Alberta recycling MANAGEMENT AUTHORITY

SINGLE-USE PRODUCTS, PACKAGING AND PAPER PRODUCTS (PPP) SUPPLY REPORT REQUIREMENTS FOR PRODUCERS

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Purpose & Scope

This document sets out the requirements for preparing a Producer's Single-Use Products, Packaging and Paper Products (PPP) supply reports. It specifies what must be reported, how reported quantities must be calculated, and what records must be maintained to support reported data.

It applies to all PPP Material Types: Paper, Rigid Plastic, Flexible Plastic, Metal, Glass, and Biodegradable Plastics.

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 PPP 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.
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 EPR Regulation.
EPR Regulation	The Extended Producer Responsibility Regulation (AR 194/2022), as amended or replaced from time to time.
Inspection	Has the same meaning as in Section 12.1 of the PPP Bylaws.
Material Type	Any of the types of PPP Designated Material set out in Schedule "A" under PPP Bylaws. Material Types covered by this document: Paper, Rigid Plastic, Flexible Plastic, Metal, Glass and Biodegradable Plastics.
PPP Designated Material	Single-use products, packaging, packaging-like products, and paper products designated under sections 1 to 11 and Part 1 of the Regulation and Part 1 of the EPR Regulation pursuant to section 13 of the EPR Regulation.

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 PPP Designated Material under section 14 of the EPR Regulation for the purposes of Part 1 of the EPR Regulation, and excluding persons listed under section 15 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 PPP Material Type for which a Producer has a reporting obligation under the Bylaws. Examples are provided in the PPP Material Type Guide.
Supply	In relation to a designated material, means to manufacture, distribute, sell or otherwise transfer a PPP Designated Material in Alberta.
Verifier	A qualified third-party professional or employee, accredited in accordance with the PPP Verification Procedure, who prepares a report confirming the accuracy of information submitted to the Authority.

Supply Reporting Requirements

Who Must Report

You are a Producer under this document if you are determined to be the Producer of a PPP Designated Material under Part 1 of the EPR Regulation and are not exempt under 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.

1. 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 to consumers in Alberta for residential use for any applicable report period. Reporting periods run from January 1 to December 31 of the calendar year.

- Paper

- Rigid Plastic (excluding biodegradable plastics)
- Flexible Plastic (excluding biodegradable plastics)
- Metal
- Glass
- Biodegradable Plastics

> ***Exclude:***
>
> *Certain PPP Designated Material is excluded from your reported weight under the "allowable deductions" rule. See step 3 below.*

2. How Do I Calculate Weights?

Step 1 - Determine the quantity of each reportable product supplied

Determine the quantity of each reportable product supplied to consumers in Alberta and intended for residential use 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 PPP Designated Material. The Authority may inspect your records at any time.
2. Material Types (e.g., Paper) 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.
3. Producers are required to report the weights of PPP Designated Material supplied to consumers in Alberta and intended for residential use. Deduct from the calculation any PPP Designated Material not intended for residential use.

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.
2. If a reportable product or its packaging is made up of two or more Material Types (e.g., a label on a metal can or flexible plastic on a paper envelope), apply the **Component Threshold Rule in Appendix A** to determine the Material Type under which the unit weight must be reported.

Step 3 – Calculate allowable deductions

Your reportable weight may be reduced by allowable deductions. Each deduction must be supported by a documented methodology and verifiable records.

Deduction = D1 + D2

D1 - PPP Designated Material deposited into a receptacle at a location that is not a residential premise **and** where the related product was also used or consumed at that location (e.g., in-store, food court).

1. **Identify** the quantity supplied to eligible non-residential locations using direct records.
2. **Determine** the quantity associated with products used or consumed at those locations using direct records or a documented estimation methodology.
3. **Calculate** the deductible weight by applying unit weights determined in Step 2.

Example:
A coffee shop supplied 10,000 coffee cups to consumers. Based on sales records, 8,500 cups are used and disposed of on-site. If the documented unit weight is 10 g per cup, the deductible weight is: 8,500 cups x 10g per cup = 85,000 g (85 kg).

D2 - PPP Designated Material returned or collected from an eligible source at the time a related product was installed or delivered (e.g., packaging collected and managed by the installer or delivery company).

- Record the quantities removed during installation, delivery, or return activities.
- Convert the quantities to weight using the documented unit weights determined in Step 2 and calculate the total deductible weight for the reporting period.

Step 4 – 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) – Deductions

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:

- Paper
- Rigid Plastic (excluding biodegradable plastics)
- Flexible Plastic (excluding biodegradable plastics)
- Metal
- Glass
- Biodegradable Plastics

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.

3. 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 PPP Designated Material supplied to consumers in Alberta	Sales records

	and intended for residential use, and reportable products under each Material Type or Stock Keeping Unit (SKU) during the reporting period.	
☐	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, including systems and reports used.	Supply report operational procedure
☐	Your process for determining which products are biodegradable plastics.	Supporting product classification records
☐	Your methodology for determining product weight, including any Component Threshold Rule application.	Weight calculation worksheet, BOMs, product design specifications
☐	If using the population formula to determine the number of units supplied: Alberta and other provinces' population figures.	Statistics Canada census reference
☐	Your list of records or sources used as the basis for D1/D2 deductions, including your deduction methodology for any portion used or consumed on-site.	Deduction list and methodology (e.g., the sampling study or point-of-sale data, etc.)
☐	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 and Recordkeeping Expectations

Your Supply Report Must:

a) Include all Material Types supplied to consumers into Alberta and intended for residential use during the reporting period (January 1 to December 31), regardless of whether the PPP Designated Material is ultimately used in residential use or elsewhere.

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 PPP 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 deduction methodology, if applicable.

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

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

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

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

k) 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 PPP Supply Data Verification Procedure.

Related Resources

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

Appendix A - Component Threshold Rule

Use this rule when a PPP Designated Material reportable product is made up of two or more different Material Types (see Step 2 above).

- A component is an integrated part of the PPP Designated Material and is attached to the product when supplied to the consumer. Examples include 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 a PPP Designated Material item that helps the consumer use the product and is attached to the product when supplied to the consumer. Examples include a mascara brush forming part of a container closure, a toy on top of candy packaging acting as part of the closure, or a measuring cap of a detergent container.

Scope

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

How the Rule Is Applied

- If you apply the Component Threshold Rule to a product or its packaging, you must document the calculations used to apply the rule.
- You must retain documentation demonstrating how you determined whether products or components are subject to the Component Threshold Rule, including the applicable weight determination shown below.

Component or Ancillary Component Weight	Remains Attached When Consumer Discards Product/Packaging?	Reporting Requirement
≤ 5% of total product or packaging weight	Yes or No	Report on the component or ancillary component weight under the **Material Type that represents**

		the majority of the package's weight.
> 5% of total product or packaging weight	Yes	Report on the component or ancillary component weight under the **Material Type that represents the majority of the package's weight.**
> 5% of total product or packaging weight	No	Report the component or ancillary component weight under the specific **Material Type associated with the component or ancillary component**.

This documentation must be Verifiable and made available for the Authority's Inspection upon request, see "**What Records Do I Need to Maintain**?" above.