CalRecycle

The Plastic Pollution Prevention and Packaging Producer Responsibility Act

Statewide Needs Assessment

February 2026

State of California
Gavin Newsom
Governor

California Environmental Protection Agency
Yana Garcia
Secretary

Department Of Resources Recycling and Recovery
Zoe Heller
Director

Office of Public Affairs
1001 I Street (MS 22-B)
P.O. Box 4025
Sacramento, CA 95812-4025
www.calrecycle.ca.gov/Publications/
1-800-RECYCLE (California only) or (916) 341-6300

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Executive Summary

The Plastic Pollution Prevention and Packaging Producer Responsibility Act (Senate Bill 54, Allen, Chapter 75, Statutes of 2022) (the Act) establishes an extended producer responsibility program to reduce waste generated by single-use packaging and single-use plastic food service ware (covered material) sold in California, while ensuring the rest is recycled or composted to meet our state's recycling and climate goals. The Act requires the development of a statewide needs assessment to ensure the actions and investments by producers of covered material are evidence-driven and address the varying needs and challenges faced by California's diverse communities.

The needs assessment consists of several studies to address the requirements established in Public Resources Code (PRC) section 42067. These studies identify the steps producers may take to reduce, reuse, recycle, and compost their covered material. They cover a wide range of technical subjects to characterize each stage in the lifecycle of covered material, including its design. Together, these studies provide the basis for designing an effective plan to reduce plastic waste and support California's circular economy.

The insights gathered through this assessment evaluate the best available data to understand California's waste reduction, reuse and recycling system, the interactions it has within the United States and international markets, and the patterns of human consumption associated with covered material. The assessment informs immediate program planning and investment strategies, as well as lays the groundwork for future research and innovation in the circular economy.

The needs assessment includes new data collection and modeling to provide information on the flows and impacts of covered material. However, comprehensive data regarding the flow of covered material is still in development. As the Act is implemented, required comprehensive reporting will significantly improve understanding of material flows and handling in the state, resulting in benefits to public health and the environment due to reduced plastic pollution.

This report presents a high-level overview of the results of the statewide needs assessment, highlighting key takeaways and considerations for the implementation of the Act. The studies that comprise the needs assessment evaluate each step in the supply chain for covered material. More detailed information on any aspect of the needs assessment is available in the supporting technical documents referenced in this report.

The Act's Progress and Path Ahead

2022
- SB 54 signed into law by Governor Newsom

2023
- Advisory Board members appointed by CalRecycle

2024
- Recyclable/Compostable Categories List published
- Source Reduction Baseline Report published

2025
- First Report to the Legislature submitted
- Updated Covered Material Categories List published
- Statewide Material Characterization Study of SB 54 Materials, Final Findings published

2026
- Needs Assessment Report published
- Covered Material Categories List Update published
- SB 54 regulations are finalized

2027
- Second Report to the Legislature submitted

2028
- 30% of packaging recycled

2030
- 40% of plastic packaging recycled
- Needs Assessment updated

2032
- 100% of packaging is recyclable or compostable
- 65% of plastic packaging recycled
- 25% less plastic packaging sold

What is the Statewide Needs Assessment?

The Plastic Pollution Prevention and Packaging Producer Responsibility Act (the Act) statewide needs assessment is comprised of several studies that collectively evaluate each stage of the management of covered material, including how material design influences it. The studies of the needs assessment were:

Source Reduction Baseline Study

Establishes a baseline of the weight and number of plastic components associated with plastic covered material sold, offered for sale, or distributed in or into California in 2023. The report was published on December 31, 2024, and serves as the baseline to achieve a 25% reduction in plastic covered material.

The Collection, Processing, and End Markets Study

Evaluates the current infrastructure for the management of covered material and the potential actions and investments needed to meet the recyclability, compostability, and recycling rate requirements of the Act.

Four technical reports were produced as part of this study.

1. The Current State of Collection Report
2. The Current State of Processing Report
3. The Current State of End Markets Report
4. The Needed State of Collection, Processing, and End Markets

The Source Reduction and Material Design Study

Evaluates existing source reduction, including reuse and refill infrastructure, and covered material design considerations, as well as actions to increase source reduction in order to meet the requirements of the Act.

Two technical reports were produced as part of this study.

