



Sample Report

Hazardous and Special Products Supply Data Verification

Reporting to begin in 2023

Purpose

This report provides a sample Verification Report for Hazardous and Special Products (“HSP”) supply data. This sample report is for reference only.

Background

Under the [HSP Regulation](#), producers of categories A (oil filters, non-refillable pressurized containers) and B (oil containers, antifreeze, solvents, paints and coatings, pesticides, refillable pressurized containers) are required to report and verify supply data. The supply data reported by category A producers is also used to establish their management requirement for the following year. Beginning in 2023, **all registered category A and B producers are expected to verify their supply data** by submitting a Verification Report to RPRA using the steps outlined in the [Registry Procedure – Hazardous and Special Products 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 category A and B HSP materials, 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 and is accepted in PDF format.

Templates

Template for Verifier who is an external practitioner

HSP 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

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

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 RPRA's [Registry Procedure – Hazardous and Special Products Supply Data Verification \(the "Registry Procedure"\)](#). I have performed the following procedures using RPRA's Registry Procedure to assist [name of producer – referred to as Company X in rest of template] in the preparation of the HSP supply reporting to meet the verification requirement.

The following procedure was completed with respect to the total weight of [complete the below for each applicable type of HSP material within each applicable category of HSP]:

Category A:

- [weight] kgs of [Oil filters] Company X supplied in [Year]
- [weight] kgs of [Non-refillable pressurized containers] Company X supplied in [Year]

Category B:

- [weight] kgs of [Oil containers] Company X supplied in [Year]
- [weight] kgs of [Antifreeze] Company X supplied in [Year]
- [weight] kgs of [Solvents] Company X supplied in [Year]
- [weight] kgs of [Paints and coatings] Company X supplied in [Year]
- [weight] kgs of [Pesticides] Company X supplied in [Year]
- [weight] kgs of [Refillable pressurized containers] Company X supplied in [Year]

Registry Procedure:

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 HSP Regulation)?
- What are the brand names of products for which the producer has collection and management obligations for?
- What is the producer's methodology for determining how the products were supplied in Ontario (refer to the definition of "supply" in the 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 HSP Regulation?

HSP producers that supply antifreeze, solvents, paints and coatings, or pesticides in Ontario must include the product's primary packaging, except for primary packaging that has a capacity of greater than 30 litres or 30 kgs, and in that case, the weight of the product is also exempt.

Findings [Findings must be adapted to the particular facts of your company. Also, sample findings below refer only to one of the HSP materials (i.e., paints). If you are reporting on other HSP materials, 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 HSP 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 paints all over North America, with one distribution center located in Ontario. The paints are sold online and in-retailer stores. SKU is set up for every paint with the product weight and compacity. 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 paints 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 was by reviewing the HSP Regulation and RPRA's compliance bulletin. We use the actual weight methodology and the actual weight sold in Ontario to determine the total paints supplied.]

[Sample description of how the weight of the product's primary packaging was included: The size of the paint cans ranges from 20 ml to 10 liters. The paint cans are made from tin-coated steel. The weight of the paint cans is included when reported to RPRA. The actual weight consists of the paints' weight and the primary packaging.]

<ul style="list-style-type: none"> • Does the HSP producer supply antifreeze, solvents, paints and coatings, or pesticides? • What is the material used for primary packaging (primary packaging material does not include corrugated/boxboard boxes, plastic film, shrink wrap, or printed materials, as they are obligated as Blue Box materials)? • What is the capacity of the container for the HSP supplied in Ontario? • What is the producer’s methodology for determining the weight of the primary packaging of the HSP supplied in Ontario? 	
<p>2. Select a sample of obligated SKUs in accordance with Appendix A of the Registry 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. HSP producers that supply antifreeze, solvents, paints and coatings, or pesticides in Ontario, also agree the total actual weight including the primary packaging weight to the manufacturer’s specifications. • If calculated weight is used, compare the calculation to the respective WCFs to determine if the products were reported in the correct categories and if the WCFs were applied correctly. For example: <ul style="list-style-type: none"> • Use a correct WCF for antifreeze containers and antifreeze • Use a correct WCF for antifreeze supplied in new cars and in bottles 	<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><i>OR</i></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 of the Registry Procedure.</p>

<p>3. Agree the number of the product units reported:</p> <p>a. If actual number of units is used, agree it to the producer's sales records to corroborate the total units reported.</p> <p>b. If calculated number of units is used:</p> <ul style="list-style-type: none"> • Agree the Ontario population to the most recent Statistics Canada official census (reference Appendix B of the Registry Procedure), • Agree the population of each province and territory in Canada in which the producer sells HSP to the most recent Statistics Canada official census, and <p>i. Recalculate the number of Ontario units supplied based on Appendix E of the Registry Procedure.</p>	<p>Example 1: Actual number of units is used, and the reported number of paints 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 [PROVINCES AND TERRITORIES] used in the calculation [WAS/WERE] agreed to the reported number of paints sold in Ontario was agreed to [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 Registry Procedure. For each sample selected, verify that they do not meet the definition of "HSP".</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 "paints".</p>

<p>5. Sample one month's data and:</p> <ul style="list-style-type: none"> • Compare the raw sales report with the obligated product supply report. Select samples in accordance with Appendix A of the Registry Procedure and obtain explanations from management for the variances (if any) and assess if they are reasonable, • Select samples in accordance with Appendix A of the Registry Procedure and confirm if the weight of the primary packaging (if any) has been included or excluded in accordance with the HSP Regulation, and Select sample in accordance with Appendix A of the Registry Procedure and confirm if the weight of the antifreeze and oil filters supplied with new cars (if any) has been included in accordance with the HSP Regulation. 	<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 paints.</p> <p>Based on the 20,000 invoices that occurred in May [YEAR], I selected 60 invoices and found the paint cans are included in the total weight reported.</p>
<p>6. Select a sample in accordance with Appendix A of the Registry 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 in the Ontario market 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 paints from retailer A invoices because they were initially sold to retailer A located in Toronto and later shipped to retailer B in Quebec.</p>

Print Name

Signature

Title

Contact info