

SESSION 4:

Navigating EPR Compliance Through Practical Tools and Applications

June 2, 2026
1:00 PM



Disclaimer 1:

The U.S. Packaging, Labelling, and EPR landscape is moving fast and rapidly changing. rePurpose tries to ensure accuracy and up-to-date information, however there may be things covered that will change or have changed. This is intended for general informational purposes only and should not be interpreted or relied upon as legal advice.

Disclaimer 2:

Grappling With New Regulations Can Cause Uncommon Side Effects



My EPR Lens

Population (2020)

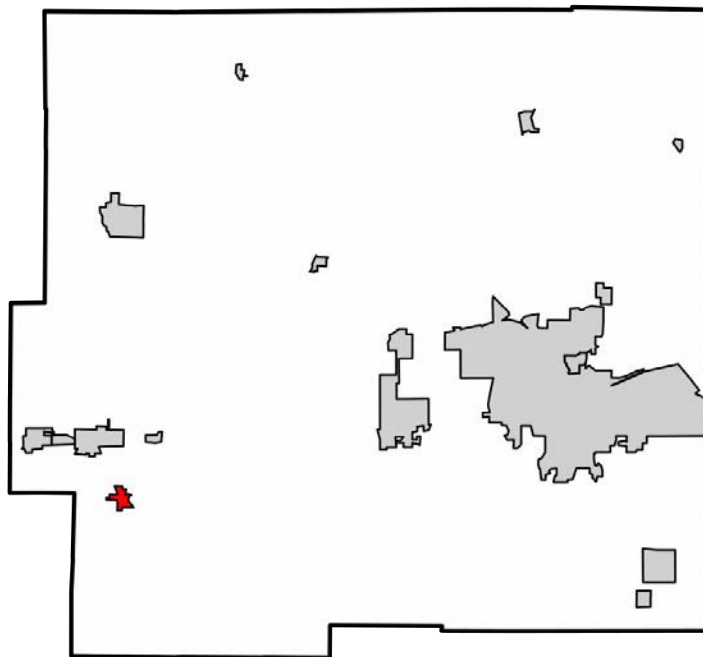
- Total 455
- Density 1,639.9/sq mi (633.15/km²)

Time zone UTC-5 (Eastern (EST))

- Summer (DST) UTC-4 (EDT)

ZIP code 47357

Area code 765



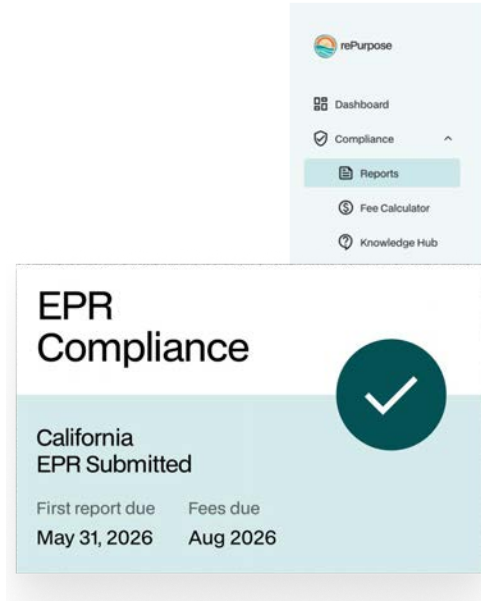
Historical population

Census Pop.	%±
1850	765 —
1870	823 —
1880	855 3.9%
1890	742 -13.2%
1900	682 -8.1%
1910	601 -11.9%
1920	580 -3.5%
1930	612 5.5%
1940	646 5.6%
1950	752 16.4%
1960	700 -6.9%
1970	694 -0.9%
1980	729 5.0%
1990	634 -13.0%
2000	611 -3.6%
2010	490 -19.8%
2020	455 -7.1%

U.S. Decennial Census^[9]

15+ years of sustainability
+ compliance experience.

We support EPR reporting
for brands.



The screenshot shows the rePurpose dashboard with a sidebar menu containing Dashboard, Compliance, Reports, Fee Calculator, and Knowledge Hub. The main content area displays 'EPR Compliance' with a large green checkmark icon. Below this, it states 'California EPR Submitted'. At the bottom, it lists 'First report due May 31, 2026' and 'Fees due Aug 2026'.

Packaging Compliance

Upcoming deadlines

	Oregon EPR Report due May 31, 2026	☒ Obligated View Report
	Colorado EPR Report due May 31, 2026	☒ Obligated View Report
	Canadian Federal Plastics Registry Report due May 31, 2026	☒ Obligated View Report
	California EPR Report due May 31, 2026	☒ Obligated View Report
	Maryland EPR Report due May 31, 2026	☒ Obligated View Report



California EPR 2025



We are preparing your submission in the CAA portal

Your team and ours have reviewed and approved this report. We'll email you when the CAA portal is ready with your next steps.

[→ View Report](#)

[Mark Submitted](#)

About

EPR Program

California's SB-54 creates a statewide Extended Producer Responsibility (EPR) system for packaging and single-use plastic food service ware. It requires producers to ensure their packaging is recyclable, compostable, or reusable by future deadlines, achieve significant reductions in single-use plastics (such as a 25% cut by 2032), and take on the costs of collection, recycling, and composting. Producers must also report data and performance metrics to California's recycling agency and contribute funding to support infrastructure and mitigation programs, shifting the responsibility for packaging waste management from local governments and consumers to the companies that create it.

Reporting Period

January 1, 2023 - December 31, 2023

[Learn more](#)

Visit [ca.gov](https://www.ca.gov)

Tasks & Deadlines



Step 1: Register for California EPR 2027 Program

Sep 5, 2025

Completed



Step 2: Sign California Interim State Addendum

Nov 1, 2025

Completed



Step 3: Complete Interim Report (2023 baseline data) for California EPR 2027 Program

Nov 10, 2025

Completed



Step 4: Submit Interim Report (2023 baseline data) for California EPR 2027 Program

Nov 15, 2025

Completed



Step 5: Pay California Early Fees Invoice

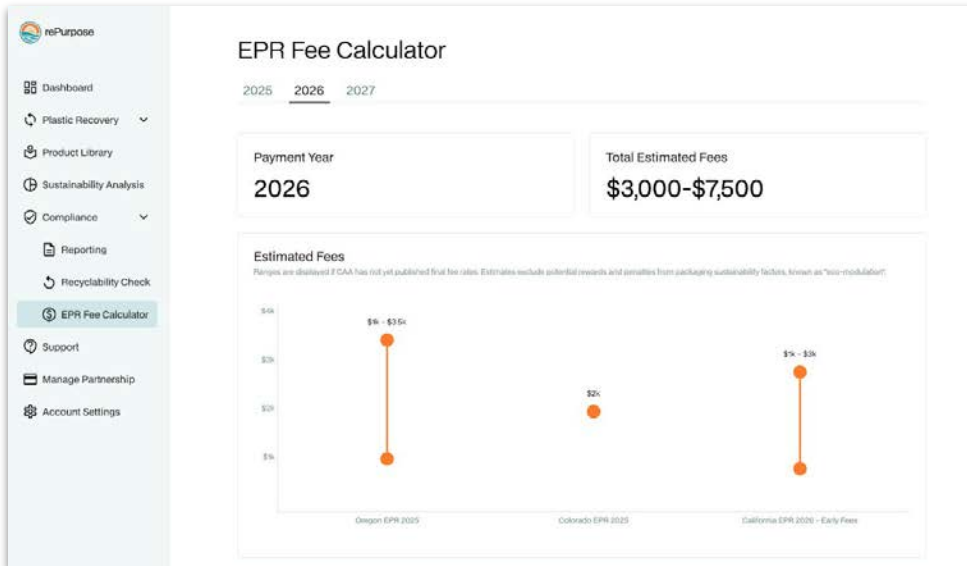
Aug 31, 2026

Upcoming



Material Category	Component name	Total Weight (lbs)	Plastic Weight (lbs)	# of Plastic Components
Plastics - Rigid Items	Shrink Wrap 500 lb pallet	8,881.84	8,881.84	2,000
	Ice pack	881.84	881.84	2,000
Plastic - Flexible				
25_P22P - PP (#5) - Other Flexible and Film Items	Label Zipper/Slider x 1 Plastic	22.05	22.05	10,000
25_P36P - Other/Mixed Plastics - Flexible and Film Items	Granola Pouch 1 sub-components	12,435.93	12,435.93	188,030
	Pallet Wrap 1 sub-components	231,483	231,483	2,100,000
	Liner	11.02	11.02	10,000
Plastic - Other				
25_P47P - Plastic - Small - Two or more sides measuring 2" or less	Cap v1 1 sub-components	277,779.6	277,779.6	2,100,000
	Cap v2 1 sub-components	220.46	220.46	10,000
Totals		2,826,366.07	810,311.24	13132607

Estimate your fees to inform better packaging decisions



Estimated Fees Breakdown by Unit

Use this breakdown to see how detailed reporting and material-based fees are calculated. If you choose the simplified, tonnage-based or flat fee reporting options, this view can still help you spot higher-cost units if you ever choose the detailed reporting option

[Download CSV](#)

Component Name	Total US	OR Fee	CO Fee
Dropper top 1	\$6,000 - 12,000	\$6,000 - 12,000	\$171.36
Bottle - glass	\$2,000 - 5,000	\$6,000 - 12,000	\$380.21
Slim Tube Applicator	\$4,000 - 8,000	\$250 - 500	\$380.21
Lotion - Standard	\$2,000 - 4,000	\$1,500 - 3,000	\$8,901
Conditioner	\$1,500 - 3,000	\$2,000 - 5,000	\$6,789.12
Recyclable squeeze bottle	\$5,000 - 9,000	\$7,000 - 11,000	\$1,098
Shampoo	\$900 - 1,500	\$6,000 - 12,000	\$0
Matte Spray Cylinder	\$4,000 - 7,000	\$5,000 - 10,000	\$0
Totals	\$25,000 - 40,000	\$25,000 - 40,000	\$2,559.54

What we're covering today

01 Pulse Check

02 EPR Foundations

03 Current State

04 What's Next

05 Data is Your Foundation

06 Insights on Getting it Right

07 Q/A

How Many of You Have Submitted Your Reports?



For Those That Did Report, How Painful Was It?