1. The Current State of Source Reduction and Material Design
2. The Needed State of Source Reduction and Material Design

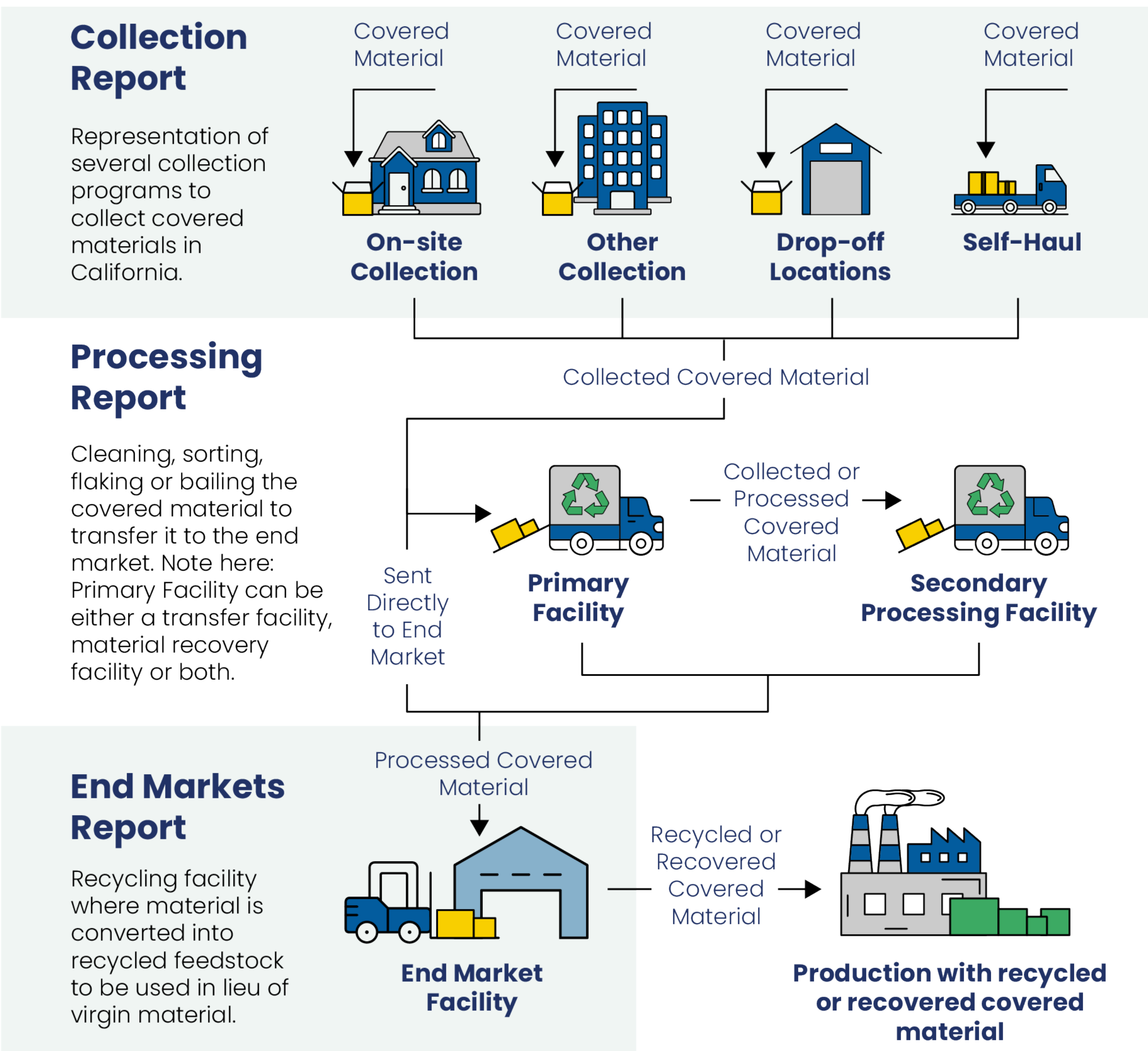
The Consumer Education and Access Study

Evaluates the access communities have to services and infrastructure for source reduction, reuse/refill, recycling, and composting through a survey of a representative sample of Californians. This report also evaluates educational opportunities for communities to recycle and compost correctly under a changing system.

How is Covered Material Currently Managed?

Various types of covered material are currently managed differently in California resulting in varying levels of collection, processing, and recycling. Some material, such as glass, are widely accepted in curbside collection, are feasible to process at recycling processing facilities, and have well-established end markets in California. Other material types, like polyvinyl chloride (PVC), commonly associated with construction materials but also used in packaging, and ceramic, are not commonly collected or processed and have limited end markets.

Conceptual Covered Material Supply Chain Chart



Curbside Collection of Covered Material

Most evaluations of material collection focus on curbside collection through on-site pickup, but additional methods exist for collecting covered materials. Drop-off collection methods include jurisdiction-run drop-off programs, privately owned and operated locations, and public space collection. Other collection strategies include mail-back programs and redemption programs. Covered material may also be source-separated by the generator and sent directly to end markets. Curbside collection through on-site pickup, however, remains the primary means by which most California residents access recycling and composting services.

Currently, most California residents (about 87%) have access to curbside collection services through on-site pickup for recycling and organics recycling. There is, however, significant regional and demographic disparity in access. In particular, the Coastal and Mountain regions of the state disproportionately lack access, with only 56% and 10% of the region's populations having access to on-site pickup through curbside collection services, respectively (as shown in Figure 1).

