



EPR REQUIREMENTS

STATE OF COLORADO

Colorado's Producer Responsibility for Recycling Packaging and Paper Act (HB22-1355) requires covered producers to join a Producer Responsibility Organization (PRO), and through the PRO, fund and manage the end of life of those materials, which includes collection, processing, and recycling or composting.

EPR Extended Producer Responsibility

EPR is a policy approach that assigns producers responsibility for the end-of-life of products. This can include both financial responsibility and operational responsibility, though the amount and type may differ. **Producers** are required to provide funding and/or services that assist in managing covered products after the use phase.

Who is a producer?

Under Colorado's EPR law, the term "producer" is best interpreted as the entity responsible for introducing packaging and paper products into the market, thereby generating post-consumer waste. This is not necessarily the manufacturer of the packaging itself, but rather the party that utilizes packaging to deliver, distribute, or sell goods to consumers or entities that then turn that packaging into waste.

Where can I find out more information, and what is required of my company as a producer?

The Circular Action Alliance (CAA) is the PRO implementing the law and offers many resources for businesses. circularactionalliance.org/circular-action-alliance-colorado



Key Milestones in the Regulatory and Implementation Process

- ▶ **July 31, 2026**
CAA Deadline for Data Reporting
- ▶ **January 1, 2026**
Producers Remit Dues to CAA on or Before this Date
- ▶ **Early 2026**
Program Begins

Colorado expressly excludes packaging used "solely in business-to-business transactions" where a covered material is not intended to be distributed to the "end consumer" and also excludes materials for transportation or distribution to "non-consumers." Thus stretch film is excluded.

What should a company in Colorado be doing to prepare?

Companies should be aware of EPR laws being implemented in other states. Oregon is expected to charge up to \$0.78/pound. Don't expect Colorado to have lower fees in the future.

Push Toward Harmonization

- **Industry coalitions** and trade groups are advocating for standardized definitions and reporting formats to reduce compliance burdens for national producers.
- **Producer Responsibility Organizations (PROs)** like Circular Action Alliance are working across states to streamline registration, data collection, and fee calculations.
- **Federal involvement** is minimal so far, but some experts suggest that national guidelines or incentives could help unify state approaches over time.

Take action now!

Colorado Companies should continue to take action to reduce packaging. Early action is essential.

- Evaluate your packaging for **recyclability and environmental impact**.
- Consider switching to **packaging that uses less virgin plastic, creates less waste**, or has a lower environmental footprint.

Making packaging design changes now can reduce your future compliance costs and improve sustainability ratings.

THE SOLUTION: MAKE THE SWITCH

Ultra-High Performance Films

Stretch Films that provide the opportunity for gauge optimization and lower waste per pallet wrapped, while maintaining the quality and integrity of the load.





EPR REQUIREMENTS

STATE OF MINNESOTA

Minnesota's Packaging Waste and Cost Reduction Act requires producers of packaging, food packaging, and paper products to join a Producer Responsibility Organization (PRO) and through the PRO, partially fund end of life management for covered materials, including recycling.

EPR Extended Producer Responsibility

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Who is a producer?

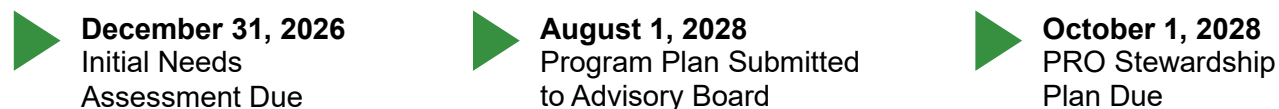
A producer is best interpreted as the entity responsible for introducing packaging and paper products into the market, thereby generating post-consumer waste. This is not necessarily the manufacturer of the packaging itself, but rather the party that utilizes packaging to deliver, distribute, or sell goods to consumers or entities that then turn that packaging into waste.

Where can I find out more information, and what is required of my company as a producer?

The Circular Action Alliance (CAA) is the PRO implementing the law and offers many resources for businesses. circularactionalliance.org/circular-action-alliance-minnesota



Key Milestones in the Regulatory and Implementation Process



On Feb. 18, 2025, the Minnesota Pollution Control Agency (MPCA) confirmed CAA's registration to implement the state's EPR program. Producers must be a member of a PRO that is registered with MPCA by July 1, 2025.

What steps should you take now?

