

**Plastic Pollution Prevention and Packaging Producer Responsibility Act
 Producer Responsibility Organization Application Form**

Instructions: Type your responses into this form and save the final version as a PDF document. Please submit this form with all other uploads.

Applications are due on or before January 01, 2024, at 11:59 PM PDT. This statutorily mandated deadline will not be extended. Direct any questions to packaging@calrecycle.ca.gov.

1. Organization Contact Information		
Organization Name: Circular Action Alliance		
Employer ID#: 92-3197259	Phone: 202-344-4202	
Address: Circular Action Alliance c/o The Recycling Partnership 20 F Street NW, 7 th Floor Washington, DC 20001	Website: circularactionalliance.org	
City: Washington	State: District of Columbia	Zip Code: 20001
2. Contact Person		
Contact Person Name: Charles Schwarze		
Title: Chair	Phone: 434-442-0244	
Address: Circular Action Alliance c/o The Recycling Partnership 20 F Street NW, 7 th Floor Washington, DC 20001	Email: info@circularaction.org	
City: Washington	State: DC	Zip Code: 20001
I certify under penalty of perjury under the laws of the State of California that to the best of my knowledge and belief, all foregoing and supporting information is true and complete.		
X 		
Signature (by a contact authorized to represent the organization)		Date: December 29, 2023
Print Name: Charlie Schwarze		Title: Chair

Information About Organization

1. Provide a summary of the organization and a description of how the organization is qualified to serve as the producer responsibility organization (PRO).

Summary of the Organization

Circular Action Alliance (CAA) is a U.S., non-profit producer responsibility organization (PRO) established to support the implementation of extended producer responsibility (EPR) laws for paper, packaging, and food service ware. The organization was founded by leading U.S. producers representing retail, food, beverage, and consumer packaged goods manufacturing.

CAA's 18 Founding Members are Amazon; Clorox; Colgate-Palmolive; Ferrero US; General Mills; Keurig Dr Pepper; Kraft Heinz; L'Oréal; Mars, Incorporated; Nestlé USA; Niagara Bottling, LLC; PepsiCo; Procter & Gamble; SC Johnson; Target; The Coca-Cola Company; Unilever United States; and Walmart. Together, CAA's membership represents more than 900 brands sold in the U.S. and uses all covered material types.

CAA was incorporated as a non-profit corporation on December 21, 2022, and is recognized by the Internal Revenue Service as exempt from taxation under Section 501(c)(3) of the Internal Revenue Code.

The organization's mission is to provide producers with consistent EPR services across multiple states while developing and implementing EPR programs that:

- Meet state-specific regulatory requirements;
- Leverage existing recycling systems and infrastructure; and
- Advance the circularity of covered materials through collaboration with local governments, service providers, and recycling system stakeholders.

In support of this objective, we are submitting this application to become the approved PRO in California. Our organization has the expertise and vision to collaboratively build a producer responsibility plan that will achieve the objectives of the California Plastic Pollution Prevention and Packaging Producer Responsibility Act (California Public Resources Code Sections 42040 to 42084). Our progress in 2023 includes the following:

- On May 1, 2023, CAA became the first PRO approved to administer an EPR program for paper, packaging and food service ware in the U.S., after being appointed by the Colorado Department of Public Health and Environment (CDPHE) as the single PRO responsible for implementing Colorado's Producer Responsibility Program for Statewide Recycling Act.
- On September 1, 2023, CAA submitted a letter of intent to the Oregon Department of Environmental Quality, indicating the organization's intention to submit a program plan by March 31, 2024, to implement an EPR program in Oregon under the Recycling Modernization Act.
- On October 18, 2023, CAA was approved as the single PRO to represent the interests of producers in Maryland. As the Maryland PRO, CAA will have a seat on the Producer Responsibility Advisory Council, which will make recommendations to the Governor and

legislature on how to effectively establish and implement a producer responsibility program for packaging materials.

The strategic operating principles that have guided our team and our board while supporting the organizational development of CAA are as follows:

- Deliver efficient EPR compliance services to producers through scale of operations, harmonization of service delivery, and program planning consistency across states;
- Provide strong producer governance based on meaningful stakeholder engagement and representation of the broader producer community;
- Enhance collection of covered materials through increased access to recycling infrastructure and efforts to reduce contamination through coordinated outreach and education initiatives;
- Support the optimization of recycling facilities to increase the recovery of recyclable materials and enable circular systems for paper, packaging, and food service ware in EPR states;
- Improve consumers’ experience with recycling services by equipping residents with the information required to raise recycling rates and build public confidence in producer-led recycling programs/systems;
- Support and incentivize innovation in packaging design and delivery models to reduce waste and enhance recyclability;
- Develop and support viable, responsible end markets that:
 - maximize the value of recycled commodities;
 - advance circular solutions for hard-to-recycle materials; and
 - provide high-quality recycled materials to producers for use as recycled content in new products and packaging.

How CAA is Qualified to Serve as the Producer Responsibility Organization (PRO) Under SB 54

The Founding Members of CAA met a key requirement of SB 54 by forming and joining a PRO in December of 2022. CAA was established and is building an organization designed to meet the requirements of SB 54 and achieve California’s goals of preventing plastic pollution and building a circular economy. CAA’s organization, policies and operational plans meet the SB 54 requirements for PRO selection as outlined in Table 1.

Table 1: CAA Qualifications

SB 54 PRO Required Selection Criteria	CAA Qualifications
Pursuant to California Public Resources Code (PRC) Section 42041(x), the organization must be exempt from taxation under Section 501(c)(3) of the federal Internal Revenue Code of 1986.	CAA is recognized by the Internal Revenue Service as exempt from taxation under Section 501(c)(3) of the Internal Revenue Code of 1986.
Pursuant to PRC Section 42061.5(a)(1), the organization must demonstrate to CalRecycle that its governing board consists of producers that represent the diversity of covered material	CAA’s Founding Membership uses all covered material types placed into the market under SB 54. These details are described in response to Questions #3 and #5 below. A detailed list of Founding Member companies, brands, and covered material types is provided in Appendix C and Appendix D.

SB 54 PRO Required Selection Criteria	CAA Qualifications
placed in the market by those entities, and that the board also includes nonvoting members with representation of material trade associations and companies if those material types are covered by the organization.	CAA’s governance plan includes the establishment of a California Board to oversee SB 54 implementation. This Board will include producers that represent the diversity of covered material placed in the market and non-voting material trade association members. These governance considerations are described more fully under Questions #3 and #4 below.
Pursuant to PRC Section 42061.5(a)(2), the organization must demonstrate to CalRecycle that it has adequate financial responsibility and financial controls in place, such as fraud prevention measures and an audit schedule.	Ensuring adequate financial responsibility and effective internal controls in accounting and auditing is of the utmost importance. CAA uses Generally Accepted Accounting Principles as the foundation for its comprehensive set of accounting methods and practices. CAA has adopted strong financial and operating policies reflecting this focus of protecting the organization’s resources, including fraud prevention measures, reserve policies, and an audit schedule, in addition to other measures. We describe this more fully in the Financial Information section of this application.

In-Depth Understanding of SB 54 Requirements and Stakeholder Perspectives

CAA team members have expertise in building PROs and developing and implementing EPR program plans in collaboration with producers, regulators, and recycling system stakeholders. The team leveraged this experience during its in-depth analysis of SB 54 and its participation in CalRecycle’s informal rulemaking workshops in 2023.

CAA has not only sought advice and insight from within its own team but has also adopted a proactive engagement strategy with California stakeholders by meeting with organizations and individuals who will play a role in achieving the objectives of SB 54. At each of these meetings, CAA brought an informed perspective to our review of the law and draft regulatory concepts, while focusing on the questions and concerns of each group, including producers and their trade associations, local governments, recycling service providers, local chambers of commerce, product stewardship organizations, and environmental non-governmental organizations. Understanding the requirements and condensed timelines in SB 54, CAA prioritized this work to ensure the organization is prepared to implement the requirements of law.

CAA continues to participate in EPR working group discussions hosted by California stakeholders, to hold presentations focused on producer readiness with organizations representing obligated producers, and has created its own forums to share information and receive input from all stakeholders. We hold a quarterly webinar for all stakeholders, and we have established a Producer Working Group that meets monthly and is open to all producers.

Team Expertise and Capabilities

CAA Founding Members are united in their vision to create a circular economy for paper, packaging, and food service ware in the United States. CAA’s Founding Members have experience with the implementation of various EPR programs, and they have assembled a team of professionals drawn from across North America with expertise in developing and operating EPR programs to respond to state-specific regulatory requirements and recycling system needs.

CAA team members have participated in EPR implementation and program operation for many years, playing integral roles in the creation, operation, and improvement of PROs. The team has expertise in regulatory compliance, project management, governance, recycling systems and materials management, system improvement, end markets, finance, fee setting, eco-modulation, packaging design, not-for-profit operation, information technology, reporting, consumer education, producer and stakeholder relations, and public affairs. A full review of the team's experience is outlined in Appendix A, and the Organizational Charts are in Appendix B.

CAA's team is comprised of independent service providers who are supporting EPR planning and the organization's development. If approved as the PRO, CAA has plans in place to hire staff, who will support program plan development, operations, and producer services. We are committed to building our local team in California, as well as developing the organization's central expertise to enable seamless knowledge transfer across jurisdictions and consistent producer services.

Support from Producers and Affiliated Organizations

In advance of the submission of this application, 61 individual companies and 73 California and national trade associations representing producers and local Chambers of Commerce have expressed written support for CAA's approval as the PRO to represent all producers in California. Combined with the extensive outreach and information sharing with California producers that CAA has conducted over the last year, we believe this show of support from companies representing different sectors demonstrates confidence in CAA's ability to help the regulated community navigate and ultimately meet their obligations under SB 54. The list of companies supporting CAA is included in Appendix E. The Chamber of Commerce letter outlining the support of different organizations is included in Appendix F.

2. Explain why this organization is interested in serving as the PRO.

CAA was established with a dedicated mission to represent producers and collaborate with stakeholders on advancing the circular economy for packaging, paper, and food service ware. CAA is interested in serving as the PRO in California to support the effective implementation of SB 54 – a precedent-setting piece of legislation. We also believe it is important to have a PRO that not only shares common goals, but also can productively work with CalRecycle and other California stakeholders while representing the interests of our members and maintaining trust with the broader producer community.

For the purposes of the successful implementation of SB 54, CAA recognizes that it needs to bring a highly qualified team with rich experience and dedication to the table. As mentioned, the CAA team has spent months laying the groundwork to be a capable partner for CalRecycle by:

- Participating extensively in CalRecycle informal rulemaking;
- Engaging local stakeholders and building key networks and relationships;
- Identifying potential challenges in SB 54 and strategies to address them; and
- Building organizational capacity and administrative systems.

We outline our plans to effectively implement the requirements of SB 54 in response to Question 5. In developing our implementation plan for EPR in California, our team has been motivated by the

unique opportunity SB 54 presents to build on the success of collection and recycling programs managed by local jurisdictions and recycling service providers while supporting producers with:

- Reducing the unnecessary use of plastic covered material;
- Reincorporating more recycled material into products and packaging as recycled content;
- Shifting to reusable or refillable packaging, where applicable;
- Increasing recycling;
- Improving the tracking of covered materials from local recycling programs to viable, responsible end markets;
- Enhancing recycling and composting infrastructure through incentives, grants, or other mechanisms;
- Developing, supporting, and maintaining viable end markets; and
- Supporting opportunity in the circular economy, local jobs, and growth.

3. List the voting members and titles of the organization’s governing board along with the following information:

- **Term lengths for each member and information on whether a board member is eligible for reappointment.**
- **List of the producer(s) that each member represents.**
- **List of covered materials placed in the market by those entities. Please provide a detailed and specific list of materials. Covered materials are defined in Public Resources Code (PRC) section 42041(e).**

List the voting members and titles of the organization’s governing board.

CAA’s National Board of Directors is comprised of 18 voting representatives of Founding Members, which represent a diversity of covered material placed in the market in California. Each Founding Member has the right to appoint one representative to serve as a Director on CAA’s National Board of Directors.

The CAA Board of Directors has established the California Board of CAA, which will have the delegated authority to act on behalf of the National Board of Directors to approve the producer responsibility plan and the budget for implementation of the plan. The California Board will include Founding Member representatives, other producer representatives, and non-voting members.

Table 2 below lists the 18 Founding Members of CAA, along with the names and titles of their designated representatives and their roles on the National Board of Directors.

Table 2. Circular Action Alliance Founding Members and National Board of Directors

Founding Member Organization	Director Name	Title	Board Position
Keurig Dr Pepper	Charles Schwarze	Senior Director, Sustainability—Packaging and Product Stewardship	Chair and Director
General Mills	Neil Menezes	Packaging Sustainability Policy Manager	Vice Chair and Director
SC Johnson	Jeff Bezzo	Executive Director Plastic Sustainability	Treasurer and Director
Niagara Bottling LLC	John Breedlove	Vice President, Legal	Secretary and Director

The Coca-Cola Company	Kirsten Witt	Director, Public Affairs & Communications	Director
PepsiCo, Inc.	Anke Boykin	Senior Director, Global Public Policy and Government Affairs	Director
Procter and Gamble	Jon Hansted	Senior Director, Finance & Accounting	Director
Ferrero US	Kelly Smith	Vice President, Head of Institutional Affairs	Director
Unilever United States	Stefani Millie	Associate Director, External Affairs and Sustainability	Director
L'Oréal USA	Kelly Molinari	Vice President, Corporate Affairs & Engagement	Director
Nestlé, USA	John Caturano	Senior Category Manager, Procurement—Sustainability/Recycling	Director
Amazon	Kara Ruecker	Director, Public Policy	Director
Target	Abby Donovan	Director, Sustainability Policy and Governance	Director
Mars, Incorporated	Cori Herbig	U.S. States Public Policy Director	Director
Colgate-Palmolive	Anne Bedarf	Director, Packaging and Plastics Sustainability	Director
Kraft Heinz	Robert Scott	President, Research and Development—North America	Director
Walmart	Alex Schenck	Director, Global Public Policy, Environment, Sustainability, and Product Safety	Director
Clorox	Pat Hayes	Vice President, Government & Community Affairs	Director

Term lengths for each member and information on whether a board member is eligible for reappointment.

Each Founding Member appoints one person to serve as a Director on the National Board. Individual Directors are appointed to one-year terms and may serve consecutive terms of office. The National Board will appoint the members of the California Board.

The voting members of the California Board will be appointed for two-year terms and will be eligible for reappointment.

Additionally, CAA has engaged a third-party organization, which has provided support in the development of the California governance model. This organization is conducting a comprehensive review of CAA's governance.

List of the producer(s) that each member represents.

See Appendix C for the Founding Members and their associated producer brands (the consumer brands of Founding Members).

List of covered materials placed in the market by those entities. Please provide a detailed and specific list of materials.

Together, CAA's Founding Members supply all covered material types to the California market. Covered material types supplied by Founding Members are listed in Appendix D.

4. List the nonvoting members and titles of the organization’s governing board and the following information:

- **Term lengths for each member and information on whether a board member is eligible for reappointment.**
- **List of material trade associations and companies represented that each nonvoting member represents.**
- **List the types of covered material represented by each organization.**

List the nonvoting members and titles of the organization’s governing board.

Table 3 below lists the non-voting members on the California Board, their titles, and their roles on the State Board.

Table 3. CAA California Board nonvoting members

Nonvoting Member Organization	Name	Title	Board position
California League of Food Producers	Trudi Hughes	President & CEO	Non-voting Board Member
California Retailers Association	Rachel Michelin	President	Non-voting Board Member
California Manufacturers & Technology Association	Robert Spiegel	Vice President of Government Relations	Non-voting Board Member

CAA has also invited the Agricultural Council of California to nominate a non-voting representative to serve on the California Board. The Agricultural Council’s membership list is available here: <https://agriculturalcouncil.com/members/>.

Term lengths for each member and information on whether a board member is eligible for reappointment.

Individuals will be appointed for two-year terms and will be eligible for reappointment.

As mentioned, CAA has engaged a third party, which provided support on the development of the California governance model and is conducting a broader governance review.

List of material trade associations and companies represented that each nonvoting member represents.

Table 4 below lists the non-voting members and the material trade associations and companies each represents.

Table 4. Nonvoting member representation

Nonvoting Member	Industry	Represented Producers
California League of Food Processors	Food manufacturing	Represents both large and small food and beverage producers throughout the state including processors of fruits, vegetables, and

		dairy products, as well as baked goods and specialty products. Membership list available here: https://www.clfp.com/processor-member-list
California Retailers Association	Retail	Represents California's retail industry, working on behalf of more than 400,000 retail establishments including general merchandise, department stores, mass merchandisers, online marketplaces, restaurants, convenience stores, supermarkets, and grocery stores, chain drug, and specialty retail.
California Manufacturers & Technology Association	Manufacturing	Represents California's manufacturing, processing, and technology-based companies, representing 400 businesses from the entire manufacturing community and working on behalf of 30,000 companies in the state. Membership information available upon request.

List the types of covered material represented by each organization.

The California Board's non-voting members represent organizations that supply both single-use packaging and plastic single-use food service ware materials, as defined by Section 42041(e) of SB 54, to the California market.

5. Describe how your organization can most effectively implement this chapter including, but not limited to, responding to the following:

- **Describe the organization's experience in establishing and/or operating producer responsibility organizations/stewardship organizations.**
 - **Describe this organization's commitment to environmental and social justice.**
 - **Disclosure of any entities or organizations that the PRO has conducted business with or has any financial or contractual affiliation with.**
 - **Provide a list of the producers, including brands, who are currently members of or are affiliated with this organization. For each producer, please specify what covered material types they produce.**
 - **Provide any other information to demonstrate that the organization can effectively implement the requirements of the law and is relevant to the organizations' qualifications to be the producer responsibility organization.**
-

Describe the organization's experience in establishing and/or operating producer responsibility organizations/stewardship organizations.

CAA's team has a broad range of experience and expertise in establishing and operating PROs. From start-up to operations, the team has worked closely with producers, regulators and stakeholders to achieve the policy objectives of EPR laws and regulations. This experience includes:

- PRO development, producer governance, and EPR program plan development and implementation;
- Waste and recycling services procurement, reimbursement model development and execution, and collaboration with local governments on recycling system improvements;
- Administrative and reporting systems development;
- Recycling operations management, investment, and facility design;
- Post-collection network development, including audit protocols;
- Producer recruitment, engagement, reporting, and compliance;
- Material costing and fee-setting methodology development, fee-setting, and accounting systems management;
- Eco-modulation, recyclability, and market development;
- IT system development and integration;
- Communications and engagement, including consumer and producer education, outreach campaigns, and working groups;
- Environmental justice issues;
- Jurisdictional recycling studies to support the implementation EPR programs;
- Local governments, service provider, and producer preparation to enable compliance with and implementation of EPR policies;
- Stakeholder relations, consultation, and collaborative program development; and
- Advice to government on regulatory design, EPR implementation, oversight and enforcement, and transitioning to full EPR.

Many CAA team members also have extensive experience outside of PRO start up and PRO operations while still focused upon recycling, recyclability, producer material choice, IT systems,

stakeholder engagement, market assessment and development, and sustainable materials management. Several team members have worked extensively in California in these areas. We have included summary resumes for all our team members in this application.

As mentioned, CAA's team is comprised of independent service providers who are supporting EPR planning and the organization's development. If approved as the PRO, CAA has plans in place to hire staff, who will support program plan development, operations, and producer services.

Describe this organization's commitment to environmental and social justice.

CAA is committed to working with local governments, service providers, and environmental justice groups to minimize the negative environmental or public health impacts of plastic pollution on disadvantaged, rural, low-income communities. We believe our first and most important action will be listening to the concerns raised by these communities.

As we learn from these discussions, we will evolve our priorities and our approach to furthering environmental and social justice and implementing SB 54. As a starting point, we have identified the following priorities to support the inclusion of environmental justice considerations in our planning and decision making:

- Leverage the SB 54 needs assessment, including Advisory Board feedback, for information that can help us better understand the challenges disadvantaged, low-income and rural communities face, improve our understanding of negative impacts to date, and promote inclusion;
- In collaboration with local governments, service providers and environmental justice groups, develop an approach in the producer responsibility plan that ensures implementation avoids and minimizes negative environmental or public health impacts on disadvantaged or low-income communities or rural areas and vulnerable communities outside of the state;
- Create education and awareness activities informed by broad-based engagement to better understand how people participate in recycling systems in their communities and leverage that information to develop clear, culturally relevant communication materials that empower people to participate more fully; and
- Leverage robust monitoring and reporting activities to provide fulsome information on participation, allowing CAA to adjust and adapt quickly from a program design and operation perspective, while developing approaches that consider the impacts of SB 54 on all communities and peoples.

CAA is committed to realizing SB 54's potential and looks forward to continued discussion and collaboration with disadvantaged communities to advance environmental justice. Our vision is to enable a circular economy for packaging and food service ware that provides environmental benefits and economic opportunities to all Californians.

Disclosure of any entities or organizations that the PRO has conducted business with or has any financial or contractual affiliation with.

CAA's team is comprised of independent service providers assembled to help position the organization to accomplish its purposes. Other service providers are listed in Table 5.

Table 5: Service Providers

Entity or Organization	Affiliation
Alliance of Nonprofits for Insurance (ANI)	Insurance Provider
Bank of America	Banking Services
Bully Pulpit Interactive	Marketing and Communications Services
California Advisors, LLC	Stakeholder Relations Services
California Chamber of Commerce	Producer Recruitment Assistance
Cascadia Consulting Group, Inc.	Environmental Consulting
Clear Strategy Inc.	Managed Services and Principal Consultant
CliftonLarsonAllen LLP	Outside Accounting Services
Coalition Insurance Solutions Inc.	Insurance Provider
Dembo Jones, P.C.	Independent Auditor
Earthshift Global	Life Cycle Assessment (LCA) Services
Forrester	IT Research
Grant Thornton LLP	Governance Advisory Services
HDR Engineering Inc. and Eunomia Research & Consulting Ltd	Colorado Needs Assessment Contractor approved by the Colorado Department of Public Health and Environment
IMIDIA LLC	IT Data Discovery
Innovative Computing & Applied Technology LLC (INCATech)	GIS Services
Korn Ferry (US)	Organizational and Staffing Consulting Services
PricewaterhouseCoopers LLP	IT Strategy and Planning Services
Seven Letter ONA	Media and Communications Services
The Recycling Partnership, Inc.	Technical and Administrative Support Services
USI Insurance Services	Insurance Broker
Venable LLP	Outside Legal Counsel

Provide a list of the producers, including brands, who are currently members of or are affiliated with this organization. For each producer, please specify what covered material types they produce.

Please see Appendix C.

Provide any other information to demonstrate that the organization can effectively implement the requirements of the law and is relevant to the organizations' qualifications to be the producer responsibility organization.

Introduction

CAA's California EPR program planning team has actively participated in CalRecycle's rulemaking workshops and has provided comments on regulatory concepts with an overarching priority of ensuring that the regulations will support the PRO with successfully delivering and implementing the producer responsibility plan. To meet this objective, our team has developed an implementation plan and has been consulting with stakeholders and members on approaches to address the SB 54 areas listed below. This implementation plan, described throughout this application, is subject to change as further planning and stakeholder consultation is undertaken.

Producer Recruitment and Readiness

If approved as the PRO, CAA is ready to move forward with its implementation plan in 2024. Most urgent is ensuring producers join the PRO as soon as possible following approval of the PRO application. Two key policies will support an effective effort to have producers join the PRO:

- Clarity in all tiers of the definition of producer; and
- A requirement for producers to join the PRO in 2024.

We will continue to sign up producers for our Producer Working Group where they will have the opportunity to engage with the CAA team and receive guidance on reporting on covered material categories (CMCs) into CAA's online producer portal before the submission of the producer responsibility plan to the Advisory Board in 2026. This reporting of producer supply data will support the development of the producer responsibility plan, fee schedule, and source reduction agreements with producers.

Producer Services

CAA will provide producers with a comprehensive suite of services and support functions to meet their EPR obligations under SB 54 and supporting regulations. If selected as the PRO, CAA will develop a Participant Producer Agreement, which will outline the services that CAA will provide to producers.

CAA will also work with and consult with producers in 2024 on the development of a Producer Source Reduction Agreement. This agreement will be used by CAA to assess and agree to individual producer source reduction plans that will support CAA in meeting its obligation under SB 54 to collectively achieve source reduction targets on behalf of participant producers. As part of the development of the Participant Producer and Producer Source Reduction Agreements, specific policies and procedures on compliance and reporting will be prepared and made available to producers.

Producer Reporting

If selected as the PRO in California, CAA will initiate plans to expand its current outreach to and support for the producer community with guidance and appropriate reporting tools and resources. This initiative will include the development of a reporting guidebook that will be designed to assist companies in identifying whether they meet the definition of "producer" under the statute. It will also provide producers with instructions on determining which of the materials they supply to the market meet the definition of "covered material" and which materials are excluded from any obligation. The

guidebook will assist producers with setting up their internal information systems to capture supply data and other required information on CMC types.

CAA will provide participant producers with access to a secure online reporting portal to facilitate the submission of annual supply data. This reporting portal will allow for CAA to capture and aggregate the information that must be submitted to CalRecycle in the PRO Annual Report, as well as the applicable individual producer data where required.

Producer Responsibility Plan and Needs Assessment

Key to success is approval of the first producer responsibility plan in 2026 in order to launch the EPR program by January 1, 2027. Achieving this milestone will require the PRO to work closely with CalRecycle, the Advisory Board and recycling system stakeholders to meet the ambitious schedule to complete all needed steps leading up to plan submittal. CAA will align its program planning with the needs assessment process while continuing to work on all the required elements of the plan in parallel to ensure that timelines can be met.