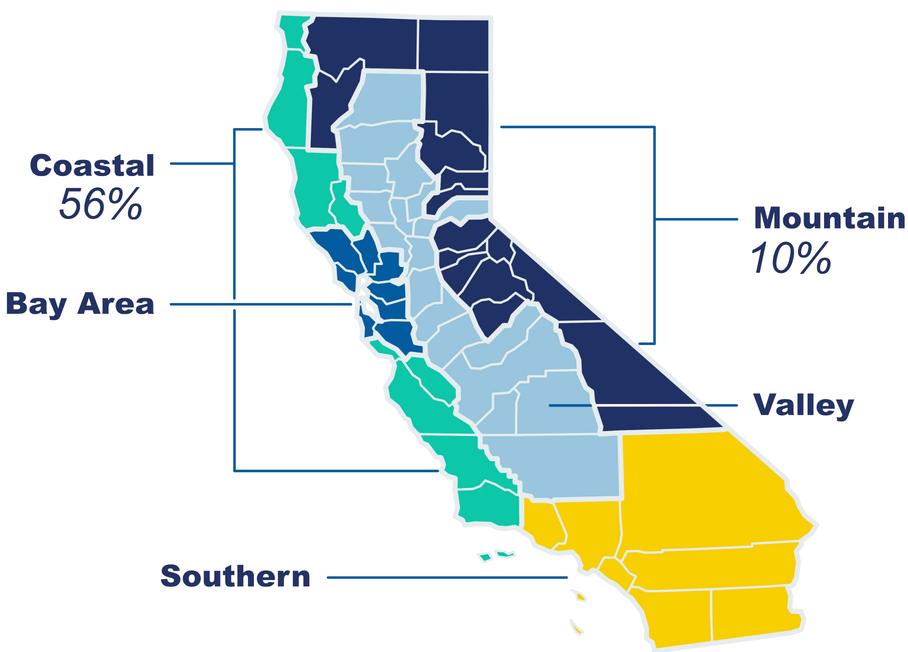


Figure 1. Percent of Households with Access to Residential Onsite Curbside Collection Services in Mountain and Coastal Regions

Access to curbside recycling and organics collection services were also evaluated for commercial and multifamily locations. Multifamily collection is often commingled with commercial collection, as they typically use similar bins and are part of the same collection routes. Figure 2 shows the percentage of commercial and multifamily locations that do not have on-site pickup through curbside collection services for recycling or organics.

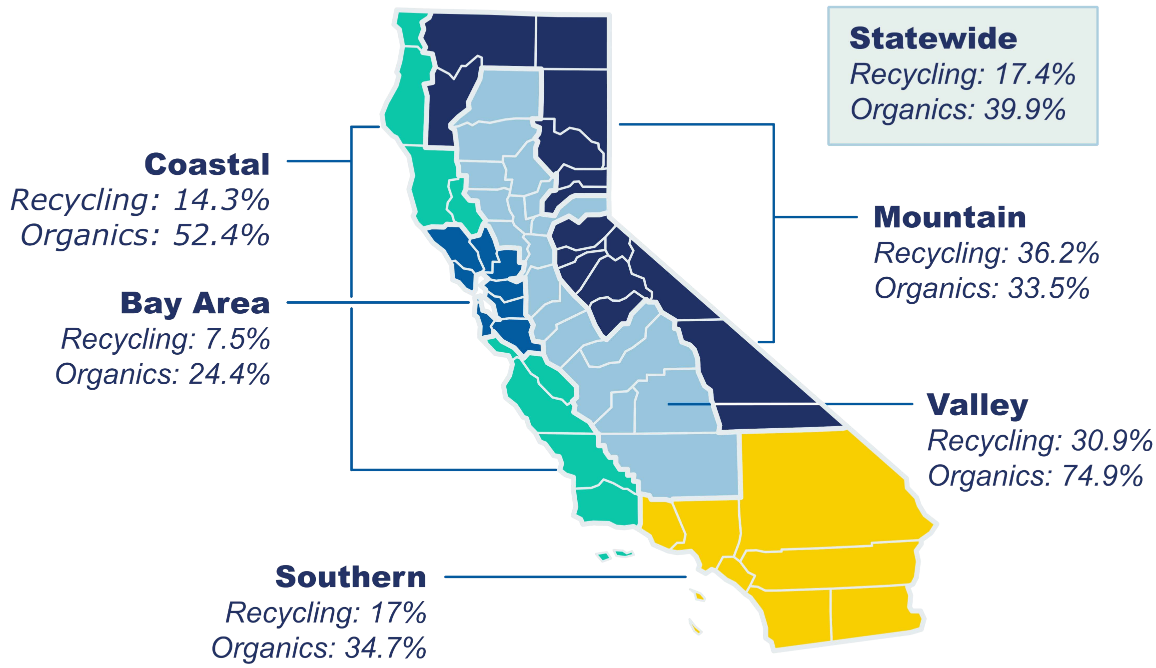


Figure 2. Percentage of Commercial and Multifamily Generators Without Access to Onsite Curbside Collection

Processing of Covered Material

Once covered materials are collected for recycling, they are processed at facilities across the state. This includes 89[*] recycling processing facilities, also referred to as material recovery facilities (MRFs), and 58 organics processing facilities (OPFs)[†] identified as handling these materials. As shown in the figures on the next pages (Figure 3 and Figure 4), most MRFs are located within urban areas, while OPFs are more often in rural areas that are near urban areas. The highest density of both facilities tends to occur near highly populated areas, specifically the Bay Area and Southern California.

[*] Based on information available at the time of publication. More MRFs and OPFs handling covered material in California may exist.