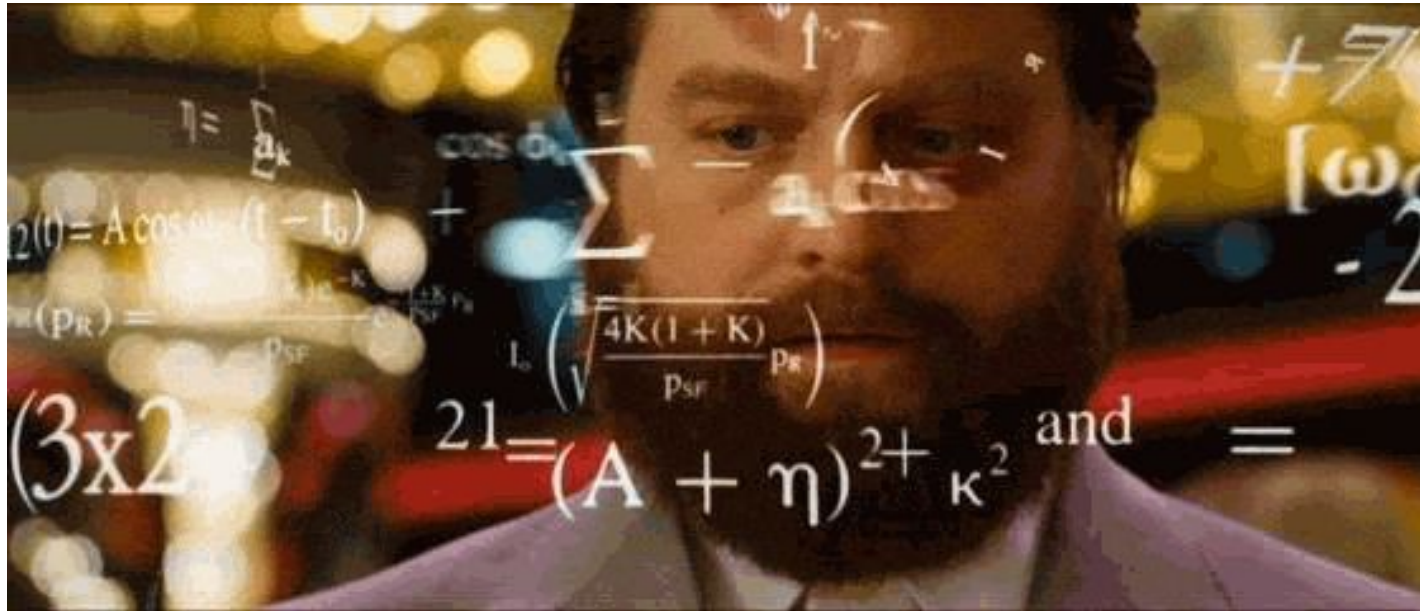


How Many Of You Are Still Working On Them?





How Many Are Just Starting Out and Trying to Make Sense Of It ALL?

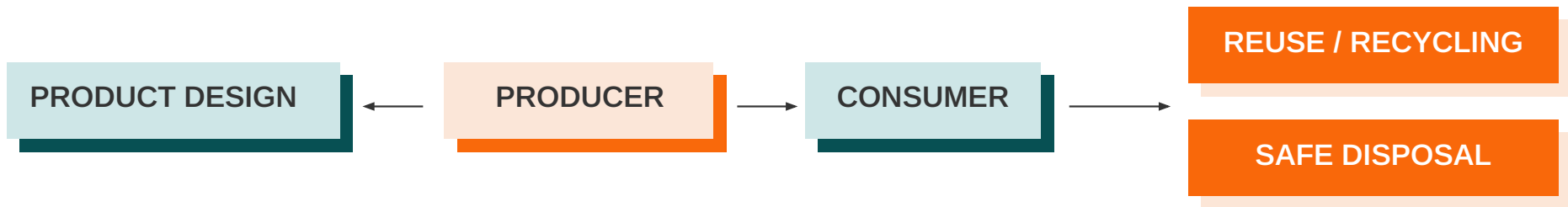


The Foundations

What even is EPR?

A Mechanism to Mobilize Finance

EPR Shifts the responsibility of managing packaging waste from local governments to the producers of the packaging....in so many words



GOAL: Incentive use of better materials to lower environmental impact

[illegible]Walmart elf
eyes lips face

saie



Who is Managing EPR Regulations?

A Producer Responsibility Organization (PRO) plays a pivotal role in helping states regulate Extended Producer Responsibility (EPR) laws.

Essentially, a PRO is an entity that helps producers comply with EPR laws by managing the collection, recycling, and disposal of packaging materials. This is particularly crucial for small to medium-sized Consumer Packaged Goods companies, which may lack the resources to navigate complex regulatory landscapes on their own.



PROs like the **Circular Action Alliance (CAA)** offer a range of services to support producers. These include registration assistance, reporting tools, and educational resources to ensure compliance with state-specific EPR laws. By centralizing these functions, PROs enable producers to focus on their core business activities while meeting their environmental responsibilities.

Who is Obligated?

A **"Producer"** is defined as any entity that manufactures, imports, or sells packaged goods.

This includes companies that place packaging on the market under their own brand, importers of packaged goods, manufacturers of unbranded products, and retailers who sell private-label products. Producers are held responsible for the lifecycle of their packaging, from design to disposal.

"Covered Entities" refer to producers who are legally obligated to manage the end-of-life stage of their packaging materials. To determine if a company is a covered entity, it must review the producer definitions outlined in each state's EPR legislation.

For instance, in Oregon, covered products include packaging, printing and writing paper, and food serviceware. The responsible producer is often the brand owner or the entity that imports the product into the country.

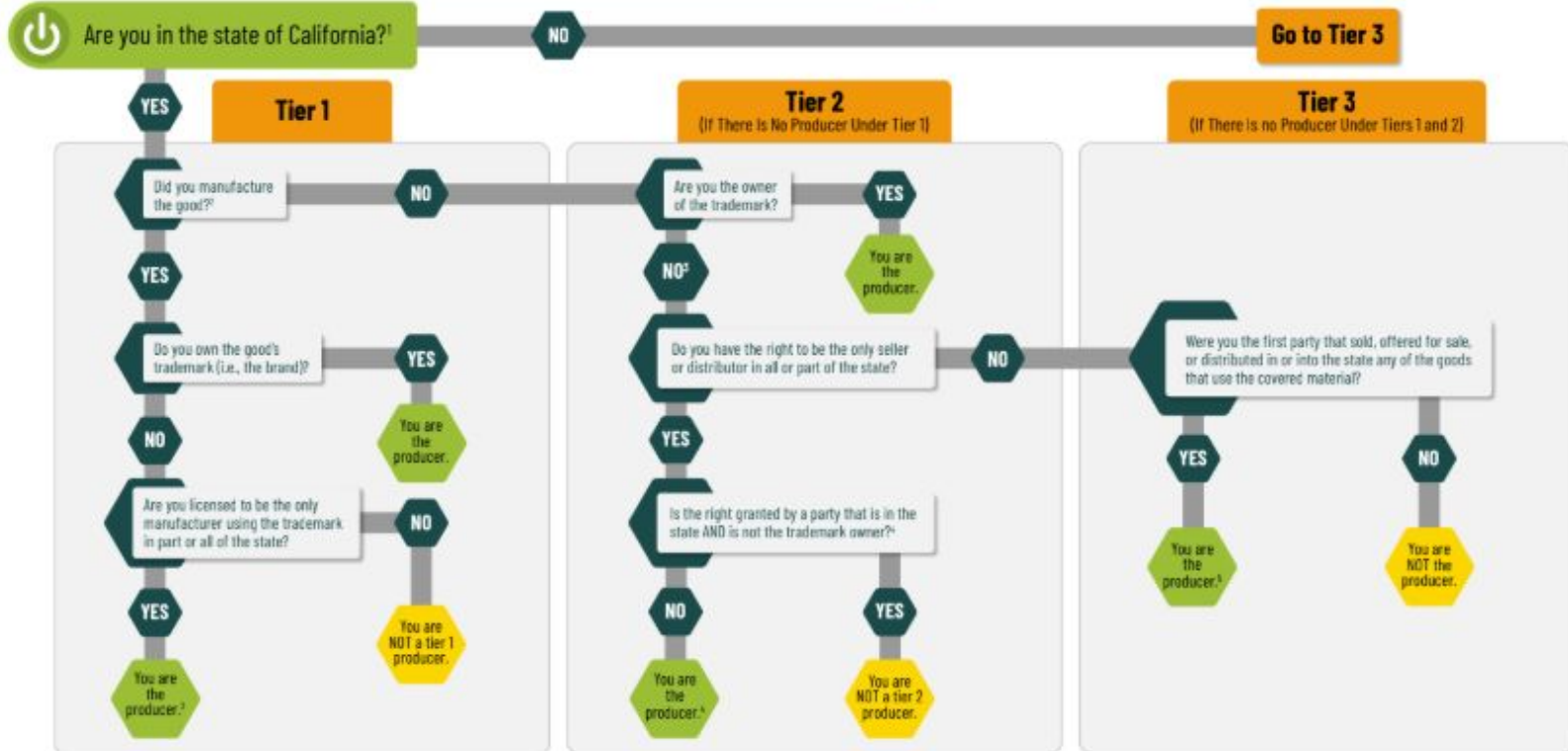


Decision Trees Help :)



Are You a Producer?

A situational screening tool for California's packaging law



How Does it Work?

Rewarding Good Design

Policies want to create a financial signal: good design and system investments pay off, poor design gets more expensive.

Introducing Eco-modulation (vs. traditional EPR Fees)

State-specific schemes:

1. Encourage innovation in reuse, recyclability, and material reduction
2. Align business incentives with environmental outcomes
3. For brands, translates design choices into concrete cost differences

Active vs. passive (automatic fee adjustment) factors



Eco-modulation is like car insurance pricing..

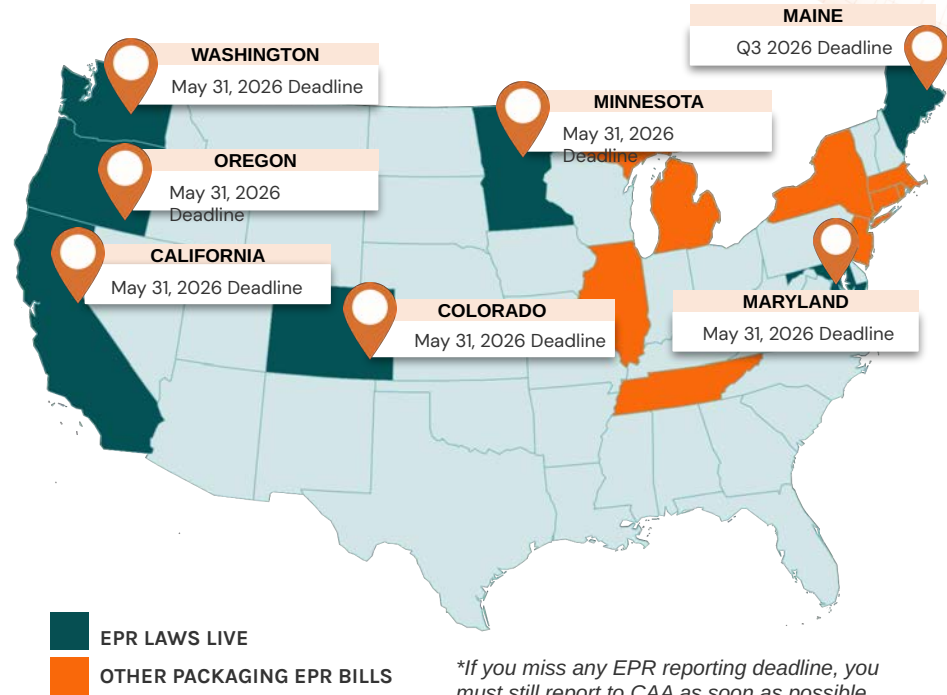
US EPR Legislation Landscape

7 active Packaging EPR Laws

Programs moving into active implementation (& enforcement)

Other states advancing legislation (Illinois, New Jersey, New York)

EPR is here to stay – and expand.



