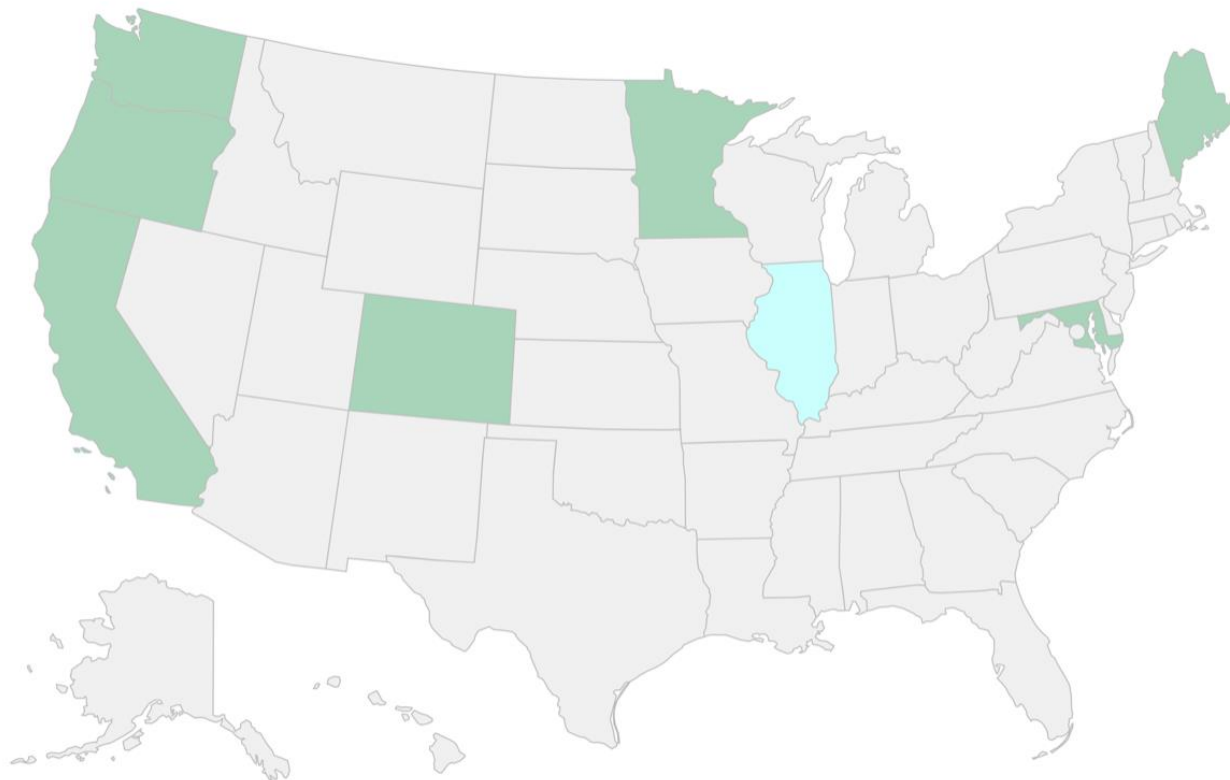


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The Current EPR Landscape in The U.S



USA Current State: EPR



■ EPR Packaging Bill in Place
■ "Needs Assessment" EPR Law Underway

7+1

EPR packaging bills have passed in the U.S

10+/-

States have introduced legislation on EPR for packaging in 2024-25. This number continues to rise.

