Alberta recycling MANAGEMENT AUTHORITY

HAZARDOUS AND SPECIAL PRODUCTS (HSP) SUPPLY REPORT REQUIREMENTS FOR PRODUCERS

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Version: 01

Initial Publication Date: October 14, 2026

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Revision Date	Version	Summary of Revisions
October 14, 2026	01	Original Release

Purpose & Scope

This document sets out the requirements for preparing a Producer's Hazardous and Special Products (HSP) supply reports. It specifies what must be reported, how reportable quantities must be calculated, and what records must be maintained to support reported data.

It applies to all HSP Designated Material Types: Battery (Part A); Non-Battery - Corrosive, Flammable, Pesticide, Toxic products and their containers (Part B).

This document covers what goes into your report, not how to enter it in the ARMA Connect portal. Once you've determined what to report and how, please submit your reports through ARMA Connect. See the HSP Supply Report Submission Guide for step-by-step submission instructions.

Key Terms

In this document, the following terms have the meanings below. A term may be used in the singular, plural, past, or future tense, regardless of how it is defined here.

Term	Meaning
Authority	The Alberta Recycling Management Authority, as designated by Section 2 of the EPR Regulation to be responsible for the administration and oversight of the matters described in the EPR Regulation.
Battery	Single-use and rechargeable battery chemistries, as defined in section 21 of the Regulation.
Brand Holder	A person or organization that owns or licenses a brand or otherwise has the right to market a product under that Brand.
Brand List	A complete list of the Brands a Producer owns, licenses or has the right to market in Alberta.
CCS	Common Collection System, as defined in the Regulation.
EPR Regulation	The Extended Producer Responsibility Regulation, AR 194/2022, as amended or replaced from time to time.
HSP Designated Material	Hazardous and Special Products designated under sections 1 to 11 and Part 2 of the Regulation.
Inspection	Has the same meaning as in Section 11.1 of the HSP Bylaws.

Material Type	Any of the types of HSP Designated Material set out in Schedule “A” of the HSP Bylaws. Material Types covered by this document: Batteries (single-use and rechargeable) and Corrosive, Flammable, Pesticide, Toxic products including their containers.
PRO	Producer Responsibility Organization means an organization appointed by a Producer to act as an agent on behalf of the Producer. A PRO is the operator of the CCS.
Producer	A person determined to be the producer of a HSP Designated Material under section 23 of the Regulation for the purposes of Part 2 of the EPR Regulation.
Registered	With respect to a Producer, PRO, Processing Facility, or Community registered with the Authority.
Reportable Product	A product within a HSP Material Type for which a Producer has a reporting obligation under the Bylaws. Examples are provided in the HSP Material Type Guide.
Supply	In relation to a Designated Material, means to manufacture, distribute, sell or otherwise transfer a HSP Designated Material in Alberta.
Verifier	A qualified third-party professional or employee, accredited in accordance with the HSP Verification Procedure, who prepares a report confirming the accuracy of information submitted to the Authority.

PART A - Reporting Requirements Battery HSP

Who Must Report

You are a Producer under this document if you are determined to be the Producer of a HSP Designated Material under Part 2 of the EPR Regulation or the Bylaws.

If you have retained a PRO, your PRO may prepare and submit your supply report on your behalf.

If you have not delegated supply reporting to a PRO, you must submit your supply data to both the PRO, as the operator of the CCS, and the Authority, as the oversight body.

A1. What Do I Need to Report?

Each Producer shall report to the Authority the weight in kilograms of Batteries (single-use and rechargeable chemistries), per section 21(a) of the EPR Regulation and the HSP Material Type

Guide that the Producer Supplied into Alberta for any applicable report period. Reporting periods run from January 1 to December 31 of the calendar year.

> ***Exclude:***
>
> *Do not include the weight of any packaging supplied with the Batteries that is already regulated under Part 1 of the Regulation (e.g., the box or blister pack).*

A2. How Do I Calculate Weights?

Step 1 - Determine the quantity of Batteries supplied

Determine the quantity of each reportable product supplied into Alberta during the reporting period.

Producers must use a methodology that is most reasonably accurate, documented, and supported by verifiable records. The methodology selected should reflect the Producer's available data and business operations. Examples of possible methodologies include:

- Actual Alberta sales or shipment records, generated from point-of-sale or Enterprise Resource Planning (ERP) systems;
- Import or distribution records into Alberta;
- Where actual Alberta-specific data is not available, estimates based on actual Canada sales data and official Statistics Canada provincial population figures.