Canada EPR Legislation Landscape

9 Canadian regions (8 provinces, 1 territory) with active EPR laws, differing in scope, timelines, reporting rules, and even stewardship organizations.

The programs primarily cover packaging and paper products.

In addition to provincial EPR, Canada's Federal Plastics Registry (FPR) Report is an additional reporting requirement to track plastic lifecycle data.



It's Working!

Oregon Spotlight

Resource Mobilization:

1. >\$19.5M for recycling facility upgrades by CAA
2. \$3.1M to local communities for contamination reduction

Impact: 50,000+ recycling carts and 14 trucks deployed in communities previously lacking access.

Between \$81.5 million and \$123 million funding is projected through 2027 to fund infrastructure across the state.



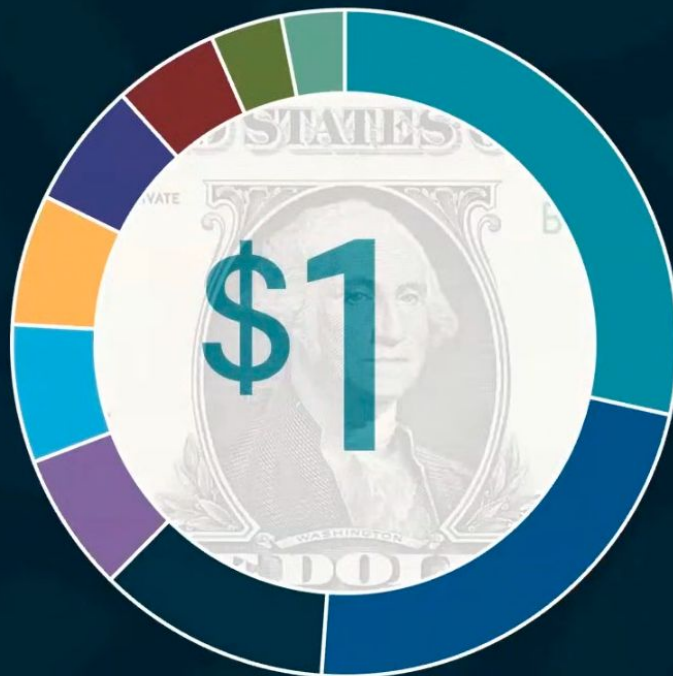
Producer Fees Supporting EPR

Producer fees fund investments that drive positive environmental outcomes for communities.

How Producer Fees Are Spent in Oregon – 2026

A breakdown of how every dollar of program funding is allocated

Payments to Commingled Recycling Processing Facilities	28.5	
Collection Services Expansion	22.7	
90+ Drop-off RecycleOn Centers for PRO Acceptance List	11.3	
PRO Management and Administration	6.7	
Program Reserves	6.7	
Contamination Reduction Programming	6.3	
Oregon Audit Center, Responsible End Market Support, etc.	6.1	
Transportation Reimbursement (USCL)	5.1	
Required Reimbursement to the State for Administrative Costs	3.5	
Resident Education and Outreach	3.1	



WASTE DIVE Deep Dive Library Events Press Releases Topics

DIVE BRIEF

Oregon rolls out drop-off recycling sites as part of EPR program

The state's new drop-off depots are meant to collect harder-to-recycle items not accepted in curbside bins.

Published Oct. 21, 2025

Megan Quinn
Senior Reporter

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Kim Holmes, the Circular Action Alliance's executive director for Oregon, speaks at the opening of the RecycleOn drop-off recycling center in Ashland, Oregon, on Oct. 15, 2025. The rollout is the first of an expected 140 new drop-off depots. Courtesy of Circular Action Alliance

Program goal: overhaul recycling systems

Part 1: increase curbside recycling access to over 150,000 homes and businesses around the state.

Part 2: create system for “tricky materials” (e.g. plastic bags, lids, plastic buckets, shredded paper and foil)

Focus on “real community benefit”

Education & Outreach Materials

RecycleOn.org serves as a trusted source for community members to get information about recycling in their state.

E&O materials are developed and printed by CAA to ensure community members receive consistent educational tools to recycle with confidence.



Recycling Guide



Billing insert



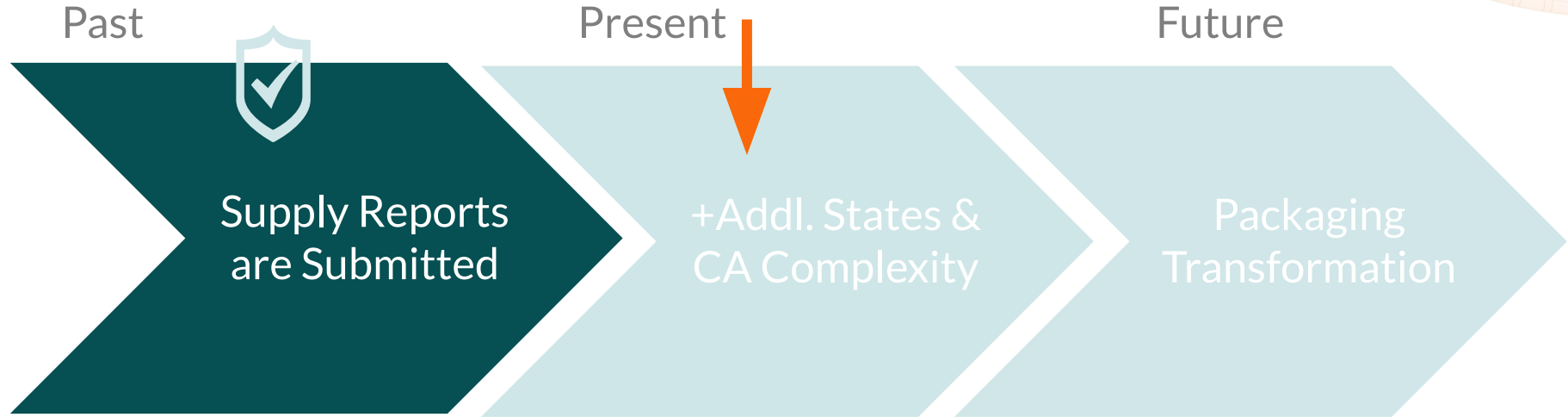
Info Card



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What's Next?

EPR is Maturing



Reports Completed

State	2026 Report Deadline	Data Year	Report Type
Oregon	May 31, 2026	CY 2025	Annual Supply Report *
Colorado	May 31, 2026	CY 2025	Annual Supply Report
California	May 31, 2026	CY 2023	Baseline Producer Supply Report
	August 1, 2026	Forecast 2027–2032 vs. 2023	Individual Source Reduction Plan
	May 31, 2026	CY 2025	Annual Supply Report
Minnesota	May 31, 2026	CY 2025	Annual Source Reduction Report
	May 31, 2026	CY 2025	Simplified Supply Report **
Maryland	May 31, 2026	CY 2025	Simplified Supply Report
Washington	May 31, 2026	CY 2025	Simplified Supply Report
Maine	TBD — Q4 2026	CY 2025	Start-up Report (total supply weight)

 CAA selected as PRO

 PRO/SO not yet selected

* Annual Supply Report — detailed material data across all defined categories

** Simplified Supply Report — higher-level report at the material class level (plastic, paper, glass)



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EPR Timeline: Key Dates & Fees

2025–2027 EPR compliance roadmap

Q4 2025

Open producer registrations in Oregon, Colorado, Maine, Washington and California

Q1 2026

January

Oregon invoice #1 and Colorado invoice #1 issued (1 invoice per state, 50% of annual 2026 dues)

Q2 2026

May 31, 2026

2025 supply reports due for Oregon, Colorado, California for program fees in 2027

July 2026

Oregon invoice #2 and Colorado invoice #2 (1 invoice per state, 50% of annual dues)

Q3 2026

August 2026

California early fee invoices issued

Q4 2026

2026 EPR Due Invoices Issued

October 2026

2027 EPR Fee list published for Oregon, Colorado and California

Upcoming Fees



Program	Report that informs 2026 Payment	Type of 2026 Payment	Program Year	Estimated Invoice Dates	What can I use to budget my 2026 fees/dues payments?
Oregon	- March 31, 2025 - CY2024 Data Annual Supply Report	Program Fees	2026	Jan & Jul, 2026 (Two 50% installments)	- Company's CY2024 Supply Data in OR - CAA 2026 OR Producer Fee Rate Schedule (available by end of Oct 2025)
Colorado	- July 31, 2025 - CY2024 Data Annual Supply Report	Program Dues	2026	Jan & Jul, 2026 (Two 50% installments)	- Company's CY2024 Supply Data in CO - CAA 2026 CO Producer Due Rate Schedule (posted in Producer Portal on Oct 13, 2025)
California	- May 31, 2026 - CY2025 Data Annual Supply Report	Early Fees	Pre-Program	Aug 2026 (One installment)	- Company's CY2025 Supply Data in CA - CAA CA Producer Early Fee Rate Schedule - Estimated Ranges (posted in Producer Portal on Sep 23, 2025)
Maine	TBD – Q3 2026	Start-up Fees	Pre-Program	TBD – Q4 2026	TBD, based on selection of Stewardship Organization (SO)

CAA selected as PRO
 PRO/SO not yet selected

What Happens if I Don't Report?

1

Legal and Financial Penalties:

Up to \$50k/day

2

Increased Compliance Costs:

Last-minute fees and legal expenses

3

Restricted Market Access:

States can block your sales

4

Damage to Brand Reputation:

Negative media coverage and reduced trust



“The consequences of non-compliance can **escalate quickly**. Penalties for failing to register or report can result in **fines of up to \$25,000 per day**. The Oregon Department of Justice may intervene to halt your product sales in the state—effectively **freezing your Oregon market access**.”



Do Yourself a Favor...

Don't be discouraged, get compliant!

Public documentation of large producers
out of compliance in Apr-May

Published delinquency policy



**Circular
Action
Alliance®**

You are receiving this notice because your company has one or more unfulfilled reporting and/or fee payment obligations for the Oregon 2026 Program Year.

Notice of Delinquency for Oregon EPR

This Notice of Delinquency is being provided because your company has one or more unfulfilled obligations administered by CAA related to reporting and/or fee payment for the Oregon 2026 Program Year. At this time, the required action(s) have not been completed, and your account is currently Out of Good Standing with CAA.

CAA administers certain producer obligations under Oregon's Extended Producer Responsibility (EPR) program, including registration, reporting, and fee administration. When an obligation administered by CAA is not fulfilled, CAA notifies the producer and provides an opportunity to resolve the delinquency.