Recyclability and Compostability

SB 54 requires producers to ensure that all covered material offered for sale, distributed, or imported in or into the state on or after January 1, 2032, are recyclable in the state or eligible for being labeled “compostable” in accordance with Chapter 5.7 (commencing with Section 42355). If selected, CAA will work with producers, local governments and recycling service providers to identify and address challenges with collection, processing and/or end markets for materials that do not receive an initial determination of recyclability or compostability. We will draw on our experience throughout North America with particular emphasis on seeking to harmonize recyclable lists across U.S. states, including those with EPR laws.

We anticipate taking the following actions, in coordination with needs assessment studies and Advisory Board participation as appropriate:

- Engage local stakeholders to identify barriers and opportunities to improve the recyclability of select materials through investments in collection, processing and market infrastructure and/or ongoing cost supports or incentives. The focus will be on evaluating requirements for sustainable operations to meet the standards of responsible end markets.
- Evaluate the status, challenges, and opportunities for development of responsible end markets for select materials on a preliminary basis supported by opportunities to invest in new local collection, processing and market infrastructure for select materials.
- Inform producers about the full set of criteria required to be considered recyclable and compostable, and any opportunities or requirements for documenting that their covered materials satisfy all the criteria that may be included in final adopted regulations. This will include identifying the need to eliminate any potentially harmful materials currently used in covered materials.

Fee-Setting and Eco-Modulation

With participation from its Founding Members, CAA is presently developing a fee-setting methodology supported by a specific set of guiding principles.

Fee-Setting Overview

CAA is mandated to set adequate fees that fully finance the PRO budget, ensuring the fulfillment of SB 54 requirements, and enabling complete implementation. These fees shall encompass material management costs related to collecting, sorting, and transporting covered materials, as well as costs to develop and sustain viable responsible end markets, advance source reduction initiatives, support producers with reuse and refill infrastructure, and other programs that enhance material recycling while minimizing environmental and public health impacts, as per the Needs Assessment. The fees will also cover departmental reimbursements, administrative fees, PRO operations, reserves, in line with the reserves policy, and the \$500-million surcharge under the California Plastic Pollution Mitigation Fund.

Fee Structure

The base fee schedule will include each CMC and will account for unique characteristics of different materials, as well as the development of responsible end markets. CAA's fee structures, including modulation factors for each CMC, will be justified through data and principles. CMC-specific management costs will significantly influence differentiation in fees. The producer responsibility plan submission will include a detailed description and rationale behind the fee structure and the approach to eco-modulation incentives.

Application of Credits and Malus Fees

By the third operational year, CAA plans to implement a system to provide producers with credits or charge malus fees based on the producer's packaging design choices and subsequent environmental or public health impacts. CAA will establish standards and criteria, based on measurable technical references and accredited third-party certifications to evaluate and qualify producers for these incentives.

Local Jurisdictions and Service Provider Engagement

As required by PRC section 42051.1. (c)(3)(A), the producer responsibility plan must demonstrate how the PRO will "leverage and utilize existing collection programs and recycling, composting, sorting and processing infrastructure." We recognize the work that has been undertaken by local governments and recycling service providers to build the existing recycling system in California and that EPR programs are part of a complete and integrated solid waste management system that must consider overall system impacts. In support of developing a producer responsibility plan, we have initiated discussions with local government and recycling service provider organizations to explore how the producer responsibility plan can utilize "solid waste collection programs and solid waste facilities as the designated system for the collection and processing of covered material," fulfilling the requirements set out under PRC section 42051.1. (c)(3)(B).

If approved as the PRO, we will continue to work with local governments and service providers to assess how the producer responsibility plan can support the expansion of recycling system through increasing services and material collection and improving recycling performance tracking. Taking

these actions will enable CAA to identify opportunities for further innovation and investment to increase recycling rates and support responsible end market development.

Municipal/Service Provider Reimbursement

A key discussion CAA has started with local government organizations and representatives is assessing how the producer responsibility plan should determine “the costs that will be incurred by local jurisdictions, recycling service providers, alternative collection systems,” as well as the “mechanism and schedule” for transferring funding to local jurisdictions. If selected as the PRO, CAA will develop a proposed mechanism and consult with local governments and service providers on the process to collect and verify information on recycling system costs, as well as the information technology system that will be required for the collection of information and issuing payments for recycling services.

CAA has started developing a reimbursement model to meet SB 54 requirements. To that end:

- CAA began ongoing stakeholder engagement with local jurisdictions and recycling service providers in early 2023. If selected, we plan to focus this engagement on understanding local needs and perspectives and vetting and refining proposed approaches. This ongoing engagement will complement and inform our collaboration with CalRecycle, the Advisory Board and needs assessment contractors.
- CAA is identifying and evaluating reimbursement system elements and options. Stakeholder discussions have highlighted several key related issues, such as how to determine costs, invoice for reimbursements and ensure appropriate datasets are provided.
- We are actively researching California’s local waste, recycling and organics policies and systems, and will continue to engage stakeholders in this effort. If selected we will draw on our understanding of California’s local systems and refine our implementation approaches in response to feedback from CalRecycle, the Advisory Board, and ongoing local stakeholder engagement.

As with other SB 54 requirements, our approach recognizes the importance of starting early and working with stakeholders to develop feasible and supported approaches well in advance of deadlines, to satisfy SB 54 requirements.

Responsible End Markets

SB 54 introduces transformational new requirements for responsible end markets (REMs) with the goal of increasing transparency, source reducing plastic covered material and increasing recycling rates. SB 54 states, to be considered recycled, covered material shall be sent to a REM. CAA is involved in several activities related to complying with REM requirements in Oregon and preparing for REM requirements in other states. These activities include:

- Participating in related rulemaking activities;
- Issuing a request for information and conducting research to understand options for tracking and verifying the flow of covered material through the recycling supply chain;
- Compiling information to characterize current recycled material markets;

- Developing an IT strategy and mapping out the requirements of a material tracking system to verify REMs;
- Engaging with local governments and recycling service providers to develop a collaborative solution for REM tracking and verification; and
- Retaining experts to assist in evaluating current markets, REM verification requirements and options, estimating costs to meet REM standards and for related costs, and strategies for developing new REM capacity.

If selected as PRO, CAA will actively collaborate with CalRecycle, the Advisory Board and stakeholders to help ensure that needs assessment studies are thorough and align to the specific requirements of the first producer responsibility plan.

Performance Reporting and Recycling Rates

SB 54 requires each plastic CMC to achieve ambitious recycling rate targets beginning with 30 percent by January 2028, and increasing to 65 percent by January 2032. Achieving the 65 percent target will require performance by all CMCs at every stage of the process. Since the targets apply to all SB 54 covered materials regardless of their generation source, achieving these rates will require increased collection of covered material from a wide variety of settings, including: multi-family, commercial, and away-from-home environments, as well as rural and remote areas.

CAA is committed to identifying and documenting the most effective approaches to maximize covered material recycling rates. We anticipate our activities will include:

- Collaborating closely with local jurisdictions and recycling service providers to build support for a wide range of investments to enhance and expand recycling collection and processing services to maximize recovery, minimize contamination, and satisfy REM standards;
- Providing funding for local education and promotion campaigns while reinforcing messaging and harmonization through strong regional and statewide campaigns that also involve reuse and refill systems; and
- Funding research and development to help demonstrate new collection and sortation technologies that dovetail with REM needs and development opportunities.

Source Reduction

The first source reduction target of 10 percent (with a minimum of 2 percent reuse or refill) starts on January 1, 2027, the same day that producers are required to be part of an approved producer responsibility plan. In addition, source reduction agreements must be in place with producers prior to the submission of the producer responsibility plan to the Advisory Board in 2026. To meet these objectives, it is essential to have producers join the PRO as soon as possible in 2024.

If selected as the PRO, CAA intends to take the following actions (in coordination with needs assessment studies as appropriate) to support producer progress on source reduction:

- Educate producers on source reduction requirements with emphasis on the initial January 2027 10 percent target with a minimum of two percent refill/reuse;

- Support the Source Reduction Study outlined by CalRecycle at its September 2023 SB 54 workshop by encouraging and supporting voluntary producer responses to the anticipated survey. This includes helping producers to align tracking and reporting systems with SB 54 CMCs;
- In accordance with final adopted SB 54 regulations, CAA will:
 - Support CalRecycle in the updating of the 2023 Source Reduction Baseline study based on data in individual producer source reduction plans; and
 - Determine a formula for providing up to eight percent source reduction credit for use of post-consumer recycled content in covered materials.
- As outlined above in the producer services section, CAA will begin consultations on the Producer Source Reduction Agreement and producer source reduction plans to have enforceable agreements that in aggregate will meet the PRO's statewide source reduction targets.

Advisory Board

If selected as the PRO, CAA and the California Board will work with the Producer Responsibility Advisory Board on addressing the recommendations from the needs assessment studies and developing the producer responsibility plan. The Advisory Board will play an important role in fostering the stakeholder collaboration required to tackle the challenges of reducing plastic waste, increasing recycling, determining pathways for reusable and refillable packaging, establishing a circular economy, and protecting the broader environment.

Financial Information

PRC section 42061.5(a)(2) requires CalRecycle to evaluate the PRO's financial responsibility and the financial controls that are in place to ensure proper management of funds. Responses to the following questions will assist CalRecycle's evaluation of these requirements.

1. Describe the types of audits conducted and their associated audit schedule.

CAA is committed to designing, implementing, and maintaining high quality governance, risk management, and compliance practices.

At present, CAA undergoes an annual financial statement audit conducted by an independent public accounting firm. Consistent with our commitment to fiscal transparency, we have attached a copy of our most recent completed financial statement audit to this application.

Beyond annual financial statement audits, CAA will perform periodic risk assessments and associated operational audits, if and where appropriate as our organization evolves, through an internal team or in partnership with an external firm.

Although federal funding is not presently envisioned, CAA will monitor and maintain compliance around federal grants to determine if receipts trigger the requirement of a Single Audit.

If selected as the California PRO, CAA intends to implement similar practices to ensure that our organization prioritizes statutory compliance and a strong commitment to leading practices around governance, risk management, and compliance topics.

2. Describe what fraud prevention measures the organization has implemented.

CAA is committed to running an organization that operates efficiently and effectively, while executing with appropriate controls in place to manage risk and prevent fraud. Various policies and procedures have been developed to establish repeatable processes and ways of working across the various types of transactions and day-to-day operations that CAA conducts. Within these policies, CAA has designed steps to ensure that appropriate authorization requirements are established, and segregation of duties is considered.

To-date, CAA has established the following policies:

1. Accounts Receivable Policy;
2. Accounts Payable Policy;
3. Anti-trust Compliance Policy;
4. Budget Policy;
5. CAA Reserve Fund Policy;
6. CAA California Specific Reserve Fund Policy;
7. Compensation Policy;
8. Conflict of Interest Policy;
9. Finance, Audit, and Investment Committee Terms of Reference (Charter);
10. Financial Reporting Policy – Internal Financial Statements;
11. Financial Statement Audit Policy;
12. Fraud Prevention Policy;
13. Guiding Principles for Senior Decision Makers (Procurement);
14. Internal Control Policy;
15. Privacy Policy;
16. Procurement Policy (Interim);
17. Records Retention Policy; and
18. Whistleblower Policy.

These organizational policies are intended to guide and inform how the organization will operate.

3. Pursuant to PRC 42051.1(j)(3), the PRO shall not maintain total program reserves exceeding 60% of its annual operating expenses. How will the organization meet this requirement? What policies regarding reserve funding has or will the organization implement?

The Board of Directors and management of CAA is committed to prudent fiscal management and stewardship. As a non-profit corporation with tax-exempt status under Section 501(c)(3) of the Internal Revenue Code, CAA understands its responsibility to strike a balance between ensuring that the organization has an appropriate degree of liquidity and financial assets to manage the day-to-day and ongoing needs of the organization while also deploying maximum resources towards advancing mission objectives.

CAA has recently worked with an outside consultancy – with significant experience in the areas of non-profit organization reserves planning – to develop a reserve policy that details the organization’s commitment to prudent fiscal and balance sheet management given its non-profit mission. Furthermore, the project team examined long-standing reserve management practices in Canadian EPR programs for insights when developing the policy. CAA considers reserves planning and management to be a long-term consideration and one that must sensibly integrate with the organization’s long-range operating and financial intentions.

CAA is acutely aware that the organization selected to serve as the California PRO will be operating in a unique and dynamic environment, both in general, but also in its earliest days. Topics such as operational ramp-up, producer registration with the PRO, EPR fee determination, and payment of the \$500 million surcharge to the California Plastic Pollution Mitigation Fund on an annual basis all offer different complexities to organizational and financial planning. CAA is committed to managing its liquidity in a sensible way while also positioning the organization to:

- effectively manage/mitigate financial risk;
- satisfy ongoing operating expenses; and
- effectively position the organization for the future.

CAA intends to re-evaluate its reserves needs on an annual basis in concert with its ongoing business and financial planning processes, which includes the development of an annual budget and higher-level, multi-year financial projections.

CAA has closely reviewed PRC Section 42051.1(j)(3) and understands the goals and options available to the PRO with regard to the legislation. CAA believes that it will be a trustworthy and reliable partner for CalRecycle along these dimensions.

4. Explain any other ways your organization demonstrates that it has adequate financial responsibility and financial controls in place to ensure proper management of funds. For example:

- **Financial Policies and Procedures that outline guidelines for financial management, including budgeting, spending, procurement, and reporting, ensuring consistency and transparency in financial operations.**
 - **Qualified and Trained Staff who possess the necessary skills and knowledge to handle financial matters effectively.**
 - **Proper oversight of financial matters through regular review of financial reports and approval of budgets and expenses, ensuring the PRO's financial sustainability.**
 - **Internal financial controls, such as segregation of duties, multiple approvals for financial transactions, and regular audits or reconciliations, to prevent fraud, errors, and ensure accuracy and integrity of financial data.**
-

CAA is committed to strong fiscal stewardship and the proper management of financial resources. CAA has demonstrated this commitment and will continue to implement leading financial management practices as outlined below.

CAA's commitment to prudent fiscal management can be evidenced by the following:

- Financial policies and procedures – CAA developed the following policies to provide key guidance to the CAA finance team and other relevant stakeholders:
 - Accounts Receivable;
 - Accounts Payable;
 - Budget Policy;
 - CAA Reserve Fund Policy;
 - CAA California Specific Reserve Fund Policy;
 - Finance Audit and Investment Terms of Reference;
 - Financial Reporting Policy – Internal Financial Statements; and
 - Financial Statement Audit Policy.

The policies establish appropriate responsibilities within these areas and processes that should be followed to ensure proper management of funds.

- Professional staff and external advisors – The current CAA finance team structure includes a team of finance consultants. The team consists of certified individuals with extensive finance and accounting experience. CAA intends to onboard a CFO at the national level who will report to the CEO. Under the CFO, CAA expects to establish a finance director, an accounting director, and a financial analyst. Additionally, the state level finance teams will have a Director of Finance, as well as finance and accounting support staff. In addition to hiring qualified and trained staff with the necessary skills to handle financial matters effectively, CAA has also partnered with third party SMEs, where relevant, to obtain guidance on best practices and industry standard processes.
- Governance and external financial statement review – CAA has established a Finance, Audit, and Investment Committee (FAI Committee) to provide financial oversight and risk monitoring. Individuals have been selected to serve on the FAI Committee due to their significant

experience serving in finance leadership roles at Fortune 500 and other leading consumer and packaged goods companies, such as Procter & Gamble, SC Johnson, Niagara Bottling, and Keurig Dr Pepper.

Additionally, the financial reports are prepared by an accountant before being sent to the FAI Committee.

- Internal controls – CAA has developed 18 policies to define our processes and procedures. These policies are directing our internal control environment that continues to evolve as our organization grows.

Internal controls have been defined for the following areas:

- Segregation of Duties;
- Delegation of Authority;
- Fair Pricing;
- Maintenance of Separate Funds; and
- Producer and Service Provider Verification.

Funds are held in separate accounts at the national and state level. States also have separate accounts from each other. These internal controls have been developed based on the COSO framework. As CAA grows, the organization will continue to monitor its internal controls to ensure best practices are maintained.

Appendix A: CAA Team Bios

The following bios are for CAA's team of independent service providers, who are supporting EPR planning and the organization's development, as of the date of this application.

Ron Soreanu (CAA Project Lead)

Location: Toronto, Ontario, Canada

- Project Lead, CAA (2022-Present);
- Lead Advisor for the Producer Working Group that incubated and launched Circular Action Alliance;
- Co-Chair, Producer Working Group (2020-2021) that supported the development of a national PRO in Canada (precursor to Circular Materials, a national, non-profit organization responsible for paper and packaging recycling systems in Canada);
- Vice President, Public Affairs, Communications and Sustainability, The Coca-Cola Company (2014-2021):
 - Led the Company's sustainability strategy and execution in Canada;
- Board of Directors, Stewardship Ontario (2019-2021);
- Chair of the Board, Canadian Beverage Association (2017-2021);
- Board of Directors, Alberta Beverage Container Recycling Corporation (2016-2021):
 - Served as a Board member for producer responsibility organization that operates Alberta's deposit-return program.
- Chair, Public Affairs Committee, Alberta Beverage Container Recycling Corporation (2018-2020).

Shane Buckingham (CAA EPR Program Planning Lead)

Location: Grimsby, Ontario, Canada

- EPR Program Planning Lead, CAA (2022-Present):
 - Leading EPR program plan development for CAA and managing the EPR program planning team.
 - Leading SB 54 implementation planning and managing the California EPR team.
- Principal, Apex Policy:
 - Lead Advisor for the Producer Working Group that incubated and launched Circular Action Alliance.
 - Lead Advisor on the project team that created Circular Materials, a national, non-profit organization responsible for paper and packaging recycling systems in Canada (2021-2023)
 - Created and facilitated Circular Materials' Producer Working Group, covering a range of topics, including recycling system design, material costing, recycled content and rulemaking (2021-2023).
 - Led Circular Materials' producer recruitment strategy and team, ensuring Circular Materials was successful in representing a majority of producers in Ontario in less than a year (2021-2022).
 - Represented Circular Materials in the Ontario government's mediation process amongst PROs, which led to regulatory reforms supporting the creation of a common collection system for paper and packaging (2022).
- Principal, Earncliffe Strategy Group:
 - Strategic Communications and Stakeholder Relations Advisor, Stewardship Ontario (2020-2021):
 - Advised on the consultation and approval of the Blue Box Wind-Up Plan to transition from the shared producer-municipal funding model to full extended producer responsibility for paper and packaging.
 - Policy and Strategic Communications Advisor, Automotive Materials Stewardship (2020-2021):
 - Advised on the development of Ontario's extended producer responsibility regulation for Hazardous or Special Products.
- Senior Director, Sustainability and Industry Affairs, Canadian Beverage Association (2017-2021):

- Prepared the Canadian Beverage Association's 2017 and 2018 Annual Reports for the Beverage Refrigeration Units Stewardship Plan, British Columbia (2017-2019);
- Successfully managed the roll-out and communications of the Canadian Beverage Association's Public Space Recycling Pilot Project with the Town of Erin, Ontario, which included the installation of 87 recycling bins and a community promotion and education campaign (2017–2018);
- Represented the Canadian Beverage Association in Ontario's Producer Blue Box Working Group to provide feedback on the development of the province's Blue Box Regulation (2020–2021); and
- Represented the Canadian Beverage Association in Ontario's Blue Box Mediation between producers and municipal representatives on transitioning municipal curbside blue box programs to a new producer-funded and operated recycling system for paper and packaging (2019).
- Director of Communications, Ontario Waste Management Association (2016–2017):
 - Managed strategic communications and policy development on labor law, climate change and organic waste diversion.
- Press Secretary, Federal Environment Minister (2014–2015):
 - Collaborated with communications staff at Environment Canada, on behalf of the Environment Minister, to roll out ministerial announcements, such as the release of Canada's 2030 emissions target and the science review of microbeads, which led to the phase-out of their use in cosmetics in Canada.
- Communications and Policy Advisor, Environment Critic of Ontario's Official Opposition (2011-2014, 2016):
 - Developed legislative strategy and policy responses on EPR for paper, packaging, electronics, tires, batteries, and household hazardous materials.
- Board Director, Alberta Beverage Container Recycling Corporation (2018-Present):
 - Chair, Public Affairs Committee, Alberta Beverage Container Recycling Corporation (2020–Present).

Jeff Meyers (CAA Senior Strategic Advisor)

Location: Atlanta, GA, United States of America

- Senior Strategic Advisor, CAA (2023-Present):
 - Responsible for organizational development of CAA including organizational design, recruitment, and strategic planning.
- Project Lead, Producer Working Group, The Recycling Partnership, Inc. (2022-2023):
 - Formally incubated and launched Circular Action Alliance; and
 - Led Strategy and long-term planning efforts and large system change projects.
- Chief Strategy Officer, The Recycling Partnership, Inc. (2019–2021):
 - Oversaw and created the long-term strategic plans for boosting U.S. recycling rates.
- Chief Financial Officer, The Recycling Partnership, Inc. (2019–2021):
 - Oversaw a complete financial management upgrade including new systems and processes to be a best in-class non-profit.
- Operations Lead, The Recycling Partnership, Inc. (2017–2019):
 - Oversaw portfolio/project management, drove robust system analytics, and shaped strategy for recycling system improvements.
- Recruitment Lead, The Recycling Partnership, Inc. (2015–2016):
 - Helped recruit brands, retailers, converters and other recycling value chain stakeholders to invest in boosting recycling rates.
- Manger Sustainable Packaging, The Coca-Cola Company (2011–2015):
 - Managed sustainable packaging for North America with reduction, recycled content, collection, and recyclability efforts.
- Board member of The Recycling Partnership and the Closed Loop Fund (2011–2015).

Chris van Rossem (CAA Reporting and Regulatory Compliance Advisor)

Location: Toronto, Ontario, Canada

- Reporting and Regulatory Compliance, CAA (June 2023–Present):
 - Policy advisor on California, Oregon, Colorado statutes, with a focus on California rule-making;
 - Covering material reporting and fee category development and alignment across jurisdictions; and
 - Supporting national fee-setting principles and implementation of eco-modulation criteria.
- Implementation Consultant for Circular Materials in Ontario, Canada—Independent Consultant (July 2021–Present):
 - Supporting the development of a Producer Portal for reporting supply-to-market producer quantities, including reporting guidelines and reporting tools;
 - Determining reporting categories to facilitate supply-to-market reporting and fee rate differentiation and producer access to recovered resources;
 - Undertaking concept development of a common collection system with multiple PROs to access to materials;
 - Recruiting producers and members in a competitive compliance market for PRO services; and
 - Providing individual producer support for understanding regulatory obligations and reporting requirements.
- Technical Support – Flexibles Working Group, Canada Plastics Pact (August 2021–Present):
 - Aligning a diverse set of stakeholders on the development and publication of a 5-Year Roadmap for Advancing a Circular Economy for Flexible Plastics in Canada.
- Canadian Stewardship Services Alliance (CSSA) (January 2014–July 2021):
 - Developed a nationally harmonized producer reporting material list to facilitate reporting in multiple provincial programs for packaging and printed paper;
 - Developed and maintained a National Reporting Guidebook for producers;
 - Developed an inbound audit protocol for sampling of collected packaging and printed paper across British Columbia to support regulatory reporting and inform collection and processing contracts, including mass balance reporting;
 - Oversaw performance reporting and performance metrics of packaging and printed paper programs subject to third-partying audit and verification;
 - Provided technical and strategic support for a revised fee-setting methodology for annual producer fee rates, including a new methodology for cost allocation based on material cost differentiation;
 - Researched implementation of eco-modulation requirement for Producer Responsibility Organizations as per the EU’s Waste Framework Directive; and
 - Provided Facilitation and Topic Introduction—EPR Fee Modulation—International Stewardship Forum, Paris, France, 2019: https://www.globalpsc.net/wp-content/uploads/2019/08/Paris_Forum_2019_Day_2_Presentations_0819_EN.pdf.
- Waste Diversion Ontario (July 2009–July 2012):
 - Provided oversight and review of quarterly performance reporting of Industry Funding Organizations (IFOs) for the four product groups (Tires, Packaging, Municipal and Household Special Waste, Waste Electrical and Electronic Equipment) regulated under the Waste Diversion Act; and
 - Reviewed Industry Stewardship Plans (ISPs) for groups of producers wanting to opt out of the requirement to pay fees to IFOs.

