

# MEMBER EDUCATION WEBINAR



PRESENTED BY: Product Care Team

March 25, 2026



# HOUSEKEEPING

- Participant cameras and microphones will remain off.
- You can send us your questions using the Q&A function.
- There will be time at the end of the presentation where questions raised in the Q&A will be addressed.
- This webinar is being recorded to ensure all feedback is captured accurately. To request a copy please contact [memberservices@productcare.org](mailto:memberservices@productcare.org).



# AGENDA

01

EPR  
Obligations

04

Product  
Obligation  
Clarifications

02

Product Care  
Member  
Obligations

05

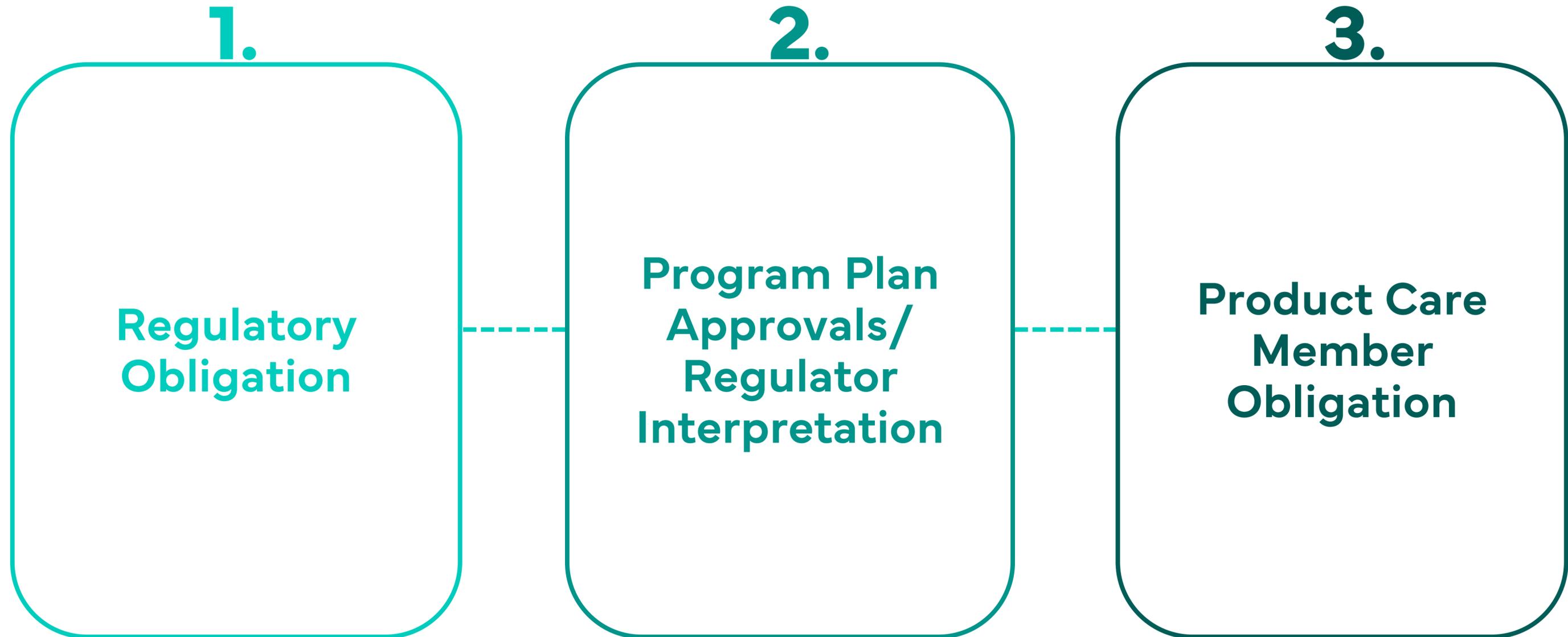
Q&A

03

Remitter  
Relationships

# EPR OBLIGATIONS

# DEFINING EPR OBLIGATIONS



# DEFINING REGULATORY OBLIGATION?

Each **provincial regulation** defines who the **regulated obligated party** is.