To resolve this delinquency and return your account to Good Standing, all outstanding required reporting and/or fee payment actions reflected in your account must be completed. Applicable terms are outlined in the Oregon State Addendum you signed during registration. If you need assistance identifying the specific outstanding items on your account, please contact us.

If this delinquency is not resolved within 90 days of the date of this notice, CAA will escalate information regarding the unresolved delinquency to the Oregon Department of Environmental Quality (DEQ), as required.

If you believe this notice was sent in error or have questions about your account status, please



Circular Action Alliance invoicing on behalf of Circular Action Alliance Oregon

2026 invoices are arriving in inboxes!

Billed To

Invoice Date: January 20, 2026
Customer ID: [Redacted]
Invoice Number: [Redacted]
PO#:
Program: Oregon Program
Year 2026

Invoice Date: January 20, 2026
Customer ID: [Redacted]
Invoice Number: [Redacted]
PO#:
Program: Oregon Program
Year 2026

For questions about this bill, email
ar@circulardaction.org

Summary of Charges

Amount Due: [Redacted]
Payment for this invoice is authorized to be made in two installments. 50% of the total invoice amount is due within the applicable payment terms from the invoice date. The remaining 50% is due no later than July 30, 2026, regardless of payment terms. Any balance unpaid after its applicable due date will incur a 1% late fee per month on the outstanding amount. Remittance of the full invoice balance within the applicable payment terms, in lieu of the installment schedule, is preferred.

Billed To

Remittance Instructions

Invoice Date: January 20, 2026
Invoice Number: [Redacted]
Customer ID: [Redacted]
Amount Due Mar 06, 2026
ACH Instructions:
Bank Name: Bank of America
Bank Account Name: Circular Action Alliance
Account Type: Checking
Bank Account Number: 28658223
ACH Routing Number: 021052053
TAX ID Number: 92-3197259
Remittance Address:
PO BOX 744943
Los Angeles, CA 90074

Line	Sales Item Line Description	Supply Weight Lbs.	Fee Rate	Amount
1	OR-26-Compliance Fee.Polycoated Paperboard	[Redacted]	\$0.48	[Redacted]
2	OR-26-Compliance Fee.PP (#5) - Other Rigid Containers, Cups, Plates, Trays (non-nursery (plant))	[Redacted]	\$0.62	[Redacted]
3	OR-26-Compliance Fee.Plastic Laminates and Other Flexible Plastic Packaging	[Redacted]	\$1.02	[Redacted]

Amount Due [Redacted]

Payments under \$100K can be made at www.circularaction.org/pay by credit card or ACH or through the QR code below. Credit card payments may be subject to a fee.

www.circularaction.org/pay



Remember to add the Account and Invoice Numbers on the payment remittance.

Source Reduction Plans are Next

	State	2026 Report Deadline	Data Year	Report Type
✓	Oregon	May 31, 2026	CY 2025	Annual Supply Report *
✓	Colorado	May 31, 2026	CY 2025	Annual Supply Report
✓		May 31, 2026	CY 2023	Baseline Producer Supply Report
	California	August 1, 2026	Forecast 2027–2032 vs. 2023	Individual Source Reduction Plan
✓		May 31, 2026	CY 2025	Annual Supply Report
✓		May 31, 2026	CY 2025	Annual Source Reduction Report
✓	Minnesota	May 31, 2026	CY 2025	Simplified Supply Report **
✓	Maryland	May 31, 2026	CY 2025	Simplified Supply Report
✓	Washington	May 31, 2026	CY 2025	Simplified Supply Report
	Maine	TBD — Q4 2026	CY 2025	Start-up Report (total supply weight)

CAA selected as PRO

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** Simplified Supply Report — higher-level report at the material class level (plastic, paper, glass)

CA Mandates Better Packaging

Introducing SB 54 (2032), Precursor to your ISR

Individual Producer Obligation

100%

Recyclable / Compostable

All single-use
packaging must be
recyclable or eligible
for compostable
labeling

PRO/CAA Obligation (Aggregate for the Entire Producer Community)

65%

Recycling Rate for Plastic

Recycle at least 65%
of single-use plastic
packaging and food
serviceware in CA

25%

Source Reduction for Plastic

Reduce plastic
covered material by
25% (plastic weight
AND no of plastic
components) vs. 2023
baseline

10%

Reuse / Refill / Elimination

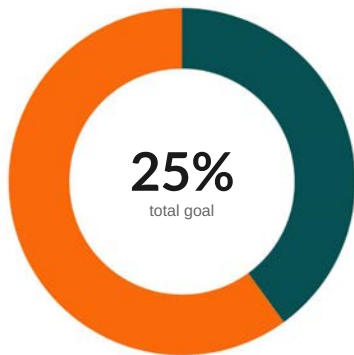
At least 10% of plastic
packaging shifted to
reusable/refillable or
eliminated



rePurpose

Eligible Pathways to Achieve the the 25% Plastic Source Reduction Goal

For CAA



Source: SB 54, CalRecycle

Reuse, Refill & Elimination

10%

Required minimum — no substitutes allowed

Other reduction pathways

15%

Right-sizing, material switching, concentration, bulk PCR content capped at 8% of total plastic covered material

For YOU

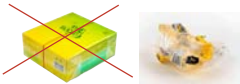
Set reduction targets to contribute to the collective

Use of ISRs to learn & set directives. CAA to accept/deny.

Get credit for past action taken (2013-2022)

Best foot forward but be realistic. Get support!

Approved Pathways to Achieve Source Reduction

1	Reuse / Refill Shift from single-use to reusable or refillable packaging.		Example: Refillable loose-leaf tin; customers return for refills
2	Elimination Remove a plastic component entirely without replacing it.		Example: Removing the plastic overwrap from tea box packaging
3	Material Switching Switch from plastic to a non-plastic alternative.		Example: Replacing plastic tea pouches fully paperboard packaging
4	Right-sizing / Lightweighting / Concentrating / Bulk Reduce plastic via lightweighting, concentrating, or bulk.		Example: Bulk loose-leaf bags replacing individually wrapped sachets
5	PCR Content (Alternative Compliance) Incorporate certified post-consumer recycled content. Capped at 8%.		Example: Plastic using 30% APR-certified PCR content in plastic canister lids

Plastic Source Reduction Baseline and 2023 Estimates

- **What “source reduction” means:**

Reducing the amount of plastic covered material a producer puts on the market, measured by plastic weight & plastic component count, compared to a 2023 baseline established by Calrecycle. *(No business growth adjustment applies)*

- **What does not count as source reduction:**

Switching from a recyclable/compostable covered material to a non-recyclable/non-compostable one. *(recyclable and compostable determinations are as per Calrecycle's CMC list)*

- **Historical source Reduction:** Plastic reductions made between 2013-2022 can be reported and may earn credit.

Plastic Source Reduction
2023 Baseline numbers per
initial assessment contracted
by Calrecycle

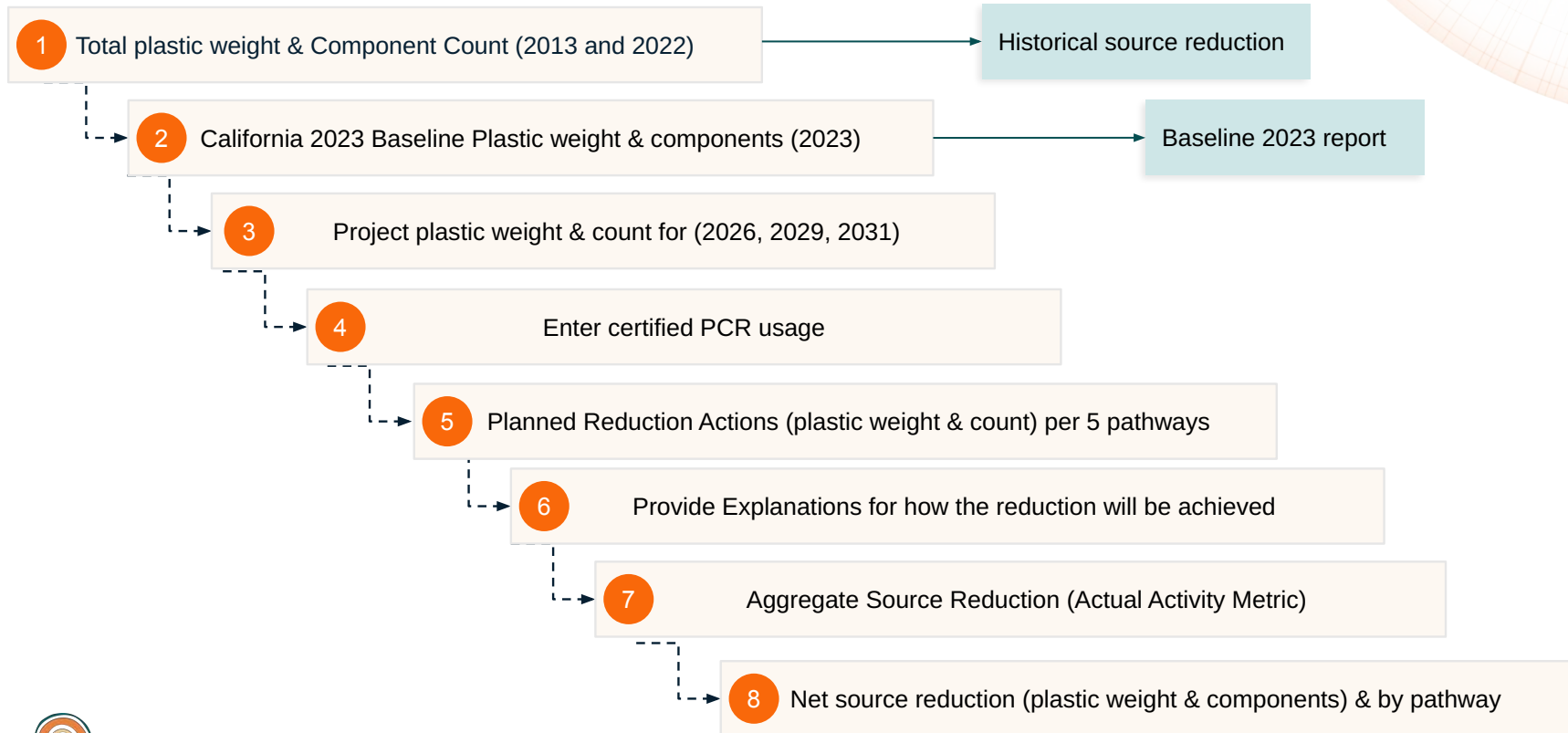
2.9 M 2.4M Packaging
0.5M Food Service Ware

Tons of plastic covered material
were sold, offered for sale, or
distributed into California in 2023.

