



Information Regarding Registrant Classification and Reporting Obligations

There are two categories of registrants - Remitters and Payment-on-Purchase ('POP'). In order to distinguish a Remitter from a POP, Paint Recycling Alberta ('PRA') uses two categories of registration numbers. These registration numbers facilitate the process of verifying revenue completeness to PRA.

1. REMITTERS

These companies are assigned a six digit PRA registration number that begins with '0' (i.e. 002345). They are exempt from being charged the Advanced Disposal Surcharge ('environmental fees') by their supplier¹. Remitters report the environmental fees and remit them based on sales or supplies of eligible products that are to be charged the fees.

2. POP

These companies are assigned a six digit PRA registration number that begins with '7' (i.e. 702345). POPs pay the environmental fees to all of their suppliers when purchasing inventory. Therefore, they are not required to report the environmental fees and remit them to PRA as it will be done by their suppliers on their behalf.

The following information provides details regarding the Remitter and POP categories along with the process used for collection and remittance of the environmental fees.

1. REMITTERS

A remitter will have three different categories of sales/supply:

- a) Sales to registrants with a POP number
 - i. The remitter will levy, collect and remit the environmental fees.
 - ii. For ease of environmental fee verification, please indicate the fees on all invoices.
- b) Sales to registrants with a remitter number
 - i. The 'selling' remitter is not required to remit the environmental fees on sales to other remitters that have valid remitter registration numbers.
 - ii. For all transactions where the environmental fees are not remitted, the 'selling' remitter must be able, upon request, to substantiate why they have exempted the environmental fees, including providing the customer's proof of being a remitter.
 - iii. The 'purchasing' remitter is required to levy, collect and remit the environmental fees on subsequent sales/supply transactions with their customers. The process is

¹ Remitters are generally exempt from being charged environmental fees by all suppliers unless they choose to deal with a POP supplier. Since POP registrants are charged environmental fees, they must still have the means to offset what they have paid to their supplier. Therefore, a remitter can expect to be charged environmental fees from POP suppliers. In this instance the remitter would only report what they have received in eligible products from remitter suppliers.

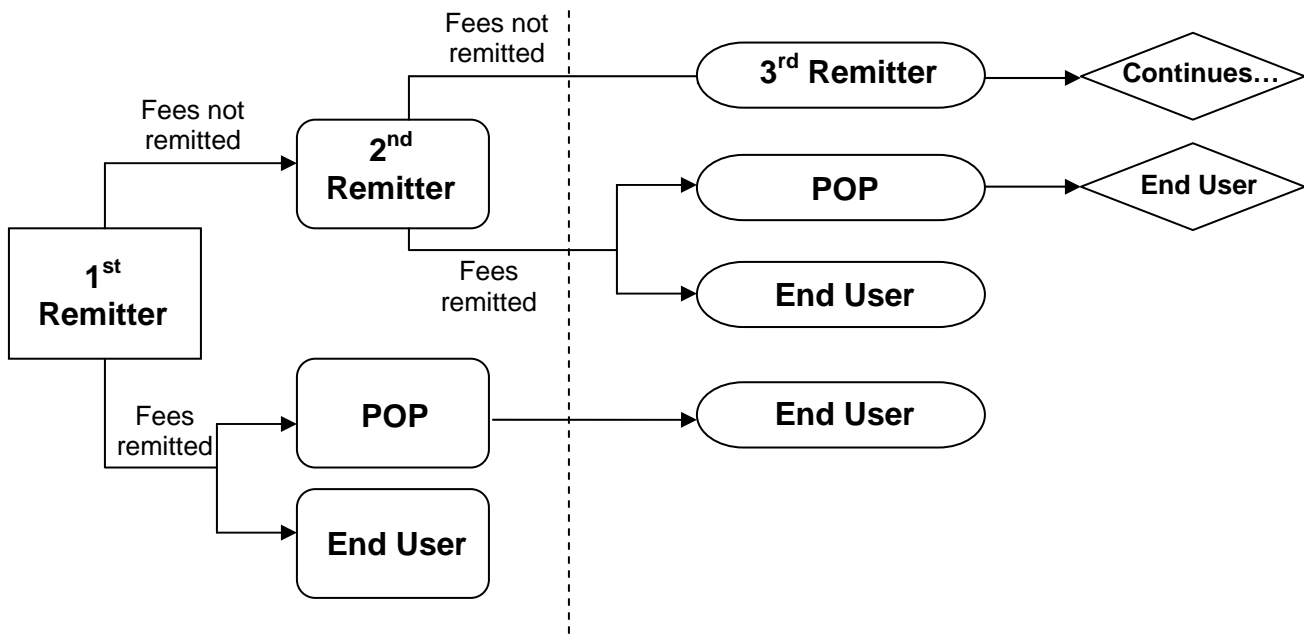


repeated if there is a subsequent sale to another remitter; please refer to the chart below.

- iv. PRA will maintain a service² whereby remitters can quickly and easily verify registration status.
- v. Eligible products will **never** have the environmental fees exempted if sold to a non-registrant or an end user.

Every year, remitters will provide PRA a registration update. This update will confirm that the registrant continues to sell eligible products

Basic Model for the Process of Remitting Environmental Fees



2. POP

- a) The following outlines the requirements a registrant **must meet** to be eligible for POP status.
 - i. Purchase all inventory eligible for environmental fees only from suppliers registered with PRA and pay the fees to these suppliers (whether Remitter or POP)

(If your company does not meet the above criteria and you have been designated a POP registrant, please contact Alberta Recycling in order to review your situation.)

² Some service options include a regular mail update of Registration number additions, deletions and changes, and an online system for immediate verification of a registration status.



b) POP Responsibilities

- i. POP pays the environmental fees to their suppliers (who must be a remitter or another POP), when purchasing all eligible products from them.
- ii. POP must retain all invoices from suppliers which indicate the eligible products purchased and amount of environmental fees paid.
- iii. On an annual basis, POP will provide PRA a registration update that includes a complete list of suppliers. This update will confirm that the registrant continues to sell eligible products for which they pay their suppliers the environmental fees.
- iv. POP collects the environmental fees from their customers and retains the fees to offset what was previously paid to their suppliers.
- v. When a POP sells to another registrant (POP or Remitter), they must levy and collect the environmental fees and record on the sales invoice the following:
 - The amount of environmental fees charged or,
 - Indicate in some way to the customer that the environmental fee is being transacted on that particular sale/supply.