[†] Facilities may also handle material other than covered material

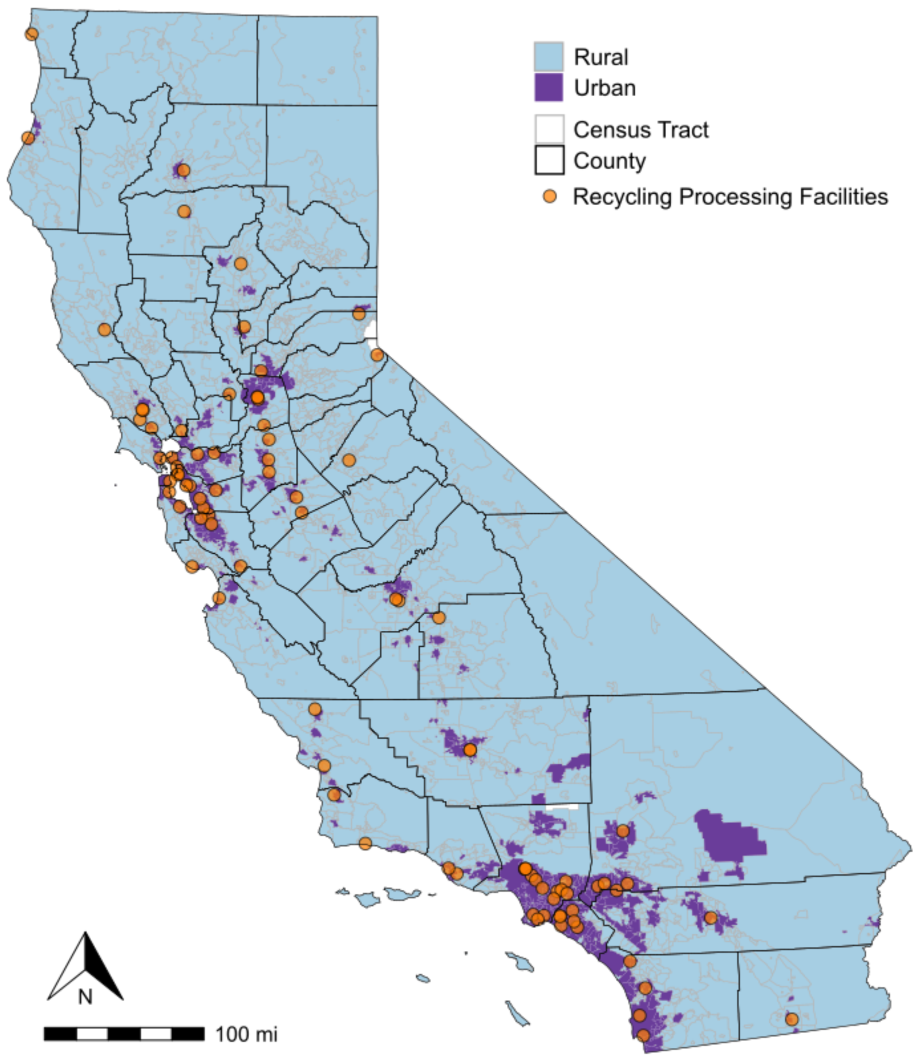


Figure 3. Location of Recycling Processing Facilities in California

MRFs in California currently process an estimated 5.9 million tons of covered material, with additional capacity varying by facility type and region. As these facilities often manage several different streams of material, including material intended disposal, the permitted capacities of these facilities are not representative of the available capacity for covered material processing in the state. OPFs in California process an estimated 5.7 million tons, with a total permitted capacity of 8.3 million tons per year.