171.4 B 84B Packaging
87.4B Food Service Ware

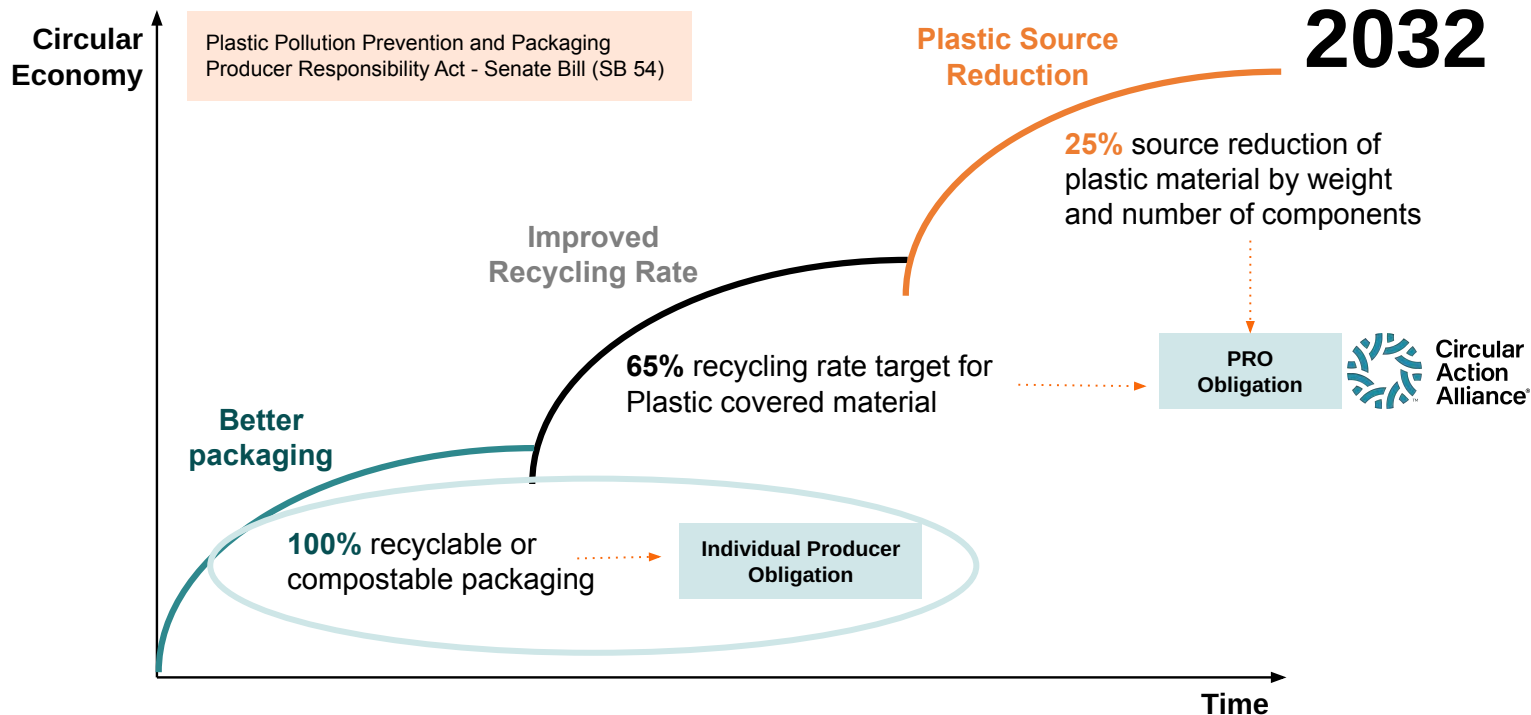
plastic components (by count)
were sold, offered for sale, or
distributed into California in 2023.

Steps involved in building your ISR Plan



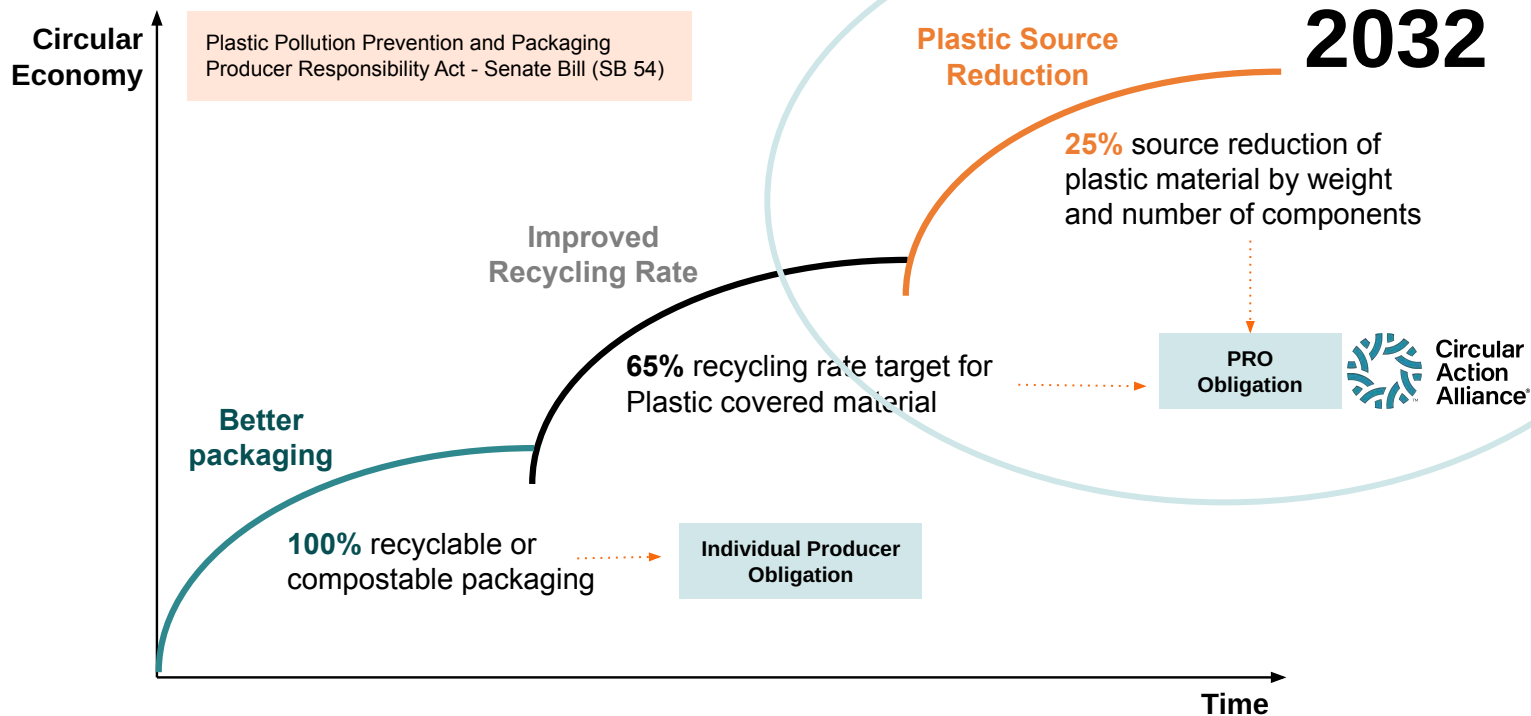
Recap

Your Role. A Collective Goal.



Recap

CA Mandate, Universal Benefit



Key Actions for Producers

Five actions to stay compliant with California SB 54

1

Complete California registration with CAA

Select your reporting option (PRO or self-reporting) and sign CAA's onboarding agreements.

~~May 31, 2026~~

2

Submit (or verify) the California Baseline Report

2023 Data Year. If you submitted in November, use this round to confirm plastic weights and component counts.

~~May 31, 2026~~

3

Submit the 2026 Annual Supply Report

2025 Data Year.

~~May 31, 2026~~

4

Submit the Annual Source Reduction Report

2025 Data Year. No thresholds or penalties this year, but it lowers fees and counts toward your reduction contributions.

~~May 31, 2026~~

5

Prepare the Individual Source Reduction Plan

Annual ISR plan submission. May be subject to public disclosure

Aug 1, 2026

Producers must register and report 2023 data by June 1st 2026

SB54 Adds layers of complexity to what some of you did for OR and CO

Table 1: How CAA Calculates Total Fees

Total Fees	
	Total Base Fee
+	Reuse Investment Fee
+	PPMF Weight-Based Fee
+	PPMF Component-Based Fee
=	Total Fees

PPMF

Taking traditional fee schedules to a new level

PPMF Fees

The PPMF fees collect funds producers must contribute to the PPMF under SB 54 (\$500 million per year). SB 54 contains a provision whereby resin manufacturers may contribute up to \$150 million per year. CAA's program plan will include a proposal on how resin manufacturers can report and remit fees. However, CAA has no legal authority to require resin manufacturers to pay into the PPMF without an amendment to SB 54. The illustrative fees assume the full \$500 million is paid for by the producers of plastic packaging.

California SB 54: Illustrative Fee Schedule

2027 Low Scenario — Excerpt from CAA Illustrative Fee Schedule

Material Class	Material Category	Total Base Fee (¢/lb)	Reuse Investment Fee (¢/plastic component lb)	PPMF Weight Fee (¢/plastic component lb)	PPMF Component Fee (¢/plastic component unit)
Ceramic	All Forms w/ plastic component	27	4	17	0.10
Glass	Bottles & Jars w/ plastic component	1	4	17	0.10
Glass	Other Forms w/ plastic component	23	4	17	0.10
Metal	Aluminum non-aerosol w/ plastic component	5	4	17	0.10
Paper/Fiber	Cardboard w/ plastic component	2	4	17	0.10
Paper/Fiber	Aseptic Cartons	9	4	17	0.10
Plastic - Rigid	PET (#1) Bottles, Jugs, Jars (Clear)	11	4	17	0.10
Plastic - Rigid	PVC (#3) Rigid Items	33	4	17	0.10
Plastic - Rigid	PS (#6) Foamed Containers	47	4	17	0.10
Plastic - Flexible	PET (#1) Flexible & Film	45	4	17	0.10
Plastic - Flexible	PVC (#3) Flexible & Film	69	4	17	0.10
Plastic - Flexible	Other/Mixed Plastics — Flexible & Film	57	4	17	0.10
Wood/Organics	All Untreated Forms w/ plastic component	2	4	17	0.10

California SB 54: Illustrative Fee Schedule

2027 High Scenario — Excerpt from CAA Illustrative Fee Schedule

Material Class	Material Category	Total Base Fee (¢/lb)	Reuse Investment Fee (¢/plastic component lb)	PPMF Weight Fee (¢/plastic component lb)	PPMF Component Fee (¢/plastic component unit)
Ceramic	All Forms w/ plastic component	67	10	25	0.12
Glass	Bottles & Jars w/ plastic component	3	10	25	0.12
Glass	Other Forms w/ plastic component	58	10	25	0.12
Metal	Aluminum non-aerosol w/ plastic component	12	10	25	0.12
Paper/Fiber	Cardboard w/ plastic component	6	10	25	0.12
Paper/Fiber	Aseptic Cartons	23	10	25	0.12
Plastic - Rigid	PET (#1) Bottles, Jugs, Jars (Clear)	35	10	25	0.12
Plastic - Rigid	PVC (#3) Rigid Items	82	10	25	0.12
Plastic - Rigid	PS (#6) Foamed Containers	127	10	25	0.12
Plastic - Flexible	PET (#1) Flexible & Film	100	10	25	0.12
Plastic - Flexible	PVC (#3) Flexible & Film	176	10	25	0.12
Plastic - Flexible	Other/Mixed Plastics — Flexible & Film	148	10	25	0.12
Wood/Organics	All Untreated Forms w/ plastic component	5	10	25	0.12