## Regulations address:

- Which entity in the supply chain is obligated
- Company residency considerations in a province or in Canada
- Hierarchy of obligation (where applicable)
  - Brand owner, producer or manufacturer
  - Wholesaler, distributor or first importer
  - Retailer, marketer of the product to consumer
- Framework for included product categories and end-of-life system management requirements
  - Some regulations more prescriptive than others
- Historically obligation was focused more on provincial residency and/or first importers or sellers
- Recently, in some jurisdictions, focus has shifted to brand owners with residency in Canada (e.g. ON, AB, YT, NB)

Important for Product Care and the regulators to understand who the obligated party is in the supply chain pursuant to the regulation.

*Product Care reports to the regulator a list of obligated parties, where required.*

# PROGRAM PLAN APPROVALS & REGULATORY INTERPRETATION

- Regulations typically have provisions for:
  - Program plan development by a producer/PRO that is subject to Ministry approvalOR
  - Regulatory oversight/interpretation by arms-length regulator (*e.g. ARMA, RPRA*)
- Program plans or regulator interpretation guidance typically provide further details and clarifications on the:
  - Scope of products included or excluded (*e.g. size limits, product types, classification rules, etc.*)
  - Details on the sectors that products are supplied into (*e.g. residential, IC&I*)
  - Specific requirements or additional clarity for end-of-life management
- Program plans do not typically define or provide further clarification on who the regulatory obligated parties are, this resides in the regulations

# PRODUCT CARE MEMBERSHIP

- To achieve compliance, obligated parties must participate in provincial EPR programs
- Product Care provides programs that support obligated parties in achieving compliance for the end-of-life management of obligated products
- Many companies along the supply chain may have regulated obligations for certain supply of obligated products into a jurisdiction and some companies may supply obligated products but may not be the regulated obligated party in the jurisdiction

# PRODUCT CARE MEMBERSHIP

- To ensure that all obligated products can efficiently be reported into the Product Care program, Product Care often works with many companies along the supply chain (whether the companies are the regulated obligated party or not)
- Regulated obligated parties and other companies in the supply chain that register as members with Product Care:
  - Report and remit fees on all obligated products they supply into a jurisdiction
  - To ensure an obligated product is only reported once into Product Care, remitter relationship agreements or commercial agreements must be established

# PRODUCT CARE MEMBER OBLIGATION

# MEMBER OBLIGATION

## PRODUCT CARE MEMBERSHIP AGREEMENT

### S.5.1

“a member shall pay all EHF’s on the sale or distribution of products”

### S.5.3

“without limitation members shall report on all of their sales including those sales where the member has assumed the ‘regulatory obligations’ for another party”

Product Care waives this requirement to the extent that a member provides evidence that another member has or will remit the required EHF’s

Product Care expects members to report all of its sales, whether the member is the regulated obligated party or not, unless:

- 1 Complete a remitter relationship agreement on the Product Care portal
- 2 Maintain documentation satisfactory to Product Care to validate that another member is reporting these sales

**[EHFreporting.com](https://www.ehfreporting.com)**

# REMITTER RELATIONSHIPS

# WHAT IS A REMITTER RELATIONSHIP?

- Remitter relationships should be clearly established
  - Effective date shall be the date the agreement is accepted by both parties and should correspond to the beginning of a month
- Product Care members are required to report and remit EHF's on their program products supplied ***unless another registered Product Care member has agreed to report and remit on that supply*** (sec. 1.1 Member Rules and Policies)
- A remitter relationship may be established by way of commercial agreement or through the use of the Product Care remitter relationship tool
- Remitter Relationship notification functionality in the portal which enables members to notify Product Care and establish agreement between themselves and another member
  - Utilized to track and report remitter relationships in place

# WHAT IS A REMITTER RELATIONSHIP?

The Remitter Relationship notification function allows for a document to be uploaded if members would like to save a copy of any agreement in place.