David Lefebvre (CAA Policy Advisor and Producer Engagement)

Location: North Vancouver, British Columbia, Canada

- CAA Policy Advisor and Producer Engagement (August 2023–Present):
 - Founding Members’ Working Group Lead:
 - Overseeing engagement with founding member companies to keep them apprised of regulatory changes, consult on matters of importance, and develop strategic pathways/approaches to respond to emerging/evolving regulation;
 - Policy advisor on California statute, rulemaking, etc.;

- Supporting alignment across jurisdictions;
- Supporting national fee-setting principles; and
- Producer engagement.
- Principal, Lefebvre Consulting Inc. (September 2022–Present):
 - EPR Facilitation and Engagement Consultant, Government of Manitoba (June 2023–Present):
 - Overseeing formation, execution and facilitation of a committee to co-design enhancements to the province’s transition to full EPR, from a shared responsibility program.
 - Sustainability consultant, British Columbia Provincial Health Services Authority (PHSA) (September 2022–January 2023):
 - Developed a strategy and list of initiatives to advance PHSA’s sustainability program provincially, including in-depth assessments of procurement, medical imaging, lab, pharmacy, etc.
 - EPR Public Affairs Consultant, Recycle BC (November–December 2022):
 - Developed a strategy and assisted with onboarding of new public affairs manager.
- Director, Public Affairs, Canadian Stewardship Services Alliance, Recycle BC and Multi-Material Stewardship Western (January 2019–October 2022):
 - National and U.S. engagement with provinces and states to develop greater understanding of extended producer responsibility for packaging and paper;
 - Managed all public affairs issues and opportunities for the three organizations;
 - Developed and executed proactive government relations strategies for all organizations, operating as primary government contact, negotiator, and spokesperson;
 - Successfully negotiated approval of Recycle BC’s Program Plan with the BC Government in 2019;
 - Provided strategic advice to provincial First Nations Recycling Initiative (environmental justice);
 - Developed and executed an EPR stakeholder roadshow, engaging with more than 50 local governments and helping manage the Province of Saskatchewan’s transition to full EPR; and
 - Advised the Province of Alberta in its transition to full EPR.
- Twenty-five-plus years in media and public affairs (publicly traded, ENGO, and government organizations—health and advanced education).

Linnea Whitney Skierski (CAA California Regulatory and Stakeholder Engagement Advisor) (The Recycling Partnership – TRP)

Location: Sacramento, California, United States of America

- California Regulatory and Stakeholder Engagement Advisor, CAA (October 2023–Present).
- Director of Policy Implementation, The Recycling Partnership (September 2023–Present):
 - Supporting EPR and related legislative implementation through PRO services, public comment and strategic engagement in the legislative process; and
 - Undertaking California strategic stakeholder engagement.
- Board Member, California Resource Recovery Association (August 2022–Present):
 - Technical Council Liaison, coordinating amongst 12 different stakeholder working groups on outreach, growth and operations;
 - Serving as Awards (2023–24) and Conference (2022–23) Committee Chair; and
 - Membership Committee Chair, advising on membership and industry growth opportunities to drive engagement.
- Director of Growth, Recyclist (a Routeware Company) (October 2018–June 2023):
 - Developed and executed all growth, sales, communication and marketing strategies;
 - Managed relationships with local government, private companies, consulting partners and other strategic partners and stakeholders; and
 - Researched CA legislation (SB 1383, AB 341, AB 1826) and assisted customer base with implementation of statutory requirements through development of educational resources and software tools.
- Program Manager, Tahoe Food Hub 501(c)3 (2017–2019):

- Worked as operational manager for retail sales, online marketplace, distribution, fundraising events and education programs;
- Managed team and supervised retail employees;
- Provided sales, marketing and PR, accounts payable/receivable, grant writing, public speaking; and
- Provided consulting services to K-12 educators on aligning farm to school and sustainability curriculum with California state standards.

Ed Boisson (CAA California Technical Advisor) (TRP)

Location: San Rafael, California, United States of America

- California Technical Advisor, CAA and The Recycling Partnership (March 2023–Present):
 - SB 54 Rulemaking Analysis and California Policy Advisor:
 - Analyzing requirements of SB 54 and related California policies; and
 - Analyzing CalRecycle proposed rulemaking concepts and projecting SB 54 implementation issues and needs.
 - California Infrastructure Analysis and Stakeholder Engagement Advisor:
 - Providing historical context, data and insights on California recycling systems, data sources and policies; and
 - Facilitating connections with key California recycling companies, local jurisdictions and other stakeholders.
- Principal, Boisson Consulting, Recycling Industry Development Consultant (January 2014–Present, and previously September 1998–June 2004):
 - For The Recycling Partnership:
 - Supporting SB 54 implementation activities, including producer education through the Policy Readiness Knowledge Hub;
 - Surveyed and prepared a characterization of recycling programs for California’s 182 largest cities;
 - Surveyed California MRFs to evaluate interest in enhancements to expand recyclable material sorting capabilities; and
 - Evaluated recyclability of ten packaging formats using TRP’s Pathway to Circularity Framework criteria.
 - Under CalRecycle Contracts:
 - Evaluated EPR policies for tires and electronic waste;
 - Conducted over 200 recycling center cost analyses over eight years for CalRecycle Processing/Handling Fee Cost studies; and
 - Conducted over ten annual scrap tire recycling market reports.
 - Managed a national analysis of alternative beverage container recycling policies and programs and secured written support from diverse industry, government and environmental activist stakeholders.
- Recycling Industry Consultant, R.W. Beck, Inc./SAIC (July 2004–December 2013):
 - Local Practice Leader responsible for leading California project work.
 - Project Manager under several CalRecycle contracts:
 - Prepared a comprehensive inventory of California recycling and waste infrastructure, and a waste projection model;
 - Developed a cost model for the Covered Electronic Waste Program;
 - Analyzed EPR policies and alternatives for tires and electronics waste;
 - Developed and oversaw the Tire Recycling Business Assistance Program;
 - Facilitated stakeholder engagement for an LCA study of waste conversion technologies.
 - Analyzed North American EPR and stewardship policies for the State of Connecticut, Department of Environmental Protection.
 - Analyzed commercial organics processing contract performance for City of San Jose, Environmental Services Department.
 - Prepared an audit of local recycling programs, analyzed local advanced disposal fee options and conducted a waste characterization study for StopWaste.Org (Alameda County).

- Executive Director, Northeast Recycling Council (September 1994–December 1998):
 - Coordinated recycling research, policies and stakeholder engagement across ten U.S. state environmental departments;
 - Prepared a study and model for analyzing recycling industry size and economic impacts; and
 - Tracked recycling markets and oversaw voluntary industry agreements related to newsprint and directories.

Dylan de Thomas (Policy Advisor) (TRP)

Location: Portland, Oregon, United States of America

- Strategic Policy Advising for Circular Action Alliance (2023–Present).
- VP of Public Policy and Government Affairs, The Recycling Partnership (2020–Present):
 - Strategic Policy Advising for Circular Action Alliance;
 - Key member of SB 54 negotiation process;
 - Lead for the policy and public affairs team at The Recycling Partnership, directing advocacy efforts for the organization at the state and federal levels; and
 - Currently serving on Oregon’s Recycling Advisory Council as it works to advise the implementation of Oregon’s EPR law, the Recycling Modernization Act.
- VP of Industry Collaboration, The Recycling Partnership (2016–2020):
 - Lead for external affairs and cross-industry collaborative efforts at TRP to expand and improve recycling across the U.S.
- Editorial Director, Resource Recycling (2007–2016):
 - Responsible for developing and managing all editorial content for Resource Recycling, E-Scrap News and Plastics Recycling Update as well as producing the agendas for the company’s three annual conferences—the Resource Recycling Conference, the E-Scrap Conference, and the Plastics Recycling Conference.

Amanda Kelley (CAA Project Planning Assistance) (TRP)

Location: Los Angeles, California, United States of America

- Project Planning Assistance, CAA (2023–Present);
- Grant Writer & Development Manager, The Recycling Partnership (2022–Present):
 - Writing and coordinating development of grant proposals in collaboration with program teams, synthesizing multiple sources of information into a cohesive narrative;
- Development Coordinator, Environmental Market Solutions Lab (emLab) (2020–2022):
 - Wrote research proposals, monitored grant deliverables, managed grant reporting schedule, supported report development;
- Communications Coordinator, Santa Barbara Channelkeeper (2018–2020):
 - Developed outreach/awareness campaigns focused on a range of environmental issues, wrote communications content for social media, mailing lists, newsletters, and press releases;
- E-Connect Fellow, National Center for Ecological Analysis and Synthesis (2017–2018); and
- Wrote articles to raise the profile of ecological research findings.

Isabelle Faucher (CAA Policy Advisor)

Location: Toronto, Ontario, Canada

- CAA Policy Advisor:
 - Supporting CAA with California SB 54 rulemaking and program planning.
- Principal and Owner, Isabelle Faucher Consultancy (January 2015–Present):
 - Provide Managing Director services to the Carton Council of Canada, an industry association whose mandate is to grow the collection and recycling of used beverage cartons across Canada;
 - Actively participate in EPR developments pertaining to packaging and paper across Canada’s various jurisdictions (legislative tracking, comment submission, other);

- Work closely with existing PROs on furthering a variety of common goals, including carton end-market development, consumer awareness, and ensuring fair fee setting methodologies;
- Carry out outreach and engagement with a wide range of EPR for packaging stakeholders (MRFs, PROs, municipalities, oversight agencies, government, producers and their associations, schools, others); and
- Board Member, Circular Innovation Council (2020–Present).
- Conducted an assessment of the state of paper recycling in Canada to understand current capacity, barriers and opportunities to increase collection and processing for Environment and Climate Change Canada (November 2022–March 2023);
- Provided research and writing services for the development of a milestone study pertaining to paper recycling in Canada for the Commission for Environmental Cooperation (November 2022–March 2023);
- Provided consultancy services as part of an international consortium engaged by the Chilean Ministry of the Environment to support the evaluation and recommend the next round of priority products for designation under Chile’s Extended Producer Responsibility (EPR) legislative framework (July 2021–June 2022); and
- Engaged by the AVINA Foundation, the Inter-American Development Bank, and the Regional Initiative for Inclusive Recycling (IRR) to co-write “Comparative Study of Legislation and Extended Producer Responsibility Public Policy” study (January–July 2018).
- Manager, Consulting, Reclay StewardEdge (2012–2015):
 - Developed environmental advocacy guideline documents and common guiding principles to facilitate collaboration among producers on sustainable recovery initiatives in emerging markets;
 - Provided strategic planning and project management services relating to increase the recycling performance of used cartons in Canada to Tetra Pak Canada and the Carton Council of Canada;
 - Facilitated the implementation of a tailored used capsule recycling solution for Nespresso USA; and
 - Led the development of a Guidance Document on Sustainable Waste Management in York Region Schools for the Regional Municipality of York.
- Policy Analyst, Reclay StewardEdge (2006–2012):
 - Provided project management services pertaining to the documentation of project outcomes aimed at increasing the effectiveness and efficiency of packaging and paper recycling programs in Ontario;
 - Provided compliance options on the implementation of an EPR for printed paper and packaging in Saskatchewan (Canada), advised multi-stakeholder groups on key program features, and orchestrated public consultation events; and
 - Co-led the development of a producer-led program plan for MHSW, including drafting of specific sections, overseeing the consultation process, and leading the work of various technical groups.

Dave Faris Yousif (CAA Recycling System Funding)

Location: Hamilton, Ontario, Canada

- CAA Technical Advisor:
 - Supporting CAA with recycling system funding and EPR program planning in California.
- Advisor, Region of Peel (2019-present):
 - Leading the blue box transition and regulation development project, this involved:
 - Informing the development of the new regulation through analytical research, and government and other stakeholder advocacy;
 - Leading strategic negotiations with Circular Materials;
 - Leading the negotiations with waste collection contractors to facilitate recyclables collection during transition period and development of amending agreements;
 - Crafting a comprehensive MRF business valuation and asset disposal procurement process that influenced pivotal decisions regarding the site's future. The procurement

- process avoided the site from becoming a stranded asset, resulting in substantial revenues; and
 - Conducted scenario analysis to assess impacts to the delivery of waste collection and diversion services considering anticipated changes as a result of blue box transition.
- Overseeing the revamp of waste management policies under Peel Region's Official Plan, integrating climate-related opportunities. This integration resulted in the consideration of future waste management infrastructure needs in municipal planning.
- Supporting the continuous implementation of Peel Region long-term waste management strategy, a Roadmap to a Circular Economy.
- Supporting the development of Peel's single-use plastics reduction strategy.
- Leading the development of Peel Region's strategy for long-term organic waste reduction and diversion strategy.
- Project Manager, Continuous Improvement Fund (2017–2019):
 - Developed and led a municipal working group on service provider contractual issues (collection and processing contracts);
 - Assisted municipalities in the development of tender documents for collection, processing and/or marketing services;
 - Supported a Southwest Ontario municipality with a two-year pilot project that sought to recycle multi-laminated packaging and other difficult to recycle plastics. This work entailed a detailed business case analysis that will inform the municipality's decision making;
 - Carried out a study to identify the most economical option for the delivery of recycling processing and marketing services over the short to medium term (two to five years);
 - Supported the MRF asset and business valuation project, the goal of which was to determine the value of recycling facilities thus providing municipalities with evidence required to make an informed decision regarding the future of their MRFs;
 - Supported the EPR transition and legislation impact assessment on operations and finances project;
 - Developed and delivered various training courses including Contract Management Essentials;
 - Led the development of material cost allocation models for the entire waste stream, and depot and landfill operations;
 - Supported a municipal study looking at the harmonization of blue box services within a regional government;
 - Developed EPR transition contractual language and guidance materials; and
 - Supported a study that tests the use of mixed broken glass as storm-water attenuation media.

Olivia Barker (CAA Communication and Recruitment Director)

Location: Location: Essex, Massachusetts, United States of America

- Communications and Recruitment Director, CAA (2022–Present):
 - Leading external communications, producer recruitment and stakeholder engagement initiatives.
- Senior Manager, Environmental Public Policy, Amazon (2021–2022):
 - Served as the U.S. Public Policy Lead for circular economy issues for Amazon and worked across the business to assess and respond to producer responsibility policies for electronics and packaging.
- Director, Public Affairs & Communications, The Coca-Cola Company (2013–2021):
 - Led and implemented state/local policy and communications initiatives for The Coca-Cola Company across New England, New York, New Jersey and Puerto Rico;
 - Assisted in the development of companywide policy positions on EPR for packaging; and
 - Held a variety of public affairs roles for the company and bottling partners in Washington, D.C., Atlanta, GA, Tokyo, Japan and Boston, MA.
- Senior Account Executive, Hill + Knowlton (2011–2013):
 - Developed and executed communications and reputation-building strategies on behalf of a leading global communications firm's clients in the clean energy, environmental, technology and non-profit sectors.

- Communications Specialist, New West Technologies (2010–2011):
 - Provided public relations and speechwriting support to the U.S. Department of Energy’s Office of Energy Efficiency and Renewable Energy.

John Hite (CAA Regulatory and Stakeholder Engagement Advisor)

Location: Wilmington, Vermont, United States of America

- Regulatory and Stakeholder Engagement Advisor, CAA (July 2022–Present):
 - Providing policy advice on Oregon and California rulemaking processes;
 - Delivering strategic stakeholder engagement across EPR states; and
 - Serving as Lead, producer recruitment and education.
 - Including leading CAA’s producer working group.
- Analyst, The Recycling Partnership (2022):
 - Supported EPR analysis and research, including large EPR report.
- Connecticut Department of Energy and Environmental Protection (2021–2022):
 - Led development and drafting of a producer responsibility policy for packaging and printed paper with the Connecticut Department of Energy and Environmental Protection; and
 - Included stakeholder engagement.
- Zero Waste Policy Analyst, Conservation Law Foundation (2018–2021):
 - Led development and drafting of a producer responsibility policy for packaging and printed paper with a stakeholder coalition in Massachusetts; and
 - Engaged in producer responsibility for packaging policy discussions in Vermont and Maine.

Doug Mander (CAA Oregon Program Manager)

Location: Toronto, Ontario, Canada

- Oregon Program Manager, CAA (November 2022–Present):
 - Leading CAA project team engagement in the Oregon Recycling Modernization Act (RMA) rules development process;
 - Representing CAA on both the Oregon Department of Environmental Quality (DEQ) RMA Phase II Rules Advisory Committee and the DEQ Commingled Recycling Processing Facilities Technical Workgroup; and
 - Coordinating CAA project team development of the CAA Oregon Program Plan.
- Treasurer, Encorp Atlantic on behalf of Beer Canada (April 2023–Present):
 - Treasurer for non-profit PRO responsible for the management of the New Brunswick deposit-return system for beverage containers as of April 1, 2023; and
 - Encorp Atlantic is also implementing a new Program Plan for New Brunswick’s extended producer responsibility regulatory framework as of April 1, 2024.
- Public policy consultant engaged by several Ontario stewardship boards in the development, design, implementation and coordination of wind-up transition plans as required under the Ontario Waste Diversion Transition Act (2016-2022).
 - Ontario Tires Stewardship (2016-2019).
 - Ontario Electronics Stewardship (2018-2019).
 - Stewardship Ontario (Municipal Hazardous or Special Waste Program) (2018-2022).
 - Stewardship Ontario (Blue Box Program – 2022 to Present).
- Public policy consultant engaged by Beer Canada to provide policy and regulatory advice regarding the design and implementation of paper and packaging regulatory frameworks in Ontario, British Columbia, New Brunswick, Nova Scotia, and Newfoundland and Labrador (2001–Present).
 - Member of Ontario Beer Store negotiating team for the Ontario Deposit Return Program Agreement (initiation and renewal) which implemented deposit return system for wine and spirit containers in Ontario (2007 & 2015).
 - Developed beer industry stewardship plans and annual stewardship reports in New Brunswick (2002–2023), British Columbia (2001–2007) and Ontario (2007–2014).

- Public policy consultant engaged by Ontario Automotive Recyclers Association in the development of a regulatory framework to establish environmental standards for the management of end-of-life vehicles, adopted in Ontario Environmental Protection Act regulations 2015 (2009–2015).
- Ontario Government policy advisor/manager that designed legislative frameworks in a broad range of sectors, including establishing regulatory agencies to administer those frameworks (liquor, real estate, travel, wine standards, technical safety standards, consumer protection) (1989–2001).

Peter Hargreave (CAA Colorado Program Manager)

Location: Hamilton, Ontario, Canada

- Colorado Program Manager, CAA (2022–present):
 - Responsible for overseeing the needs assessment and managing the development of a program plan for packaging in Colorado.
- President, Policy Integrity Inc. (2017–present):
 - Regulatory Support, Governments of Alberta, Nova Scotia, Newfoundland and Labrador, Yukon, and Northwest Territories (2021–2023):
 - Supported the development and implementation of provincial and territorial EPR policies for packaging and paper products and in some hazardous and special products;
 - Led the development and implementation of a producer responsibility program for gas cylinders in Connecticut (2021–2023);
 - Led the development of national study on the generation and management of plastic packaging across Canada and with analysis related to the industrial, commercial, and institutional plastic packaging (2023);
 - Led major studies in British Columbia and the Yukon to assess the generation and management of industrial, commercial and institutional packaging and paper products (2022–2023);
 - Regulatory and Technical Support, for Ontario municipal governments (2017–2023):
 - Supported the transition to full producer responsibility for packaging and paper products and assisted with the development of various waste management reports, submissions, and analysis;
 - Led the development of a methodology for assessing the recyclability and circularity of agriculture packaging in Canada (2022);
 - Led the development of a report to provide a foundational analysis on the generation and management of plastic packaging in Canada (2021);
 - Assisted in the development of guidance materials for the Canadian Council of Ministers of the Environment on Recyclability, Labelling and Terms (2021);
 - Assisted in the development of a stewardship program greenhouse gas measurement and management plan for consumer batteries (2021–2022);
 - Assisted in developing a report related to improving the end-of-life management of beverage containers in Alberta for the deposit return system (2020);
 - Assisted on a report on improving end-of-life container management for Alberta's deposit return system (2020);
 - Led an international scan of recycled content and recyclability labelling regulations, policies, and programs for the Government of Canada (2020); and
 - Assisted various private sector waste management companies in understanding market conditions related to disposal, organics processing, recycling and excess soil management (2019–2020).
- Director of Policy, Ontario Waste Management Association (2011–2017)
 - Led in the development of policy positions and research on behalf of private and public sector waste management providers.
- Senior Advisor and Director of Policy, Ontario Ministry of the Environment (2006–2007 and 2010)
 - Advised and directed ongoing work on the development and oversight of producer responsibility policies for blue box, waste electronics, household hazardous and special waste, and used tires.

Susan Bush (CAA Technical Advisor, Maine)

Location: Narragansett, Rhode Island, United States of America

- Policy Advisor, CAA (July 2023–Present):
 - Leading engagement in rulemaking process in Maine, clarifying intent and details with DEP staff as needed, ensuring team members are informed on topic areas of expertise.
 - Developing feedback on draft rules and soliciting feedback from topic leads on CAA team to provide.
- EPR Policy Analyst and Consultant, Circular Matters (April 2019–Present):
 - Tracking and analyzing U.S. EPR and other packaging-related legislation (proposed and passed) and Canadian policies and identifying potential issues and opportunities for clients;
 - Analyzed effectiveness and costs of deposit-return system versus EPR, drew from cost, and recovery rate data in several European and Canadian deposit-return and EPR programs (confidential client, 2022–2023); and
 - Developed an EPR framework for a packaging trade association, identifying preferred options for specific elements of EPR and key desired terms and conditions, as well as potential risks and opportunities for producers, drawing on experience in Canadian provinces and several European countries (2022).
- Other Packaging-Related Planning and Policy Consulting, Circular Matters (April 2019–Present):
 - Conducted mercury-containing lamp EPR program audits for National Electrical Manufacturers Association EPR program in Vermont (2022); and
 - Played a key role in developing the Texas Recycling Market Development Plan. Assessed gaps between supply and demand, identified barriers to expanding materials markets, identified potential strategies (including policy mechanisms) to improve markets for recovered materials, and identified existing stakeholders that could play a role in recycling market development (2021–2022).
- Sustainable Materials Management Planning, Louis Berger (2014–2015):
 - Served as primary author of Tennessee’s 2015-2025 Solid Waste and Materials Management Plan;
 - Conducted several public input sessions across the state to identify and incorporate stakeholder feedback; and
 - Identified objectives, strategies and tactics to increase material recovery and leverage existing resources within Tennessee. The Plan has already helped the Department of Environment and Conservation achieve a significant portion of the objectives in the Plan well ahead of schedule (2014-2015).
- Twenty-five years of consulting experience in solid waste management and recycling, focusing on policy and best management practices to optimize recycling systems. Examples include: conducted MRF time and motion studies, solid waste and recycling cost and performance benchmark studies, developed best management practices for recycling, identified and assessed policy options, and created tools and outputs to aid in optimizing recycling.

Alex Chan (CAA Fee-Setting Manager)

Location: Toronto, Ontario, Canada

- Fee-Setting Manager, CAA (August 2023–Present):
 - Responsible for developing a national fee-setting framework and implementation roadmap, including establishing p fee-setting principles and a harmonized fee-setting methodology, national material costing framework and eco-modulation principles in adherence to state-level differences.
- Vice President, Data and Program Performance, Circular Materials (2022–2023):
 - Led data performance strategy and the development of fee-setting for emerging EPR programs.
- Director, Recycling Operations Analytics and Performance - North America, GFL (2020–2022):
 - Built up analytics and performance competency for North American recycling business units at GFL, a publicly-traded waste management company on the NYSE and TSX.
- Senior Director, Commercial Analytics and Pricing Strategy, Aurora Cannabis Inc. (2017–2020).
- Director, Business Intelligence and Analytics, Canadian Stewardship Services Alliance (2010–2017):

- Led or developed producer fees for packaging programs in multiple Canadian jurisdictions;
- Developed inaugural fees for BC in 2014 and Saskatchewan (2014 and 2015);
- Played a leading role in producer consultations for the development of two separate fee methodologies in Canada (2012–2017); and
- Supported program plan development, program operationalization, program performance, supply chain costing and commodity forecasting, implementing PRO EPR systems, regulatory reporting and data services (2010–Present).

Pierre Benabidès (CAA End Market Specialist)

Location: Montreal, Quebec, Canada

- Technical Advisor, End Markets and Colorado, CAA (June 2023–Present):
 - Developing CAA National approach for responsible end markets, including verification process;
 - Analyzing current end markets needs and possible actions to undertake; and
 - Assisting Colorado Program Manager in overseeing the needs assessment and managing the development of a program plan for packaging.
- Executive Director, Circular Plastic Taskforce (2021–Present):
 - Coordinating projects aimed at testing different solutions to improve plastic recycling for targeted plastics; and
 - Leading the PRFLEX initiative aimed at improving the recovery and recycling rates of flexible plastics collected from Canadian households.
- President, Lichens Recyclability Inc. (2019–Present):
 - Supporting brand owners and producers in assessing the recyclability of targeted packaging in a Canadian context;
 - Supporting recyclers in market development and expansion of recycling capacities;
 - Providing technical advice to Canadian PROs in setting and implementing their program plans;
 - Most relevant recent work:
 - Cleanfarms (Agricultural product PRO in Canada): Developing Agricultural Packaging Design Guidelines for Recyclability (2022-2023).
 - DG ENV: Analyzing how different European jurisdictions manage the plastic packaging generated in the ICI sector (part of the project Reducing Plastic Waste in Canada) (2022-2023).
 - Circular Materials: Assessing sorting capacity in New Brunswick in the context of EPR implementation (2022).
 - Quebec Beverage Container Recycling Association: Assessing needs and recycling capacity for materials collected through the new deposit-return system (2022–2023).
 - Fonds de Solidarité FTQ: Assessing the plastic generation in Quebec for an investment in the plastic recycling industry (the client is a development capital fund) (2022).
 - PET Recycler-Confidential: Assessing and advising on potential rPET feedstock for the implementation of a PET recycling plant in North America Northeast region (2021).
 - Sustana Fiber: Analyzing the technical and economic feasibility for recycling the plastic and aluminum component of carton products (2021–2022).
 - RECYC-QUÉBEC & Éco Entreprises Québec: Assessing markets for fibers collected through curbside collection programs in Quebec in the context of EPR modernization (2021-2022).
 - TC Transcontinental: Technical advisory for setting up a plastic film recycling plant in Quebec (2019–2020); and
- Senior Advisor, Materials and Markets Development, Éco Entreprises Quebec (2016–2019):
 - Led the market development work of the Innovative Glass Workplan.
 - Led the technical section of the Plastic Solutions Forum.
 - Provided general assessment and support on end markets development.

