

Purpose

This report provides a sample Verification Report for battery and ITT/AV supply data. This sample report is for reference only.

Background

Under the [Batteries](#) and [Electrical and Electronic Equipment \(EEE\)](#) Regulations, battery and information technology, telecommunication, and audio-visual (ITT/AV) equipment producers are required to report supply data each year in order to establish their management requirement for the following year. Beginning in 2022, **all registered battery and ITT/AV producers are expected to verify their supply data** by submitting a Verification Report to RPRA using the steps outlined in the [Registry Procedure - Batteries and ITT/AV Supply Data Verification](#). The supply data is expected to be verified by a Verifier as defined in the Registry Procedure.

The Verification Report must include the following:

- 1) The qualifications of the Verifier,
- 2) The reported weight of batteries and ITT/AV, and management reduction, and
- 3) The results of applying the specific verification steps to validate the reported units and weight.

There is no prescribed format for the Verification Report. The Verifier can adjust the headings and add additional information as needed. RPRA will review each Verification Report individually to determine its adequacy.

How to Submit the Report

The Verification Report must be uploaded after a producer completes supply data reporting. The Verification Reports are accepted in PDF format.

Templates

Template for Verifier who is an external practitioner

Battery and ITT/AV producers who engage an external practitioner to complete their verification will meet the reporting requirement if the external practitioner provides a report in accordance with CSRS 4400, Agreed-upon procedures engagements.

RPRA will not issue a report template for an external practitioner, as the practitioner will follow CPA professional standards and the firm's practice.

Template for Verifier who is an internal employee

Battery and ITT/AV producers who decide to have an internal Verifier complete this verification can follow the sample template in [Appendix A](#).

Template for post-consumer recycled content

Battery and ITT/AV producers that claim post-consumer recycled content are expected to have a qualified third-party verification performed by an independent product-certification organization. A sample certification can be found in [Appendix B](#).

Have a question?

If a producer or Verifier has questions about the Verification Report, contact the Compliance and Registry Team at registry@rpra.ca or call **1-833-600-0530** for support.

Appendix A – Sample report for internal Verifier

Date
Address

Dear RPRA,

As a [describe the verifier's qualifications], I am a Qualified Person as defined in the RPRA's [Registry Procedure -Batteries and ITT/AV Supply Data Verification \(the "Registry Procedure"\)](#). I have performed the following procedures using RPRA's [Registry Procedure -Batteries and ITT/AV Supply Data Verification](#) to assist [name of producer – referred to as Company X in rest of template] in the preparation of the Battery and ITT/AV supply reporting to meet the verification requirement.

The following procedures were completed with respect to the total weight of [complete the below for each of ITT/AV, Primary Batteries, and Rechargeable Batteries]:

- [weight] kgs of [ITT/AV, Primary Batteries, or Rechargeable Batteries] Company X supplied in [Year]
- [weight] kgs of post-consumer content (see Appendix B for a certificate of environmental claim validation summary)
- [weight] kgs of warranty management reduction
- [weight] kgs of right of repair management reduction

Registry Procedure: before Management Reduction

1. Document responses for the following questions:
 - What is the producer's marketing process, including how products are supplied in Ontario (e.g., ecommerce, retail sales, etc.)?
 - How are products supplied in Ontario tracked separately from products supplied in other provinces?
 - How is a SKU (Stock Keeping Unit) set up in the producer's ERP/database/system, and what product specifications are included (e.g., product weight, product description, brand name, etc.)?
 - What are the producer's obligations based on the definition of a producer? (Refer to the corresponding Regulation.)
 - What are the brand names of products for which the producer has collection and resource recovery obligations?
 - What is the producer's methodology for determining how the products were supplied in Ontario (refer to the definition of "supply" in definition section)?
 - What is the producer's step-by-step process for preparing the product supply report, including what systems or applications are used to track product supply and what reports are used? (Ensure that all details required to understand how the product supply report is prepared are documented.)
 - What is the producer's methodology for determining the weight of the products supplied in Ontario?
 - How does the producer determine which products are included in the product supply report and which ones, if any, are excluded, based on the definitions in the Batteries and EEE Regulations?

Findings [Findings must be adapted to the particular facts of your company. Also, sample findings below refer only to ITT/AV. If you are reporting on Rechargeable or Primary Batteries, you must also include findings for those materials.]

Example: Per discussion with **[identify name and position of employee you inquired of]:**

Company X is an ITT/AV producer, as company X is the producer for **[identify brand names of products your company is a producer for].**

[Sample description of marketing process, supply and tracking process, and SKU set up: Company X designs, manufactures, and sells laptops all over North America, with one distribution center located in Ontario. The laptops are sold online and in-retailer stores. SKU is set up for every laptop model with the product weight and dimensions. All sales in Ontario, including online sales, are tracked in SAP, and Ontario sales are identified by province code ("ON").