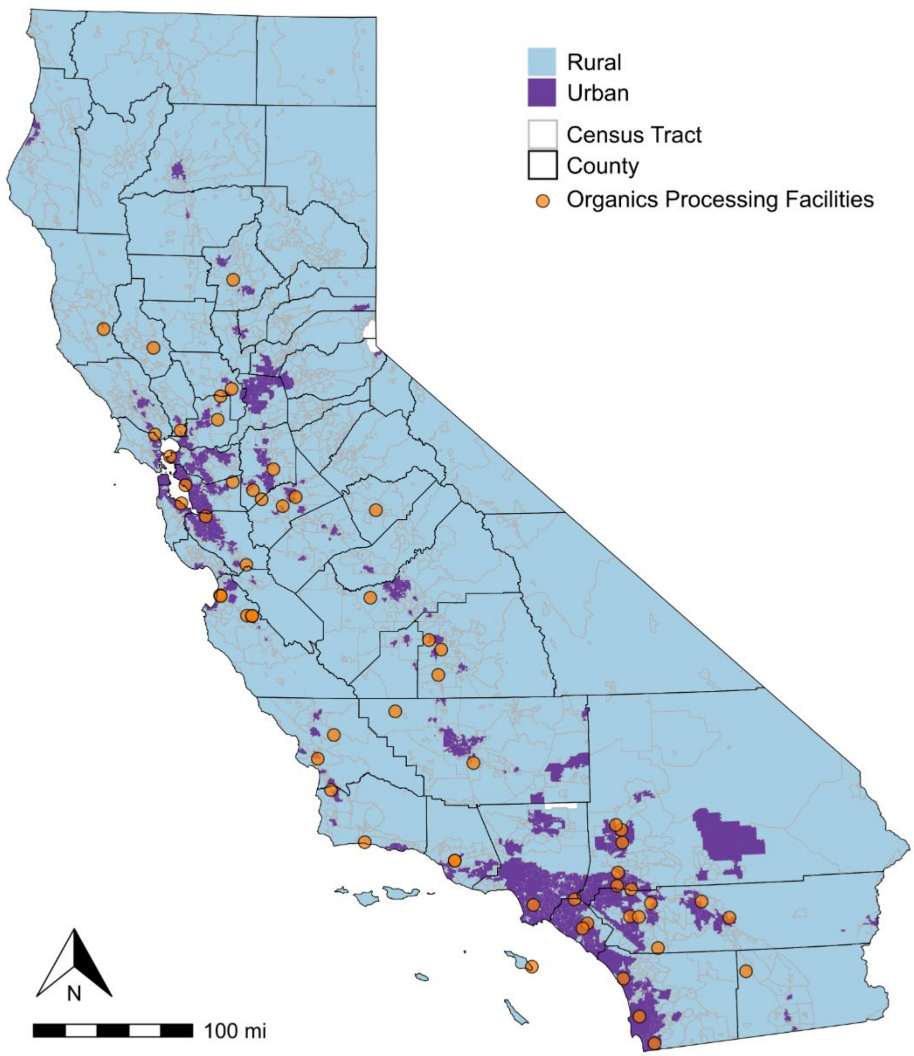


Figure 4. Location of Organics Processing Facilities in California

Contamination of Covered Material

Contamination of material received by MRFs and OPFs is a significant challenge for material handlers, leading to increased operational costs, reduced market value of bales and a degradation of quality in recovered materials. Contamination includes material not intended for recycling but ending up in recycling streams. Contamination can be a result of material intentionally included in a product (i.e., product design choice) or material that incidentally or accidentally ends up in the recycling stream (i.e., improper sorting).

Surveyed MRFs indicated that typical inbound material is generally 20% to 30% contaminated. Many types of compost applications have a very low tolerance for physical contaminants, particularly plastics, which can damage equipment, impact soil conditions, and reduce overall product confidence.

Generally, the highest recycling yields come from material that is source-separated and has a pathway to an end market that minimizes opportunities for contamination.

Value of Covered Material

The market value of covered material, which incentivizes processors to recover and sell that material to end markets, determines the ability for processors to sort out that material. Processors depend on material market stability to ensure their ability to sustain the costs to recover that material. Volatility in international market availability and domestic demand can result in material markets that are insufficient to support the cost of recovering that material. However, some types of covered material generally have sufficient market value to be sorted by processors across the state in preparation to be sent to end markets, including glass and metal.

For materials that have well developed and stable markets, pricing of bales can fluctuate significantly. For example, the value of baled natural high-density polyethylene (HDPE) has ranged from under $0.20 a pound to over $1 a pound (RecyclingMarket.Net, n.d.) in the past three years in the Southwestern United States. Market values for other baled materials are similarly volatile, and several materials often have market values so low that handling the material is not profitable for MRFs.

The value of domestically-sourced recovered material can face additional challenges from cheaper imported recovered material. Often, the result of this condition is that the market value for the domestically-sourced material is unable to profitably compete with the value of imported material.

End Markets for Covered Material

After processing, material is sent to end markets as a feedstock for recycling into new products. Some end markets also receive material directly from generators or brokers, generally source-separated by commercial generators (e.g., commercial plastic film sent directly to end markets). Evaluations of existing end markets indicate that some covered materials lack a reliable, well-developed path to recycling. It is estimated that more than 70% of the covered material sent to end markets is currently exported to overseas end markets, most of which consists of paper and fiber covered material. Specific overseas end markets were not analyzed in this study.

Those materials that have available end markets for recycling have varying recycling yield rates, meaning that some materials are recycled more efficiently compared to others. Where end market information was available, the estimated amount of material produced from covered material was assumed to be the recycled amount of that covered material. The difference between the amount of material received and the amount of material produced by end markets was used to estimate the recycling yield for different types of covered material. For plastic covered materials with identified end markets, current information indicates that recycling yields range between less than 60% to 90%. To meet recycling rate requirements, materials with lower recycling yields will need to either increase their efficiency or achieve higher collection and processing recovery rates to compensate for the lower recycling efficiency.

For example, recycling processes to recover fiber from multi-material laminate cartons have reported higher-yield losses compared to recovering fiber from nonlaminated items. For fiber laminated with other materials such as metal and plastic, a recycling process to produce insulation from that material is reported to have much lower yield losses, which illustrates that selection of the recycling process for the incoming feedstock may influence recycling yields.

International End Markets

Information on operational conditions of international end markets is not currently available. This creates data gaps in determining whether international end markets for California scrap material meet requirements to be considered responsible, and how the material is handled. Many countries have imposed contamination restrictions on importing scrap material. In 2018, China initiated the Operation National Sword policy (CalRecycle, 2018) aimed at reducing the environmental impact of handling imported scrap material. In 2019, an amendment to the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal addressed international transport of plastics (Secretariat of the Basel Convention, n.d.). These international policy changes, coupled with import policy changes for several other key importers of scrap material from California, have caused a significant decline in plastic exports over the past several years.

Covered material sent to international end markets may still be disposed of, or not recycled, as defined by the Act. The amount of exported material that is disposed of, or not recycled, is currently unknown. The following graphic shows the amount of plastic scrap (including noncovered material) exported from California by top destinations.