Francis Veilleux (CAA Technical Advisor, Operations)

Location: Sarnia, Ontario, Canada

- Technical Advisor, CAA (April 2023–Present):

- Technical Advisor, Operations on Oregon EPR Program Plan Leading Local Government Workstream; and
- Technical Advisor, Operations on Colorado EPR Program Plan assisting with the Needs Assessment.
- President, Bluewater Recycling Association (April 1989–Present):
 - Assembled one of the largest municipal cooperatives in Ontario (1989–Present);
 - Advised municipalities through four iterations of EPR programs in Ontario;
 - Director and Treasurer, Waste to Resources Ontario (2011–Present);
 - Member of Association of Municipalities of Ontario (AMO) Waste Management Task Force. Representing municipalities through EPR Regulations (2006–Present);
 - Designed and built several Material Recovery Facilities (MRF), including one of the most automated MRFs in Ontario; and
 - Launched and promoted Ontario's first carbon negative collection vehicle using cow manure which exceeded one billion impressions (2022).
- President, Boomrana Advisory Services Inc. (1999–Present):
 - Developed several operations and economic analysis models and guidelines, which can assist municipalities in planning 3Rs programs and improve economics through reduced costs and improved efficiencies (1999–Present);
 - Technical Advisor on the Ontario Blue Box Program Enhancement and Best Practices Assessment Project (2007);
 - Established safety standards for the waste management industry as a Member of the American National Standard Institute Z245.1 Committees (ANSI) (2018–Present); and
 - Contributed to development of industry best practices documents as a Member of the SWANA Applied Research Foundation (ARF) Collections Research Group, and Sustainable Materials Management Group (2021–Present).
- Respected executive with nearly 35 years of extensive experience leading operations, projects, and staff in the recycling industry. Proven track record fueling next-level organizational growth. Hands-on leader designing, redesigning, and launching cutting edge solutions, driving greater efficiencies, engagement, and revenue. Versatile, able to strategize the big picture and manage the fine details. Able to forge solid relationships with strategic partners and build consensus across multiple organizational levels and infuses a culture of innovation and shared success.

Stephanie Kersten-Johnston (CAA Project Management, Oregon Project Manager)

Location: Amsterdam, Netherlands

- Project Management, Oregon Project Manager, CAA (January 2023–Present).
- VP of Innovation, The Recycling Partnership (2023–Present):
 - Project Lead for Partnership's support of CAA:
 - Directing team of Partnership staff and contractors supporting CAA and creating program strategies;
 - Advising on PRO program implementation in Oregon and California; and
 - Advising on policy on California, Oregon and Maine rulemaking processes.
 - Team Lead for Policy Implementation.
- Director of Circular Ventures, The Recycling Partnership (2019–2023):
 - Was lead author of The Bridge to Circularity report in 2019;
 - Led team to launch the U.S. Plastics Pact (100-plus members and growing!) as part of the Ellen MacArthur Foundation's Global Plastics Pact Network in 2020; and
 - Worked on the launch and maturation of new circular packaging focused projects and initiatives including PlasticIQ, Pathway to Circularity and others.
- Adjunct Professor, Columbia University in the City of New York (2017–2020):
 - Developed a full syllabus and launched the graduate-level class on Circular Economy as part of the Masters in Sustainability Management (SUMA) Program at Columbia's Earth Institute and School of Professional Studies.
- Director, Sustainable Business (USA), The HEINEKEN Company (2017–2019):

- Worked with Operations, Brand, Procurement and Finance on U.S. sustainability reporting to meet global requirements;
- Represented HEINEKEN in partnerships across the industry relating to the organization's environmental and social agenda; and
- Supported the Corporate Relations team on PR campaigns and responses surrounding sustainability opportunities and issues.
- Sustainability Communications Specialist and Consultant (2010–2017):
 - Agenda NYC (2015-2017), Addison Group London, Tesco and others.

Patrick Benson (CAA Interim Chief Information Officer)

Location: New York, NY, United States of America

- Interim Chief Information Officer, CAA (2023–Present):
 - Responsible for developing and executing the IT Strategy to support all National and State PRO activities.
- Interim CIO and Consulting COO for leading CPG, Wholesale and Distribution, and Technology companies, focused on IT Strategy, Data Foundation and Governance, Emerging Technologies, and Business Transformation (2018–2023).
- Chief Information Officer, ClubCorp U.S.A (2015–2018)
 - Fueled business transformation and drove business value through implementation of an entirely new cloud-based portfolio and mobile sales and membership apps.
- Chief Information Officer, Ovations Brands Restaurants (2013–2015)
 - Drove modernization and acquisition through new Cloud-based ERP systems, a new enterprise IT portfolio, and advanced analytics.
- Vice-President of IT Solutions Delivery and Enterprise Architecture, Supervalu (2011–2013)
 - Implemented a Data Management Foundation supporting new retail, supply chain, and advanced analytics innovations.
- Vice-President of Americas IT, Cadbury (acquired by Kraft/Mondelez) (2005–2010)
 - Provided comprehensive innovation, strategy, delivery, and support of the entire IT portfolio across North and South America.
- Chief Information Officer, Lighthouse International (2000–2005)
 - Transformed the Lighthouse non-profit and enterprise business model through ADA accessible web and mobile capabilities.
- Senior Manager, Enterprise Architecture and Delivery, PepsiCo (1988–2000)
 - Delivered multiple generations of the PepsiCo sales, supply chain, finance, and data foundation systems serving all PepsiCo divisions.

Tim Buwalda (CAA Technical Advisor, Responsible End Markets; Oregon Program Assistant)

Location: Orlando, Florida, United States of America

- Technical Advisor, Responsible End Markets, Oregon Program Assistant, CAA (May 2023–Present):
 - Developing plan for responsible end market assurance; and
 - Assisting Oregon Program Manager with rulemaking review.
- Principal, Circular Matters LLC (April 2019–Present):
 - Processing system lead for Oregon EPR system modeling as part of Cascadia Consulting project team working for Oregon Department of Environmental Quality (2022–2023).
 - This project assessed the system impacts of collection and processing options for various collection list alternatives;
 - Led strategic assessment of EPR system features project for the American Forest & Paper Association study (2019);
 - Led EPR Principles Assessment for the Can Manufacturers Institute (2020);
 - Plastics and metals markets expert contributing to the Recyclable Materials Feedstock Study conducted for the Texas Commission on Environmental Quality as a subcontractor to Burns & MacDonnell (2020–2021);

- Led packaging MRF flow studies to assess packaging sortability for inclusion on state materials lists for Sonoco Products Company (2021, 2023), the Carton Council (2021), and PakTech (2023); and
- Led mercury-containing lamp EPR program audits for National Electrical Manufacturers Association EPR program in Vermont (2017, 2022).
- Senior Consultant, RSE-USA (September 2012–March 2019):
 - Led Material Specific Cost Allocation study for packaging and printed paper for Multi-Material Stewardship Manitoba EPR program in Manitoba, Canada (2014);
 - Led EPR Cost-Benefit Analysis project for Recycling Reinvented to assess EPR for packaging and printed paper, using data from Minnesota (2013–2014);
 - Managed Recycling and Waste Disposal Infrastructure Study for Minnesota Pollution Control Agency (2014);
 - Technical advisor to multistakeholder multi-material MRF Packaging Material Flow Study (2014); and
 - Mapped non-recycled plastics end users and processors for Dow Chemical Company (2015).
- Materials science and engineering professional with 30 years of comprehensive experience in waste and recycling policy analysis, EPR, recycling infrastructure studies, materials recovery facility design, recyclability studies, and development of recycling solutions for hard to recycle materials.

Daniel Lantz (CAA Technical Advisor)

Location: Corbyville, Ontario, Canada

- Technical Advisor, CAA (July 2023–Present):
 - Developing the systems costing model for collection, transfer and processing for all sources and material types;
 - Establishing responsible recycling end markets policy; and
 - Advising on fee setting methodology.
- Principal, Crow's Nest Environmental Inc. (November 2018–Present):
 - Strategic Advisor to the COO Circular Materials
 - Development of the collection catchments for Ontario;
 - Identification of receiving facility network.;
 - Evaluation of the processing network's capabilities to service Ontario under full EPR;
 - Development of the system costing projection model for collection, transfer, processing and revenues for Ontario;
 - Author of the collection, transfer and processing contracts for Ontario;
 - Development of materials auditing protocol and requirements;
 - Development of the contamination protocol; and
 - Review of Alberta processing infrastructure capabilities to service Alberta under full EPR.
 - Strategic Advisor to the Managing Director, Circular Materials Atlantic
 - Review of the processing infrastructure capabilities to service New Brunswick under full EPR;
 - Entity (municipality) engagement;
 - Processing facility engagement;
 - Development of collection, post-collection and depot contracts;
 - Development of collection RFP;
 - Development of MRF RFP; and
 - Development of the audit protocol and contamination protocol.
 - Strategic Advisor to the Managing Director, Multi-Material Stewardship Manitoba:
 - Review of community data to develop a cost projection model and identify costs by functional program type;
 - Identification of potential collection catchments to increase program efficiencies;
 - Input into community consultation presentation materials; and
 - Development of the audit protocol and contamination protocol.
- Chief Operating Officer, Green by Nature (January 2014–April 2017):

- Developed the post-collection network of Receiving, Consolidation and Transfer Facilities, Pre-Conditioning Facilities and Container Recovery Facility for the province of BC under full EPR;
- Oversaw the entire post-collection network (54 facilities);
- Ongoing identification and implementation of efficiency and effectiveness measures;
- Developed the audit protocol;
- Developed and operated the auditing centre undertaking 146 100kg audits monthly;
- Reconciliation of inbound and outbound data for reporting to Recycle BC;
- Biweekly meetings with Recycle BC;
- Monitored system performance relative to Recycle BC requirements including annual mass balance;
- Responsible for financial performance of the organization and quarterly board reporting; and
- Oversight of 18 staff.
- Technical Director, Stewardship Ontario (2001–2002):
 - Industry association management;
 - Developed the steward's Pay-in-Model; and
 - Helped author the Ontario Blue Box Program Plan (2002).
- Other experience of note:
 - Member of the Consumer Goods Forum Plastic Waste Coalition of Action in the development of the Golden Design Rules;
 - Technical Advisor to the Canada Plastics Pact and sole trainer of the GDRs in Canada; and
 - Six years in MRF operations with Cascades Recovery, responsible for network of plants in Canada and New York State.
- Holds a doctoral degree in Extended Producer Responsibility. The thesis looked at the influence of EPR fees on packaging design and diversion performance for plastic packaging across the European Union and within Procter & Gamble.

Trina Matta (CAA Project Administration, California and Oregon) (TRP)

Location: Atlanta, Georgia, United States of America

- Project Administration, California and Oregon, CAA (February 2023–Present):
 - Advising on policy for California, Oregon and Maine rulemaking processes;
 - Advising on PRO program implementation in Oregon with emphasis on material fate, recyclability and responsible end markets; and
 - Providing project management and operational assistance in Oregon and California.
- Director of Policy Implementation, The Recycling Partnership (February 2023–Present)
 - Supporting EPR and related legislative implementation, public comment and strategic engagement in the legislative process.
- Director of Film & Flexibles Recycling Advancement, The Recycling Partnership (February 2020–February 2023)
 - Led the Film & Flexibles Recycling Coalition, a collaborative industry stakeholder group testing film recycling opportunities in the U.S.
 - Scoped and managed pilot projects to test recycling of film from MRFs.
 - Served as project manager for additional film recycling projects.
- Senior Manager, GreenBlue (2016–2020):
 - Managed collaborative partnerships with non-profits and government agencies; and
 - Analyzed and reported on recycling supply chains and recycled content for various studies, including co-authoring ASTRX Review of Material Flow at MRFs and Reprocessors.
- Consultant, RRS (2013–2016):
 - Developed solutions for hard-to-recycle materials.
- Policy Analyst, NC Department of Environmental Quality (2011–2013):
 - Advised senior staff of the Department on environmental policy challenges.

Kim Holmes (CAA Technical Advisor)

Location: Scappoose, Oregon, United States of America

- Oregon Technical Advisor on behalf of The Recycling Partnership, CAA (2023–Present):
 - Advisor on PRO program implementation in Oregon.
 - Policy advisor on Oregon rulemaking process;
- Principal Consultant, 4R Sustainability, Inc. (2008–Present):
 - Supporting a variety of clients in the areas of recycling and sustainability;
- Member of Oregon DEQ's Materials Technical Workgroup and Commingled Recycling Processing Facility Technical Workgroup (2022–2023);
- Member at Large, Columbia County Solid Waste Advisory Committee (2013–2019);
- Vice President, Sustainability, Plastics Industry Association (2013–2019);
- Advanced Marketing Manager—Post Consumer Recycle, SABIC Innovative Plastics (2011–2012); and
- Managing Partner, Resource Recycling (2003–2008).

Nick Isbister (CAA Oregon Technical Advisor)

Location: Portland, Oregon, United States of America

- Oregon Technical Advisor on behalf of The Recycling Partnership, CAA (2023–Present):
 - Providing advice on recycling program implementation in Oregon; and
 - Supporting data development for The Recycling Partnership's National Database.
- Owner, Principal Consultant, Innovative Recycling Group Northwest, LLC:
 - Research Associate for The Recycling Partnership (2019–Present);
 - Oregon E-cycles State Contractor Program Administrator (2022–Present); and
 - Bale and residual audit specialist for governments, trade groups and industry.
- Sustainability Advisor, City of Gresham, OR (July 2015–Present):
 - Technical assistance to businesses, schools, multifamily and single family; and
 - Cart tagging, waste audits, sustainability trainings and advising.
- Business Development Manager for James Recycling (2019–Present):
 - Customer expansion, route planning and municipal relationship management.

Sukalyan Talukdar (CAA Fee Setting Analyst)

Location: Toronto, Ontario, Canada

- Fee-setting Analyst, CAA (October 2023–Present):
 - Developing the fee setting and supply chain costing models in line with national fee-setting framework and implementation roadmap; and
 - Conducting scenario analysis to develop a robust model.
- Senior Process Analyst, Liquor Control Board of Ontario (LCBO) (May 2022–Present):
 - Leading data engineering, database management, data analytics, visualization and automation of reports and KPIs in SQL Server, power BI and R script.
- Supply Chain Analyst, GFL Environmental (March 2021–April 2022):
 - Sourced business data from multiple sources, analyzed and prepared dashboards and visuals;
 - Prepared and published recycling performance reports and customer sales for Central Canada business units; and
 - Designed the end-to-end supply chain network of recyclable materials from the municipalities in Ontario by applying weighted K-means clustering and linear programming, optimized count of Material Recovery Facilities and Transfer Stations.
- Management Consultant, Ernst and Young (EY) (Jan 2019–Feb 2020):
 - Transformed the sales and operations planning process by generating statistical forecasts and driving consensus demand planning processes, which involved master data management, consensus planning between sales, finance, supply, and manufacturing teams.
- Program Manager, Amazon (May 2017–Jan 2019):
 - Executed business data analytics, project management, SOP formulation, process excellence, and lean six sigma through Kaizen events and taking initiatives that improve processes, tools, as well as reducing Muda (waste).

- Ten years of experience in data analytics, data engineering, database management and data visualization, statistical and machine learning models, project management, sales and operations planning, process improvement (kaizen) and financial reporting.

Thomas Etien (CAA Eco-Design/Eco-Modulation Expert)

Location: Paris, Ile-de-France, France

- Eco-Design/Eco-Modulation Expert, CAA (Aug 2023).
- Eco-design and Recycling stream Development Manager for French main waste management company (PAPREC):
 - Support to brand-owners, technical and economical evaluation of packaging end-of-life; and
 - Manager of reuse program at national level.
- Worked for two major brand-owners as eco-design and recyclability expert (L'OREAL & DANONE):
 - Managed global strategy about recyclability, design for recycling; and
 - Led internal and external reporting in close cooperation with main EPR and NGOs (Ellen MacArthur Foundation, Consumer Goods Forum).
- Three years as Recycling Development Manager for CITEO, French EPR:
 - For the past 30 years, French EPR has been dedicated to household packaging; and
 - Managed R&D, collaboration with key partners all along the value chain (municipalities, regulators, sorting centers, recyclers, brand-owner, packaging, and material producers).
- Valorplast, Main Trader of Household Plastic Packaging:
 - Managed R&D (development of recycling stream) and contractual relationship with municipalities, French EPR, sorting centers and recyclers; and
 - Led the French and European eco-design technical committee (eq to APR in U.S.).

Scott Mouw (Technical Advisor, Data and Reporting)

Location: Raleigh, North Carolina, United States of America

- Technical Advisory of Data and Reporting for Circular Action Alliance (2023–Present).
- Senior Advisor of Strategy and Research, The Recycling Partnership (2017–Present):
 - Leads analysis and compilation of data in support of Partnership reports on the recycling system, including [Paying It Forward: How Investment in Recycling Will Pay Dividends](#).
- State Recycling Director, NC Department of Environmental Quality, Division of Environmental Assistance & Customer Service (1992–2017)
 - Led the team supporting recycling services and developing recycling infrastructure across the State of North Carolina; and
 - Led grant and assistance programs to expand material collection and processing efforts and increase public access to efficient, comprehensive local recycling services.
- Solid Waste Manager, Franklin County, NC (1988–1992).

Susan Towle (CAA Board and Project Administrator)

Location: Mississauga, Ontario, Canada

- CAA Board and Project Administrator (May 2022–Present):
 - Serving as key liaison between Board and Project Team responsible for board and project administration/management.
- Independent consultant (2015–Present):
 - Various projects working with for profit, not-for-profit and charity organizations.
- Manager, Government and Public Affairs - McDonald's Canada (contract) (2018–2019):
 - Executed on key files partnering with internal and external stakeholders.
- Director Projects/Operations Services, Quality Assurance and Government Relations (2004-2014):
 - Implemented stewardship and EPR programs for Wendy's Restaurants in Canada;
 - Was responsible for project management and project administration; and
 - Conducted internal/external stakeholder engagement including participation with industry association and industry working groups and Vendor management with Stewardship consult and suppliers.

- Board of Directors, The Dave Thomas Foundation for Adoption Canada (2011-2015).
- Board of Directors, Oakville Chamber of Commerce (2012-2017).
- Oakville Chamber of Commerce, member of the Government Relations and Advocacy Committee/past Chair (2010-Present).

Mark Carpenter (CAA Communications Advisor)

Location: Arlington, Virginia, United States of America

- CAA Communications Advisor (July 2023–Present)
 - Communications Lead:
 - Developing and advising on earned and social media strategies and messaging;
 - Maintaining and updating CAA website; and
 - Implementing content development strategies.
 - Conference and meeting planning:
 - Advising on sponsorship and exhibit opportunities at relevant conferences; and
 - Serving as a booth representative at conferences.
- Vice President of Communications, Institute of Scrap Recycling Industries—ISRI (March 2013–February 2023)
 - Elevated to vice president after two other promotions to grow, mentor and lead a team of seven individuals with a \$1.8 million budget; developed and executed the strategy for member communications, earned and social media, public relations, website development, publications, video and graphic design and marketing;
 - Devised the strategy and engineered the roll out of an industry-wide language rebrand to achieve positive outcomes for the recycled materials industry based on qualitative and quantitative research;
 - Directed media outreach, onsite communications, and messaging strategies for the world’s largest recycling convention and exposition (over 5,000 attendees), and other industry events; and
 - Developed and implemented marketing plans for association events, and professional development programs.
- Over an additional decade of experience working in other government, political campaigns and advocacy institutions managing public affairs and communications outreach efforts.

Sidney Roth (CAA Communications & Stakeholder Engagement Advisor)

Location: Boston, Massachusetts, United States of America

- Communications & Stakeholder Engagement Advisor, CAA (July 2023–Present):
 - Developing and providing support on communications strategy, social media and website content and messaging;
 - Organizing and facilitating stakeholder communications and events including mass email communications and stakeholder forums; and
 - Supporting producer recruitment.
- Experience working with non-profits and research institutions on communications, stakeholder education and engagement, advocacy, environmental justice, and environmental policy.

Michael Harris, MA (CAA Stakeholder Engagement & Communications Advisor and Producer Recruitment)

Location: Kitchener, Ontario Canada

- Stakeholder Engagement Advisor and Producer Recruitment, CAA (October 2023–Present):
 - Recruiting producers to engage with and support CAA.
- Producer Recruitment Team, Circular Materials Ontario (October 2022–September 2023):
 - Successfully engaged with and recruited over 500 producers across Canada and U.S.
- Regional Councillor/ Finance Chair & Budget Chief—Region of Waterloo (October 2018–Present).
- Member of Provincial Parliament, Ontario Legislative Assembly (2011–2018):
 - Served in the 40th Parliament (2011-2014) and 41st Parliament (2014–2018). Transportation & Environment Critic for Official Opposition.

Christine Yeager (CAA Stakeholder Engagement & Communications Advisor and Producer Recruitment)

Location: Golden, Colorado, United States of America

- Stakeholder Engagement & Communications Advisor and Producer Recruitment, CAA (three months):
 - Recruiting producers to engage with and support CAA.
- Director, Sustainability Program Management Office, The Coca-Cola Company (two years):
 - Set the strategic direction of North America Operating Unit at Coca-Cola to achieve its World Without Waste objectives; and
 - Evaluated California's SB54 requirements against the current state of Coca-Cola's business to assess and plan for compliance. Led the team that reported the data for compliance with source reduction regulation.
- Extensive experience in process improvement, technology deployments and stakeholder engagement in the Consumer Packaged Goods Industry (15 years).

Ali Briggs-Ungerer (CAA Stakeholder Engagement & Communications Advisor and Producer Recruitment)

Location: Portland, Oregon, United States of America

- Stakeholder Engagement & Communications Advisor and Producer Recruitment, CAA (October 2023–Present):
 - Recruiting producers to engage with and support CAA.
- Oregon Plan Manager, Electronic Manufacturers Recycling Management Company (MRM) (2012–Present):
 - Managing a Producer Responsibility Organization (PRO) for electronics recycling in Oregon, including compliance and reporting to Oregon DEQ, monitoring KPIs and benchmarks and serving as liaison between producers, DEQ, recyclers and collection sites (~250 stakeholders).
- Director of Market Development/Director of Member Services, Association of Plastic Recyclers (2017–2022):
 - Developed and implemented programmatic growth strategy to certify post-consumer recycled content (PCR);
 - Facilitated a committee of 30 industry representatives to monitor and assess six market development programs, resulting in better alignment of program outcomes to organizational priorities; and
 - Gathered, synthesized and translated technical information from subject matter experts into easy-to-follow content for non-technical audiences.
- Program Manager, Resource Recycling (2021–2023, 2011–2015)
 - Organized 20-plus national conferences on plastics, electronics and municipal recycling, including monitoring of pressing industry issues to develop topical conference agendas.
- Reuse Program Manager, Free Geek (2006–2010):
 - Managed five revenue-generating and educational programs for a non-profit recycler, including developing training and operation processes, creating technical documentation and aligning programs with organizational priorities.

Karen Bieri, CSCMP (CAA Procurement Manager)

Location: Brampton, Ontario, Canada

- Procurement Manager, CAA (June 2023–Present):
 - Responsible for developing the Procurement Policy; and
 - Leading procurement activities including sourcing, competitive document (request for proposals) development, and contract negotiations.
- Independent Consultant (2018–Present):
 - Working with various public entities in the development of their waste management contracts, including but not limited to, collection contracts for waste, organics and recyclable materials, depot management systems, contracting for the construction of an integrated waste management facility and several waste management service assignments related to recycling and recycling systems.

- Director, Procurement Services, Ontario Agency (2018–Present):
 - Government start-up Agency—created and implemented the organization’s procurement policies, procedures and protocols; and
 - Procured the necessary goods and services to ensure the successful launch of the organization.
- Director, Purchasing & Operations, Legislative Assembly of Ontario (2013–2017):
 - Managed the development, implementation and delivery of strategic plans, policies and procedures for services in these areas to align the various operations into a cohesive team moving to a customer centric strategic focus; and
 - Negotiated the most complex contracts with consideration to user needs, regulatory requirements, budget allocations and sensitivity to political issues.
- Manager, Procurement Services, The Regional Municipality of Peel (1990–2013):
 - Was responsible for all aspects of the Public Works division for the second largest municipality in the Greater Toronto Area; and
 - Procured all goods and services required for the waste management division.
- A certified Supply Chain Management Professional with extensive experience in public procurement. Holds an International Federation of Purchasing and supply Management IFPSM Global Professional Standard designation. Has led teams and organizations in sourcing and executing contracts for goods and services in multi-facility operations related to complex capital and operational requirements.