USA Current State: EPR Comparison

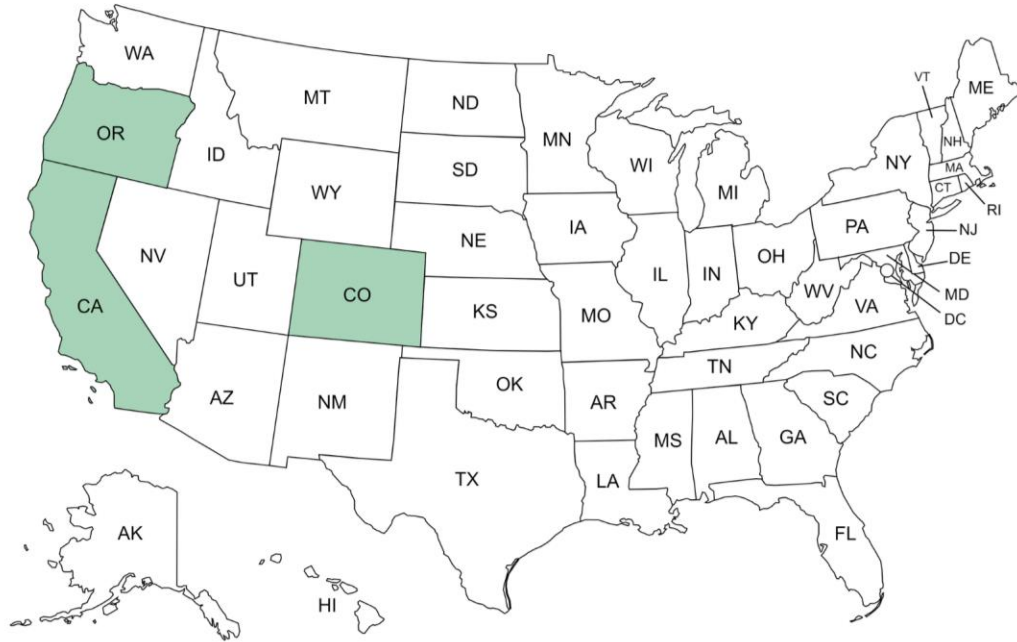
	Oregon	Colorado	Maine	California	Minnesota	Washington	Maryland
Signed Into Law	August 2021	June 2022	July 2021	June 2022	May 2024	May 2025	May 2025
Covered Materials	• Packaging • Packaging-like products • Paper products • Food ServiceWare • <i>*OR is a “Bottle Bill State”; DRS packaging is exempt</i>	• Packaging • Packaging-like products • Paper products	• Packaging • Reusable packaging • <i>*ME is a “Bottle Bill State”; DRS packaging is exempt</i>	• Packaging • Packaging-like products • <i>*CA is a “Bottle Bill State”; DRS packaging is exempt</i>	• Packaging • Packaging-like products • Paper products • Reusable packaging	• Packaging • Packaging-like products • Paper products • Reusable packaging	• Packaging • Packaging-like products • Paper products • Reusable packaging
B2B Applicability	Yes	No (in year 1)	Limited	Yes	No	No	No
Full or Partial System Funding	Partial	Full	Full	Partial	Partial	Full	Partial
Implementation Date	July 2025	July 2025	April 2026	January 2027 (2032 Fully)	January 2029 (2032 Fully)	March 2029	July 2029

EPR Obligations For Producers

	Oregon	Colorado	Maine	California	Minnesota	Washington	Maryland
Join approved PRO + collect data	Yes	Yes	Yes <i>(to a SO)</i>	Yes	Yes	Yes	Yes
Report data to a PRO	Yes	Yes	Yes <i>(to a SO)</i>	Yes	Yes	Yes	Yes
Pay Fees / Dues based on data	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<i>Potential</i> redesign of materials / delivery models	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Source reduce plastic	No	No	<i>Potentially</i>	Yes	No	Yes	Yes
Ensure materials are recyclable / compostable	No	No	No	Yes	Yes	Yes	No

**Majority of legislation / rules are still under review stages*

EPR In The West: 2025



Oregon

- In February, CAA's Program Plan was formally accepted. The Plastic Pollution and Recycling Modernization Act (SB 582) is now the **first fully formalized EPR for packaging law in the U.S**
- **Registration and reporting was due March 31 (extended to April 30)**
- As of May 1, an estimated 3,300 Producers reported