Figure 5. Plastic Scrap Exports from California to Canada, Mexico, and Overseas in 2024

Impacts on Communities

The infrastructure that handles covered material is commonly located in areas identified as carrying high pollution burdens according to CalEnviroScreen 4.0 (Office of Environmental Health and Hazard Assessment (OEHHA), 2023). While the high pollution burden cannot be solely tied to the management of covered material, it is evidence that these communities are disproportionately burdened by these activities. Impacts on local communities can include factors such as traffic, noise, air and water pollution, odor, fires, and rodents and pests that can spread disease.

Additionally, access to services varies significantly by community. Lower-income and rural communities are less likely to have access to recycling services.

What are the Recycling Rates for Covered Material?

CalRecycle published the first recycling rate estimates to the Covered Material Categories (CMC list update on December 31, 2025).

The recycling rate (as defined in PRC section 42041(ab)) means the percentage, overall and by category, of covered material sold, offered for sale, distributed, or imported in the state that is ultimately recycled. The recycling rate is calculated as:

$$= \frac{Amount\ of\ covered\ material\ recycled\ in\ a\ given\ year}{Amount\ of\ covered\ material\ recycled\ and\ disposed\ of\ in\ a\ given\ year}$$

At the time of this initial calculation, reporting of the amount of covered material recycled was not available. To address the current data gaps, the recycling rate calculation included the following assumptions:

- Covered material must be recycled by a responsible end market to be considered recycled according to the Act. At this time, no responsible end markets have formally been established. This initial calculation assumes that existing end markets will meet the criteria to be considered a responsible end market.
- Without comprehensive data that will come with implementation of the Act, the amount of material recycled is assumed to equal the amount estimated to be produced by end markets where information was available. For covered material for which end market data was not available, the amount recycled was assumed to be less than the amount of the material sent by processors to end markets.
- Data on covered material sent by processors or used by end markets are not currently available at the covered material category (CMC) level. As a result, estimated recycling rates are for groupings of CMCs.
- There are some CMCs, and groupings of CMCs, for which there is no available information on the amount of covered material sent to, or recycled by, end markets. In these cases, these have been identified as having insufficient data to estimate a recycling rate.
- For the purposes of this recycling rate estimate, “disposal” encompasses landfilling, transformation, and engineered municipal solid waste conversion at a permitted solid waste facility. To estimate disposal, CalRecycle assumed that the CMC proportions estimated in the What’s in California Landfills: Measuring Single-Use Packaging and Plastic Food Service Ware Disposed Of (2025) report were reflective of total disposal in 2024, which was derived from the CalRecycle Recycling and Disposal Reporting System (RDRS) (CalRecycle, 2024).

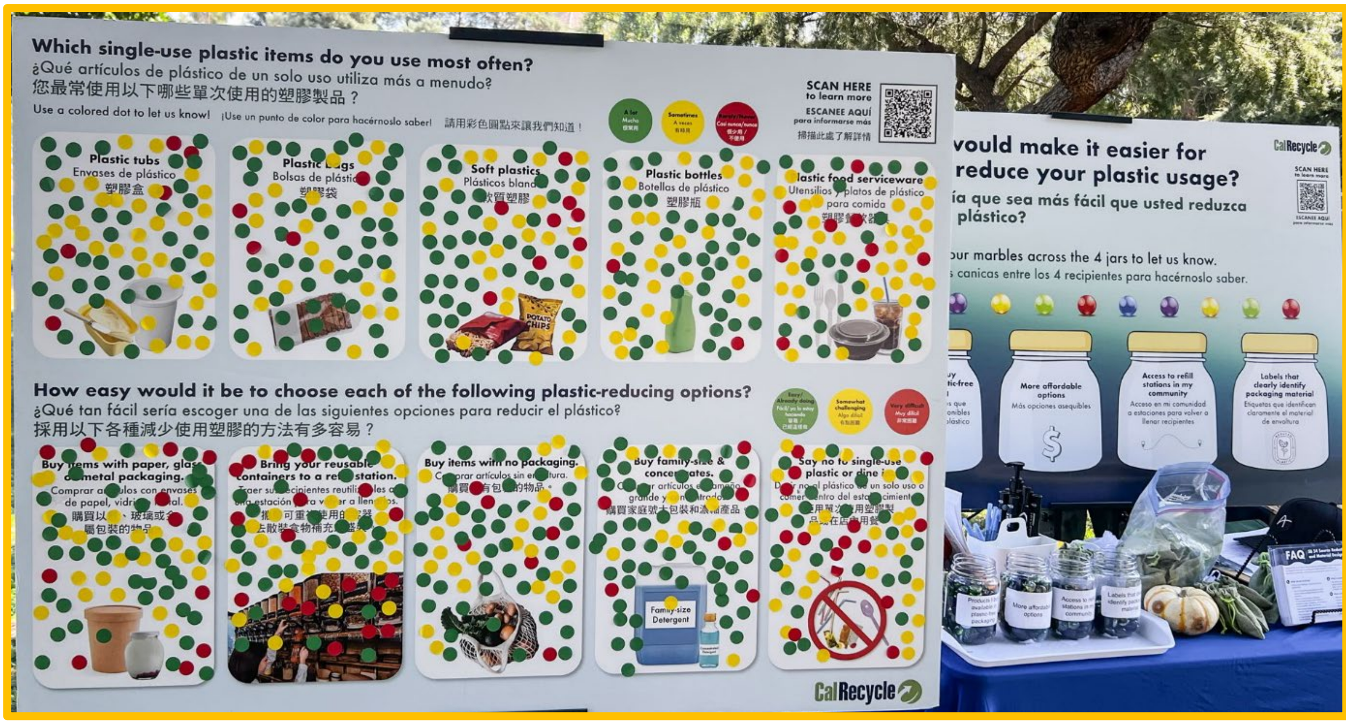
These initial recycling rate estimates highlight a gap in knowledge as to how much covered material is currently being recycled. In many instances, there is insufficient data to estimate the amount of a CMC, or grouping of CMCs, that is recycled. Recycling rates are impacted significantly by the lack of end market information, because the rates then underestimate the amount measured as recycled compared to the amount measured as disposed of.