Example:
Where actual Alberta-specific supply data is unavailable, a Producer may estimate Alberta supply using the following population formula:

Quantity Supplied into Alberta = (P1 ÷ P2) × Canada National Sales

P1 = population of Alberta (most recent Statistics Canada official census)
P2 = total population of all provinces/territories in Canada where you sell the reportable product (most recent census)

Canada National Sales = total number of units sold into Canada for each reportable product during the reporting period.

Note:

1. A Producer must use actual supply data where possible. Reasonable estimates are only acceptable if actual supply data is unavailable. You must maintain sufficient records to

demonstrate you accurately calculated your supply of HSP Designated Material. The Authority may inspect your records at any time.

2. Material Types (e.g., Single-use batteries) may include multiple reportable products. Where the population formula is used, calculate the quantity supplied for each reportable product separately before aggregating the results for the Material Type.

Step 2 - Determine the weight of Batteries supplied

Determine the weight, in kilograms, of each reportable product. The weight of each unit must be recorded and rounded to the nearest **0.001 kg** (1.0 gram).

Choose one method per Battery size/chemistry:

1. Multiply the actual weight of each Battery (per manufacturer specifications) by the unit count from Step 1; or

2. Multiply the applicable Weight Conversion Factor (WCF) from Appendix A by the unit count from Step 1.

Weights provided in the report must be from a source that is no more than three (3) years old, and the Producer must provide evidence that the product material, design, composition, and packaging have not changed during that period.

Step 3 - Calculate the total reportable weight for Batteries

For each product being reported, calculate the net reportable weight using the following formula:

Net Reportable Weight for each product (kg) = (Quantity Supplied × Unit Weight)

Sum, the net reportable weights of all products reported within the same Material Type to determine the total reportable weight for that Material Type.

Report the final total weight, in kilograms, for each of the following Material Types:

- Single-use batteries
- Rechargeable Batteries

Note: The total reportable weight for a Material Type may consist of multiple reportable products with different quantities and unit weights. The final reported weight must represent the sum of all net reportable weights within that Material Type.

A3. What Records Do I Need to Maintain?

Keep sufficient records to demonstrate the accuracy of your supply reports and that your calculation methodology fully reflects your obligations as a Producer under the EPR Regulation, including without limitation, the following:

	Item	Examples of Records and Documentation
☐	Evidence of the quantity of HSP Designated Material supplied in Alberta and reportable products under each Material Type or Stock Keeping Unit (SKU) during the reporting period.	Sales records
☐	How reportable products are supplied into Alberta (e.g., e-commerce, retail, etc.).	Sales Policy and/or Procedures, e-commerce sales reports, Point-of-Sales (POS) sales reports
☐	How Alberta sales are tracked separately from other provinces.	Enterprise Resource Planning (ERP) and/or sales system export
☐	How SKUs are set up (weight, description, brand) in your system.	SKU master or product database
☐	Brands that you are responsible for under the EPR Regulation.	Brand list
☐	Your methodology for determining what was supplied in Alberta.	Written methodology and/ or process notes
☐	Your step-by-step process for preparing the supply report, including systems and reports used.	Supply report operational procedure
☐	Your methodology for determining product weight (actual vs. WCF, include any volume-to-weight conversions).	Weight calculation worksheet
☐	How you determine which products are non-obligated SKU's.	Inclusion/exclusion methodology
☐	If using the population formula to determine the number of units supplied: Alberta and other provinces' population figures.	Statistics Canada census reference

☐	Any exclusions and adjustments to the report.	Adjustment log with explanation (e.g., return records, duplicate records, inventory reconciliations, products demonstrated to have been supplied outside Alberta etc.)

PART B - Reporting Requirements Non-Battery HSP

Who Must Report

You are a Producer under this document if you are determined to be the Producer of a HSP Designated Material under Part 2 of the EPR Regulation or the Bylaws.

If you have retained a PRO, your PRO may prepare and submit your supply report on your behalf.

If you have not delegated supply reporting to a PRO, you must submit your supply data to both the PRO, as the operator of the CCS, and the Authority, as the oversight body.

B1. What Do I Need to Report?

Each Producer shall report to the Authority the weight in kilograms of each of the following Material Types supplied in Alberta for any applicable report period. Reporting periods run from January 1 to December 31 of the calendar year:

- Corrosive Products (including containers)
- Flammable Products (including containers)
- Pesticides (including containers)
- Toxic Products (including containers)

Report the weight of the products listed above that you supply into Alberta, as per the requirements set out in section 21(b), (c), (d), (e), (g), (h), (i) and (j) of the Regulation and as defined in the HSP Material Type Guide.