[Sample description of methodology for determining supply, process for preparing supply report, determination of weight: Every month, a sales report is generated to summarize all ITT/AV sold in the province of Ontario. The monthly total obligated weight is then calculated by multiplying the total units supplied with each product's actual weight. The annual total is the sum of the monthly total.]

[Sample description of exclusions: The methodology to determine whether a product is obligated is by reviewing the EEE regulation and RPRA's compliance bulletin. We use the actual weight methodology and the actual weight sold in Ontario to determine the total ITT/AV supplied.]

<p>2. Select a sample of obligated SKUs in accordance with Appendix A of the Batteries and ITT/AV Supply Data Verification Procedure and perform the following for each:</p> <ul style="list-style-type: none"> • If actual weight is used, agree it to the manufacturer’s specifications. • If calculated weight is used, compare the calculation to the WCFs in Appendix C and Appendix D of the Batteries and ITT/AV Supply Data Verification Procedure to determine if the products were reported in the correct categories and if the WCFs were applied correctly. 	<p>Example 1: Company X has over 500 SKUs, therefore 60 SKUs were selected from a report obtained from SAP. Actual weight is used, and each was agreed to the manufacturer’s specification.</p> <p>OR</p> <p>Example 2: Company X has over 500 SKUs, therefore 60 SKUs were selected from a report obtained from SAP. Calculated weight is used and the calculation and category for each was agreed to the WCFs in Appendix C and Appendix D of the Registry Procedure.</p>
<p>3. Validate the accuracy of the product units reported.</p> <ul style="list-style-type: none"> • If actual number of units is used, agree it to the producer’s sales records to validate the total units reported. • If calculated number of units is used: <ul style="list-style-type: none"> • Agree the Ontario population to the most recent Statistics Canada official census, • Agree the population of each province and territory in Canada in which the producer sells batteries and/or ITT/AV to the most recent Statistics Canada official census, and • Recalculate the number of Ontario units supplied based on Appendix E of the Supply Data Verification Procedure. 	<p>Example 1: Actual number of units is used, and the reported number of laptops sold in Ontario was agreed to the sales records for the [year]. [If actual number of units varies from what was reported, identify the variance with the phrase “Exception noted” and describe the variance, for example: “A variance of 500 units under-reported.”]</p> <p>OR</p> <p>Example 2: Calculated number of units is used, and the following was performed:</p> <ul style="list-style-type: none"> • Ontario population used in the calculation was agreed to the [DATE] Statistics Canada official census, • The population of [PROVICES AND TERRITORIES] used in the calculation [WAS/WERE] agreed to the reported number of laptops sold in Ontario was agreed to f[DATE] Statistics Canada official census, and • [If calculated number of units varies from what was reported, identify the variance with the phrase “Exception noted” and describe the variance, for example: “A variance of 500 units under-reported.”]

<p>4. Select a sample of non-obligated SKUs in accordance with Appendix A of the Batteries and ITT/AV Supply Data Verification Procedure. For each sample selected, verify that they do not meet the definition of “battery” or “ITT/AV,” as applicable, based on the SKU selected.</p>	<p>Example: Company X has over 500 non-obligated SKUs, therefore 60 non-obligated SKUs were selected from a report obtained from SAP. Each non-obligated SKU selected did not meet the definition of “battery” or “ITT/AV”, as applicable.</p>
<p>5. Confirm the accuracy and completeness of the reporting of obligated products supplied to the Ontario market by sampling one month’s data and comparing the raw sales report with the obligated product supply report. Select samples in accordance with Appendix A of the Batteries and ITT/AV Supply Data Verification Procedure and scrutinize the variances and validate if they are reasonable.</p>	<p>Example: The month of May [YEAR] was selected and the raw sales report was compared to the obligated product supply report. After comparing the raw sales report in May with the invoices company X claimed contained obligated product, I found 20,000 invoices company X claimed with no obligated product. I selected 60 out of the 20,000 invoices and found none of them are ITT/AV.</p>
<p>6. Select a sample in accordance with Appendix A of the Batteries and ITT/AV Supply Data Verification Procedure of manual adjustments made to the product supply report and assess if they are reasonable. For example:</p> <ul style="list-style-type: none"> • Products supplied into Ontario and subsequently shipped out of Ontario will result in an adjustment to the supply report. 	<p>Example: Company X made manual adjustments to 600 invoices listed in the product supply report, therefore 60 of the 600 invoices were selected. The adjustments were to remove laptops from retailer A invoices because they were initially sold to retailer A located in Toronto and later shipped to retailer B in Quebec.</p>
<p>Registry Procedure: for Management Reduction [ITT/AV only]</p>	<p>Findings [Findings must be adapted to the particular facts of your company – ITT/AV only]</p>
<p>Verification steps to validate the <u>manufacturer’s warranty</u>:</p> <p>The Verifier is expected to do the following:</p> <ul style="list-style-type: none"> • Obtain and read the producer’s corporate warranty policy. 	<p>Example: I obtained and read Company X’s corporate warranty policy. Company X provided an extended warranty for limited models. The warranty management reduction was calculated based on the three laptop models. (Model A, Model B, and Model C). The corporate warranty policy is three years.</p>