Colorado

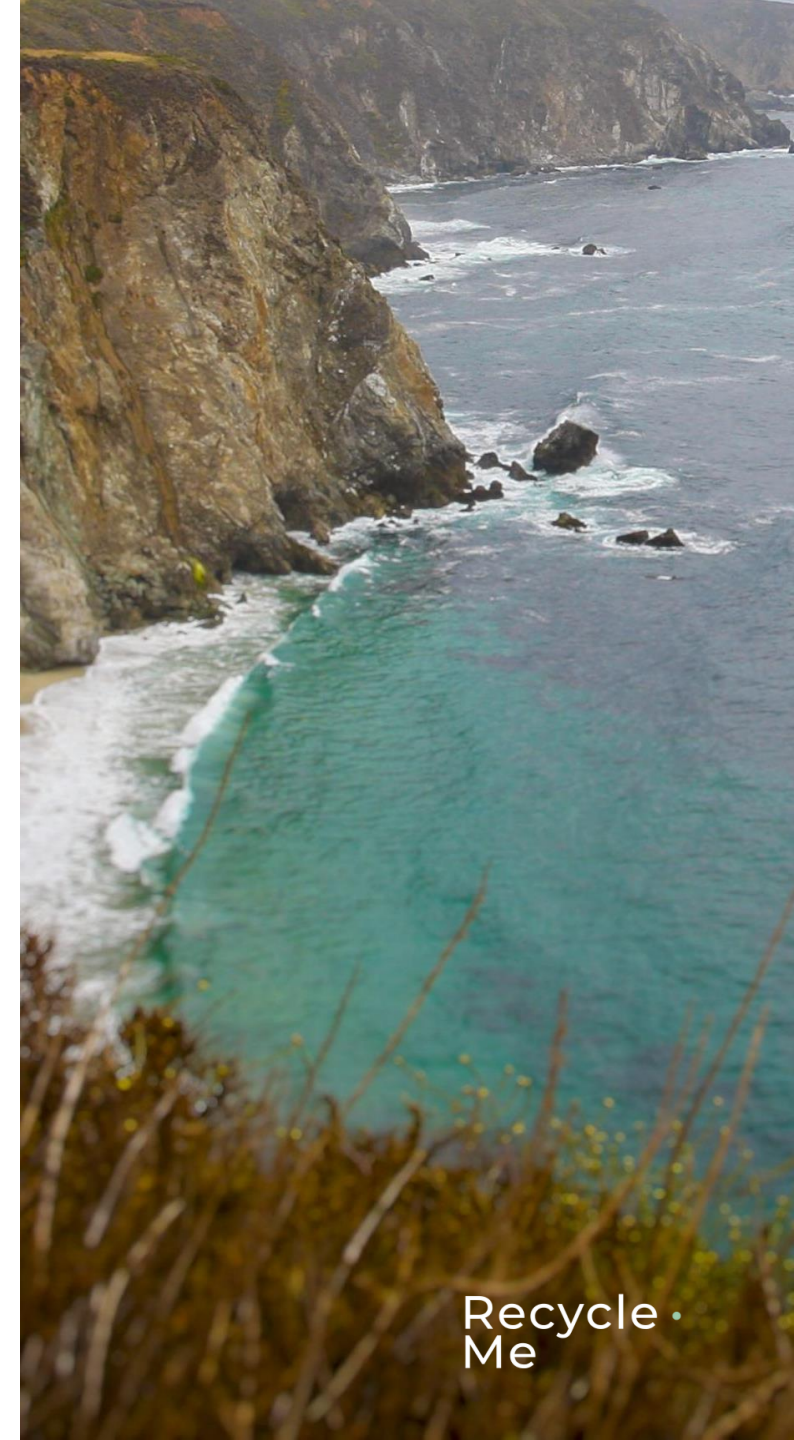
- CAA was approved by the CDPHE as the PRO that will administer Colorado's EPR law for packaging and paper products on May 1, 2023
- **Registration and reporting was due July 31**
- The first Program Plan has been submitted by CAA for review

California

- On January 8, 2024, CAA was selected by CalRecycle as the state's inaugural, single PRO
- **On March 7, the Governor directed CalRecycle to redraft the regulations**
- ***Even though the plan is under review, Producers are obligated to report by November 15***