While the details of packaging EPR laws are still evolving, there are practical actions you can start today:

- Designate a lead contact to register with the CAA and monitor updates on EPR requirements and determine whether any exceptions apply; legal guidance may also be helpful.
- Compile a complete record of your packaging SKUs, including weights and material types, to establish baseline data for reporting
- Document your progress—track all initiatives over the past decade that reduced packaging or improved recyclability.
- Identify your next opportunities to minimize packaging and enhance recyclability. Partnering with experts can accelerate this process.

Key deadlines begin in 2026, so early action is essential.

Steps specific to stretch film

- Evaluate your packaging for recyclability and environmental impact.
- Consider switching to packaging that uses less virgin plastic, creates less waste, or has a lower environmental footprint.
- Watch what is happening in other states, like California and Oregon, where EPR laws are being implemented ahead of other states.

Design changes now can reduce future compliance costs and improve sustainability ratings.

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Certified PCR Films

Certified PCR Films that provide the opportunity for gauge optimization.





EPR REQUIREMENTS

STATE OF OREGON



Oregon's Plastic Pollution and Recycling Modernization Act

requires producers of residential and commercial packaging, printing and writing paper, and food service ware to join a Producer Responsibility Organization (PRO) and, through the PRO, fund the end-of-life management of those materials, which includes processing and recycling

EPR Extended Producer Responsibility

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Who is a producer?

Under Oregon's EPR law, the term "producer" is best interpreted as the entity responsible for introducing packaging and paper products into the market, thereby generating post-consumer waste. This is not necessarily the manufacturer of the packaging itself, but rather the party that utilizes packaging to deliver, distribute, or sell goods to consumers or entities that then turn that packaging into waste.

Where can I find out more information, and what is required of my company as a producer?

The Circular Action Alliance (CAA) is the PRO implementing the law and offers many resources for businesses. circularactionalliance.org/oregon



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Alliance®**

Key Milestones in the Regulatory and Implementation Process



March 31, 2025

Producer Reporting Deadline for Oregon



July 1, 2025

Program Begins

The first step to meeting your obligations under Oregon's packaging EPR law is to register with CAA. Additional reporting requirements are now required.

What should a company in Oregon do to avoid fees?

Companies should begin by evaluating their producer status, joining the PRO, and reviewing their packaging materials for compliance. Early action is essential.

- Evaluate your packaging for **recyclability and environmental impact**.
- Consider switching to **packaging that uses less virgin plastic, creates less waste**, or has a lower environmental footprint.
- **Making packaging design changes now can reduce your future compliance costs and improve sustainability ratings.**

What should companies purchasing stretch film do to reduce future fees?

Oregon is expected to charge up to \$0.78/pound. Don't expect lower fees in the future. **Take action now!**

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MINIMUM 25% RECYCLED CONTENT
POST-CONSUMER





EPR REQUIREMENTS

STATE OF WASHINGTON

Washington's EPR program, known as the Recycling Reform Act ([SB 5284](#)), makes producers responsible for the end-of-life management of their packaging and paper products. This 2025 law establishes a system where producers must join and fund a Producer Responsibility Organization (PRO) to collect and manage these materials, aiming to improve recycling rates and reduce waste. Washington already has EPR programs for electronics, paint, batteries, and other items.

EPR Extended Producer Responsibility

A policy approach that assigns producers responsibility for the end-of-life of products. This can include both financial responsibility and operational responsibility, though the amount and type may differ. **Producers** are required to provide funding and/or services that assist in managing covered products after the use phase.

Who is a producer?

Specifically, the law identifies a producer as any of the following, depending on how the product is sold:

- Manufacturer of the product (not necessarily the manufacturer of the packaging)
- Brand licensee or brand owner
- Importer of record into Washington state
- Distributor operating within Washington
- Any other person contractually designated as responsible for the product

Typically, the “producer” is not the manufacturer of the packaging itself, but rather the party that utilizes packaging to deliver, distribute, or sell goods to consumers.

Key Milestones in the Regulatory and Implementation Process

▶ **July 1, 2026**
Producer Registration Deadline

▶ **September 1, 2026**
Producer Submit One-time Payment to WA

Producers must join a producer responsibility organization (or register individually) by July 1, 2026, to manage recycling, compliance and reporting responsibilities.

What should a company in Washington be doing to prepare?

Companies in Washington should begin preparing for the Recycling Reform Act by identifying their producer status and evaluating their packaging materials for compliance. Key deadlines begin in 2026, so early action is essential.

- Evaluate your packaging for **recyclability and environmental impact**.
- Consider switching to **packaging that uses less virgin plastic, creates less waste**, or has a lower environmental footprint.
- Watch what is happening in California and Oregon, where EPR laws are ahead of Washington.