Stephanie Anselm (CAA Project Management)

Location: Toronto, Ontario, Canada

- Project Management for IT Strategy and Requirements Development, CAA (February 2023–Present).
- Independent consultant for Canadian Oversight Agencies (2017–Present):
 - Operational strategist and business project manager working on a wide range of projects and providing strategic leadership, organizational skills and change management to support the start-up and operation of the Resource Productivity and Recovery Authority in Ontario and Oversight for EPR for Divert NS in Nova Scotia;
 - Supported businesses to comply with Individual Producer Responsibility requirements in Ontario for tires, batteries, electrical and electronic equipment, hazardous and special products, lighting and paper products and packaging through the development of multiple registry portals;
 - Supporting businesses to comply with Extended Producer Responsibility requirements in Nova Scotia for Packaging, Paper Products and Packaging-like products through the development of registry portal;
 - Supported delivering digital reporting services for waste and recovery programs beyond producer responsibility through the development of the Excess Soils Registry;
 - Supported a full range of departments (communications, compliance, finance and IT), with operationalizing business plans;
 - Supported procurement processes through the development of requirements and vendor selection for registry, digital reporting services, communication and finance systems;
 - Supported building a vendor of record list for registry procurement; and
 - Supporting organizations in building operational processes and project management practices of reporting project status through project status meetings and executive steering committee meetings.
- Independent consultant for producer responsibility program for gas cylinders in Connecticut (2023–Present):
 - Identified the key activities and decisions that need to be made for the early development and set up of the organization; and
 - Developed an execution plan to support the key hires in activating implementation activities.
- Independent consultant for non-profit organizations (2015–2017).
- Led transformation projects in wide variety of sectors including Automotive, Retail, Financial Services and Healthcare (1998–2014).
- Board of Director, Athletics Ontario (2021–Present).

Ashley Reid Smith (CAA Finance Consultant)

Location: Atlanta, Georgia, United States of America

- Finance Consultant, CAA (November 2023–Present):
 - Responsible for overseeing financial systems implementation, accounts payable and receivable, financial reporting and the creation of internal controls and financial policies.
- Chief Financial Officer, The Ready Company March 2023-Present):
 - Responsible for overseeing the company's financial operations, including budgeting, forecasting and financial planning;
 - Managing all aspects of accounting and payroll, ensuring compliance with accounting standards and maintaining the general ledger;
 - Providing strategic financial guidance to the company's leadership, helping shape the business strategy with a keen eye on financial health and sustainability; and
 - Involved in negotiating procurement contracts, managing relationships with banks and overseeing investments.
- Board Treasurer, Wholesome Wave Georgia (January 2020–Present).
- Senior Director of Finance, The Recycling Partnership (October 2019–March 2023):
 - Provided hands-on management, and continuous improvement of the day-to-day accounting and financial operations of The Recycling Partnership, a \$30M non-profit organization; and
 - Managed financial reporting and analysis, budgeting and forecasting, financial system implementation and improvements and financial audits.
- Interim Director of Finance, Public Broadcasting Atlanta (WABE) (May–October 2019)
 - Was responsible for the oversight of the full cycle accounting activities, internal and external financial reporting, \$16 million budget development and tracking, financial grants management, compliance, investments, insurance and audit functions of the organization; and
 - Ensured that there were effective financial and accounting system controls and standards in place.
- Director of Finance and Operations, Wholesome Wave Georgia (February 2016–January 2019):
 - Was responsible for providing strategic financial management and leadership of the organization's accounting, budgeting, compliance, human resources and administrative functions to ensure long-term sustainability.
- Accounting Manager, Atlanta Ballet (May 2012–February 2016):
 - Managed all accounts payable and receivable processes, ensuring transparency and compliance with non-profit regulations
 - Managed payroll processing, organization insurance, and collaborated with departments to support the organization's mission effectively.

Alex Stockler (CAA Project Support) (TRP)

Location: Overland Park, Kansas, United States of America

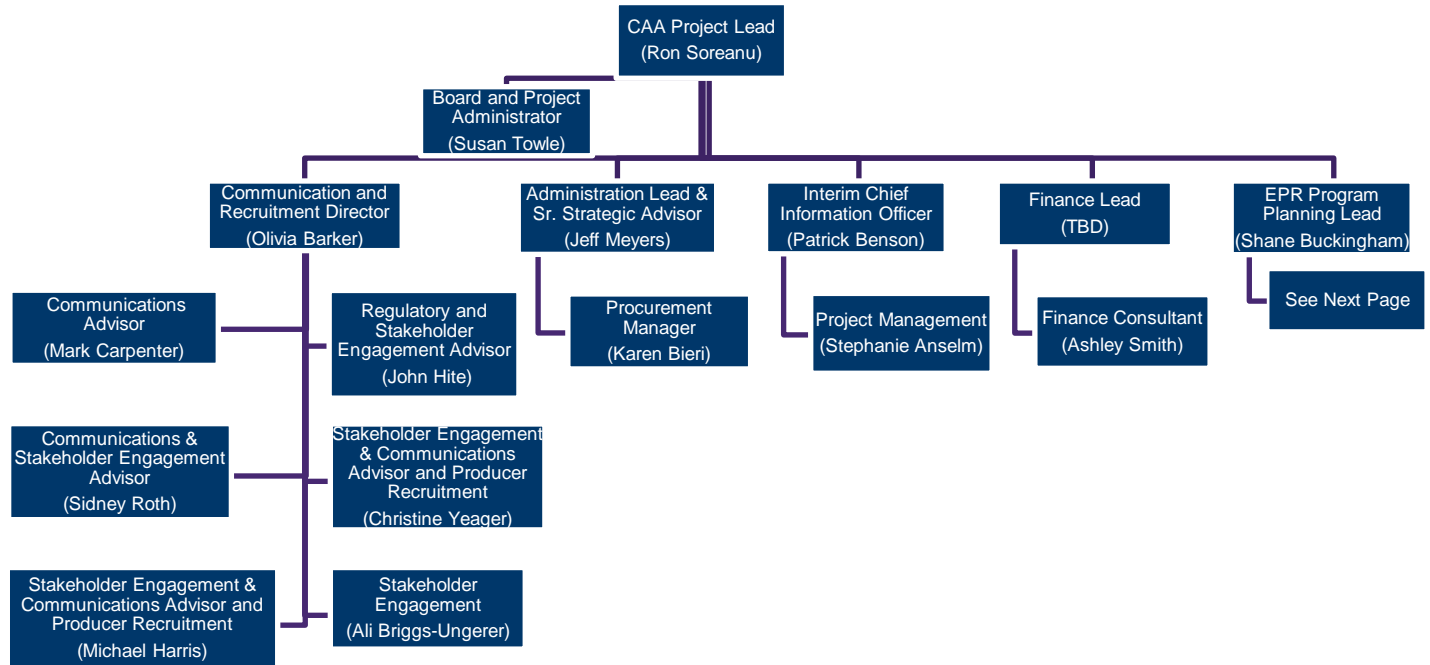
- Project Support, CAA (2023–Present).
- Public Policy & Government Affairs Manager, The Recycling Partnership (2023–Present):
 - Supporting advocacy and implementation efforts to foster a circular economy; and
 - Providing project and research support for Policy team efforts.
- Public Affairs/Public Policy, Springfield WORKS/Working Cities Challenge (2022–2023):
 - Aiding in research, development, design and implementation of a 100-plus participant pilot program studying the benefits cliff effect impacting individuals across the Commonwealth of Massachusetts;
 - Drafting and internal and external communications; building and growing a social media strategy and presence while tracking engagement; and
 - Conducting policy research and analysis of proposed and existing policies to inform and bolster our policy design and implementation practices.
- Campaign Manager, Skoog for OP Mayor (2021).
- Field Representative, Progressive Turnout Project (2020).
- Deputy Digital Director, Mike Broihier for Senate (2020).

- Field Organizer, Friends of Andrew Yang (2019-2020).
- Interim Coordinator, Public Policy & Government Relations, Greater Kansas City Chamber of Commerce (2019).

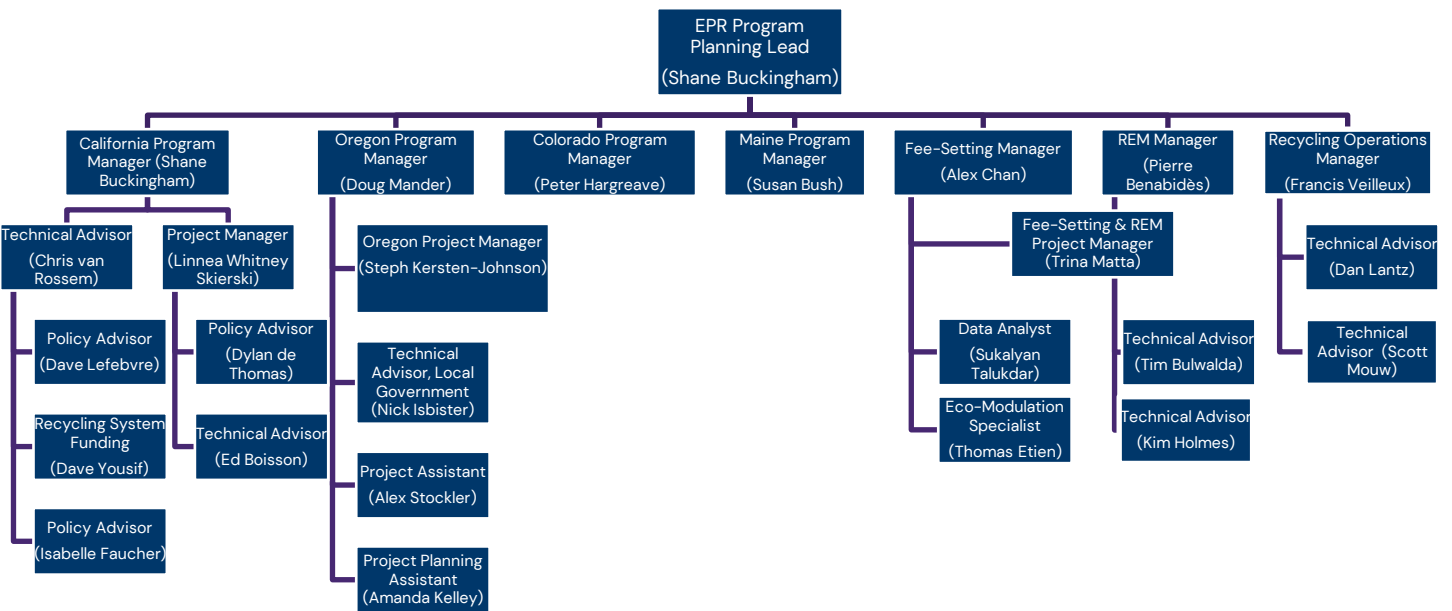
Appendix B: Organizational Charts

The positions represented in the organizational chart are for CAA's team of independent service providers, who are supporting EPR planning and the organization's development, as of the date of this application.

Overall Organizational Structure



EPR Program Planning and Regulatory Compliance Team



Following is a text-based version of the above Organizational Charts (Overall Organizational Structure plus EPR Program Planning and Regulatory Compliance Team, combined)

- CAA Project Lead (Ron Soreanu)
 - Board and Project Administrator (Susan Towle);
 - Communication and Recruitment Director (Olivia Barker):
 - Communications Advisor (Mark Carpenter);
 - Regulatory and Stakeholder Engagement Advisor (John Hite);
 - Communications & Stakeholder Engagement Advisor (Sidney Roth);
 - Stakeholder Engagement & Communications Advisor and Producer Recruitment (Christine Yeager);
 - Stakeholder Engagement & Communications Advisor and Producer Recruitment (Michael Harris); and
 - Stakeholder Engagement (Ali Briggs-Ungerer).
 - Administration Lead & Sr. Strategic Advisor (Jeff Meyers):
 - Procurement Manager (Karen Bieri).
 - Interim Chief Information Officer (Patrick Benson):
 - Project Management (Stephanie Anselm).
 - Finance Lead (TBD):
 - Finance Consultant (Ashley Smith).
 - EPR Program Planning Lead (Shane Buckingham):
 - California Program Manager (Shane Buckingham):
 - Technical Advisor (Chris van Rossem);
 - Policy Advisor (Dave Lefebvre);
 - Recycling System Funding (Dave Faris Yousif);
 - Policy Advisor (Isabelle Faucher);
 - Project Manager (Linnea Whitney Skierski);
 - Policy Advisor (Dylan de Thomas); and
 - Technical Advisor (Ed Boisson).
 - Oregon Program Manager (Doug Mander):
 - Oregon Project Manager (Steph Kersten-Johnson);
 - Technical Advisor, Local Government (Nick Isbister);
 - Project Assistant (Alex Stockler); and
 - Project Planning Assistant (Amanda Kelley).
 - Colorado Program Manager (Peter Hargreave):
 - Fee-Setting Manager (Alex Chan):
 - Fee-Setting & REM Project Manager (Trina Matta);
 - Data Analyst (Sukalyan Talukdar); and
 - Eco-Modulation Specialist (Thomas Etien).
 - REM Manager (Pierre Benabidès):
 - Fee-Setting & REM Project Manager (Trina Matta);
 - Technical Advisor (Tim Bulwalda); and
 - Technical Advisor (Kim Holmes).
 - Recycling Operations Manager (Francis Veilleux):
 - Technical Advisor (Dan Lantz); and
 - Technical Advisor (Scott Mouw).

Appendix C: CAA Founding Members and Producer Representation

Name of Producer	Associated Brands
The Coca-Cola Company	<ul style="list-style-type: none"> • AHA • Aquapure • Bacardi Mixers • Barq's • Blue Sky • BODYARMOUR Edge • BODYAMOUR LYTE • BODYAMOUR Sportwater • BODYAMOUR SuperDrink • Bright and Early • Coca-Cola • Coca-Cola with Coffee • Diet Coke • Coca-Cola Zero Sugar • Core Power • Costa • Dasani • Diet Barq's • Dunkin' • Fairlife Milk • Fanta • Fanta Zero Sugar • Fresca • Fuze • Glaceau Smartwater • Glaceau Vitaminwater • Glaceau VWTR Zero • Gold Peak • Good Moo'd • Hansen's • Hi-C • Honest Kids • Honest • Inca Kola • Mellow Yello • Minute Maid • Minute Maid Juice To Go • Peace • Pibb • Powerade • Powerade Zero • Seagrams • Simply • Sprite • Sprite Zero Sugar • Suja • Topo Chico • Tum-E Yummies • Yup
Keurig Dr Pepper	<ul style="list-style-type: none"> • KEURIG (Brewers and Coffee) • MCCAFFEE • 7UP • A SHOC • A&W • BAI • BARISTA PRIMA • BIG RED • BIGELOW • C PLUS • CACTUS COOLER • CAFÉ BUSTELO • CAFÉ ESCAPES • CANADA DRY • CARIBOU • CELESTIAL SEASONINGS • CINNABON • CLAMATO • CORE • CRUSH • DIET RITE • DONUT SHOP • DUNKIN' • DR PEPPER • EIGHT O'CLOCK • EVIAN • FOLGERS • FORTO ENERGY • FRENCH MARKET COFFEE • LIMITLESS • MARGARITAVILLE • MAXWELL HOUSE • MR & MRS T • MISTIC • MOTTS (FOOD & BEVERAGES) • NANTUCKET NECTARS • NEHI • NEW ENGLAND COFFEE • NEWMAN'S OWN • OLD COLONY • PEETS COFFEE • PENAFIEL • POLAR • RC COLA • REALEMON/REALIME • REVV • ROCHESTER • ROSES • SCHWEPPEES • SEATTLE'S BEST COFFEE • SNAPPLE • SQUIRT • STEWARTS • SUNDROP • SUNKIST • SUNKIST NON-CARB • SUSSEX • SCHWEPPEES

Name of Producer	Associated Brands	
	<ul style="list-style-type: none"> · GEVALIS · GLORIA JEANS · GREEN MOUNTAIN · HAWAIIAN PUNCH · HIRES · HYDRIVE · IBC · ILLY · KAHLUA · KRISPY KREME · LAVAZZA · LIPTON 	<ul style="list-style-type: none"> · SWISS MISS · TAHITIAN TREAT · TAZO · TULLY'S · TWININGS · UPPER 10 · VENOM ENERGY · VERNORS · VITA COCO · WINK · XYIENCE · YOO-HOO
General Mills	<ul style="list-style-type: none"> · ANNIES · ARREZZIO · AUTUMNS GOLD · BETTY CROCKER · BISQUICK · BOO BERRY · BUGLES · CASCADIAN FARM · CHEERIOS · CHEX · CHEX MIX · CINNAMON TOAST CRUNCH · COCOA PUFFS · COOKIE CRISP · COUNT CHOCULA · DUNKAROOS · EPIC · FIBER ONE · FRANKEN BERRY · FRUIT BY THE FOOT · FRUIT ROLL-UPS · FRUTE BRUTE · GARDETTOS · GO-GURT · GOOD MEASURE · GOLD MEDAL · GOLDEN GRAHAMS 	<ul style="list-style-type: none"> · GUSHERS · IMMACULATE BAKING · KIX · LARABAR · LIBERTE · LUCKY CHARMS · MORNING SUMMIT · MOUNTAIN HIGH · MUIR GLEN · NATURE VALLEY · OATMEAL CRISP · OLD EL PASO · OUI · PILLSBURY · PLENTIFULL · PROGRESSO · PROTEIN ONE · RAISIN NUT BRAN · RATIO · REESES · TOTAL · TOTINOS · TRIX · WHEATIES · WILDE TERRA · WONDERWORKS · YOPLAIT
Mars, Incorporated	<ul style="list-style-type: none"> · API · Aquarian · Buckeye Nutrition · Catsan · Cesar · Champion · Crave · Karma · Dine · Dreamies · Eukanuba · Greenies · Iams · Misfits · My Cat DNA · My Dog DNA · Natusan · NomNom 	<ul style="list-style-type: none"> · Balisto · Wrigley's Big Red · Bounty · Celebrations · Combos · Wrigley's Doublemint · Dove · Eclipse · Ethel M Chocolates · Galaxy · Wrigley's Hubba Bubba · Wrigley's Juicy Fruit · Life Savers · M&M's · Maltesers · Mars · Milky Way · My M&M's

Name of Producer	Associated Brands
	<ul style="list-style-type: none"> · Nutro · Ultra · Wild Frontier · Peawee · Pedigree · Pedigree Dentastix · Royal Canin · Sheba · Spillers · Temptations · Thomas · Whiskas · Winergy · 3 Musketeers · 5 · Altoids · American Heritage Chocolate · Amicelli · Orbit · Skittles · Snickers · Starburst · Trü frü · Twix · Wrigley's Winterfresh · Wrigley's Extra · Wrigley's Spearmint · Ben's Original · Seeds of Change · Tasty Bite · Nature's Bakery · Munch · KIND · Creative Snacks · Excel
<p>Niagara Bottling, LLC</p>	<ul style="list-style-type: none"> · Niagara Brand Water · H2O+
<p>PepsiCo, Inc.</p>	<ul style="list-style-type: none"> · BAKED · BAKEN-ETS · BARE · CAP'N CRUNCH · CHEETOS · CHESTERS · CHURRUMAIS · CRACKER JACK/CRACKER JILL · CRUJITOS · DORITOS · EL ISLENO · FRITO LAY · FRITOS · FUNYUNS · GAMESA · GRANDMA'S · HEALTH WARRIOR · HILO LIFE · LA COCINA DE JOSEFINA · LAY'S · LIFE · MAUI STYLE · MISS VICKIES · MOTHERS · MUNCHIES · MUNCHOS · NATUCHIPS · NEAR EAST · NUT HARVEST · OFF THE EATEN PATH · PASTA RONI · PEARL MILLING COMPANY · POPCORNERS · QUAKER · RARE FARE FOODS · RED ROCK DELI · RICE A RONI · TURBOS · Aquafina · Brisk Lemon · Bubly · Bundaberg · Celcius · Crush Orange · Diet Pepsi · Gatorade · Ginger Ale · Mtn Dew Kickstart · LIFEWTR · Lipton · Manzanita Sol · Mountain Dew · MUG Root Beer · Nitro Pepsi · Pepsi · Pepsi Zero Sugar · Propel · Proud Source · Rockstar · Schweppes Tonic · Starbucks Frappuccino · Starbucks Triple Shot · Starbucks Cold Brew · Starbuck Nitro · Starbucks Double Shot · Starry · Starry Zero Sugar · Yachak Yerba Mate · Mtn Dew Energy · Amp · SoBe · Stubborn · Nitro Pepsi Vanilla · Pepsi Mango

Name of Producer	Associated Brands	
	<ul style="list-style-type: none"> · ROLD GOLD · RUFFLES · SABRITAS · SANTITAS · SIMPLY · SMARTFOOD · SONRICS · SPITZ · STACYS · SUNCHIPS · TOSTITOS 	<ul style="list-style-type: none"> · Pepsi Zero Sugar Mango · Pepsi Wild Cherry · Diet Pepsi Wild Cherry · Pepsi Zero Sugar Wild Cherry · Pepsi Caffeine Free · Diet Pepsi Caffeine Free · Pepsi Real Sugar · Pepsi Watermelon · Pepsi Peach · Diet MUG Root Beer · MUG Zero Sugar
Procter and Gamble	<ul style="list-style-type: none"> · Pampers · Luvs · All Good · Tide · Gain · Downy · Bounce · Dreft · Ariel · Cheer · Era · 9 Elements · Bounty · Charmin · Puffs · Always · Tampax · This is L. · Gillette · Venus · Braun · Mielle · Pantene · Head & Shoulders · Herbal Essences · Aussie · Ouai · Walker & Co · Hair Food/Recipe · Farmacy 	<ul style="list-style-type: none"> · Dawn · Febreze · Swiffer · Cascade · Mr Clean · Microban · Crest · Oral B Brand · Fixodent · Arc · Gleem · Burt's Bees · Vicks · Metamucil · Pepto Bismol · Prilosec · Diagnostics · Align · New Chapter · Nervive · Olay · Old Spice · Secret · Native · Ivory · First Aid Beauty · SKII · Tula · Safeguard
Ferrero US	<ul style="list-style-type: none"> · Baby Ruth · Butterfinger · Crunch · Kinder Bueno · Kinder Chocolate · Kinder Joy · 100Grand · Raisinets · Chunky · SnoCaps · Fannie May · Ferrero Rocher 	<ul style="list-style-type: none"> · Delacre · Keebler Cookies · Keebler Pie Crusts · Keebler Ice Cream Cones · Famous Amos · Little Brownie Bakers · Mother's Cookies · Murray Cookies · Murray Sugar Free Cookies · Royal Dansk · Nutella · Tic Tac
Unilever United States	<ul style="list-style-type: none"> · AHC · Axe 	<ul style="list-style-type: none"> · Murad · Nexxus

Name of Producer	Associated Brands
	<ul style="list-style-type: none"> · Baby Dove · Baby Seventh Generation · Ben & Jerry's · Beloved · Best Foods · Breyers · Camay · Caress · Degree · Degree Men · Dermalogica · Dove · Dove Kids · Dove Men Care · Dove DermaSeries · Dr. Sweat · Find Your Happy Place · Good Humor · Hellman's · Hourglass · Kate Sommerville · Klondike · Knorr · Lever 2000 · Liquid I.V. · Living Proof · Love Beauty & Planet · Magnum · Maille · Mele · Michiru · Noxzema · Nubian Heritage · Nutrafol · nyakio · OLLY · Onnit · Paula's Choice · Pond's · Popsicle · Q-Tips · REN · Schmidt's · Seventh Generation · SheaMoisture · SheaMoisture Baby · SheaMoisture Men · Simple · Sir Kensington's · SmartyPants Vitamins · St. Ives · Sundial · Tatcha · The Laundress · The Right to Shower · TIGI · TRESemmé · Talenti · Vaseline · Welly · Yasso · Yes Honey
L'Oréal USA	<ul style="list-style-type: none"> · Lancôme Paris · Kiehl's Since 1851 · Giorgio Armani Beauty · Yves Saint Laurent · Shu Uemura- · IT Cosmetics · Urban Decay · Ralph Lauren · Mugler · Viktor & Rolf · Valentino · Azzaro · Maison Margiela Paris · Prada · Youth to the People · Biolage · Carols Daughter · CeraVe · Dermablend · Mizani · L'Oréal Paris · Garnier · Maybelline New York · Nyx Professional Makeup · Essie · Dark and Lovely · La Roche Posay · Vichy Laboratories · CeraVe · SkinCeuticals · L'Oréal Professionel · Kérastase Paris · Redken · Matrix · Pureology · PulpRiot · SkinBetter Science · Softsheen Carson · Thayers
Nestlé, USA	<ul style="list-style-type: none"> · Abuelita · Acqua Panna · Alpo · Bakers Complete · Blue Bottle Coffee · Boost · Natural bliss · Nature's Bounty · NIDO · Nescafé · Nescafé Dolce Gusto · Nescafé Ready to Drink

Name of Producer	Associated Brands	
	<ul style="list-style-type: none"> · BrainXPERT · California Pizza Kitchen · Carnation · Cat Chow · Celltrient · Chef · Chef-Mate · Coffee-Mate · Compleat · Contrex · DiGiorno · Dog Chow · Douglas Laboratories · Essentia · Fancy Feast · FDguard · Friskies · Garden Gourmet · Garden of Life · Gerber · Gourmet · HBgard · Hot Pockets · IBgard · Jack's · Klean Athlete · La Lechera · Lean Cuisine · Libby's · Life Cuisine · Maggi · Media Crema · Meritene · MILO · Minor's 	<ul style="list-style-type: none"> · Nescafé Taster's Choice · Nespresso · Nesquik · Nesquik Breakfast Cereal · Nestlé · Nestlé Hot Cocoa · Nestlé Sensations · Nestlé Vitality · Nutren junior · Nuun · OPTIFAST · OPTIFIBRE · Osteo Bi-flex · Ovaltine · Perrier · Persona · Pure Encapsulations · Purina · Purina ONE · Purina Pro Plan · Puritan's Pride · Quality Street · S. Pellegrino · Seattle's Best Coffee · Solgar · Spoonfulone · Starbucks Coffee At Home · Stouffer's · Sweet Earth · Toll House · Tombstone · Trio · Vital Proteins · Wobenzyme
Amazon	<ul style="list-style-type: none"> · Ring · Blink · Eero · Amazon Aware · Alcove · Rivet · Stone & Beam · Ravenna · Amazon Commercial · Denali · Kitzy 	<ul style="list-style-type: none"> · Lifelong · Mama Bear · Amazon Basic Care · Amazon Elements · Presto! · Amazon Essentials · Amazon Collection · Simple Joys by Carter · Wag · Wonder Bound
Target	<ul style="list-style-type: none"> · A New Day · All in Motion · Art Class · Auden · AVA & VIV · Boots & Barkley · Brightroom · Casaluna · Cat & Jack · Cloud Island · Colsie 	<ul style="list-style-type: none"> · Wine Cube · Kona Sol · Made By Design · Market Pantry · Mondo Llama · More Than Magic · Opalhouse · Open Story · Original Use · Pillowfort · Project 62