Improvements in the recycling system will be needed for plastic covered materials to achieve the 2028 recycling rate goal of 30%. While some HDPE and PET covered materials are estimated to have recycling rates of 19% and 16%, respectively, most other plastics have a calculated recycling rate of under 5% currently.

The highest recycling rates calculated for covered material are in the glass and paper/fiber categories, with top performing materials currently achieving a 65% recycling rate or greater.

How Did We Engage with the Public?

Throughout the studies that comprise the statewide needs assessment, public engagement and feedback were a critical focus. Understanding how implementation of the Act may impact the people of California is essential for successful implementation of the law.



CalRecycle hosted frequent public workshops and partnered with community groups throughout the design and implementation of the statewide needs assessment. This collaborative approach ensured that proposed actions reflect community input and consider potential impacts on California residents. Community considerations are woven into every component of the needs assessment.

For the major contracted studies, CalRecycle also engaged community-based organizations, environmental justice groups, California Native American Tribes, and other priority populations to solicit information on their experiences and benefit from their expertise. Through this engagement, over 769 people participated in pop-up events held around the state, 176 people participated in listening sessions on topics related to source reduction and recycling, and 332 surveys were completed. To supplement in-person engagement, CalRecycle conducted a statewide survey of almost 2,300 adults to capture how Californians currently practice source reduction, reuse, composting, and recycling activities and what could encourage them to increase their participation.

How Can We Source Reduce Covered Material?

Source reduction strategies can be used to generate less covered material, thus reducing the overall amount of plastic used and the amount of covered material that needs to be managed through recycling and composting. Strategies for source reduction include eliminating unnecessary plastic components, lightweighting to use less plastic, and switching from plastic covered material to nonplastic covered material.

Source reduction also includes refillable and reusable systems that replace single-use plastic covered material. This can include items that are refillable at the store as well as items that are prefilled at a different location than the point of sale. These systems depend on reliable pathways for the material to be returned to the producer that does the prefilling.

Additionally, switching to reusable food service ware from single-use plastic food service ware for dine-in, takeout, or at home is another way to source reduce plastic covered material. Setting up closed-loop systems for reusable food service ware at event spaces, schools, work campuses, or other venues is a first step to both achieving the source reduction requirements as well as using these contained systems to encourage a reuse culture that can be used to further expand reuse and refill practices across the state.

One of the main findings was that solutions that work for all are necessary to allow for widespread adoption of source reduction strategies, including reuse and refill. Many strategies will need significant expansion to provide access to most communities in the state. Currently, low-income communities are less likely to have access to reuse and refill options than wealthier communities, as identified in the study. To effectively ensure consistent participation, these options will need to be available to consumers at similar price points to single-use alternatives.

Creating a system built for everyone, rather than only offering a specialty option, will allow for more durable and equitable change. Early investments that make sustainable choices accessible within existing shopping patterns leveraging inclusive design processes, combined with long-term infrastructure that reduces costs and increases convenience, can ensure reuse and refill systems work for all communities.

How Can Redesign Help?

Successfully meeting the requirements of the Act will shift California from a single-use, disposal-based economy to a circular model for single-use packaging and plastic food service ware. Material design changes play a critical role in this transition. Simplification, standardization, and harmonization of covered materials can streamline the entire supply chain, reducing costs, improving public health and delivering environmental benefits.

Design choices are critical to achieving the Act's goals. Effective source reduction strategies include using less plastic, eliminating unnecessary components, right-sizing packaging, offering bulk options, and substituting alternative materials.

The upstream decisions made by manufacturers and producers about the composition and design of covered material also will have widespread downstream impacts on the actions and investments needed to upgrade and expand the state's collection, processing, and recycling infrastructure. Material design choices influence whether an item can be effectively collected, sorted, and sent to end markets. Some design choices result in higher costs to recover that material and reduced quality of the recycled product derived from the material.

Reducing the types and complexity of covered material in the market is expected to make it easier for consumers to properly sort covered material, which in turn can simplify education and outreach needs, resulting in reduced contamination and improved recycling yields.

How Does the Infrastructure Need to Improve?

Meeting the requirements of the Act will require a holistic approach that considers the benefits of redesigning covered material, opportunities to optimize current infrastructure, and the necessary expansion of services and infrastructure.

Design improvements and system optimization can deliver significant benefits while minimizing the need for major infrastructure changes, helping meet the Act's requirements efficiently. The development or expansion of infrastructure to handle covered material must consider all potential impacts to local communities. This will ensure that public health and the environment are protected and that California communities are not disproportionately burdened by the infrastructure expansion and growth. Additionally, consideration should be made for how to build a system that benefits communities through job creation, reduction of litter, cost reduction, and other environmental and economic benefits.

