier" means an accredited third party, either an employee of the business or a hired third-party, who has one of the following designations in good standing and is not the person who prepared the report that is being verified:
 - (i) Chartered Professional Accountant (CPA) in Canada;
 - (ii) Certified Public Accountant (CPA) in the United States of America;
 - (iii) Association of Chartered Certified Accounts (ACCA) Qualification ;
 - (iv) Certified Internal Qualified Person (CIA);

- (v) Certified Professional Bookkeeper (CPB) in Canada ;
 - (vi) Registered Professional Accountant (RPA) in Canada;
 - (vii) A professional engineer as licensed by the Association of Professional Engineers and Geoscientists of Alberta (APEGA);
 - (u) "Verify" and "Verification" mean the assessment by a Verifier of the methods by which data or evidence in support of a compliance claim has been collected and used with confirmation of the accuracy of such data or evidence and the methods by which such data or evidence has been used (e.g. mathematically manipulated) to establish a Producer's claim of compliance.
- 1.2 A defined term may be used in the singular, plural, past tense or future tense, regardless of how it is defined herein

ARTICLE 2 REQUIREMENT TO VERIFY

2.1 Requirement to verify

- (a) Producers are required to implement practices and procedures to comply with the collection and material management requirements and to undertake Verification of compliance in accordance with these procedures. Any data or evidence produced in support of a compliance claim or submitted in an annual report will be Verified by a Verifier. The report prepared by a Verifier shall include an opinion on the accuracy of the reported data and the compliance claim.
- (b) In reaching an opinion, the Verifier is expected to:
 - (i) Assess and document the reasonableness of the Producer's methodology, or the PRO's methodology where a Producer has retained a PRO, to develop the data that is required to be submitted to the Authority; and

- (ii) Obtain and review supporting evidence, as required.
- (c) Where a Producer has retained the services of a PRO, the PRO can arrange for an independent Verifier to undertake the Verification on the Producer's behalf.
- (d) Where that PRO has more than one subscribing Producer, a single verification report may be submitted to the Authority on behalf of all subscribing Producers where the Verifier has Verified each Producer's report in Section 2.1(b).

2.2 **Review of Verification by Authority**

- (a) In reviewing a Verification, the Authority may:
 - (i) Accept the Verification in lieu of the underlying evidence and records;
 - (ii) Inspect any of the underlying evidence and records to confirm the Verification, on twenty-four (24) hours' notice per the Inspection Procedures established by the Authority, as amended from time-to-time;
 - (iii) Reject the Verification, in whole or in part, and require the Producer or Verifier to re-do the Verification if, in the Authority's sole opinion acting reasonably, the Verification fails to sufficiently provide the information required pursuant to Section 13.2 of the PPP Bylaws.

ARTICLE 3 PROCEDURES FOR CALCULATING AND VERIFYING SUPPLY

3.1 **Maintenance of supply records and reporting**

- (a) A Producer shall maintain records in respect of the weight of Designated Materials which they Supply to consumers in Alberta for residential use and shall be able to make those records available for Inspection by the Authority as per the PPP Bylaws;

- (b) Each Producer shall report to the Authority the weight of each of the following categories of Designated Materials Supplied to consumers in Alberta for residential use in the previous calendar year:
 - (i) Glass;
 - (ii) Flexible plastics;
 - (iii) Rigid plastics;
 - (iv) Metal;
 - (v) Paper .

The weight of each Designated Material Supplied to consumers in Alberta for residential use is calculated by the product of the number of units of a Designated Material Supplied into Alberta determined as per Section 3.2 and the unit weight as specified in Section 3.3.

3.2 **Procedure for determining supply units**

- (a) Producers should select the methodology that provides the most accurate result for determining the number of units of Designated Material Supplied into Alberta:
 - (i) the actual number of Designated Material units; or
 - (ii) the number of Designated Material units calculated using the formula set "calculated method" out in Section 3.2(b) to determine the Alberta portion of the Designated Material units supplied into Canada.
- (b) The estimated number of units of a Designated Material Supplied to consumers in Alberta for residential use can be determined by using the formula:

$$(P1/P2) \times \text{Canada National Sales}$$

"P1" is the population of Alberta as reported by Statistics Canada in the most recent official census.