> ***Include:***
>
> *Unlike Batteries, the primary packaging (immediate container that touches the product) of these products is included in your reported weight. You may report the product and its primary packaging weight together (e.g., a flammable product and its container are reported in aggregate).*

> ***Exclude:***
>
> *Do not report any secondary packaging that is already regulated under Part 1 of the Regulation (e.g., corrugated/boxboard boxes, plastic film, shrink wrap, printed materials).*

B2. How Do I Calculate Weights?

Step 1 — Determine the quantity of each reportable product supplied

Determine the quantity of each reportable product supplied into Alberta during the reporting period.

Producers must use a methodology that is most reasonably accurate, documented, and supported by verifiable records. The methodology selected should reflect the Producer's available data and business operations. Examples of possible methodologies include:

- Actual Alberta sales or shipment records, generated from point-of-sale or Enterprise Resource Planning (ERP) systems;
- Import or distribution records into Alberta;
- Where actual Alberta-specific data is not available, estimates based on actual Canada sales data and official Statistics Canada provincial population figures.

Example:
Where actual Alberta-specific supply data is unavailable, a Producer may estimate Alberta supply using the following population formula:

Quantity Supplied in Alberta = (P1 ÷ P2) × Canada National Sales

P1 = population of Alberta (most recent Statistics Canada official census)
P2 = total population of all provinces/territories in Canada where you sell the reportable product (most recent census)

Canada National Sales = total number of units sold into Canada for each reportable product during the reporting period.

Note:

1. A Producer must use actual supply data where possible. Reasonable estimates are only acceptable if actual supply data is unavailable. You must maintain sufficient records to

demonstrate you accurately calculated your supply of HSP Designated Material. The Authority may inspect your records at any time.

2. A Material Type (e.g., Flammable Products) may include multiple reportable products. Where the population formula is used, calculate the quantity supplied for each product separately before aggregating the results for the Material Type.

Step 2 — Determine the weight of each reportable product supplied

Determine the weight, in kilograms, of each reportable product. The weight of each unit must be recorded and rounded to the nearest **0.001 kg** (1.0 gram).

Producers must use a methodology that is reasonable, accurate, documented, and supported by verifiable records to determine the weight of a reportable product. The methodology selected should reflect the Producer's available data and business operations. Examples of possible methodologies include:

- Stated weights derived from product specification sheets or manufacturer technical documentation;
- Calculated weights derived from Bills of Materials (BOMs);
- Direct measurement using calibrated scales and documented weighing procedures;
- Unit weights derived from a representative sample of identical or substantially similar products.

Weights provided in the report must be from a source that is no more than three (3) years old, and the Producer must provide evidence that the reportable product material, design, composition, and packaging have not changed during that period.

Note:

1. Products reported within the same Material Type may have different unit weights. Determine and document the weight of each reportable product separately before calculating the total reportable weight.

Step 3 - Calculate the total reportable weight for each Material Type

For each product being reported, calculate the net reportable weight using the following formula:

Net Reportable Weight for each product (kg) = (Quantity Supplied × Unit Weight)

Sum, the net reportable weights of all products reported within the same Material Type to determine the total reportable weight for that Material Type.

Report the final total weight, in kilograms, for each of the following Material Types:

- Corrosive Products (including Containers)
- Flammable products (including Containers)
- Pesticides (including Containers)
- Toxic Products (including Containers)

Note: The total reportable weight for a Material Type may consist of multiple reportable products with different quantities and unit weights. The final reported weight must represent the sum of all net reportable weights within that Material Type.

B3. What Records Do I Need to Maintain?

Keep sufficient records to demonstrate the accuracy of your supply reports and that your calculation methodology fully reflects your obligations as a Producer under the EPR Regulation, including without limitation, the following:

	Item	Examples of Records and Documentation
☐	Evidence of the quantity of HSP Designated Material supplied in Alberta and reportable products under each Material Type or Stock Keeping Unit (SKU) during the reporting period.	Sales records
☐	How reportable products are supplied into Alberta (e.g., e-commerce, retail, etc.).	Sales Policy and/or Procedures, e-commerce sales reports, Point-of-Sales (POS) sales reports
☐	How Alberta sales are tracked separately from other provinces.	Enterprise Resource Planning (ERP) system and/or sales system export