California SB 54: Illustrative Source Reduction Incentive Mechanism

2027 Bonus & Malus Schedule — incentives for source reduction, reuse, and PCR

Bonus	Description	\$/ton	¢/pound
Tier 1	2026 supply of plastic minus 2027 supply (max: 2026 minus 2023)	200	10
Tier 2	2027 supply minus 2023 supply (no max; cannot combine with Tier 1)	1,500	75
Reuse	Plastic weight avoided via Business-to-Business Prefill, Business-to-Consumer Prefill, or In-store Refill	500	25
PCR	PET Bottles (non-CRV)	400	20
	PET Thermoforms	800	40
	HDPE Bottles, Natural	20	1
	HDPE Bottles, Color	300	15
	PP Rigid	200	10
	Mono PE Flex	1,000	50
	Mono PP Flex	1,200	60
Malus	Description	\$/ton	¢/pound
2027	Estimated based on amount of bonus producers may claim on their 2027 supply	25	1.25

Source: Circular Action Alliance, California Illustrative Fees, May 2026.

Small Business Exemptions

	California*	Colorado	Oregon	Minnesota	Maryland	Washington
Covered Material Weight	N/A	<1 ton	<1 metric ton	<1 ton	<1 ton	<1 ton
Revenue / Sales	Producers, retailers, or wholesalers that, in the most recent calendar year, had gross sales of less than \$1,000,000 in the state	A person with less than \$5,632,843 in realized gross total revenue, not including on-premises alcohol sales, during the prior calendar year**	Has a gross revenue of less than \$5 million for the organization's most recent fiscal year	A person that in their most recent fiscal year earned global gross revenues of less than \$2,000,000.	A person that in their most recent fiscal year earned global gross revenues of less than \$2,000,000.	Has a global gross revenue, not including on-premises alcohol sales, for the prior fiscal year of: Until January 1, 2031, less than \$5,000,000
Each company's sales and covered material volume is considered in aggregate with parent/subsidiaries and other associated producers.						

*Producers who expect to file a small producer exemption pursuant to Section 18980.5.2 of Draft Regulations with CalRecycle will be required to do so directly as CAA will not file a small producer exemption application on behalf of the producer

**Producer Exemption Dollar Limit As of July 1, 2025

Additional Considerations

Think About in Like Taxes....know where the

- Packaging for FDA-regulated Drug, Medical Devices & Fortified Nutritional Supplements
- Dietary supplements [CO & WA only]
- Products Regulated by FIFRA (Federal Insecticide, Fungicide, and Rodenticide)
- Poison Prevention Act - e.g. Marijuana packaging in CO
- Dangerous, Flammable, Hazardous Products
- Beverage containers subject to Bottle Bills - **Only Primary Packaging excluded**
- Refillable or Reusable Packaging or Food Service Ware (Some states only e.g. CO, CA)
- Durable Packaging > 5 years
- Packaging associated with paint products
- Exemptions for Certain Materials with Demonstrated Recycling Rates



Durable Good Storage Packaging (5+ Years)

5-Year Rule

- Packaging designed for long-term protection/storage of a product with a lifespan of 5+ years
- **Exempt in:** California, Colorado, Oregon, Emerging states (reusable materials may need to be reported in some states)
- Single-use packaging does **NOT** qualify even if product has 5+ year lifespan

Toy / Tool / Board Game Example

- **California specifically cites:** multi-piece toys sold in containers designed to be stored in those containers
- Also includes: tools in rigid storage containers, board games/puzzles in paperboard boxes
- Key test: is the packaging designed to store the product long-term?

How Tillamook Solved EPR & Saved \$100K

CUSTOMER INFO

Tillamook | Food Manufacturing | \$1.2B Revenue

CHALLENGE

Multi-state EPR compliance with tight deadlines, varying packaging types and data in spreadsheets

SOLUTION

Automated, multi-state compliance tracking and reporting, regulatory expertise, and comprehensive data management.

"rePurpose had a very long history in the stewardship and sustainability realm. This wasn't just a company jumping on the EPR opportunity—they had real expertise."

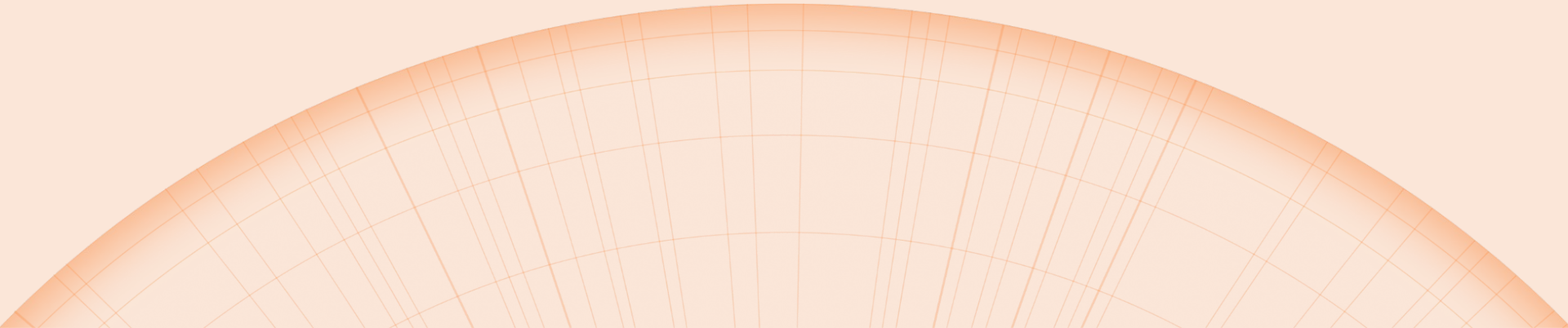
Steve Marko
VP R&D & Packaging
Tillamook



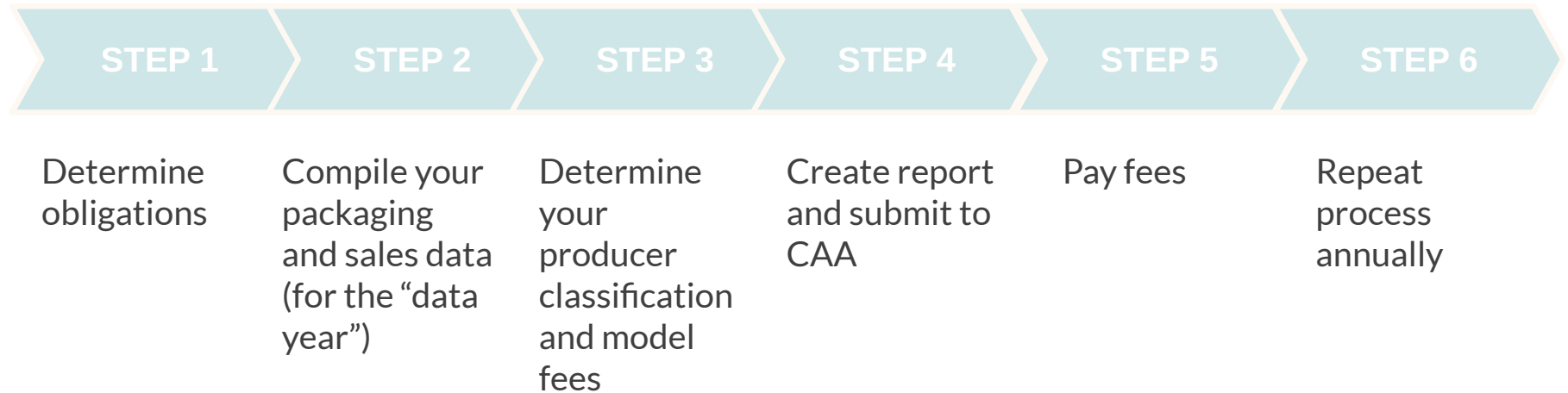
RESULTS

- **\$100K savings on EPR fees for one state** - "rePurpose reviewed our Oregon filing and reclassified our materials correctly saving \$100K in fees. The partnership has already paid for itself."
- **Weeks of work completed in days** - "Within 3-4 days, they came back with 80% of our database structure already built."
- **4-5 hours per week time savings** - "I need to focus on innovation and keeping the business running."

In Practice



Step-by-Step EPR Compliance Journey



EPR is a Cross-Functional Challenge That Starts with Systematic Data Collection

WHAT BRANDS NEED TO DO TO COMPLY

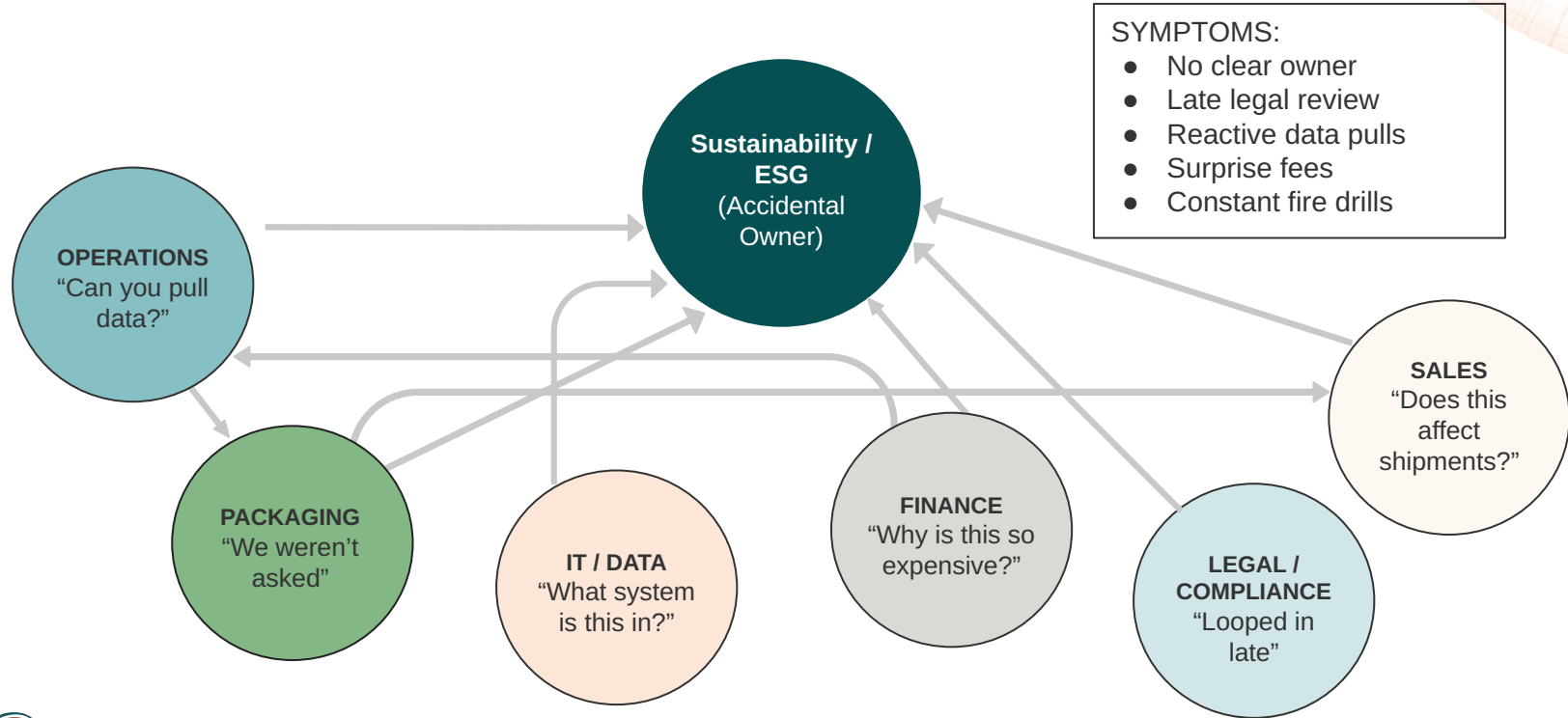
- ✓ **Determine if you're obligated**
Interpret definitions to confirm how to report
- ✓ **Gather and format packaging data**
Collect mass, material type, format, PCR content, and sales volume for all packaging by SKU and channel
- ✓ **Submit with the right reporting method**
Decide the best disclosure path and methodology