<ul style="list-style-type: none"> • Select a sample of warranty claims in accordance with Appendix A of the Batteries and ITT/AV Supply Data Verification Procedure and agree the warranty period to the producer’s warranty policy (eligible warranty periods start one year from the date of purchase). • Recalculate the producer’s total warranty reduction by taking the weight of the material for which the warranty was provided and applying a 5% reduction for each full calendar year under warranty after one year from the date of purchase. • Select a sample of warranty claims in accordance with Appendix A of the Batteries and ITT/AV Supply Data Verification Procedure and ensure customers did not incur any additional charges by tracing to the replacement orders 	<p>There were 300 warranty claims against Model A, B, and C in the year [YEAR], therefore 50 warranties claims were selected. The selected claims were within the warranty period.</p> <p>Company X’s total warranty reduction was recalculated by taking the weight of models A, B and C supplied in Ontario for [YEAR and multiplying by 10% (1 year warranty is not eligible for a reduction, therefore 5% each year for two years).</p> <p>The replacement orders for the selected claims were obtained and the customers did not incur any additional charges.</p>
<p>Verification steps to validate the <u>right to repair</u>:</p> <p>The Verifier is expected to do the following:</p> <ul style="list-style-type: none"> • Validate if the producer provides information to the consumer at no charge regarding how to repair the product (e.g. online repair manual or free repair hard copy manual). • Select a sample of repair orders in accordance with Appendix A of the Batteries and ITT/AV Supply Data Verification Procedure and document the following for each: <ul style="list-style-type: none"> • Whether the customer was charged for tools or parts; • Whether the information, tools, and parts are still available to the customer at the time the producer is reporting the supply data; • Whether the producer only applied a 10% reduction to the product category that offered a repair option. For any product type that does not have a repair order, confirm with management any policy or documentation to support the provision of repair 	<p>Example: Per discussion with [identify name and position of employee you inquired of]:</p> <ul style="list-style-type: none"> • Company X provides customers the right to repair for specific models (Models D and E). The right to repair management reduction was calculated based on D and E's laptop models. Obtained a copy of the online repair manuals and validated they are free for all customers. • There were 300 repair claims again Model D and E in [YEAR], therefore 50 repair claims were selected. For each selected repair claim: <ul style="list-style-type: none"> ○ the customer did not incur any additional charges for parts or tools. ○ The repair manuals, tools and parts are still available to all customers at as of the date of this report. ○ Only applied a 10% reduction to the product category that offered a repair option was applied. There was at least one repair order for both Models D and E. • Company X’s right to repair management reduction was recalculated by taking the total weight of models D, and E supplied in Ontario for [YEAR] and multiplied by 10%.

<p>tool/parts/information to the customer for free repair; and</p> <ul style="list-style-type: none"> Recalculate the producer's total right to repair reduction by taking the weight of the product that provided a repair option and multiplying it by 10%. 	
<p>Verification step to validate the maximum management reduction for ITT/AV:</p> <ul style="list-style-type: none"> Verify the total management reduction claimed by the ITT/AV producer, including post-consumer content, warranty, and right to repair. Validate that this total is less than 50% of the total supply weight. 	<p>Example: The total management reduction claimed by Company X, including post-consumer content, warranty, and right to repair, was recomputed and is less than 50% of the total supply weight reported for the calendar year [YEAR].</p>

Print Name

Signature

Title

Contact info

Appendix B – Sample template for post-consumer recycled content

Name and contact information of the independent product certification organization

Environmental Claim Validation Summary

Company X

Report Number [if applicable]

XXXX- XXXXX

Validation Period:

January 1 – December 31, 2020

Project Number [if applicable]

XXXX-XXXXX

Claim:

Product XXXX made by company X contains a minimum of 5% post consumer recycled content.

Method:

RPRA's [Registry Procedure-Batteries and ITT/AV Supply Data Verification](#)