☐	How SKUs are set up (weight, description, brand) in your system.	SKU master or product database
☐	Brands that you are responsible for under the EPR Regulation.	Brand list
☐	Your methodology for determining what was supplied in Alberta.	Written methodology and/or process notes
☐	Your step-by-step process for preparing the supply report, incl. systems and reports used.	Supply report operational procedure
☐	What material is used for the primary packaging (i.e. container).	Packaging specification
☐	The capacity of the container for the HSP supplied in Alberta, per the HSP Material Type Guide.	Container specification
☐	Your methodology for determining product weight including the primary packaging (i.e. container).	Weight calculation worksheet, BOMs, product design specifications
☐	How you determine which products are included/excluded, per the HSP Material Type Guide.	Inclusion/exclusion methodology
☐	If using population formula to determine the number of units supplied: Alberta and other provinces' population figures.	Statistics Canada census reference
☐	Any exclusions and adjustments to the report.	Adjustment log with explanation (e.g., return records, duplicate records, inventory reconciliations, products demonstrated to have been supplied outside Alberta etc.)

Data Quality & Recordkeeping Expectations

These expectations apply to both Battery and Non-Battery HSP supply reports.

Your Supply Report Must:

a) Include all Material Types supplied into Alberta during the reporting period (January 1 to December 31).

b) Include all reportable supply, regardless of whether the material is ultimately recycled, disposed of, or reused.

c) Include a complete list of the Brands you own, license or have the right to market in Alberta.

d) Include sufficient documentation to identify the applicable Brands and associated reported quantities, and retain any agreements, authorizations, or contractual arrangements that support reporting HSP Designated Material on behalf of another Producer or Brand Holder, if applicable.

e) Include whether the methodology used to determine product weights has changed since the previous reporting period.

f) Include the Producer Legal Entity Organizational Chart, showing relationships among all parent, subsidiaries, affiliated and sister companies.

g) Use kilograms as the unit of measure and reporting for all weights.

h) Be supported by retained documentation: sales records, import records, bills of materials (BOMs), invoices, weight calculations, and any assumptions or estimation methods used.

i) Be submitted through ARMA Connect by June 30 of the calendar year or your PRO's reporting system by their communicated deadline.

j) Be reviewed and certified prior to submission by an authorized signatory attesting the information is complete and accurate to the best of their knowledge.

Your Internal Controls Should Ensure Data Is:

a) Accurate and free from material errors.

b) Complete and representative of all reportable products supplied.

c) Consistent with supporting documentation and financial or sales records.

d) Calculated using your approved methodologies where actual data is unavailable.

e) Reproducible, so reported values can be re-derived during an inspection.

Supply report Verification

a) All supporting documentation, including the evidence and records used for verification, must be retained for five (5) years and made available upon request by the Authority.

b) The Authority may request verification of reports.

c) The Authority will notify Producers that are required to verify their supply reports by November of each year.

d) For further information about the verification process, please refer to the HSP Supply Data Verification Procedure.

Related Resources

For additional resources, please refer to the EPR Producers page of ARMA's website.

Appendix A — Battery Weight Conversion Factors

Use these factors only if you are not using actual manufacturer weights (see Part A, Step 2).

Single-Use Batteries by Chemistry and Size

Sold as Stand-Alone or Replacement Batteries

Battery Type by Material	Weight (kg)
Alkaline Manganese – Button Cell	0.0015
Zinc-Air – Button Cell	0.0026
Silver Oxide – Button Cell	0.0023
Lithium – Button Cell	0.0026
Lithium – AA	0.0145
Lithium – AAA	0.0076
Lithium – Primary	0.0100
Zinc-Carbon – 6V oblong lantern	1.2700
Zinc-Carbon – 6V square lantern	0.6000
Zinc-Carbon – 9V	0.0375
Zinc-Carbon – D	0.0945
Zinc-Carbon – C	0.0483
Zinc-Carbon – AA	0.0170
Zinc-Carbon – AAA	0.0097
Alkaline Manganese – AAA	0.0112
Alkaline Manganese – AA	0.0234
Alkaline Manganese – C	0.0689
Alkaline Manganese – D	0.1445
Alkaline Manganese – 9V	0.0455
Alkaline Manganese – 6V square lantern	0.7485
Alkaline Manganese – 6V oblong lantern	1.5855