Two parties to the remitter relationship:

**1.  
REMITTER MEMBER**

**2.  
NON-REMITTER MEMBER**

Regulated parties should ensure that where they are the non-remitter that the remitter relationship is documented by:

**Commercial Agreement or Invoice**

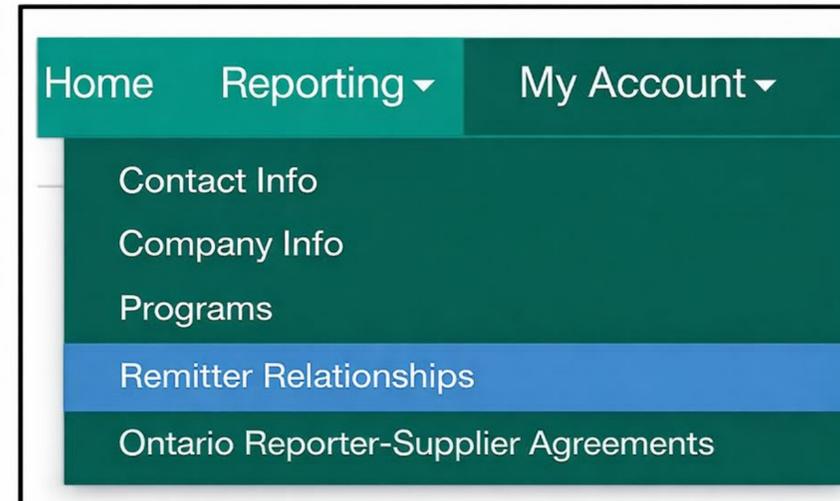
**Product Care Remitter Relationship tool**

# HOW TO USE THE PRODUCT CARE REMITTER RELATIONSHIP TOOL

- S. 14 of the Member Registration and Reporting Guide provides detailed instructions regarding the Product Care Remitter Relationship tool

## 14. Notifying PCA of Remitter Relationships

To notify PCA of a Remitter Relationship, where one PCA member is responsible for reporting and remitting EHF's on behalf of another member, go to "My Account" and the "Remitter Relationships".



- Demo of the Remitter relationship tool by Product Care

# REPORTING REQUIREMENTS

Product Care members shall report all sales of obligated products

- Monthly – EHF revenue is > \$20,000 for all programs
- Quarterly – EHF revenue is < \$20,000 for all programs
- Annually – EHF revenue is < \$2,000 for all programs

## Changes to reporting frequency outstanding

- Due to program extensions and additional sales volume, reporting frequencies are to be updated periodically
- Changes to reporting frequency required when thresholds are exceeded

# MEMBER AUDITS

S 7.1 of the PCA Membership agreement provides Product Care the right to audit the member. Purpose of the audit process is to ensure fairness to all members and provide member education.

## **Verify the accuracy of remittances**

- Units reported are verified
- Inspect the records relating to sale, supply, distribution and importing

## **Ensure completeness of reporting**

- Confirm remitter relationship or other acceptable agreements exist

## **Verify that members are charging the correct EHF on sale where EHF are invoiced**

**All members are audited regardless of size, program, or jurisdiction**

## **Plan to take a risk-based focus in 2026:**

- Product classification
- Remittance relationships
- New programs or product sub-categories

# PRODUCT OBLIGATION CLARIFICATIONS

# CLASSIFICATION ISSUES/CHALLENGES

As programs expand and become more complex, classification challenges are increasing — driving more member inquiries

**Key Driver:**

**Expansion = Complexity**

- Increased program complexity is driving higher volumes of classification inquiries
- Difficulty determining what is obligated across jurisdictions (inconsistencies between provinces)
- Products may be obligated in one jurisdiction but not another
- Some products contain multiple obligated components, requiring classification across categories