WHY THIS IS A CHALLENGE

- ✗ **Each state has different nuances**
Company structure & exemptions will impact liability
- ✗ **Data is fragmented and inconsistent**
Info lives in silos across packaging, regulatory, sales, operations, & suppliers—often in incompatible formats
- ✗ **Missteps cost time and money**
Choosing wrong or data errors = unnecessary cost

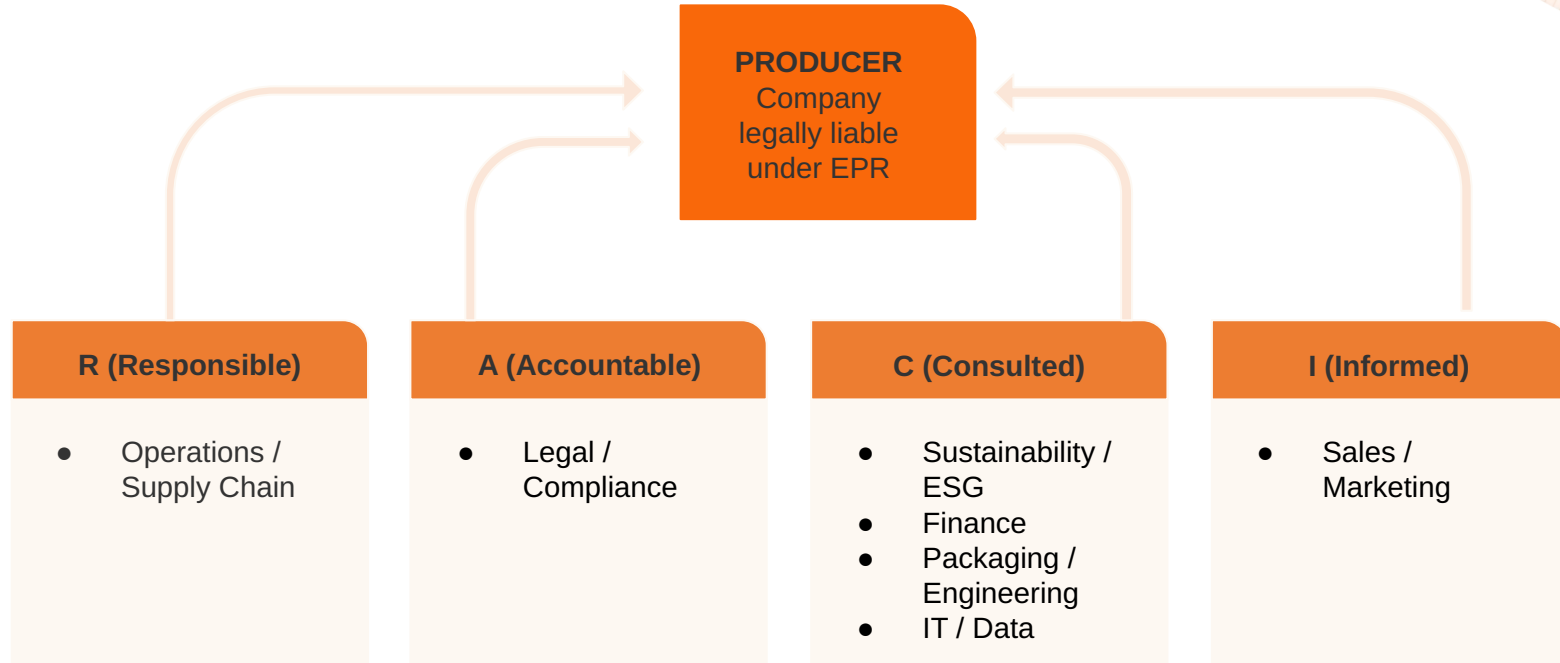
Who Owns EPR? RACI Model – BEFORE

How EPR Shows Up In Most Companies

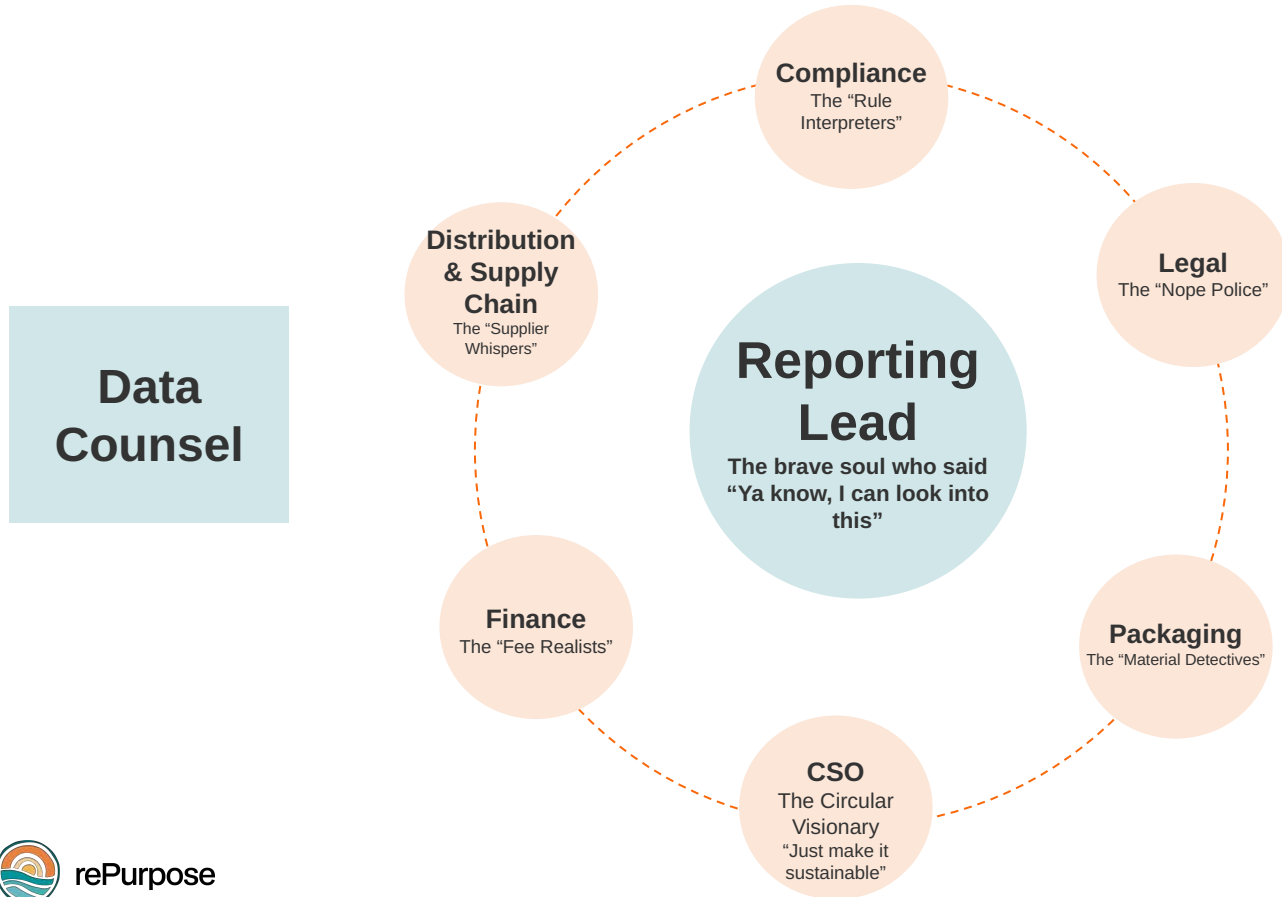


Who Owns EPR? RACI Model – AFTER

EPR with Ownership & Accountability (Bullseye / Focused RACI)



You can create variations, but you MUST DEFINE ROLES



5 most common mistakes

01

Waiting for
perfect data

02

Wrong
material
classifications

03

Ignoring
California
source
reduction

04

Treating
simplified
reporting as
optional

05

Going it alone
longer than
you need to



Strategies for streamlining supplier data collection

BEFORE OUTREACH

Build one master packaging database

- All material types, weights & resin codes
- Map to California — others are a subset
- Updates annually, cascades to all states

Rank suppliers by risk of delay

- Flag high-risk: overseas mfrs, co-packers
- Identify who could block your full report
- Start high-risk outreach 4–6 weeks earlier

INITIAL OUTREACH

Send pre-filled templates, not blank forms

- Pre-populate every field you already know
- Ask suppliers to verify — not create from scratch
- Use Word or Excel — not Google Forms

Include an EPR 101 brief with every ask

"Legal compliance obligation for 7 U.S. states"

- Deadline: May 31, 2026 — 6 states simultaneous
- Frame as business continuity vs admin

DATA COLLECTION

Help suppliers translate their data

- Provide a conversion key: your fields ↔ their terms
- Example: "resin type" = "material grade"
- For cut files: include extraction instructions
- Accept imperfect data — clean it up later
- Proprietary data? rePurpose can backfill estimates

Key insight

The problem isn't "we don't track that." It's "we track it differently." Bridge the gap and don't wait for perfect data.