Name of Producer	Associated Brands	
	<ul style="list-style-type: none"> · Dealworthy · Embark · Everspring · Favorite Day · Figment · Future Collective · Gigglescape · Good & Gather · Goodfellow & Co · Hearth & Hand Magnolia · HeyDay · Hyde & EEK! Boutique · JoyLab · Kindfull · Know Rose 	<ul style="list-style-type: none"> · Room Essentials · Shade & Shore · Smartly · Smith & Hawken · Sonia Kashuk · Spirtz · Stars Above · Sun Squad · Tabitha Brown · Threshold · Universal Thread · up & up · Wild Fable · Wondershop · Xhilaration
SC Johnson	<ul style="list-style-type: none"> · Glade · Scrubbing Bubbles · Windex · FamilyGuard · OFF! · Pledge · Raid · Kiwi · Sun Bum · Coola · Oars & Alps · Stasher 	<ul style="list-style-type: none"> · Shout · Ziploc · Drano · fantastik · Favor · Saran · Mrs. Meyer's Clean Day · method · babyganics · ECOVER · Caldrea
Colgate-Palmolive	<ul style="list-style-type: none"> · Afta · Colgate · SoftSoap · Hill's Pet Nutrition · Speed Stick · Lady Speed Stick · Suavitel · Murphy Oil Soap · Irish Spring · Palmolive Dish Soap 	<ul style="list-style-type: none"> · Tom's of Maine · Ajax · Fleecy · Fabuloso · hello · PCA SKIN · Filorga · eltaMD Skin Care · Skin Bracer
Kraft Heinz	<ul style="list-style-type: none"> · 6 in 1 · A.1. · Allegro · Bagel Bites · Baker's · Bell 'Orto · Bella Rossa · Benihana frozen meals and sauces (licensed brand) · Boca · Bonta · Bull's Eye · Capri Sun (licensed brand) · Catelli · Certo · Cheez Whiz · Chef Francisco · Christina's · Classico · Claussen 	<ul style="list-style-type: none"> · Lea & Perrins · Lunchables · Madeira Farms · Magic · Mama Linda · Maxwell House · MCP · Minute · Mio · Miracle Whip · Mr. Yoshida's/oshida's · Mrs. Grass · Nabob · Nancy's · NotMayo (Producer: The Kraft HeinzNot Company) · Ore-Ida · Oscar Mayer · P3 · Philadelphia

Name of Producer	Associated Brands
	<ul style="list-style-type: none"> · Colliders · Cool Whip · Country Time · Cousins · Cristoforo Colombo · Crystal Light · Delimex · Devour · Dream Whip · El Verano Sabroso · Emma Bella · Escalon · Ethical Bean · Fat Rabbit · Garden Select · General Foods · Gevalia · Good Seasons · Grab N' Snack · Grey Poupon · Heinz · HomeBake · HP · IHOP coffee (licensed brand) · J.L. Kraft · Jell-O · Jet-Puffed · Just Crack an Egg · Just Spices · Kool-Aid · Kraft · Poppers · PPI · Primal Kitchen · Quality Chef · Red Devil · Rice Gourmet · Richardson · Salsa del Sol · Sanka · Serv-A-Lemon · Seven Seas · Shake N Bake · Simply Heinz · Smart Ones · Stove Top · Sure-Jell · Taco Bell sauces, kits, shells, seasonings, and refried beans (licensed brand) · Tassimo (licensed brand) · Taste Pleasers · Temptee · TGI Fridays frozen appetizers (licensed brand) · Tingly Ted's hot sauce (licensed brand) · Todd's · True Soups · Twist · Velveeta · Wild Style · Wyler's · Yoshinoya · Yuban
Walmart	<ul style="list-style-type: none"> · Adventurer Force · Allswell · Aquaculture · Assurance · Athletic Works · Auto Drive · Believe by Brilliance · Bluescape · Brilliance Fine Jewelry · Brahma · Clear American · Concord · Country Farmhouse · Eliminator · Elloquii Elements · Equate · Equate Beauty · Equate HBL · Ever Start · Expert Gardener · Expert Grill · Exerhides · Faded Glory · Fall and Winter WM · Fetchwear WM · Fieldpack Marketside · Forever Bride · Mainstays · Marketside · McClaren Farms · MyLife As · My Sweet Love · Next · No Boundaries / NOBO · Ozark Trail · Ol Roy · Onn. · Parents Choice · Pen + Gear · Play Day · Portland by Portland Boot · Portland Boot Company · Price First · Prima Della · Protégé · Pure Balance · Reli On · Sams Choice · Sams Cola · Secret Treasures · Spark · Spark.Create.Imagine · Special Kitty · Spring Valley

Name of Producer	Associated Brands
	<ul style="list-style-type: none"> · Freshness Guaranteed · Garanimals · George · Genesis · Golden Rewards · Great Value · Great Value Organics · Hello Hobby · Herman Survivors · Holiday Time · Hotel Style · Hyper Tough · Import Wellness · Joyspun · Kid Connections · Super Tech · Swisstech · Terra & Sky · Time and Tru · Tredsafte · Vibrant Life · Walmart · Wal-mart Bakery · Walmart Deli · Walmart Produce · Walmart Seafood · Way to Celebrate · World Table · Wonder Nation
	<ul style="list-style-type: none"> · Brita® · Burt's Bees® · Champion Performance® · Clorox® · Clorox 2® · Clorox Healthcare® · Clorox® Total 360® · CloroxPro™ · Dispatch® · Ever Clean® · Formula 409® · Fresh Step® · Glad® · Green Works® · Gumption Cleanser · Handi Wipes® · Hidden Valley® · KC Masterpiece® · Kingsford® · Kitchen Bouquet® · Lestoil® · Liquid-Plumr® · Match Light · Natural Vitality® · Neocell® · Pine-Sol® · Rainbow Light® · Ready Mop® · RenewLife® · Selton® · S.O.S® · Scoop Away® · Soy Vay® · Stop Aging Now® · Tilex® · True Health · Wash N Dri®

Appendix D: Covered Material Types Supplied by Members

This table displays the hierarchical relationships between Material Class, Material Types, and the Consumer Goods Companies that supply packaging containing those Material Types. A single Material type can be supplied by multiple Consumer Goods Companies.

Material Class	Material Type	Amazon	Coca Cola	Colgate Palmolive	Clorox Company	Ferrero US	General Mills	Keurig Dr Pepper	Kraft Heinz	L'Oréal	Mars	Nestle	Niagara Bottling	PepsiCo	P&G	SC Johnson	Target	Unilever	Walmart
Glass/Ceramic	Glass	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Ceramic																<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
Metal	Aluminum	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Tin/Steel/Bimetal	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Other Nonferrous								<input checked="" type="checkbox"/>										<input checked="" type="checkbox"/>
	Other Ferrous				<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>									
Paper/Fiber	Kraft Paper	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Molded Fiber			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
	Multi-Material Laminate			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Corrugated Cardboard	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Paperboard	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	White Paper			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>								<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Other/Mixed Paper				<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Plastic	PET (#1)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	HDPE (#2)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	PVC (#3)								<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
	LDPE (#4)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	PP (#5)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	PS (#6)				<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Plastics and Polymers Designed for Potential Compostability			<input checked="" type="checkbox"/>							<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>
	Multi-Material Laminate	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Other/Mixed Plastics			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Wood & Other Organic Materials	Bamboo														<input checked="" type="checkbox"/>				
	Wood									<input checked="" type="checkbox"/>							<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Other/Mixed Organic																		<input checked="" type="checkbox"/>

Appendix E: Producer Letters of Support for CAA

To support this application, 61 companies submitted non-binding letter of support for CAA's PRO application, encouraging CalRecycle to approve CAA as the PRO to represent producers in California. These companies represent the diversity of material types, company size and sector that may have obligations under the scope of SB 54, including Food & Beverage, Consumer Packaged Goods, Retail, Quick Serve Restaurants, Healthcare, Pharmaceuticals, Manufacturing, and more. Additionally, several supporting companies are headquartered in California. The following companies signed letters authorizing CAA to indicate that the organization is a company who supports CAA's application to be designated as the PRO in California.

Name of Producer	Primary Sector	Headquarters
Abbott Pharmaceuticals	Pharmaceuticals	Ohio
Alpek Polyester	Chemicals Manufacturing	North Carolina
American Licorice Company	Food & Beverage	Indiana
Amy's Kitchen	Food & Beverage	California
Anchor Packaging	Packaging Manufacturing	Missouri
B. F. Ascher & Co.	Healthcare	Kansas
Bel Brands	Food & Beverage	Suresnes, Île-de-France
Blue Diamond Growers	Agriculture/Food & Beverage	California
Blue Triton	Food & Beverage	Connecticut
BRP (Bombardier Recreational Products) US	Outdoor Recreation	Wisconsin
Cadence Fashion	Apparel	Wisconsin
Chipotle Mexican Grill	Quick Serve Restaurants	California
Church & Dwight	Consumer Packaged Goods	New Jersey
CKF International	Packaging Manufacturing	British Columbia, Canada
Costco	Retail	Washington
Curio Brands	Cosmetics	Minneapolis
Danone	Food & Beverage	Colorado
Dart Container Corporation	Packaging Manufacturing	Michigan
ET Browne (Palmer's)	Healthcare	New Jersey
Fastenal	Industrial Distribution	Minneapolis
Ferrara USA	Food & Beverage	Illinois
Firestone Pacific Foods	Food & Beverage	Washington
Fonterra	Food & Beverage	Illinois
Galerie Candy	Food & Beverage	Kentucky
Gap Inc.	Apparel	California
Genpak	Packaging Manufacturing	North Carolina
Great Lakes Cheese	Food & Beverage	Ohio
Hawaiian Host Group	Food & Beverage	Hawaii
Heineken USA	Food & Beverage	Washington DC
Helen of Troy	Home Goods/Cosmetics	Texas
Hp	Electronics	California
Huhtamaki	Packaging Manufacturing	Michigan
IKEA	Home Furnishings/Home Goods	Sweden

Name of Producer	Primary Sector	Headquarters
KAO USA	Cosmetics	Ohio
Ken's Foods, Inc.	Food & Beverage	Massachusetts
Kohler	Home Goods	Wisconsin
Lebanon Seaboard Corporation	Consumer Lawn and Garden Goods	Pennsylvania
Lowe's Companies, Inc.	Retail	North Carolina
Mondelez	Food & Beverage	Washington DC
Musco Family Olive	Food & Beverage	California
McCormick & Co., Inc	Food & Beverage	Maryland
Pacific Coast Producers	Food & Beverage	California
Panasonic Corporation of North America	Electronics	New Jersey
Paris Present Incorporated	Cosmetics	Illinois
Pharmavite	Healthcare	California
Post Holdings, Inc.	Consumer Packaged Goods	Missouri
Pregis	Packaging Manufacturing	Illinois
Sabert Corporation	Packaging Manufacturing	New Jersey
Sanofi	Healthcare/Pharmaceuticals	New Jersey
Sargento Foods, Inc.	Food & Beverage	Wisconsin
Scott Bros. Dairy, Inc.	Food & Beverage	California
Scotts Miracle-Gro Company	Consumer Lawn and Garden Goods	Ohio
Sherwin-Williams	Coatings	Ohio
Sprouts Farmers Market	Grocery/Retail	Arizona
Tyson	Food & Beverage	Arkansas
Walgreens	Retail	Illinois
WestRock	Packaging Manufacturing	Georgia
White Horse Energy	Consumer Packaged Fuel	United Kingdom
Worthington Industries	Gas Cylinders	Ohio
Zep, Inc.	Cleaning Products	Georgia
Zoetis	Pet/Livestock Pharmaceuticals	Michigan

Appendix F: Chamber of Commerce Support Letter

The following letter supporting CAA's application has been signed by the California Chamber of Commerce and 73 California and national trade associations representing producers and local Chambers of Commerce.



Date 22, 2023
Department of Resources Recycling and Recovery
1001 I St
Sacramento CA 95812

Subject: Support Letter for Circular Action Alliance's Application to be the Producer Responsibility Organization Pursuant to Senate Bill 54 (Allen)

Dear Director Wagoner,

The California Chamber of Commerce, local chambers of commerce and these undersigned state and national organizations, representing diverse businesses large and small from across California, strongly support the application of the Circular Action Alliance (CAA) to be California's first Producer Responsibility Organization (PRO) for Senate Bill 54 (Allen). CAA's ability to facilitate an extended producer responsibility (EPR) program is unmatched as the only not-for-profit formed specifically to meet the requirements of U.S. EPR programs, including SB 54, supported by a team of experts with direct experience establishing PROs and developing packaging EPR program plans. CAA was the first PRO selected in the United States to manage Colorado's EPR program for paper and packaging. They also were selected for Maryland's State Producer Responsibility Advisory Council. Additionally, CAA is the only organization conducting extensive and meaningful outreach to the diversity of stakeholders across the vast California marketplace, including non-governmental organizations, businesses large and small, and local and state government.

Senate Bill 54: Moving California to Circularity

On June 30, 2022, California Governor Gavin Newsom signed SB 54 into law, requiring all single-use packaging be 100% recyclable or compostable and that all single-use plastic packaging and some plastic products be source reduced by 25% and recycled at rates no less than 65%. SB 54 effectively mandates a paradigm shift for packaging and recycling, compelling companies to make design and packaging choices that prioritize waste reduction and to ensure that single-use items are recycled and remain in a circular economy. SB 54 is one of the world's most aggressive single-use packaging EPR programs. CAA's experience is vital for a tailored approach necessary to help producers comply with all the mandates of SB 54.

CAA's Experience Fundamental for a Successful California EPR Program

SB 54 was passed and signed into state law containing some of the most aggressive EPR mandates in the world and under unprecedented compliance time frames. Expediency and competency to immediately begin implementation are necessary for the incoming PRO so that all producers can meet statutory deadlines. CAA's selection in Maryland and Colorado, as well as their work to become the PRO and prepare program plans in other EPR states, speaks to the organization's ability to leverage their experience in a way that is responsive to local context and to engage meaningfully with a range of stakeholders. By operating across states, CAA can leverage knowledge and data gathered from other programs to achieve better recycling, higher efficiency at scale and more cost savings with cross-state harmonization, which ultimately reflects in lower costs to California consumers and a better EPR program in California.

Fostering Change: Uniting Producers for Inclusive Representation and Sustainable Practices in California

As producers continue the journey to circularity through compliance with SB 54, experienced representation matters. Producers will need to work together under common leadership to ensure compliance and establish a successful program plan in California. A PRO with experience in plan development, including registering producers, gathering the necessary data, partnering with local governments and the hauling industry to support and innovate recycling systems, and providing best-in-class compliance services to producers, is essential for the program's success. CAA is the clear choice as their due diligence - conducting proactive outreach with businesses, NGOs, haulers and local and state government, to name a few - reflects strongly on the organization and its ability to lead a diverse set of stakeholders.

The coalition strongly supports the Circular Action Alliance to be selected as California’s first PRO pursuant to Senate Bill 54. CAA has clearly demonstrated their capacity and vision to meet the monumental task before them and we are confident in the organization’s ability to help producers meet the compliance obligations of SB 54 and further propel California towards a circular economy.

Respectfully,



Adam J Regele
Vice President of Advocacy and Strategic Partnerships
California Chamber of Commerce

On behalf of the following organizations:

- Agricultural Council of California
- AMERIPEN
- American Chemistry Council
- Anaheim Chamber of Commerce
- Asian Food Trade Association
- Auto Care Association
- Brentwood Chamber of Commerce
- California Apple Commission
- California Asian Chamber of Commerce
- California Blueberry Commission
- California Building Industry Association
- California Business Properties Association
- California Fresh Fruit Association
- California Grocers Association
- California Hispanic Chamber of Commerce
- California Hotel and Lodging Association
- California League of Food Producers
- California Manufacturers and Technology Association
- California Metals Coalition
- California Restaurant Association
- California Retailers Association
- Carlsbad Chamber of Commerce
- CAWA – Representing the Automotive Parts Industry
- Chino Valley Chamber of Commerce
- Cirtus Heights Chamber of Commerce
- Consumer Brands Association
- Council For Responsible Nutrition
- Dairy Institute of California
- Flexible Packaging Association
- Fontana Chamber of Commerce
- Gateway Chambers Alliance
- Greater High Desert Chamber of Commerce
- Huntington Beach Chamber of Commerce
- Imperial Valley Regional Chamber of Commerce
- Independent Beauty Association
- Industrial Environmental Association
- International Bottled Water Association
- International Dairy Foods Association
- La Verne Chamber of Commerce

Lake Elsinore Chamber of Commerce
Lodi Chamber of Commerce
Lompoc Valley Chamber of Commerce
Long Beach Area Chamber of Commerce
Mammoth Lakes Chamber of Commerce
Mission Viejo Chamber of Commerce
Morgan Hill Chamber of Commerce
National Confectioners Association
Newport Beach Chamber of Commerce
North San Diego Business Chamber of Commerce
Norwalk Chamber of Commerce
Oceanside Chamber of Commerce
Palm Desert Area Chamber of Commerce
Pet Food Institute
Personal Care Products Council
Plastic Recycling Corporation of California
Plastics Industry Association
Pleasant Hill Chamber of Commerce
PRINTING United Alliance
Ridgecrest Chamber of Commerce
Sacramento Metro Chamber of Commerce
Santa Barbara South Coast Chamber of Commerce
Santa Maria Valley Chamber of Commerce
Simi Valley Chamber of Commerce
Stockton Chamber of Commerce
The Toy Association
Tulare Chamber of Commerce
West Ventura County Business Alliance
Western Agricultural Processors Association
Western Growers Association
Western Plastics Association
Wine Institute
Yorba Linda Chamber of Commerce



Department of the Treasury
Internal Revenue Service
Tax Exempt and Government Entities
P.O. Box 2508
Cincinnati, OH 45201

CIRCULAR ACTION ALLIANCE
c/o THE RECYCLING PARTNERSP
20 F STREET NW 7TH FLOOR
WASHINGTON, DC 20001

Date;
05/08/2023
Employer ID number:
92-3197259
Person to contact:
Name: Gary Mccorkle
ID number: 32231
Telephone: 877-829-550
Accounting period ending:
December 31
Public charity status;
509(a)(2)
Form 990 / 990-EZ / 990-N required;
Yes
Effective date of exemption;
December 21, 2022
Contribution deductibility:
Yes
Addendum applies:
No
DLN;
26053514005433

Dear Applicant:

We're pleased to tell you we determined you're exempt from federal income tax under Internal Revenue Code (IRC) Section 501(c)(3). Donors can deduct contributions they make to you under IRC Section 170. You're also qualified to receive tax deductible bequests, devises, transfers or gifts under Section 2055, 2106, or 2522. This letter could help resolve questions on your exempt status. Please keep it for your records.

Organizations exempt under IRC Section 501(c)(3) are further classified as either public charities or private foundations. We determined you're a public charity under the IRC Section listed at the top of this letter.

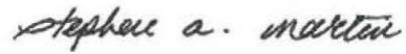
If we indicated at the top of this letter that you're required to file Form 990/990-EZ/990-N, our records show you're required to file an annual information return (Form 990 or Form 990-EZ) or electronic notice (Form 990-N, the e-Postcard). If you don't file a required return or notice for three consecutive years, your exempt status will be automatically revoked.

If we indicated at the top of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

For important information about your responsibilities as a tax-exempt organization, go to www.irs.gov/charities. Enter "4221-PC" in the search bar to view Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, which describes your recordkeeping, reporting, and disclosure requirements.

We sent a copy of this letter to your representative as indicated in your power of attorney.

Sincerely,

A handwritten signature in cursive script that reads "Stephen A. Martin".

Stephen A Martin
Director, Exempt Organizations
Rulings and Agreements

VENABLELLP

600 MASSACHUSETTS AVE., NW WASHINGTON, DC 20001
T 202.344.4000 F 207.344.8300 www.Venable.com

March 28, 2023

T 202.344.4202
F 202.344.8300

ALSteinberg@Venable.com

SENT VIA COURIER

Department of Licensing and Consumer Protection Corporations Division
1100 4th St. SW
Washington. DC 20024

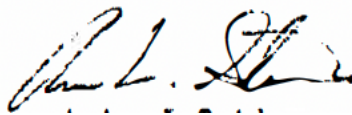
Re: Restated Articles of Incorporation of Circularity Alliance, File No.: N00007528311

To Whom It May Concern,

On behalf of Circularity Alliance, a District of Columbia nonprofit corporation with file number N00007528311, enclosed please find Restated Articles of Incorporation for filing with the Corporations Division, along with a check in the amount of \$180.00 for the applicable filing and in-person processing fees. Please file the Restated Articles of Incorporation and then return evidence of the Certificate of Restated Articles of Incorporation via email to me at ALSteinberg@Venable.com.

Should you have any questions, please do not hesitate to contact me at (202) 344-4202. Thank you for your assistance.

Sincerely,



Andrew L. Steinberg

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF LICENSING AND CONSUMER PROTECTION
CORPORATIONS DIVISION



CERTIFICATE

THIS IS TO CERTIFY that all applicable provisions of the District of Columbia Business Organizations Code have been complied with and accordingly, this ***CERTIFICATE OF RESTATED ARTICLES*** is hereby issued to:

Circular Action Alliance

Effective Date: 3/28/2023

IN WITNESS WHEREOF I have hereunto set my hand and caused the seal of this office to be affixed as of 3/28/2023 4:35 PM

Business and Professional Licensing Administration



Rebecca Janovich

REBECCA JANOVICH
Deputy Superintendent of Corporations,
Corporations Division

Muriel Bowser
Mayor

Tracking #: RxDbdloy

LILCP Corp. DM-7

MAR 28 2023

Michigantax

**RESTATED ARTICLES OF INCORPORATION
OF
CIRCULARITY ALLIANCE**

Pursuant to the provisions of the District of Columbia Nonprofit Corporation Act (the "Act"), the domestic filing entity listed below hereby applies for a Certificate of Restated Articles of Incorporation and for that purpose submits the statements below.

1. The name of the corporation (hereinafter referred to as the "Corporation") is: Circularity Alliance.
2. The Articles of incorporation of the Corporation are hereby amended as follows:
 - A. Article FIRST Is hereby amended by replacing the existing provision with the following:

ARTICLE I. NAME

The name of the corporation (hereinafter referred to as the "Corporation") is: Circular Action Alliance.

- B. Article SECOND is hereby amended by replacing the existing provision with the following:

ARTICLE II. DURATION

The duration of the Corporation shall be perpetual.

- C. Article THIRD Is hereby amended by replacing the existing provision with the following:

ARTICLE III. PURPOSES

- a. The Corporation is incorporated as a nonprofit corporation under the Act and is organized and shall be operated exclusively for charitable, scientific, literary, and educational purposes as defined under Section 501(c)(3) of the Internal Revenue Code of 1986 and the Regulations thereunder, as they now exist or as they may hereafter be amended, or the corresponding provision of any subsequent federal tax laws (hereinafter collectively referred to as the "Code"), Specifically, and without limitation, the Corporation shall:
 - i. Develop, implement, and operate community level, post-consumer paper, packaging, and packaging-like items stewardship programs, in compliance with and as mandated by local and state legislation (as well as where not mandated by law), which may include, but is not limited to:

- (1) Public outreach and education to businesses, consumers, the public, and other relevant stakeholders on reducing waste, how to recycle, and how to increase the recycling of packaging material;
 - (2) The collection and recycling of post-consumer paper, packaging; and packaging-like items;
 - (3) Program administration related to and required by (1) and (2) above; and
 - ii. Undertake other activities consistent with purposes permissible for organizations described in Section 501(c)(3) of the Code.
- b. The Corporation shall have and may exercise, to the extent that they are not inconsistent with the purposes of the Corporation, any and all powers conferred upon nonprofit corporations organized pursuant to the Act; provided, however that:
- i. No part of the net earnings of the Corporation shall inure to the benefit of, or be distributed to any director, or officer of the Corporation, or any private pensions, except that the Corporation shall be authorized and empowered to pay reasonable compensation for services actually rendered to the Corporation and to make payments and distributions In furtherance of Code section 501(c)(3) purposes;
 - ii. Except as provided and permitted under Sections 501(h) and 4911 of the Code. no substantial part of the activities of the Corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the Corporation shall not participate in or intervene in (including the publication or distribution of statements) any political campaign on behalf of or in opposition to any candidates for public office;
 - iii. Notwithstanding any other provisions of these Articles. the Corporation is organized and at all times shall be operated exclusively as a corporation not organized for profit. and the Corporation shall not conduct or carry on any activities not permitted to be conducted or carried on by an organization described in Section 501(c)(3) of the Code, and exempt from taxation under Section 501(a) of the Code;
 - iv. During any period that the Corporation is deemed to be a private foundation as described in Code Section 509(a), the Corporation:
 - (1) shall distribute its income for each taxable year at such time and in such manner as not to become subject to the tax on undistributed income imposed by Code Section 4942;
 - (2) shall not engage in any act of self-dealing as defined in Code Section 4941(d);
 - (3) shall not retain any excess business holdings as defined in Code Section 4943(c);

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- (4) shall not make any investments in such manner as to subject it to tax under Code Section 4944; and
 - (5) shall not make any taxable expenditures as defined in Code Section 4945(d).
- v. The Corporation shall not have the authority to issue capital stock in the Corporation.