Rechargeable Batteries by Chemistry and Size

Sold as Stand-Alone or Replacement Batteries

Size	Chemistry	Weight (kg)
9V	Nickel-Cadmium	0.035
9V	Nickel-Metal Hydride	0.042
N	Nickel-Cadmium	0.010
N	Nickel-Metal Hydride	0.011
AAA	Nickel-Cadmium	0.0105
AAA	Nickel-Metal Hydride	0.013
AAA	Other	0.011
AA	Nickel-Cadmium	0.0215
AA	Nickel-Metal Hydride	0.0271
AA	Other	0.022
A	Nickel-Cadmium	0.032
A	Nickel-Metal Hydride	0.040
C	Nickel-Cadmium	0.073
C	Nickel-Metal Hydride	0.080
C	Other	0.058
Sub C	Nickel-Cadmium	0.0529
Sub C	Nickel-Metal Hydride	0.055
D	Nickel-Cadmium	0.145
D	Nickel-Metal Hydride	0.1628
D	Other	0.104
F	Nickel-Cadmium	0.231
F	Nickel-Metal Hydride	0.2613
Pin Cell	Lithium-Ion	0.001
Button Cell	Lithium-Ion	0.0025
Prismatic Single Cell	Lithium-Ion	0.0217
Cylindrical Single Cell	Lithium-Ion	0.0418

Rechargeable Pouch Cells by Capacity

Sold as Stand-Alone or Replacement Batteries

Capacity	Chemistry	Weight (kg)
55–500 mAh (typical nominal)	Lithium-Ion	0.0052
501–1000 mAh (typical nominal)	Lithium-Ion	0.0158
1001–2000 mAh (typical nominal)	Lithium-Ion	0.030
2001–5000 mAh (typical nominal)	Lithium-Ion	0.055
>5001 mAh (typical nominal)	Lithium-Ion	0.112

Rechargeable Batteries by Application

Sold as Stand-Alone or Replacement Batteries

Application	Chemistry	Weight (kg)
Cell Phones (e.g., cellular phones, smartphones)	Lithium Cobalt Oxide (LCO)	0.028
	Lithium Nickel Manganese Cobalt Oxide (NMC)	0.053
Cameras/Games (e.g., video game controller)	Lithium-Ion (Includes: Lithium Cobalt Oxide, Lithium Nickel Manganese Cobalt Oxide, Lithium Manganese Oxide)	0.215
Others portable (e.g., power banks, shavers, toothbrushes, drones, cordless mice, remote controls, MP3, cordless landline phones)	Nickel-Metal Hydride (NiMH)	0.042
	Lithium-Ion (Includes: Lithium Nickel Manganese Cobalt Oxide, Lithium Manganese Oxide, Lithium Iron Phosphate)	0.215
Tablets	Lithium-Ion (Includes: Lithium Cobalt Oxide, Lithium Nickel Manganese Cobalt Oxide)	0.246
Laptops/Portable PC	Lithium Cobalt Oxide (LCO)	0.341
	Lithium Nickel Manganese Cobalt Oxide (NMC)	0.438
Cordless tools (e.g., gardening tools, cordless tools, power tools)	Lithium Nickel Manganese Cobalt Oxide NMC	0.495
	Nickel-Metal Hydride (NiMH)	0.923
	Nickel-Cadmium (NiCd)	1.182
E-bikes	Lithium-Ion (Includes: Lithium Nickel Manganese Cobalt Oxide, Lithium Manganese Oxide, Lithium Cobalt Oxide, Lithium Iron Phosphate)	2.802
Industrial excluding mobility (e.g., pallet lifters, forklifts, industrial energy storage, other non-portable)	Any Nickel (Includes Nickel-Cadmium Nickel-Metal Hydride)	2.963
	Lithium-Ion (Includes Lithium Manganese Oxide, Lithium Cobalt Oxide, Lithium Nickel Manganese Cobalt Oxide, Lithium	2.984

	Nickel Cobalt Aluminium Oxide, Lithium Iron Phosphate)	
Lighting (e.g., security lighting, shielded/full cut-off lamps, control and power lines)	Nickel-Cadmium (NiCd)	2.963
Medical (e.g., measuring instruments, medical carts and beds, portable defibrillators)	Lithium Cobalt Oxide (LCO)	2.984
Uninterruptible Power Supply (UPS)	Lithium Iron Phosphate (LFP)	2.984
Telecom	Lithium NMC	2.984
Personal Mobility Devices / Light Electric Vehicles (e.g., golf carts, mobility scooters)	Lithium NMC	3.284
Off-Grid Energy Storage (e.g., solar/wind systems, RV/boat energy storage)	Lithium Iron Phosphate (LFP)	2.984