IF STALLED

Escalate intentionally and early

Week 1–2 Initial outreach

Pre-filled template + EPR 101 brief

Week 3 No response

Escalate to account manager's manager

Week 4 Still nothing

C-suite to C-suite if supplier is critical

Data Collection Confessions

Anonymous submissions from the trenches

"We reached out to 200 suppliers. Two months later, only 60% responded. Half of what we got back was unusable."

"One film supplier ghosted us. We started requesting in September and still haven't gotten the data we needed"

"Suppliers sent us cut files and technical drawings. Nobody on our team knows how to read them"

"Our co-packer owns all the supplier relationships. We can't contact them directly"

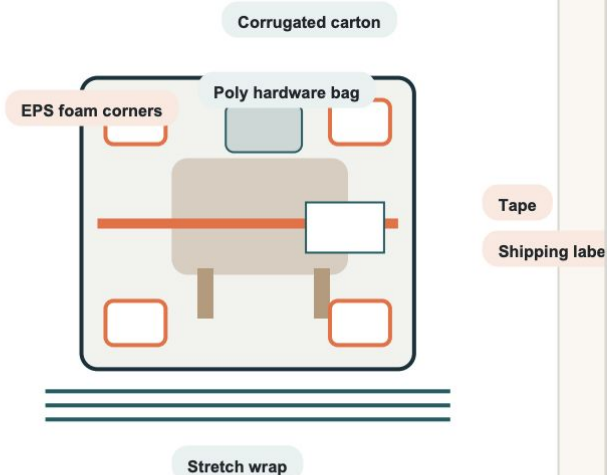
"We have data for 95% of our SKUs. That last 5% has been holding up our entire report for three months"



Furniture Packaging Through the EPR Lens

Typical Shipment Anatomy

Example: boxed chair / nightstand / flat-pack item



How It Stacks Up

OR / CO / CA packaging EPR framework

Component	Material	OR/CO	CA
Corrugated carton	Paper/fiber	Report	Report
EPS corner blocks	Rigid/foam plastic	Report	Report
Poly hardware bag	Flexible plastic	Report	Report
Tape + labels	Paper/plastic mix	Report	Report
Stretch wrap	Flexible film	Report	Report
Durable storage case	Potential exemption	Analyze	Analyze

Important nuance:
Packaging tied to long-term storage may require separate analysis.

Why Furniture Is Different

- Large packaging footprint**
per shipped unit
- Protective materials**
foam, bags, corner blocks, wrap
- Supplier data gaps**
often spread across factories
- Exemption questions**
durable storage vs. shipping pack
- Fee exposure**
design choices may change costs

What looks like ONE package to a consumer can become SIX+ reportable packaging components under EPR.

Furniture Packaging Through the EPR Cost Lens

What Consumers See vs. What EPR Sees

CONSUMER VIEW	EPR SEES	EXPLODED PACKAGING VIEW
■■■ SOFA • One Product • One Purchase • One Delivery	■ 6+ Packaging Components 4+ Material Classes Multiple Reporting Categories Variable Fee Exposure	• Shipping Label • Corrugated Carton • EPS Corner Protectors • Poly Hardware Bag • Tape • Stretch Wrap

THE PACKAGING MATTERS MORE THAN THE PRODUCT

Lower Exposure Example	Higher Exposure Example
Corrugated + Paper Protection	EPS Foam + Flexible Film + Mixed Plastics
Simpler Reporting	More Complex Reporting

Key Message: SB54 introduces a future where packaging design choices increasingly influence compliance costs. This is where packaging choices begin turning into dollars.

Translating Complexity

- Bonus reports that differ across states
- Thousands of guidance pages across 7 state and 14 CAA documents
- Tons of docs released as late as late April
- California's 2023 baseline deadline for May 31 was set May 1
- International complexity (Canada w. 625 pages of guidance across 21 documents)



Translating Complexity

- Bonus reports that differ across states
- 510 guidance pages across 14 CAA documents
- Tons of docs released as late as late April
- California's 2023 baseline deadline for May 31 was set May 1
- International complexity (Canada w. 625 pages of guidance across 21 documents)



Built-in 1271 rules as of 2026 reporting cycle



Solutions Exist!

- Bonus reports that differ across states
- 510 guidance pages across 14 CAA documents
- Tons of docs released as late as late April
- California's 2023 baseline deadline for May 31 was set May 1
- International complexity (Canada w. 625 pages of guidance across 21 documents)



Built-in 1271 rules as of 2026 reporting cycle

- + 971 from 2025 (+300%)
- 13% are just exclusions
- US 653, Canada 618
- CA 265 alone (~4X other jurisdictions)



rePurpose Introduces.....

Packaging Simulator

Instant Impact Modeling for Every Packaging Decision.

One-click scenario modeling. Zero spreadsheets. Replace months of manual analysis with real-time packaging comparisons that drive confident, compliant decisions.

Source Reduction Raises Packaging Complexity

EPR regulations are tightening. Source reduction plans are due. Recycling mandates are changing. And brands are expected to make expensive, high-stakes packaging decisions with fragmented data, limited modeling tools, and mounting compliance deadlines.

01

Regulatory Pressure & Tight Deadlines

Individual Source Reduction Plans are due to CAA by 8/1/26. Brands need data now in order to develop a plan they're accountable to.

EPR reporting & annual fees are also driving the need for more sustainable packaging.

02

No Way to Model Tradeoffs

Teams are limited to manual spreadsheets to compare EPR fees, recyclability, plastic footprint, or PCR content across packaging changes before committing.

And spreadsheets don't keep up with evolving regulations.

03

Expensive Guesswork

Without scenario modeling, packaging decisions are often reactive, driven by guesswork rather than data-driven insight.

This leads to missed savings, compliance risk, and starting over. Model the impact before you commit.

Simulate Packaging Change

Save

Dashboard

Plastic Recovery

Compliance

Packaging Simulator

Product Library

Support

Account Settings

Nonna Rosa

Name

24oz glass pasta jar - 2027 pkg optimization

Tags

Elimination X

Material Swap X

Right-sizing/Bulk format X

+

Applies To

Traditional Pasta Sauce 24oz, Fire-Roasted
Garlic Pomodoro, Garden Vale.. [+5 products](#)

Original Package



24oz glass jar (480g) x 1

Jar



Black PP screw cap w/ liner x 1

Cap - 1 sub-component



Plastic tamper-evident tear bond x 1

Seal



Full-body shrink sleeve - white x 1

Sleeve

New Package - optimized



24oz glass jar (430g)

Jar

x

1



Natural PP screw cap no liner

Cap

x

1



Paper tamper seal strip

Seal

x

1



+ Add Component

Sales Region

Total USA

EPR Fees

Material Footprint

CA Recyclability

PCR

Cost

Plastic Subc

Original Package New Package



Adjust 2027 Sales Projection

Apply

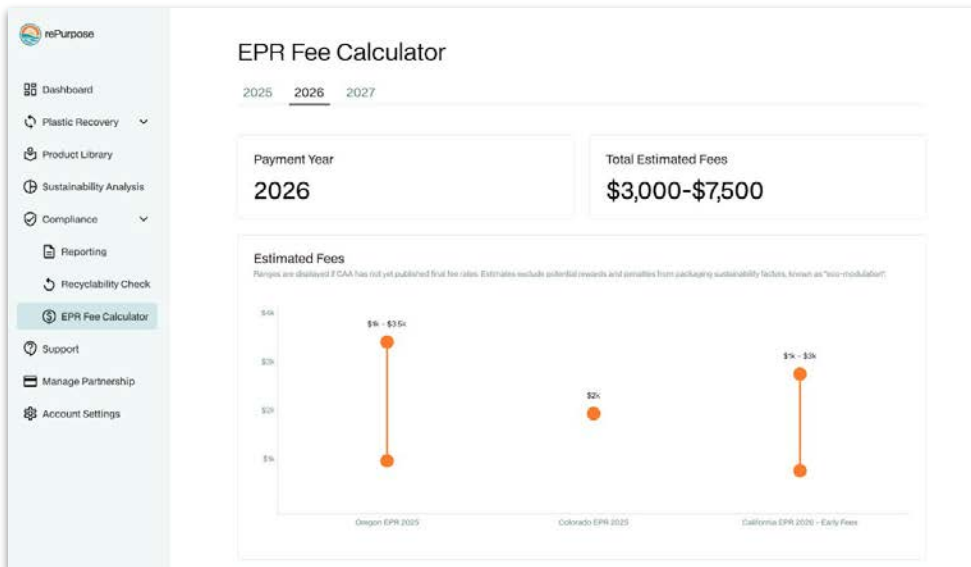
5 %

growth to all products based on 2026 sales.



Material Category	Component name	Total Weight (lbs)	Plastic Weight (lbs)	# of Plastic Components
Plastics - Rigid Items	Shrink Wrap 500 lb pallet	8,881.84	8,881.84	2,000
	Ice pack	881.84	881.84	2,000
Plastic - Flexible				
25_P22P - PP (#5) - Other Flexible and Film Items	Label Zipper/Slider x 1 Plastic	22.05	22.05	10,000
25_P36P - Other/Mixed Plastics - Flexible and Film Items	Granola Pouch 1 sub-components	12,435.93	12,435.93	188,030
	Pallet Wrap 1 sub-components	231,483	231,483	2,100,000
	Liner	11.02	11.02	10,000
Plastic - Other				
25_P47P - Plastic - Small - Two or more sides measuring 2" or less	Cap v1 1 sub-components	277,779.6	277,779.6	2,100,000
	Cap v2 1 sub-components	220.46	220.46	10,000
Totals		2,826,366.07	810,311.24	13132607

Estimate your fees to inform better packaging decisions



Estimated Fees Breakdown by Unit

Use this breakdown to see how detailed reporting and material-based fees are calculated. If you choose the simplified, tonnage-based or flat fee reporting options, this view can still help you spot higher-cost units if you ever choose the detailed reporting option

[Download CSV](#)

Component Name	Total US	OR Fee	CO Fee
Dropper top 1	\$6,000 - 12,000	\$6,000 - 12,000	\$171.36
Bottle - glass	\$2,000 - 5,000	\$6,000 - 12,000	\$380.21
Slim Tube Applicator	\$4,000 - 8,000	\$250 - 500	\$380.21
Lotion - Standard	\$2,000 - 4,000	\$1,500 - 3,000	\$8,901
Conditioner	\$1,500 - 3,000	\$2,000 - 5,000	\$6,789.12
Recyclable squeeze bottle	\$5,000 - 9,000	\$7,000 - 11,000	\$1,098
Shampoo	\$900 - 1,500	\$6,000 - 12,000	\$0
Matte Spray Cylinder	\$4,000 - 7,000	\$5,000 - 10,000	\$0
Totals	\$2500 - 15000	\$2500 - 15000	\$2,559.54

Thank You! Let's get to some Questions.



rePurpose

The leading Packaging Sustainability & Compliance platform for consumer companies. Enabling companies to navigate packaging regulations complexity with confidence.

Contact us:  sales-team@repurpose.global

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