Design changes now can reduce future compliance costs and improve sustainability ratings.

What should companies do in the area of stretch film to reduce future fees?

The first state to implement EPR fees on stretch film (Oregon) charges \$.78 per pound. Don't expect Washington to have lower fees!

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EPR REQUIREMENTS

STATE OF CALIFORNIA

SB 54: California's Plastic Pollution Prevention and Packaging Producer Responsibility Act is

an [Extended Producer Responsibility \(EPR\)](#) law that requires producers of single-use packaging and plastic food service ware to make all products recyclable or compostable by 2032 and to meet specific recycling rate and source reduction goals. To comply, producers must participate in a Producer Responsibility Organization (PRO) to manage their obligations, which include reducing plastic by 25% and achieving a 65% recycling rate for plastic packaging by 2032. The law also establishes a fund to mitigate plastic pollution.

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Who is a producer?

Under California's EPR law (SB54), the term "producer" is best interpreted as the entity responsible for introducing packaging and paper products into the market, thereby generating post-consumer waste. This is not necessarily the manufacturer of the packaging itself, but rather the party that utilizes packaging to deliver, distribute, or sell goods to consumers or entities that then turn that packaging into waste.

Where can I find out more information, and what is required of my company as a producer?

The Circular Action Alliance (CAA) is the PRO implementing the law and offers many resources for businesses. circularactionalliance.org/California



Key Milestones in the Regulatory and Implementation Process



November 15, 2025

2023 Waste Levels Reporting Data Due



On or before January 1, 2027

CalRecycle approves plan, program begins (25% reduction goal)

The first step to meeting your obligations under California's packaging EPR law is to register with CAA. Even if you have previously registered, you still have additional steps to take to submit your report by November 15, 2025.

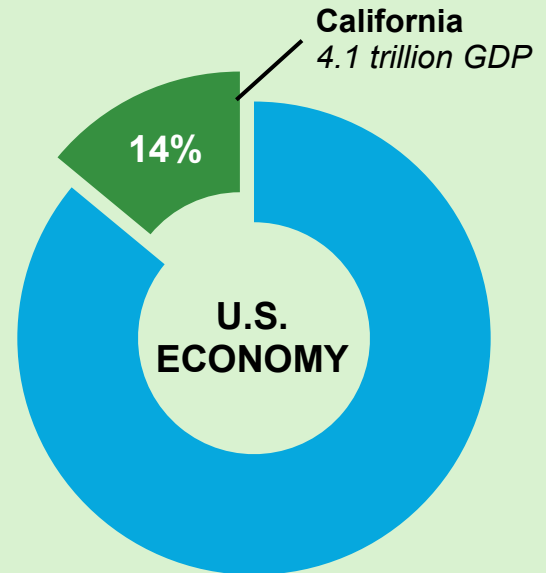
circularactionalliance.org/California

Why is this important?

Nearly all major national CPG brands, from food and beverage to household and personal care, have operations in California. These customers are among the highest users of single-use transportation packaging. The first state to implement EPR fees on stretch film (Oregon) charges \$0.78/pound. Don't expect California to have lower fees!

The law is not fully established, but newly passed legislation like the California Beverage Container Recycling & Litter Reduction Act provides direction:

- Mandates that plastic beverage containers contain at least 25% certified PCR by 2025
- Third-party certification will become mandatory to validate PCR content
- Material reduction is key to reducing taxes/fees.



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MINIMUM 25% RECYCLED CONTENT
POST-CONSUMER





EPR REQUIREMENTS

STATE OF MAINE

Maine's LD 1541 & 1423 require producers of consumer packaging material to register with the Stewardship Organization (“SO”), and through the SO, shifts the cost of managing packaging material from taxpayers to producers. According to the Maine Department of Environmental Protection (“DEP”), this program provides incentives for producers to use more readily recyclable packaging and less packaging.

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Where can I find out more information, and what is required of my company as a producer?

The Circular Action Alliance (CAA) intends to apply to become the SO (PRO) implementing the law and offers many resources for businesses. Visit circularactionalliance.org/circular-action-alliance-maine or visit maine.gov/dep/waste/recycle/epr.html



Key Milestones in the Regulatory and Implementation Process

► **Spring 2026**
Maine DEP Contracts
with the selected SO

► **May 2026**
Producers Register with
the SO and Report Data

What steps should you take now?

While the details of packaging EPR laws are still evolving, there are practical actions you can start today:

- Designate a lead contact to register with the SO and monitor updates on EPR requirements and determine whether any exceptions apply; legal guidance may also be helpful.
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