

Ref: 162065

April 23, 2012

Lyndall Fry
President
Canadian Brandowner Residual Stewardship Corporation
C/O Spin Master Inc
5880 West Jefferson Blvd.
Suite A
Los Angeles, CA 90016

Dear Ms. Fry:

## Stewardship Plan Approval

Thank you for submitting the Canadian Brandowner Residual Stewardship Corporation Stewardship Plan and Appendix 1: Electronic Toy Stewardship Program for British Columbia on September 7, 2011, and the subsequent revised and finalized documents on January 15, 2012, in fulfillment of the requirement under section 4 of the Recycling Regulation.

I have completed my review of the submission and hereby approve Appendix 1: Electronic Toy Stewardship Program for British Columbia. Please be advised that this approval applies only to materials or content contained in Appendix 1 that pertains to the requirements of Section 5 of the Recycling Regulation.

## **Program Communication and Public Awareness**

With the large number of stewardship programs launching on July 1, 2012, and to ensure a successful program launch, it is paramount that the public, consumers, industry, and any other affected stakeholders are informed of your program and any visible program fees well in advance of the program launch date. To that end, it is our understanding the several stewards/agencies are in the process of combining efforts to develop a collective communications program for stewardship programs launching July 1<sup>st</sup>.

Equally important to a successful program is ongoing communication and public awareness. We expect you to strive to exceed and continuously improve on the targets in your plan. Given the importance of public awareness, the Ministry is considering establishing a consumer awareness target for eventual incorporation into the Recycling Regulation. We will keep you apprised on the development of this initiative.

## **Consumer Fees**

I note that the plan does not indicate that visible fees will be charged at the point-of-sale. Should this change, it is the Ministry's expectation that CBRSC will engage in proactive communication to all stakeholders on the fee structure well in advance of the implementation date.

## Third Party Independent Audit of Non-financial Information in Annual Reports

Please note that the Ministry of Environment, as part of its Industry Product Stewardship compliance strategy, now requires third party testing to confirm prescribed non-financial information reported in industry stewardship agency annual reports. The enclosed document entitled "Guiding Principles - Product Stewardship Agency Non-Financial Information Testing", dated November 15, 2010, contains information and direction for stewardship agencies on the required procedures. For convenience, electronic templates of the test procedures and related documents are available on the Ministry's website at:

http://www.elp.gov.bc.ca/epd/recycling/guide/index.htm. Please be advised that these Guiding Principles are currently being refined and you will be advised when an updated document is available. Please contact Greg Tyson at (250) 387-9774 if you have questions on this requirement or associated documents.

I look forward to working with you to ensure your program is successfully implemented. If you have any questions about this approval or the implementation of your plan, please contact David Lawes at (250) 387-3588 or <a href="mailto:David.Lawes@gov.bc.ca">David.Lawes@gov.bc.ca</a>.

Sincerely,

Kris Ord

Director, Waste Management

cc: David Lawes, Head, Industry Product Stewardship Programs

Meegan Armstrong, Senior Policy Advisor

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