D. Article FOURTH is hereby amended by replacing the existing provision with the following:

A. ARTICLE IV. MEMBERS

The Corporation shall have members, whose qualifications, rights and obligations shall be as prescribed in the Bylaws of the Corporation.

E. Article FIFTH is hereby amended by replacing the existing provision with the following:

B. ARTICLE V. BOARD OF DIRECTORS

Provisions for the regulations of the internal affairs of the Corporation shall be set forth in the Bylaws, which may contain any provision that is not inconsistent with law or the Articles. The business and affairs of the Corporation shall be managed under the direction of its Board of Directors. The number of directors and the method of election or appointment of the directors of this Corporation shall be as provided in the Bylaws of the Corporation.

F. Article SIXTH is hereby amended by omitting the names of the initial directors as permitted by Section 29 409,03(b)(2) of the Act and replacing the existing provision with the following:

C. ARTICLE VI. REGISTERED AGENT AND ADDRESS

The principal office of the Corporation shall be located within or without the District of Columbia as determined by the Board of Directors. The name and address of the registered agent of this Corporation in the District of Columbia is:

Corporation Service Company 1090
Vermont Ave. NW
Washington, District of Columbia 20005

G. Article SEVENTH is hereby amended by replacing the existing provision with the following:

ARTICLE VII. INCORPORATORS AND INITIAL DIRECTORS

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The name and address of each incorporator of the Corporation, who also served as the initial directors of the Corporation, are:

<u>Name</u>	<u>Address</u>
Stephanie Potter	Nestlé USA 1812 N, Moore Street, Suite 3500 Arlington, VA 22209
Kirsten Witt	The Coca-Cola Company 1 Coca-Cola Plaza NW Atlanta, GA 30313
Anke Boykin	PepsiCo 700 Anderson Hill Road Purchase, NY 10577
John Breedlove	Niagara Bottling 1440 Bridgeway Drive Diamond Bar, CA 91765
Rachel Goldstein	Mars 6885 Elm Street McLean, VA 22101
Neil Menezes	General Mills 1 General Mills Boulevard Minneapolis, MN 55426
Charles Schwarze	Keurig Dr Pepper 53 South Avenue Burlington, MA 01803

H. Article EIGHTH is hereby amended by replacing the existing provision with the following:

ARTICLE VIII, MISCELLANEOUS

Other lawful provisions for the conduct and regulation of the business and affairs of the Corporation, for its voluntary dissolution, or for limiting, defining or regulating the powers of the Corporation or its directors are as follows:

- a. In the event of the termination, liquidation, dissolution or winding up of the Corporation in any manner or for any reason whatsoever, and after paying or making provision for the payment of all of the liabilities of the Corporation, all assets of the Corporation shall be distributed for one or more of the Corporation's exempt purposes within the meaning of Code Section 501(c)(3), or shall be distributed to the federal

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Government, or to a state or local government, for a public purpose, in such a manner as the Board of Directors may determine, and to the extent required by the Act and the Bylaws, by the members.

- b. The personal liability of the officers and directors of the Corporation is hereby eliminated to the fullest extent permitted by law and by the provisions of the Act Specifically, and without limitation, a director or officer of the Corporation shall not be liable to the Corporation or its members for money damages for any action taken, or failure to take action, as a director or officer, except for liability for (i) the amount of financial benefit received by the director or officer to which the director or officer was not entitled; (ii) an intentional infliction of harm; (iii) an unlawful distribution authorized by the officer or director in a manner outside the standards of conduct mandated for the officer or director by the Act; or (iv) an intentional violation of criminal law.
- c. To the fullest extent permitted by the Act. the Corporation shall indemnify and hold harmless each officer and director of the Corporation against any and all liabilities, costs and expenses (including attorneys' fees and expenses) reasonably incurred by him or her or on his or her behalf in connection with any proceeding to which he or she may be a party by reason of his or her being or having been an officer or director of the Corporation. Such indemnity shall not be deemed exclusive of any other rights to which those indemnified may be entitled under any Bylaw, agreement or otherwise. Such indemnity shall inure to the benefit of the heirs, executors or administrators of each officer and director,
- d. The Corporation may purchase liability insurance for the indemnity specified above to the fullest extent as determined from time to time by the Board of Directors of the Corporation. If so purchased, as required by the Act, such liability insurance shall provide a minimum limit of coverage of not less than \$200,000 per individual claim and \$500,000 per total claims that arise from the same occurrence, or such other amount as provided by the Act.

G. A new Article NINTH is hereby added as follows:

ARTICLE IX. AMENDMENT

These Articles of Incorporation may be amended from time to time in any and as many respects as may be desired; provided: (i) that the Articles of Incorporation as amended may contain only such provisions as might be lawfully contained in original Articles of Incorporation; (ii) an amendment to the Articles of Incorporation may be proposed without approval of the Board of Directors if proposed by 25% or more of the, members entitled to vote on the amendment¹ and any such proposed amendment must be adopted by the affirmative vote of two-thirds of the voting membership of the Corporation; and (iii) that

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otherwise any such amendments are made in the manner and pursuant to the procedures, and requirements prescribed by the Act. Provided, however that approval of the Board to an amendment to the Articles of Incorporation requires an affirmative vote of a majority the total number of members of the Board of Directors then in office.

2. The text of the Restated Articles of Incorporation, which consolidates the foregoing amendments and all previous amendments to the Articles of Incorporation in a single document, is as follows:

[Remainder of page intentionally blank]

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4. The foregoing amendments and Restated Articles of Incorporation were duly adopted by the Board of Directors in accordance with the requirements of the Act at a meeting of the Board of Directors held on March 22, 2023, at which a quorum was present, and was approved by the Members in the manner required by the Act and by the Corporation's Articles of Incorporation and Bylaws.

IN WITNESS WHEREOF, the undersigned have signed and attested to these Restated Articles of Incorporation as of the dates written below. These Restated articles of Incorporation may be executed in separate counterparts.

By: 
Charles Schwarze, Chair

Date: 3-24-23

Attest: _____
John Breedlove, Secretary

Date: _____

BYLAWS
of
CIRCULAR ACTION ALLIANCE

ARTICLE I

Name, Registered Agent, and Offices

Section 1.01. Name. The name of this corporation (hereinafter referred to as the “Corporation”) shall be Circular Action Alliance.

Section 1.02. Registered Agent and Offices. The Corporation shall maintain in the District of Columbia a registered agent. The Corporation may have offices inside or outside of the District of Columbia as the Board of Directors of the Corporation (the “Board”) may designate or as the business of the Corporation may require from time to time.

ARTICLE II

Purposes and Limitations

Section 2.01 Purposes and Limitations. The Corporation is organized as a nonprofit corporation under the District of Columbia Nonprofit Corporation Act of 2010, as amended from time to time (the “Act”), for the purposes as set forth in the Corporation’s Articles of Incorporation.

ARTICLE III

Members

Section 3.01 Membership Classes. The Corporation shall have one class of members known as Founding Members. The Founding Members of the Corporation are those companies who have been approved by the Board to be a Founding Member, agreed to support the purposes of the Corporation and entered into a Membership Agreement with the Corporation. Founding Members shall each be eligible to appoint one Director to serve on the Board and shall have no other governance rights.

Section 3.02 Resignation and Termination of Membership. Membership in the Corporation may be terminated by the member’s submission of written notice of membership resignation or non-renewal to the Corporation, or by the Board for cause by the affirmative vote of a majority of the Directors present at a meeting of the Board called for the purpose of considering termination of the member and at which a quorum is present. Circumstances constituting “cause” shall be solely determined by the Board, and includes but is not limited to (i) failure to timely pay fees, membership dues, or assessments, (ii) failure or refusal to comply with the Membership Agreement, or (iii) engaging in conduct that is detrimental to the reputation, mission, or operations of the Corporation. Prior to terminating or expelling a member for cause,

the member shall be provided prior notice of the proposed termination or expulsion and the reasons therefor, and be provided an opportunity to be heard, orally or in writing as determined by the Board using such reasonable procedures for hearing as determined by the Board, before the effective date of the termination or expulsion.

Section 3.03 Effect and Timing of Termination and Resignation. The termination, non-renewal, or resignation of membership shall not extinguish or relieve such member's financial obligations then accrued pursuant to Section 8.02, including unpaid dues, fees, assessments, or other charges previously accrued, if any. The termination of membership shall take effect immediately or as of a later date determined by the Board. The resignation of membership shall take effect at the time specified in the notice of resignation, or, if no time is specified, at the time such resignation is tendered. The non-renewal of membership will take effect as of the expiration of the then-current term of membership at the time the notice of non-renewal is provided.

ARTICLE IV

Board of Directors

Section 4.01. General Powers. The affairs of the Corporation shall be managed by its Board. It shall be the Board's duty to carry out the objectives and purposes of the Corporation, and to this end the Board may exercise all powers of the Corporation, except such powers reserved to the Members as provided in the Act, the Articles of Incorporation, or these Bylaws.

Section 4.02. Election, Number, and Term of Office. The Board shall consist of the number of Founding Members of the Corporation. Each Founding Member shall appoint one person to serve as a Director, and such person shall serve as a Director until the member appoints a different person to serve as the Director. Founding Member Directors shall serve one-year terms of office and until their successors take office. Founding Member Directors may serve consecutive terms of office.

Section 4.03. Board Meeting. The Board shall hold an annual meeting at a time and place determined by the Board for the purpose of transacting such business as may properly come before the meeting. The Board may also hold other regular Board meetings at such times and places as may be determined by the Chair or the Board. Special meetings of the Board may be called by or at the request of the Chair or at least 20% of the Directors of the Corporation and shall be held at such time and place as set by the Directors calling the meeting.

Section 4.04. Notice. Notice of the place, if any, date, and time of each regular meeting of the Board shall be given to each Director by mail, overnight courier, e-mail, other mode of written communication or over the telephone not less than 24 hours before the time set for such a meeting. Notice of the place, if any, date, and time of each special meeting of the Board shall be given to each Director by mail at least two days before the special meeting, or by telephone or electronic transmission (including e-mail) or delivery in person not later than the day before the day of the meeting. Notice shall be deemed effective if given in person or by telephone, mail addressed to such Director at such Director's physical or e-mail address as it appears on the records of the Corporation, or by other means of electronic transmission.

Notice may be waived in writing, prior to or after the meeting, by those Directors not present. Attendance at a meeting in person shall constitute a waiver of notice of such meeting, except where the Director attends such meeting for the express purpose of objecting, at the commencement of the meeting, to the transaction of any business because the meeting was not lawfully called or convened.

Section 4.05. Quorum and Manner of Acting. A majority of the Directors in office shall constitute a quorum for the transaction of business at any meeting of the Board, provided, that if less than a majority of the Directors are present at any meeting, a majority of the Directors present may adjourn the meeting from time to time without further notice. The act of a majority of the Directors then in office at a meeting at which a quorum is present shall be the act of the Board except when a greater vote is required by the Act or by these Bylaws. Directors shall not be permitted to vote by proxy.

Section 4.06. Teleconferencing. Any person participating in a meeting of the Board may participate by means of telephone or video conference or by any means of communication by which all persons participating in the meeting are able to hear one another, and otherwise fully participate in the meeting. Such participation shall constitute presence in person at the meeting.

Section 4.07. Action by Unanimous Written Consent. Board action may be taken without a meeting if all the voting Directors consent thereto in writing (including by electronic transmission).

Section 4.08. Removal or Resignation of Directors. Any Director may be removed from office with or without cause by the Board provided advance written notice of the intent to remove is provided to the Founding Member whose Director is being removed. Any Director may resign at any time by giving written notice to the Chair or the Secretary of the Corporation. Such resignation shall take effect at the time specified in such notice, or, if no time is specified, at the time such resignation is tendered.

Section 4.09. Vacancies. Any vacancy occurring in the Board, or any Directorship to be filled by reason of an increase in the number of Directors, may be filled at any time in the same manner in which regular appointments are made. A Director selected to fill a vacancy shall be elected for the unexpired term of his or her predecessor in office.

Section 4.10. Compensation. Directors and Officers shall not receive any compensation for their services as such; provided, however, that Officers and Directors are not precluded from serving the Corporation in any other capacity and receiving reasonable compensation for such service with the approval of the Board.

ARTICLE V

Officers

Section 5.01. Officers. The Officers of the Corporation shall be a Chair, Vice Chair, Treasurer, Secretary, and President, and such other Officers as may be determined by the Board, each to have such duties and authority as may be specified in these Bylaws or as shall be prescribed by the Board. The offices of President (or if there is no President, then Chair) and Treasurer may

not be held by the same person; otherwise, the same individual may simultaneously hold more than one office.

Section 5.02. Election and Term. The Officers of the Corporation shall be elected by the Board at any meeting of the Board. Each Officer other than the President shall hold office for a one-year term; provided, however, that Officers shall serve until their successors are duly elected and qualified. The President shall serve at the pleasure of the Board. There shall be no limit on the number of terms, consecutive or otherwise, that an Officer may serve.

Section 5.03. Removal or Resignation of Officers. Any Officer may be removed from office at any time by the Board whenever in the Board's sole judgment the best interests of the Corporation would be served thereby. Any officer may resign at any time by giving written notice to the Secretary of the Corporation. Such resignation shall take effect at the time specified in such notice, or, if no time is specified, at the time such resignation is tendered.

Section 5.04. Vacancies. A vacancy in any officership, because of death, resignation, removal, disqualification, or otherwise, may be filled at any time by the Board for the unexpired portion of the term. Vacancies may be filled or new offices created and filled at any meeting of the Board.

Section 5.05. Chair. The Chair shall preside at all meetings of the Board. If the Corporation does not have a President, then the Chair shall also have the powers otherwise given to the President of the Corporation and, subject to the control and direction of the Board, shall supervise and control all the affairs of the Corporation until such time as a President is appointed. The Chair in general shall perform all duties incident to the office of Chair and such other duties as may be prescribed by the Board from time to time.

Section 5.06 Vice Chair. The Vice Chair shall assume the duties of the Chair in the Chair's absence or incapacity and perform such other duties as from time to time may be assigned by the Chair or by the Board.

Section 5.07. Treasurer. The Treasurer shall have charge and custody of and be responsible for, all funds and securities of the Corporation; receive and give receipts for monies due and payable to the Corporation from any sources whatsoever; and deposit all such monies in the name of the Corporation in such banks, trust companies, or other depositories as shall be selected in accordance with the provisions of these Bylaws. The Treasurer shall keep or cause to be kept complete and accurate financial records of the Corporation and in general shall perform all of the duties incident to the office of Treasurer and such other duties as from time to time may be assigned by the Chair or by the Board.

Section 5.08. Secretary. The Secretary shall record or cause to be recorded the minutes of all meetings of the Board; maintain such minutes in the Corporation's permanent records as required under the Act; see that all notices are duly given in accordance with the provisions of these Bylaws or as required by law; be the custodian of the corporate records, and in general perform all of the duties incident to the office of Secretary and such other duties as from time to time may be assigned by the Chair or by the Board.

Section 5.09. President. The Board shall select and employ a President (who may have the title of President or President and Chief Executive Officer) who shall be a corporate officer and responsible for the administration and management of the Corporation's business and operations. Subject to the oversight of the Board, the President shall: supervise, coordinate and manage the Corporation's day-to-day business and activities; formulate plans and advise on policies for the accomplishment of the Corporation's objectives; prepare an annual budget for approval by the Board; have charge of the Corporation's funds, discharge its obligations, and maintain its accounts; carry into effect all directions and resolutions of the Board; and perform such other duties and have such other powers as may be prescribed by the Board or these Bylaws. The President shall report to the Board and keep the Board apprised of his or her activities in carrying out his or her duties hereunder. The President shall serve at the pleasure of the Board of Directors. Any removal of the President will be without prejudice to his or her rights under a contract of employment, and the appointment of such person shall not itself create contract rights.

ARTICLE VI

Committees

Section 6.01. Committees of the Board. The Board may, by resolution adopted by a majority of all the Directors then in office, create one or more committees, each consisting solely of three or more Directors, to serve at the discretion of the Board (each a "Board Committee"). Board Committees shall have and exercise the authority of the Board in the management of the Corporation, to the extent provided in the respective Board resolution. Notwithstanding the foregoing, a Board Committee may not (i) authorize distributions; (ii) approve or propose to the Founding Members action required by the Act to be approved by the Founding Members; (iii) fill vacancies on the Board or any Board Committee; or (iv) adopt, amend, or repeal these Bylaws. The designation and delegation of authority to a Board Committee shall not operate to relieve the Board, or any individual Director, of any responsibility imposed upon them by law.

Section 6.02. Advisory Committees. Advisory committees not having and exercising the authority of the Board in the management of the Corporation may be designated by the Board at any meeting of the Board. Except as otherwise provided in such resolutions, the Board or anyone designated by the Board shall appoint the members of such committees. Individuals who are not Directors may serve as members of any such committee.

Section 6.03. Term. Each member of a committee shall continue as such until his or her successor is appointed, unless the committee shall be sooner terminated, or unless such member shall cease to qualify or shall be removed or shall resign as a member thereof.

Section 6.04. Removal; Resignation; Vacancies. Any member of a Board Committee may be removed from office at any time by the Board, and any member of an advisory committee may be removed from office at any time by the Board, except as otherwise provided by the Board. Any committee member may resign at any time by giving written notice to the Chair or to the Secretary of the Corporation. Such resignation shall take effect at the time specified in such notice, or, if no time is specified, at the time such resignation is tendered. Vacancies in the membership of any committee may be filled at any time by appointments made in the same manner as provided in the case of the original appointments.

Section 6.05. Committee Meetings. Meetings of any Board Committee shall conform to the same standards for notice, quorum, voting, manner and method of acting, and other procedures applicable to meetings of the Board as are set forth in Article IV of these Bylaws, except as otherwise provided by these Bylaws, committee charter, or resolution of the Board. Meetings of any advisory committee shall conform to the standards for notice, quorum, voting, and manner and method of acting as may be established by the committee chair, with the approval of the committee members, except as otherwise provided in these Bylaws, committee charter, or resolution of the Board.

ARTICLE VII

Sundry Provisions

Section 7.01 Contracts. The Board may authorize any Officer or Officers of the Corporation, or agent or agents of the Corporation, in addition to the Officers so authorized by these Bylaws, to enter into any contract or execute and deliver any instrument in the name of and on behalf of the Corporation, and such authority may be general or confined to specific instances.

Section 7.02 Checks, Drafts, Etc. All checks, drafts or orders for the payment of money, notes or other evidences of indebtedness issued in the name of the Corporation shall be signed by the Chair, the Treasurer, the Vice Chair, or such Officer or Officers of the Corporation, or agent or agents of the Corporation, and in such manner as shall from time to time be determined by resolution of the Board.

Section 7.03 Deposits. All funds of the Corporation shall be deposited from time to time to the credit of the Corporation in such banks or other depositories as the Board may select.

Section 7.04 Gifts. The Board may accept on behalf of the Corporation any contribution, gift, bequest or devise for the general purposes of the Corporation or for any special purpose approved by the Board if all such purposes are within the scope of the purposes of the Corporation as set forth in the Articles of Incorporation as amended from time to time.

Section 7.05 Books and Records. The Board may engage the services of a recognized auditing firm which shall review the Corporation's books and statements, and which shall prepare annually, or more frequently if required, an operating statement, balance sheet and tax returns. The Corporation shall keep correct and complete books and records of account and shall also keep: (i) minutes of all meetings of the Board; (ii) records of all actions taken without a meeting by the Board; and (iii) records of all actions taken by a Board Committee on behalf of the Corporation. The Corporation also shall keep at its principal office (i) the Corporation's Articles of Incorporation, (ii) the Corporation's Bylaws, (iii) minutes and other required records described above for the last three (3) years; (iv) a list of the names and business address of the Corporation's current Directors and officers; and (v) the most recent biennial report filed by the Corporation with the District of Columbia.

Section 7.06 Limitation of Liability; Indemnification; and Insurance. To the fullest extent permitted by the Act and the Internal Revenue Code of 1986, as amended, or the corresponding provisions of any future internal revenue laws of the United States (i) the personal liability of each Director, Officer, employee of the Corporation is hereby eliminated, and (ii) the

Corporation shall indemnify and advance expenses to any individual who was, is, or is threatened to be made, a party to a proceeding because he or she is or was a Director, Officer, employee, and/or agent of the Corporation. The Corporation may purchase liability insurance for the indemnity specified above, as determined from time to time by the Board

ARTICLE VIII Fiscal Year and Budget

Section 8.01 Fiscal Year. Except as from time to time otherwise provided by the Board, the fiscal year of the Corporation shall be the calendar year.

Section 8.02 Budget, Fees, Dues, and Assessments. The Board shall adopt a budget for each fiscal year, setting forth categories of expenses and totals, as well as expected revenue and sources. The Board shall set fees, dues, and other assessments (collectively, “Dues”) on an annual basis, and no Member shall be obligated to pay Dues in a subsequent year if it terminates membership pursuant to Section 3.02. If the Board increases Dues during a year, a Member may terminate membership and will not be subject to the increased Dues, but will be subject to Dues established for that year.

ARTICLE IX State Program Boards

Section 9.01 Establishment of State Program Boards. The Corporation may establish governing bodies for one or more state producer responsibility programs in which the Corporation or its subsidiaries participates as the designated producer responsibility organization, as authorized by the Board (each, a “State Board”). Each State Board shall function as a designated body of the Corporation as defined in D.C. Code section 29-406.12. Each State Board shall have responsibility to approve the program plan and budget for that state and provide strategic oversight and guidance to the Corporation regarding that state’s program, subject to final approval and oversight by the Board.

Section 9.02 State Board Meetings. Each State Board shall have a governing charter approved by the Board. The charter shall operate as internal operating rules for the State Board and shall address the composition, selection process, and term of members of the State Board, as well as the procedures for meetings, notice, quorum, and manner of acting of the State Board. Unless such rules provide otherwise or in the absence of such rules, each State Board shall be subject to the requirements for meetings, notice, and manner of acting applicable to the Board of the Corporation.

Section 9.03 Minutes. Minutes of each meeting of a State Board and records of each action taken without a meeting by a State Board shall be recorded and maintained permanently among the records of the Corporation, as required by law.

ARTICLE X

Amendments

Section 10.01 By the Board. At any meeting these Bylaws may be altered, amended or repealed in whole or in part upon approval of a majority of the Directors then in office.

Adopted by the Board of Directors on March 1, 2023, as amended by the Board of Directors on March 15, 2023.

Summary of IRS Form 8879-TE and Form 990 for CAA, 2022

The IRS does not provide an ADA accessible form 8879-TE or Form 990, and the current 8879-TE form is locked, preventing any tagging or accessibility modifications. So in lieu of an accessible version of 8879-TE, the CAA team composed this summary.

The following pages include:

- 1. CAA's Form 990**
- 2. A screen shot of the Authorization e-mail (Accessible version)**
- 3. A text summary of CAA's Form 990**

Caution: Forms printed from within Adobe Acrobat products may not meet IRS or state taxing agency specifications. When using Acrobat, select the "Actual Size" in the Adobe "Print" dialog.

CLIENT'S COPY

TAX RETURN FILING INSTRUCTIONS

FORM 990

FOR THE YEAR ENDING

December 31, 2022

Prepared For:

Circular Action Alliance
20 F Street, NW, 7th Floor
Washington, DC 20001

Prepared By:

Dembo Jones, P.C.
6116 Executive Blvd., Suite 500
North Bethesda, MD 20852

Amount Due or Refund:

Not applicable

Make Check Payable To:

Not applicable

Mail Tax Return and Check (if applicable) To:

Not applicable

Return Must be Mailed On or Before:

Not applicable

Special Instructions:

This return has been prepared for electronic filing. If you wish to have it transmitted electronically to the IRS, please sign, date, and return Form 8879-TE to our office. We will then submit the electronic return to the IRS. Do not mail a paper copy of the return to the IRS. Return Form 8879-TE to us by November 15, 2023.

IRS e-file Signature Authorization for a Tax Exempt Entity

For calendar year 2022, or fiscal year beginning _____, 2022, and ending _____, 20__

2022

Department of the Treasury Internal Revenue Service

Do not send to the IRS. Keep for your records. Go to www.irs.gov/Form8879TE for the latest information.

Name of filer CIRCULAR ACTION ALLIANCE EIN or SSN 92-3197259

Name and title of officer or person subject to tax JEFF BEZZO TREASURER

Part I Type of Return and Return Information

Check the box for the return for which you are using this Form 8879-TE and enter the applicable amount, if any, from the return. Form 8038-CP and Form 5330 filers may enter dollars and cents. For all other forms, enter whole dollars only.

Table with 10 rows (1a-10a) and 2 columns (Form type and Amount). 1a Form 990 check here [X] b Total revenue, if any (Form 990, Part VIII, column (A), line 12) 1b 130,000.