California SB 54

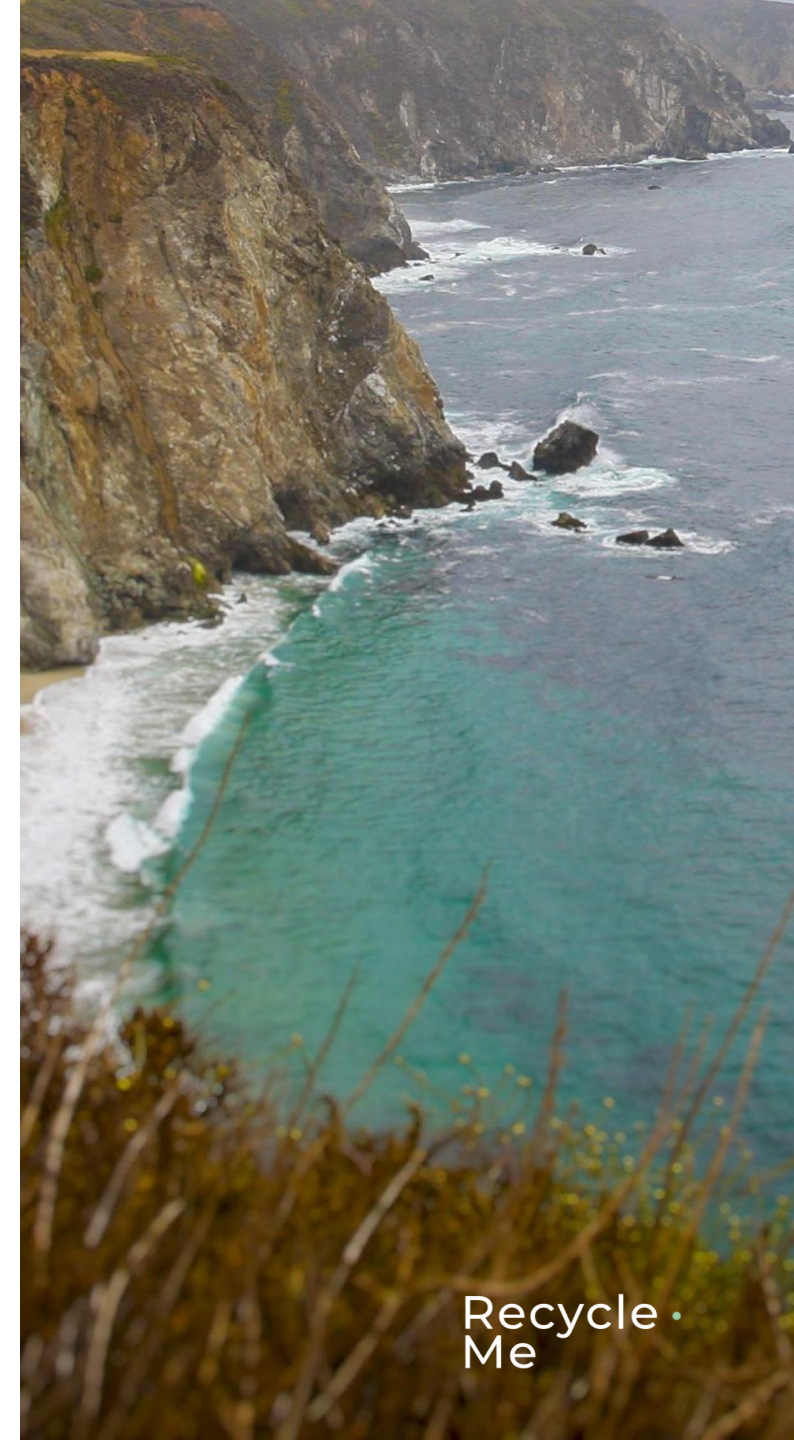
- A 45-day public comment period for California's plastic and packaging reforms began August 22, 2025, and ends October 7, 2025.
- CA has some of the most ambitious goals of any of the 5 states; by 2032:
 - **100%** of packaging in the state to be recyclable or compostable
 - **65%** of all single-use plastic packaging to be recycled
 - **25%** reduction in plastic packaging
 - ***And funding of a \$5B Plastic Pollution Mitigation Fund***
- A 45-day public comment period for California's plastic and packaging reforms began August 22, 2025, and ends October 7, 2025.