# NEW LIGHTING SUBCATEGORIES

 = new subcategories

Subcategories	BC	MB	ON	QC	NB	PEI	NS
Fluorescent/Induction Tubes	✓	✓	✓	✓	✓	✓	✓
Compact Fluorescent Lights (CFL)/Screw-In Induction Lamps	✓	✓	✓	✓	✓	✓	✓
High Intensity Discharge (HID), Germicidal, Special Purpose, and Other	✓	x	✓	✓	✓	✓	✓
Lighting Emitting Diodes (LEDs)	✓	x	x	x	x	x	x
Lighting Emitting Diodes (LEDs) – Bulbs	x	x	✓	x	✓	✓	✓
Lighting Emitting Diodes (LEDs) – Tubes and Other	x	x	✓	x	✓	✓	✓
Incandescent/Halogen	✓	x	✓	x	✓	✓	✓
Small Lamps	✓	x	✓	x	✓	✓	✓
Removeable/Replaceable Lamps Sold in/with Products	x	x	x	x	✓	✓	✓
String Lights	✓	x	x	x	✓	✓	✓
Ribbon/Tape Lights	✓	x	x	x	x	x	x
Fixtures	✓	x	x	x	x	x	x
Lighting Ballasts/Transformers	✓	x	x	x	x	x	x

# HHW/HSP PRODUCT CLASSIFICATION HIERARCHY

## Classification approach:

- Products are classified using a standardized hierarchical system
- Where a product meets criteria in multiple categories, it is assigned to the highest applicable category in the hierarchy
- This ensures consistent classification and reporting across HHW and HSP programs.



# NON-REFILLABLE FUEL CYLINDERS VS. PHYSICALLY HAZARDOUS MATERIALS

The same product is classified differently depending on the jurisdiction.

## **SK/MB**

Under the HHW program:

- Classified under the physically hazardous category
- Includes: non-refillable butane, camping, and propane cylinders

## **AB**

Under the HSP program:

- Under the NRFC-physically hazardous subcategory

## **QC**

Under a standalone NRFC program

## **Example: Propane cartridge used with an insect-repellent device**

- Classified as a pressurized fuel container / fuel cylinder
- Falls under physically hazardous materials (fuel-based, pressurized)
- Not classified as an insect repellent for regulatory purposes

# 1 SKU – MULTIPLE REPORTING SUBCATEGORIES

A single SKU can contain more than one obligated product

- Each product must be assessed, classified, and reported separately

## **Example: Pesticide device with fuel canister**

- Pesticide → classified under Pesticides (if criteria met)
- Fuel canister (non-refillable) → classified as NRFC or physically hazardous (if criteria met)
- **Result: Two reporting categories → two EHF's**

# RESOURCES



## **Product Care Membership Agreement**

Core agreement governing member obligations and responsibilities



## **Member Rules and Policies**

Detailed rules on reporting, remittance, and compliance



## **Member Registration and Reporting Guide**

Available on [ehfreporting.com](http://ehfreporting.com) and [productcare.org](http://productcare.org)



## **Recently updated Product Guides**

- Available on [productcare.org](http://productcare.org)
- Other guides under development, coming soon