Expanding Access to Collection

Ensuring convenient access to collection services for recycling will be important for achieving the requirements of the Act. In addition to access to collection at home, access to collection outside of the home (e.g., at work or in public spaces) should be expanded.

While most of the state currently has access to on-site pickup through curbside collection, significant areas of California do not have access or are currently not participating. One key opportunity highlighted by the evaluation of the current collection infrastructure is expanding access to onsite pickup through curbside collection for unserved households and businesses within or near existing service areas. The gap between participating households and businesses and access to services highlights an additional opportunity to increase collection without increasing infrastructure coverage through increased participation. Clear educational materials providing information on how to properly participate is key to ensuring participation is effective. Education and outreach could be further simplified and made more effective if coupled with covered material design changes, simplifying the task of sorting materials appropriately.

While expansion of onsite pickup for curbside collection in some areas may not be feasible due to geographic and economic constraints, other types of collection should be expanded to enable convenient access to collection in all areas of the state. Expansion of jurisdiction drop-off programs may be feasible in some areas, while expansion of alternative collection programs could work in other areas or for specific types of covered material. Additionally, expanding public space collection programs not only improves access to recycling but also helps reduce littering.

Growing Processing Capacity

While some covered materials have sufficient in-state processing capacity to meet the requirements of the Act, many materials will require changes to existing processing infrastructure or potentially the development of new capacity, including more specialized secondary processors. In addition to infrastructure upgrades, operational changes such as increased facility operating hours may allow for increased amounts of covered material to be processed using existing infrastructure.

New infrastructure and upgrades are likely to focus on small format covered materials, flexible and film plastics, as well as mixed rigid plastics which are currently a challenge for processors. Design changes coupled with improvements to processing infrastructure can assist in the recovery of small format materials. For example, some types of small format rigid plastic have end markets that would accept them, if they could be sorted from other types of small format items.

Shrinking Contamination

Reducing contamination in all material streams is critical to improving the quality of material reaching processing and end market facilities, which in turn is critical for meeting the goals of the Act. Minimizing nonrecyclable items and noncompostable items collected and processed with covered material provides significant benefit by reducing costs and improving processing efficiency, as well as the quality of the recovered material after processing. Additionally, minimizing the amount of recyclables or compostables discarded in the solid waste stream can provide significant benefits.

Labeling, education, and outreach are important to reduce contamination by helping California households and businesses properly sort their materials. This education and outreach can be bolstered by material design changes that make covered material more consistent in type and form and simpler to differentiate and properly sort. Regardless of how well households and businesses can sort covered material for collection, management of that material through processing and end markets must ensure that contaminants are removed and not introduced into the recycled output.

Reducing contamination as much as possible has multiple benefits for end markets receiving that material, including improved recycling yields and reduced costs.

Stable Material Markets

The collection and processing of covered material to send to end markets for recycling depends on sufficient market value, and the stability of that value, to ensure sustainable recovery.

Actions to ensure there is sufficient market value for recovered covered material can include investments in infrastructure to incentivize collection and processing of covered material that otherwise would not have market value. Other potential actions to provide stable market value for covered material include long-term contracts between end markets and processors to ensure consistent demand, as well as subsidies to ensure the processing of covered material is economically feasible.

Creating a demand for the recycled product is also important to create stable material markets. Design changes to covered material, including the integration of post-consumer recycled content into covered material, can often more effectively influence the market value with less need for ongoing investment.

Growing End Markets

Broadly, end markets will need to be expanded or developed for all plastic covered material types. New end market development is necessary for handling covered material that currently have limited to no end markets and are unlikely to be designed out of the system. For example, currently there are limited end markets for most types of flexible and film plastics, however, their use is very prevalent. Establishing responsible end markets to handle these materials will be important in combination with material design changes to use the flexible and film plastics that are most readily recycled.

There are important opportunities for the development of end market capacity where it can be harmonized with existing infrastructure for the management of other material in the state. For example, end markets and other infrastructure have developed through the Beverage Container Recycling Program (BCRP) that can be used to support the recycling of covered materials and beverage containers. As there is significant overlap in the types of materials covered by the BCRP and by the Act, leveraging the growth of existing infrastructure to handle covered material would create efficiencies of scale. For example, PET end markets in California that currently accept Grade A PET bales, which contain mostly beverage containers, were found to have additional capacity to take PET material. With upgrades to those end markets, those facilities could accept Grade B bales, which include much higher amounts of covered material.

What Existing Laws and Programs Intersect with the Act?

With legislation spanning 35 years, California has long been a leader in addressing waste and its impact on communities and the environment. These varied programs provide a framework for the success of the Act. Key programs influencing the implementation of the Act include, but are not limited to, the Beverage Container Recycling Program, SB 343 (Allen, Chapter 507, Statutes of 2021), AB 1201 (Ting, Chapter 504, Statutes of 2021), AB 901 (Gordon, Chapter 746, Statutes of 2015), SB 1383 (Lara, Chapter 395, Statutes of 2016), and other extended producer responsibility programs. A full listing of California bills, statutory provisions, and grant and loan programs relevant to the implementation of the Act is provided in Appendix A of this Report.

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