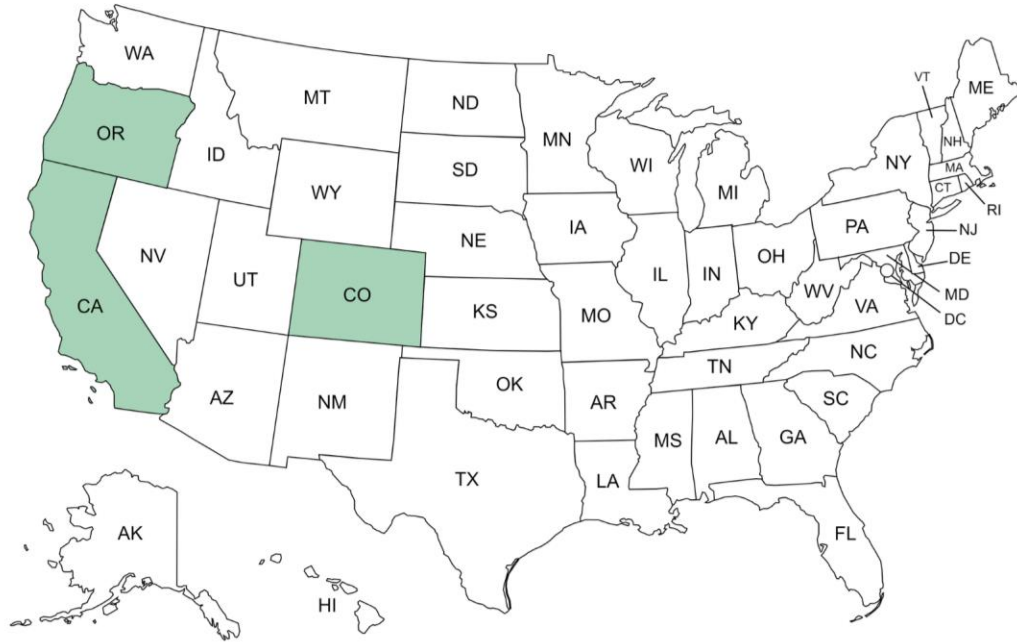
California SB 54

Scope & Coverage

- Both "B2C" and "B2B" are covered, including Secondary and Tertiary Packaging
- Single Use Materials Covered by SB 54
 - **Packaging**
 - Includes Primary, Secondary, and Tertiary (Transport) packaging
 - Excludes materials covered by other state laws e.g. grocery and produce bags, CRV containers
 - **Food Ware**
 - Includes items used to serve or consume food
 - **Covered Material Category (CMC) List**
 - CalRecycle published an updated CMC list in September, adding one new category: "Paper and fiber / multi-material laminate/paperboard with plastic coating/lining."
 - There are now **98 categories** (versus 60 in Oregon and Colorado), with emphasis on Plastic, Recyclability, and Compostability.



EPR In The West: Challenges that Producers Face



When is a Producer a Producer?

- Different Definitions (and exemptions)
- Two Different Scopes (B2C / B2B)
- Primary, Secondary, Tertiary – which is in scope?
- Bottle Bill v Non-Bottle Bill

When is a Package a Package?

- Definition (“Design to Protect or Contain”)
- When is a Package *NOT* a Package

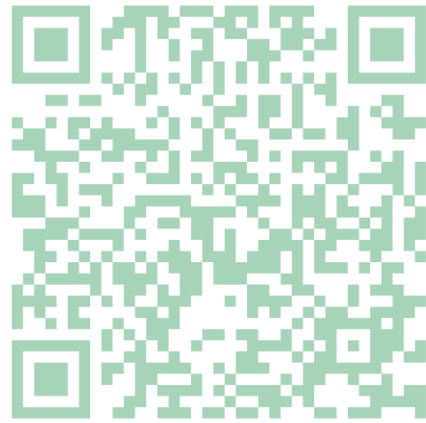
Where should the focus be?

- Different CMC lists
- Different Fees
- Different Targets
- Different Eco Modulation Plans

QUESTIONS?



Contact Jason Bergquist
Vice President, RecycleMe U.S



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Thank You!