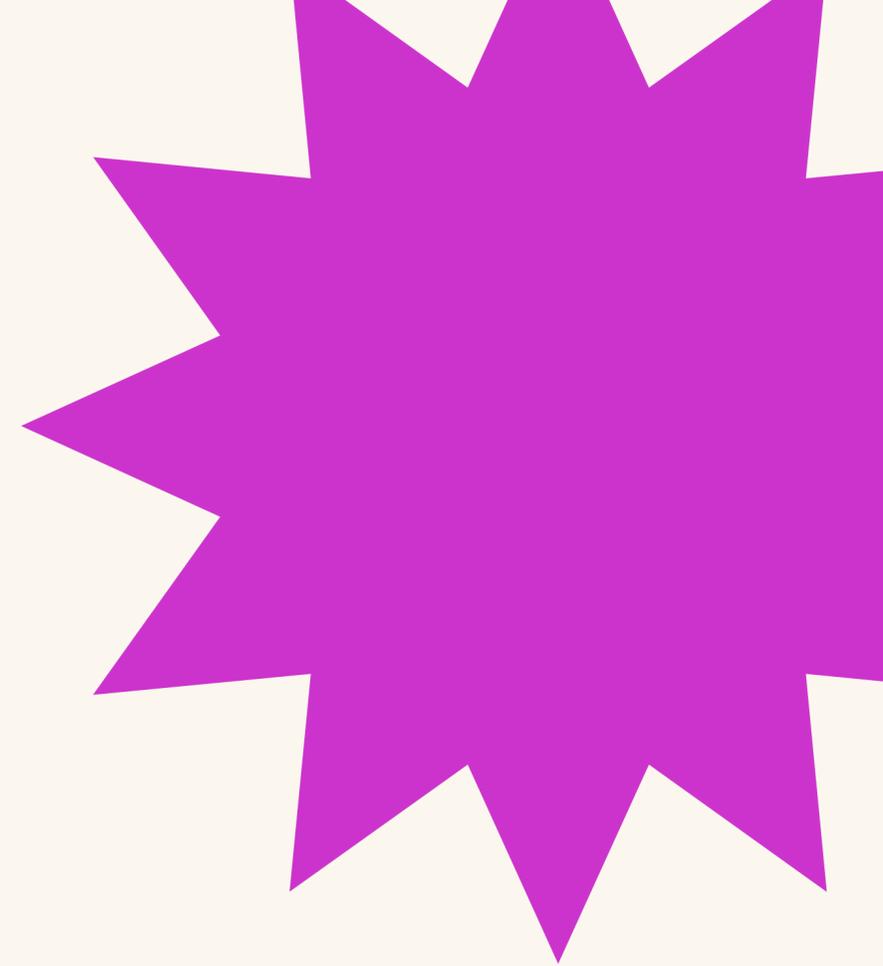
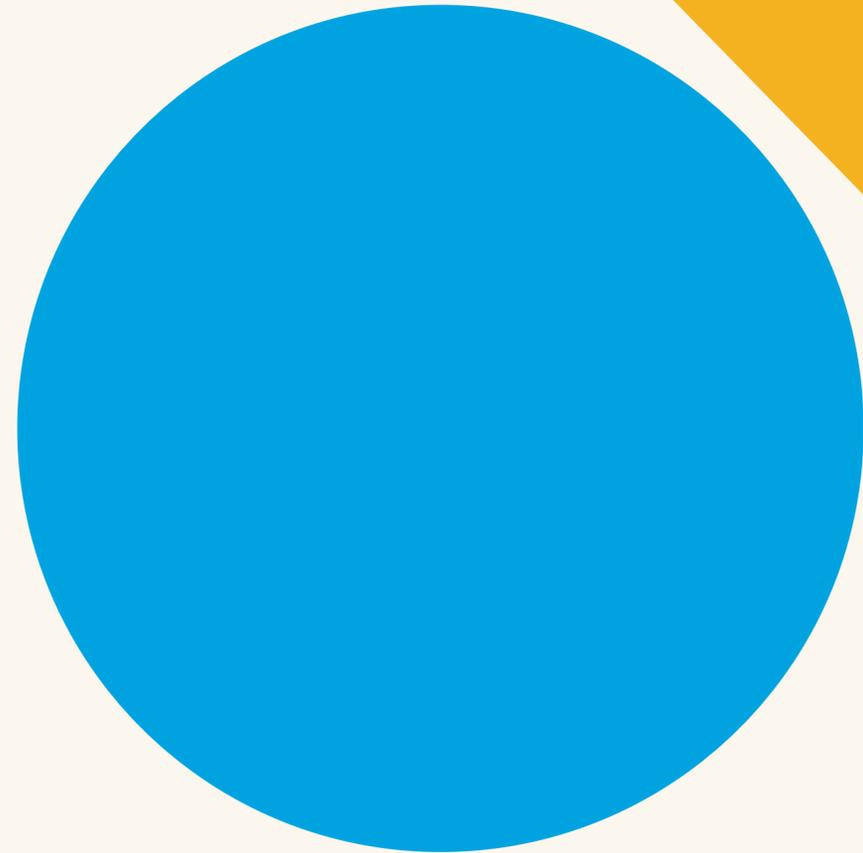


## **Product Care programs team and member services**

[memberservices@productcare.org](mailto:memberservices@productcare.org)

# Q&A

Any questions?



# THANK YOU



CONTACT US: [memberservices@productcare.org](mailto:memberservices@productcare.org)