"P2" is the total population of provinces and territories in Canada in which the producer sells the designated material as reported by Statistics Canada in the most recent official census.

"Canada National Sales" is the total units of designated material that a producer sold in Canada in the previous calendar year.

Regardless of methodology, a Producer must provide complete and accurate supply data and make this data and related records available to the Authority for the purpose of determining compliance.

3.3 **Procedure for determining weight of Designated Material**

- (a) Producers shall provide the actual weight of the Producer's Designated Material Supplied to consumers in Alberta for residential use rounded to the nearest 0.1 gram for each unit.
- (b) Where a Designated Material is made up of two or more different material types and certain components of the Designated Material constitute a small proportion of the unit, Producers should apply the component threshold rule set out in Appendix A to determine in which Designated Material the unit should be reported.

3.4 **Adjusting the annual weight of Designated Material by ineligible points of deposition**

- (a) As per Section 11.5(b) of the PPP Bylaws, the weight of the Designated Material reported by a Producer will not include Designated Material that is:
 - (i) deposited into a receptacle at a location that is:
 - (A) not a residential premise (e.g., materials supplied to a business), and

- (B) where the product related to the blue box material was supplied and used or consumed (e.g., in-store, food court); and
 - (ii) collected from an eligible source at the time a related product was installed or delivered (e.g., appliances that are installed and the packaging collected and managed by the installer).
- (b) Producers shall provide a list of sources utilized as the basis under Section 3.4(a) for deductions in quantities of Designated Materials Supplied, have the list Verified and provide the list for Inspection by the Authority on demand.

3.5 **Procedure for verifying Designated Material supply data**

- (a) Producers shall provide complete and accurate supply data and make this data and related records available to the Authority for the purpose of determining compliance.

To Verify the Supply of Designated Material, a Producer shall require its Verifier to:

- (b) Document responses for the following questions:
 - (i) What is the Producer's marketing process, including how Designated Materials are Supplied in Alberta (e.g., ecommerce, retail sales, etc.)?
 - (ii) How Designated Materials Supplied in Alberta are tracked separately from Designated Materials supplied in other provinces?
 - (iii) What is the Producer's methodology for determining how the Designated Materials were Supplied in Alberta (refer to the definition of "Supply" in the definition section)?
 - (iv) What is the Producer's step-by-step process for preparing the Designated Material supply report, including what systems or applications are used to track Designated Material Supply and what

reports are used (ensure that all details required to understand how the designated material supply report is prepared, are documented)?

(v) What is the Producer's methodology for determining the weight of the Designated Materials Supplied in Alberta?

(c) Verify the accuracy of the Designated Material units reported:

(i) Verify that the actual number of units used, agrees to the Producer's sales records; or,

(ii) If calculated number of units is used:

(A) Verify that the Alberta population to the most recent Statistics Canada official census;

(B) Verify that the population of each province and territory in Canada in which the Producer sells Designated Materials to the most recent Statistics Canada official census; and

(C) Recalculate the number of Alberta units supplied using the formula in Section 3.2(b).

(d) Verify the accuracy of weights of designated material reported:

(i) Verify the weights of designated material reported by selecting samples of Designated Materials and packaging using the sampling methodology below and measuring their weights.

Table 1: Sampling Methodology

Sample sizes obtained through this sampling methodology are based on four variables: population size (e.g. number of packaging units), confidence level, expected deviation rate, and tolerable deviation rate. Suggested variables are defined below:

- Confidence Level = 95%
- Expected Deviation Rate = 0%
- Tolerable Deviation Rate = 5%

Based on the below populations, this leads to the stated sample sizes:

Population	Sample size required	Deviations
500+	60	0
250	50	0
100	40	0
50	30	0
10	10	0

- (e) Verify any manual adjustments made to reported supply data are reasonable. For example, if adjustments made to account for Designated Materials Supplied into Alberta that were subsequently shipped out of Alberta are reasonably reflected in the calculation of supply.
- (f) Assess and document the reasonableness of the Producer's methodology for determining the Supply of Designated material and for the adjustments in Section 3.4(a); and
- (g) Obtain and review supporting evidence and data as required to Verify the Producer's reports to the Authority and the questions in this Section 3.5.

ARTICLE 4 VERIFICATION PROCEDURES COLLECTION

4.1 Verification of Producer participation in a CCS

- (a) A Producer shall verify that it is participating in a CCS by:
 - (i) providing evidence that it is operating a CCS as per Section 4.2(a);
 - (ii) providing evidence that it has entered into an agreement with a person that is operating a CCS; or

- (iii) providing evidence that it has entered an agreement with a Registered PRO that has an agreement with a person that is operating a CCS.
- (b) A Registered PRO may provide the Authority with Verification under Section 4.1(a) on behalf of any Producer with which it has an agreement to provide collection services.

4.2 **Verification of CCS established**

- (a) Any individual or entity operating a CCS shall provide to the Authority:
 - (i) Evidence of commercial agreements to service Registered Communities in accordance with Section 16 of the Regulation, Section 13.2 (a), Section 13.2 (e) of the PPP Bylaws and the PPP Collection Service Standard. Evidence shall be in the form of the cover page, the applicable pages that identify the Registered Community(ies) serviced and the form of collection service provided to the Registered Community(ies) and the signature page of each executed agreement provided as evidence in support of this Section;
 - (ii) Written descriptions of the methods of collection that comply with the PPP Collection Service Standard and how collected material will be processed to meet the material management requirements in Section 19 of the Regulation as per Sections 13.2(b), (c) and (d) of the PPP Bylaws respectively; and
 - (iii) Verification that promotion and education materials required under Section 14.2 of the PPP Bylaws have been produced, contain the requisite information required by Section 14.2 and have been made available to the public as per Section 14.4 of the PPP Bylaws.

4.3 **Verification of alternative collection system**

- (a) Where the Authority has authorized a Producer to operate an alternative collection system, the Producer shall maintain evidence that the alternative

collection system achieves collection performance standards in accordance with the accessibility and promotion and education requirements specified in the Authority's authorization of the alternative collection system pursuant to Section 8.1 of the PPP Bylaws.

- (i) Verification of any data substantiating that the alternative collection system will meet or exceed the material management requirements as per Section 8.1(c) of the PPP Bylaws.

APPENDIX A - COMPONENT THRESHOLD RULE

For the purpose of the component threshold rule, the following definitions apply:

- A component is an integrated part of the packaging, single-use product, or paper product, and is attached to the package when Supplied to the consumer.
 - (i) Examples of components include the label on a water bottle, the steel lid on a glass bottle, staples holding together a calendar, tape holding together a cardboard box or the plastic window in an envelope.
- An ancillary component is defined as packaging, single-use product, or paper product items that help the consumer use the product and are attached to the packaging or product when Supplied to the consumer.
 - (i) Examples of ancillary components include a mascara brush forming part of a container closure, a toy on the top of candy packaging acting as part of the closure, devices for measuring that form part of a detergent container cap, or the pouring spout on a juice or milk carton.

The component threshold rule only applies to components and ancillary components as defined above. The component threshold rule cannot be applied to products in which several items are packaged together using different packaging materials. For example, the plastic film around a pack of juice boxes or water bottles or samples provided in a magazine must be reported separately.

The component threshold rule is applied as follows:

- If a component or an ancillary component weighs less than 5% of the overall weight of all product or packaging components combined, then the producer shall report the weight of the component or the ancillary component under the material category that represents the majority of the product or packaging weight.

- If a component or an ancillary component weighs more than 5% and remains attached to the product or packaging when the consumer discards the product or packaging, the producer shall report the packaging component or ancillary component under the material category that represents the majority of the product or packaging weight.
- If a component or an ancillary component weighs more than 5% and will not remain connected to the product or packaging when the consumer disposes of the product or packaging, the producer shall report the packaging component or ancillary component under the specific material category associated with the component or ancillary component.