Part II Declaration and Signature Authorization of Officer or Person Subject to Tax

Under penalties of perjury, I declare that [X] I am an officer of the above entity or [] I am a person subject to tax with respect to (name of entity) _____, (EIN) _____ and that I have examined a copy of the 2022 electronic return and accompanying schedules and statements, and, to the best of my knowledge and belief, they are true, correct, and complete.

PIN: check one box only

[X] I authorize DEMBO JONES, P.C. to enter my PIN 20171 ERO firm name Enter five numbers, but do not enter all zeros

as my signature on the tax year 2022 electronically filed return. If I have indicated within this return that a copy of the return is being filed with a state agency(ies) regulating charities as part of the IRS Fed/State program, I also authorize the aforementioned ERO to enter my PIN on the return's disclosure consent screen.

[] As an officer or person subject to tax with respect to the entity, I will enter my PIN as my signature on the tax year 2022 electronically filed return. If I have indicated within this return that a copy of the return is being filed with a state agency(ies) regulating charities as part of the IRS Fed/State program, I will enter my PIN on the return's disclosure consent screen.

Signature of officer or person subject to tax

Date

Part III Certification and Authentication

ERO's EFIN/PIN. Enter your six-digit electronic filing identification number (EFIN) followed by your five-digit self-selected PIN.

52693517100

Do not enter all zeros

I certify that the above numeric entry is my PIN, which is my signature on the 2022 electronically filed return indicated above. I confirm that I am submitting this return in accordance with the requirements of Pub. 4163, Modernized e-File (MeF) Information for Authorized IRS e-file Providers for Business Returns.

ERO's signature DEMBO JONES, P.C. Date

ERO Must Retain This Form - See Instructions

Do Not Submit This Form to the IRS Unless Requested To Do So

LHA For Privacy Act and Paperwork Reduction Act Notice, see instructions.

Form 8879-TE (2022)

Form **990**

Return of Organization Exempt From Income Tax

OMB No. 1545-0047

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

2022

Do not enter social security numbers on this form as it may be made public.

Open to Public Inspection

Department of the Treasury
Internal Revenue Service

Go to www.irs.gov/Form990 for instructions and the latest information.

A For the **2022** calendar year, or tax year beginning and ending

B Check if applicable: <input type="checkbox"/> Address change <input type="checkbox"/> Name change <input checked="" type="checkbox"/> Initial return <input type="checkbox"/> Final return/terminated <input type="checkbox"/> Amended return <input type="checkbox"/> Application pending	C Name of organization CIRCULAR ACTION ALLIANCE		D Employer identification number 92-3197259
	Doing business as		E Telephone number 262-497-7712
	Number and street (or P.O. box if mail is not delivered to street address)	Room/suite	
	20 F STREET, NW, 7TH FLOOR		G Gross receipts \$ 130,000.
	City or town, state or province, country, and ZIP or foreign postal code WASHINGTON, DC 20001		
F Name and address of principal officer: JEFF BEZZO SAME AS C ABOVE		H(a) Is this a group return for subordinates? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H(b) Are all subordinates included? <input type="checkbox"/> Yes <input type="checkbox"/> No If "No," attach a list. See instructions H(c) Group exemption number	

I Tax-exempt status: 501(c)(3) 501(c) () (insert no.) 4947(a)(1) or 527

J Website: **CIRCULARACTIONALLIANCE.ORG**

K Form of organization: Corporation Trust Association Other

L Year of formation: **2022** **M** State of legal domicile: **DC**

Part I Summary		Prior Year	Current Year
Activities & Governance	1 Briefly describe the organization's mission or most significant activities: WORKING TOGETHER TO CREATE A CIRCULAR ECONOMY FOR PAPER & PACKAGING		
	2 Check this box <input type="checkbox"/> if the organization discontinued its operations or disposed of more than 25% of its net assets.		
	3 Number of voting members of the governing body (Part VI, line 1a)	3	7
	4 Number of independent voting members of the governing body (Part VI, line 1b)	4	7
	5 Total number of individuals employed in calendar year 2022 (Part V, line 2a)	5	0
	6 Total number of volunteers (estimate if necessary)	6	7
	7 a Total unrelated business revenue from Part VIII, column (C), line 12	7a	0.
b Net unrelated business taxable income from Form 990-T, Part I, line 11	7b	0.	
Revenue	8 Contributions and grants (Part VIII, line 1h)		130,000.
	9 Program service revenue (Part VIII, line 2g)		0.
	10 Investment income (Part VIII, column (A), lines 3, 4, and 7d)		0.
	11 Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)		0.
	12 Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)		130,000.
Expenses	13 Grants and similar amounts paid (Part IX, column (A), lines 1-3)		0.
	14 Benefits paid to or for members (Part IX, column (A), line 4)		0.
	15 Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10)		0.
	16a Professional fundraising fees (Part IX, column (A), line 11e)		0.
	b Total fundraising expenses (Part IX, column (D), line 25)	0.	
17 Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e)		562,296.	
18 Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25)		562,296.	
19 Revenue less expenses. Subtract line 18 from line 12		-432,296.	
Net Assets or Fund Balances	20 Total assets (Part X, line 16)	Beginning of Current Year	End of Year 750,000.
	21 Total liabilities (Part X, line 26)		1,182,296.
	22 Net assets or fund balances. Subtract line 21 from line 20		-432,296.

Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here	Signature of officer		Date		
	JEFF BEZZO, TREASURER Type or print name and title				
Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check if self-employed <input type="checkbox"/>	PTIN
	DAVID J. SHERDEL, CPA				P01306021
Preparer Use Only	Firm's name	Firm's EIN		Phone no.	
	DEMBO JONES, P.C. 6116 EXECUTIVE BLVD., SUITE 500 NORTH BETHESDA, MD 20852	52-1073331		301-770-5100	

May the IRS discuss this return with the preparer shown above? See instructions Yes No

Part III Statement of Program Service Accomplishments

Check if Schedule O contains a response or note to any line in this Part III []

1 Briefly describe the organization's mission:
CAA'S VISION IS TO BE AN APPROVED PRO IN ALL STATES THAT HAVE ENACTED
EPR LAWS FOR PAPER AND PACKAGING TO DELIVER HARMONIZED BEST-IN-CLASS
COMPLIANCE SERVICES, SCALE INNOVATION, AND BUILD SYSTEMS THAT HELP
BOTH COMPANIES AND CONSUMERS WASTE LESS AND RECYCLE MORE

2 Did the organization undertake any significant program services during the year which were not listed on the
prior Form 990 or 990-EZ? [] Yes [X] No
If "Yes," describe these new services on Schedule O.

3 Did the organization cease conducting, or make significant changes in how it conducts, any program services? [] Yes [X] No
If "Yes," describe these changes on Schedule O.

4 Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses.
Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and
revenue, if any, for each program service reported.

4a (Code:) (Expenses \$ including grants of \$) (Revenue \$)
THE ORGANIZATION OPERATES ON BEHALF OF STATE GOVERNMENTS COMMUNITY
LEVEL, POST-CONSUMER PAPER, PACKAGING, AND FOOD SERVICE WARE ITEMS
STEWARDSHIP PROGRAMS WHERE AUTHORIZED OR MANDATED BY LOCAL AND STATE
LEGISLATION. THE PROGRAMS CONDUCT PUBLIC OUTREACH AND PROVIDE EDUCATION
TO BUSINESSES, CONSUMERS, THE PUBLIC, AND OTHER RELEVANT STAKEHOLDERS
ON REDUCING WASTE, HOW TO RECYCLE, AND HOW TO INCREASE THE RECYCLING OF
PACKAGING MATERIALS. THE ORGANIZATION WILL ALSO ENGAGE SERVICE
PROVIDERS TO FACILITATE THE COLLECTION, TRANSPORTATION, AND RECYCLING
OF POST-CONSUMER PAPER, PACKAGING, AND PACKAGING-LIKE ITEMS FOR THE
PURPOSE OF MINIMIZING THE ENVIRONMENTAL IIMPACT OF SUCH ITEMS.

4b (Code:) (Expenses \$ including grants of \$) (Revenue \$)

4c (Code:) (Expenses \$ including grants of \$) (Revenue \$)

4d Other program services (Describe on Schedule O.)
(Expenses \$ including grants of \$) (Revenue \$)

4e Total program service expenses

Part IV Checklist of Required Schedules

	Yes	No
1 Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? <i>If "Yes," complete Schedule A</i>	X	
2 Is the organization required to complete <i>Schedule B, Schedule of Contributors</i> ? See instructions	X	
3 Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? <i>If "Yes," complete Schedule C, Part I</i>		X
4 Section 501(c)(3) organizations. Did the organization engage in lobbying activities, or have a section 501(h) election in effect during the tax year? <i>If "Yes," complete Schedule C, Part II</i>		X
5 Is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues, assessments, or similar amounts as defined in Rev. Proc. 98-19? <i>If "Yes," complete Schedule C, Part III</i>		X
6 Did the organization maintain any donor advised funds or any similar funds or accounts for which donors have the right to provide advice on the distribution or investment of amounts in such funds or accounts? <i>If "Yes," complete Schedule D, Part I</i>		X
7 Did the organization receive or hold a conservation easement, including easements to preserve open space, the environment, historic land areas, or historic structures? <i>If "Yes," complete Schedule D, Part II</i>		X
8 Did the organization maintain collections of works of art, historical treasures, or other similar assets? <i>If "Yes," complete Schedule D, Part III</i>		X
9 Did the organization report an amount in Part X, line 21, for escrow or custodial account liability, serve as a custodian for amounts not listed in Part X; or provide credit counseling, debt management, credit repair, or debt negotiation services? <i>If "Yes," complete Schedule D, Part IV</i>		X
10 Did the organization, directly or through a related organization, hold assets in donor-restricted endowments or in quasi endowments? <i>If "Yes," complete Schedule D, Part V</i>		X
11 If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI, VII, VIII, IX, or X, as applicable.		
a Did the organization report an amount for land, buildings, and equipment in Part X, line 10? <i>If "Yes," complete Schedule D, Part VI</i>		X
b Did the organization report an amount for investments - other securities in Part X, line 12, that is 5% or more of its total assets reported in Part X, line 16? <i>If "Yes," complete Schedule D, Part VII</i>		X
c Did the organization report an amount for investments - program related in Part X, line 13, that is 5% or more of its total assets reported in Part X, line 16? <i>If "Yes," complete Schedule D, Part VIII</i>		X
d Did the organization report an amount for other assets in Part X, line 15, that is 5% or more of its total assets reported in Part X, line 16? <i>If "Yes," complete Schedule D, Part IX</i>		X
e Did the organization report an amount for other liabilities in Part X, line 25? <i>If "Yes," complete Schedule D, Part X</i>		X
f Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? <i>If "Yes," complete Schedule D, Part X</i>	X	
12a Did the organization obtain separate, independent audited financial statements for the tax year? <i>If "Yes," complete Schedule D, Parts XI and XII</i>	X	
b Was the organization included in consolidated, independent audited financial statements for the tax year? <i>If "Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is optional</i>		X
13 Is the organization a school described in section 170(b)(1)(A)(ii)? <i>If "Yes," complete Schedule E</i>		X
14a Did the organization maintain an office, employees, or agents outside of the United States?		X
b Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? <i>If "Yes," complete Schedule F, Parts I and IV</i>		X
15 Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or for any foreign organization? <i>If "Yes," complete Schedule F, Parts II and IV</i>		X
16 Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to or for foreign individuals? <i>If "Yes," complete Schedule F, Parts III and IV</i>		X
17 Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX, column (A), lines 6 and 11e? <i>If "Yes," complete Schedule G, Part I.</i> See instructions		X
18 Did the organization report more than \$15,000 total of fundraising event gross income and contributions on Part VIII, lines 1c and 8a? <i>If "Yes," complete Schedule G, Part II</i>		X
19 Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? <i>If "Yes," complete Schedule G, Part III</i>		X
20a Did the organization operate one or more hospital facilities? <i>If "Yes," complete Schedule H</i>		X
b If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return?		
21 Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or domestic government on Part IX, column (A), line 1? <i>If "Yes," complete Schedule I, Parts I and II</i>		X

Part IV Checklist of Required Schedules (continued)

Table with 3 columns: Question ID, Question Text, Yes, No. Rows include questions 22 through 38 regarding organizational reporting, compensation, bond issues, and transactions.

Part V Statements Regarding Other IRS Filings and Tax Compliance

Check if Schedule O contains a response or note to any line in this Part V

Table with 3 columns: Question ID, Question Text, Yes, No. Rows include questions 1a, 1b, and 1c regarding Form 1096, Forms W-2G, and backup withholding rules.

Part V Statements Regarding Other IRS Filings and Tax Compliance (continued)

Table with columns for question number, question text, and Yes/No columns. Includes questions 2a through 17 regarding employee reporting, tax returns, gross income, foreign accounts, prohibited transactions, and charitable contributions.

Part VI Governance, Management, and Disclosure. For each "Yes" response to lines 2 through 7b below, and for a "No" response to line 8a, 8b, or 10b below, describe the circumstances, processes, or changes on Schedule O. See instructions.

Check if Schedule O contains a response or note to any line in this Part VI

Section A. Governing Body and Management

		Yes	No
1a	Enter the number of voting members of the governing body at the end of the tax year If there are material differences in voting rights among members of the governing body, or if the governing body delegated broad authority to an executive committee or similar committee, explain on Schedule O.		
1b	Enter the number of voting members included on line 1a, above, who are independent		
2	Did any officer, director, trustee, or key employee have a family relationship or a business relationship with any other officer, director, trustee, or key employee?		X
3	Did the organization delegate control over management duties customarily performed by or under the direct supervision of officers, directors, trustees, or key employees to a management company or other person?		X
4	Did the organization make any significant changes to its governing documents since the prior Form 990 was filed?		X
5	Did the organization become aware during the year of a significant diversion of the organization's assets?		X
6	Did the organization have members or stockholders?	X	
7a	Did the organization have members, stockholders, or other persons who had the power to elect or appoint one or more members of the governing body?	X	
7b	Are any governance decisions of the organization reserved to (or subject to approval by) members, stockholders, or persons other than the governing body?		X
8	Did the organization contemporaneously document the meetings held or written actions undertaken during the year by the following:		
8a	The governing body?	X	
8b	Each committee with authority to act on behalf of the governing body?	X	
9	Is there any officer, director, trustee, or key employee listed in Part VII, Section A, who cannot be reached at the organization's mailing address? If "Yes," provide the names and addresses on Schedule O		X

Section B. Policies (This Section B requests information about policies not required by the Internal Revenue Code.)

		Yes	No
10a	Did the organization have local chapters, branches, or affiliates?		X
10b	If "Yes," did the organization have written policies and procedures governing the activities of such chapters, affiliates, and branches to ensure their operations are consistent with the organization's exempt purposes?		
11a	Has the organization provided a complete copy of this Form 990 to all members of its governing body before filing the form?	X	
11b	Describe on Schedule O the process, if any, used by the organization to review this Form 990.		
12a	Did the organization have a written conflict of interest policy? If "No," go to line 13	X	
12b	Were officers, directors, or trustees, and key employees required to disclose annually interests that could give rise to conflicts?	X	
12c	Did the organization regularly and consistently monitor and enforce compliance with the policy? If "Yes," describe on Schedule O how this was done	X	
13	Did the organization have a written whistleblower policy?	X	
14	Did the organization have a written document retention and destruction policy?	X	
15	Did the process for determining compensation of the following persons include a review and approval by independent persons, comparability data, and contemporaneous substantiation of the deliberation and decision?		
15a	The organization's CEO, Executive Director, or top management official	X	
15b	Other officers or key employees of the organization	X	
	If "Yes" to line 15a or 15b, describe the process on Schedule O. See instructions.		
16a	Did the organization invest in, contribute assets to, or participate in a joint venture or similar arrangement with a taxable entity during the year?		X
16b	If "Yes," did the organization follow a written policy or procedure requiring the organization to evaluate its participation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization's exempt status with respect to such arrangements?		

Section C. Disclosure

- 17** List the states with which a copy of this Form 990 is required to be filed NONE
- 18** Section 6104 requires an organization to make its Forms 1023 (1024 or 1024-A, if applicable), 990, and 990-T (section 501(c)(3)s only) available for public inspection. Indicate how you made these available. Check all that apply.
 Own website Another's website Upon request Other (explain on Schedule O)
- 19** Describe on Schedule O whether (and if so, how) the organization made its governing documents, conflict of interest policy, and financial statements available to the public during the tax year.
- 20** State the name, address, and telephone number of the person who possesses the organization's books and records
THE ORGANIZATION - 262-497-7712
20 F STREET, NW, 7TH FLOOR, WASHINGTON, DC 20001

Part VII Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors

Check if Schedule O contains a response or note to any line in this Part VII

Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees

1a Complete this table for all persons required to be listed. Report compensation for the calendar year ending with or within the organization's tax year.

- List all of the organization's current officers, directors, trustees... List all of the organization's current key employees... List the organization's five current highest compensated employees... List all of the organization's former officers, key employees, and highest compensated employees... List all of the organization's former directors or trustees...

X Check this box if neither the organization nor any related organization compensated any current officer, director, or trustee.

Table with 6 main columns: (A) Name and title, (B) Average hours per week, (C) Position, (D) Reportable compensation from the organization, (E) Reportable compensation from related organizations, (F) Estimated amount of other compensation. Includes entries for CHARLIE SCHWARZE, STEPHANIE POTTER, KIRSTEN WITT, ANKE BOYKIN, JOHN BREEDLOVE, RACHEL GOLDSTEIN, and NEIL MENEZESN.

Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees (continued)

(A) Name and title	(B) Average hours per week (list any hours for related organizations below line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization (W-2/1099-MISC/1099-NEC)	(E) Reportable compensation from related organizations (W-2/1099-MISC/1099-NEC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former			
1b Subtotal							0.	0.	0.	
c Total from continuation sheets to Part VII, Section A							0.	0.	0.	
d Total (add lines 1b and 1c)							0.	0.	0.	

2 Total number of individuals (including but not limited to those listed above) who received more than \$100,000 of reportable compensation from the organization 0

	Yes	No
3 Did the organization list any former officer, director, trustee, key employee, or highest compensated employee on line 1a? <i>If "Yes," complete Schedule J for such individual</i>		X
4 For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? <i>If "Yes," complete Schedule J for such individual</i>		X
5 Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization? <i>If "Yes," complete Schedule J for such person</i>		X

Section B. Independent Contractors

1 Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization. Report compensation for the calendar year ending with or within the organization's tax year.

(A) Name and business address	(B) Description of services	(C) Compensation
CLEAR STRATEGY INC, 189 GLEN CEDAR ROAD, TORONTO, ON, CANADA M6C-3G9		555,598.

2 Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 of compensation from the organization 1

Part VIII Statement of Revenue

Check if Schedule O contains a response or note to any line in this Part VIII

			(A)	(B)	(C)	(D)	
			Total revenue	Related or exempt function revenue	Unrelated business revenue	Revenue excluded from tax under sections 512 - 514	
Contributions, Gifts, Grants and Other Similar Amounts	1 a	Federated campaigns	1a				
	b	Membership dues	1b				
	c	Fundraising events	1c				
	d	Related organizations	1d				
	e	Government grants (contributions)	1e				
	f	All other contributions, gifts, grants, and similar amounts not included above ...	1f	130,000.			
	g	Noncash contributions included in lines 1a-1f	1g	\$			
	h	Total. Add lines 1a-1f		130,000.			
Program Service Revenue	2 a	_____	Business Code				
	b	_____					
	c	_____					
	d	_____					
	e	_____					
	f	All other program service revenue					
	g	Total. Add lines 2a-2f					
Other Revenue	3	Investment income (including dividends, interest, and other similar amounts)					
	4	Income from investment of tax-exempt bond proceeds					
	5	Royalties					
	6 a	Gross rents	6a	(i) Real	(ii) Personal		
	b	Less: rental expenses ...	6b				
	c	Rental income or (loss)	6c				
	d	Net rental income or (loss)					
	7 a	Gross amount from sales of assets other than inventory	7a	(i) Securities	(ii) Other		
	b	Less: cost or other basis and sales expenses	7b				
	c	Gain or (loss)	7c				
	d	Net gain or (loss)					
8 a	Gross income from fundraising events (not including \$ _____ of contributions reported on line 1c). See Part IV, line 18	8a					
b	Less: direct expenses	8b					
c	Net income or (loss) from fundraising events						
9 a	Gross income from gaming activities. See Part IV, line 19	9a					
b	Less: direct expenses	9b					
c	Net income or (loss) from gaming activities						
10 a	Gross sales of inventory, less returns and allowances	10a					
b	Less: cost of goods sold	10b					
c	Net income or (loss) from sales of inventory						
Miscellaneous Revenue	11 a	_____	Business Code				
	b	_____					
	c	_____					
	d	All other revenue					
	e	Total. Add lines 11a-11d					
12	Total revenue. See instructions		130,000.	0.	0.	0.	

Part IX Statement of Functional Expenses

Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).

Check if Schedule O contains a response or note to any line in this Part IX

Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
1 Grants and other assistance to domestic organizations and domestic governments. See Part IV, line 21 ...				
2 Grants and other assistance to domestic individuals. See Part IV, line 22				
3 Grants and other assistance to foreign organizations, foreign governments, and foreign individuals. See Part IV, lines 15 and 16				
4 Benefits paid to or for members				
5 Compensation of current officers, directors, trustees, and key employees				
6 Compensation not included above to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B)				
7 Other salaries and wages				
8 Pension plan accruals and contributions (include section 401(k) and 403(b) employer contributions)				
9 Other employee benefits				
10 Payroll taxes				
11 Fees for services (nonemployees):				
a Management				
b Legal	6,223.		6,223.	
c Accounting				
d Lobbying				
e Professional fundraising services. See Part IV, line 17				
f Investment management fees				
g Other. (If line 11g amount exceeds 10% of line 25, column (A), amount, list line 11g expenses on Sch O.)	556,073.		556,073.	
12 Advertising and promotion				
13 Office expenses				
14 Information technology				
15 Royalties				
16 Occupancy				
17 Travel				
18 Payments of travel or entertainment expenses for any federal, state, or local public officials ...				
19 Conferences, conventions, and meetings				
20 Interest				
21 Payments to affiliates				
22 Depreciation, depletion, and amortization				
23 Insurance				
24 Other expenses. Itemize expenses not covered above. (List miscellaneous expenses on line 24e. If line 24e amount exceeds 10% of line 25, column (A), amount, list line 24e expenses on Schedule O.)				
a _____				
b _____				
c _____				
d _____				
e All other expenses _____				
25 Total functional expenses. Add lines 1 through 24e	562,296.	0.	562,296.	0.
26 Joint costs. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation. Check here <input type="checkbox"/> if following SOP 98-2 (ASC 958-720)				

Part X Balance Sheet

Check if Schedule O contains a response or note to any line in this Part X

		(A) Beginning of year	(B) End of year	
Assets	1 Cash - non-interest-bearing		1	
	2 Savings and temporary cash investments		2	
	3 Pledges and grants receivable, net		3 750,000.	
	4 Accounts receivable, net		4	
	5 Loans and other receivables from any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons		5	
	6 Loans and other receivables from other disqualified persons (as defined under section 4958(f)(1)), and persons described in section 4958(c)(3)(B)		6	
	7 Notes and loans receivable, net		7	
	8 Inventories for sale or use		8	
	9 Prepaid expenses and deferred charges		9	
	10a Land, buildings, and equipment: cost or other basis. Complete Part VI of Schedule D	10a		
	b Less: accumulated depreciation	10b	10c	
	11 Investments - publicly traded securities		11	
	12 Investments - other securities. See Part IV, line 11		12	
	13 Investments - program-related. See Part IV, line 11		13	
	14 Intangible assets		14	
	15 Other assets. See Part IV, line 11		15	
16 Total assets. Add lines 1 through 15 (must equal line 33)		0 . 16	750,000 .	
Liabilities	17 Accounts payable and accrued expenses		17 432,296.	
	18 Grants payable		18	
	19 Deferred revenue		19	
	20 Tax-exempt bond liabilities		20	
	21 Escrow or custodial account liability. Complete Part IV of Schedule D		21	
	22 Loans and other payables to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons		22 750,000.	
	23 Secured mortgages and notes payable to unrelated third parties		23	
	24 Unsecured notes and loans payable to unrelated third parties		24	
	25 Other liabilities (including federal income tax, payables to related third parties, and other liabilities not included on lines 17-24). Complete Part X of Schedule D		25	
	26 Total liabilities. Add lines 17 through 25		0 . 26	1,182,296 .
Net Assets or Fund Balances	Organizations that follow FASB ASC 958, check here <input checked="" type="checkbox"/> and complete lines 27, 28, 32, and 33.			
	27 Net assets without donor restrictions		27 -432,296.	
	28 Net assets with donor restrictions		28	
	Organizations that do not follow FASB ASC 958, check here <input type="checkbox"/> and complete lines 29 through 33.			
	29 Capital stock or trust principal, or current funds		29	
	30 Paid-in or capital surplus, or land, building, or equipment fund		30	
	31 Retained earnings, endowment, accumulated income, or other funds		31	
	32 Total net assets or fund balances	0 . 32		-432,296 .
	33 Total liabilities and net assets/fund balances	0 . 33		750,000 .

Part XI Reconciliation of Net Assets

Check if Schedule O contains a response or note to any line in this Part XI

1	Total revenue (must equal Part VIII, column (A), line 12)	1	130,000.
2	Total expenses (must equal Part IX, column (A), line 25)	2	562,296.
3	Revenue less expenses. Subtract line 2 from line 1	3	-432,296.
4	Net assets or fund balances at beginning of year (must equal Part X, line 32, column (A))	4	0.
5	Net unrealized gains (losses) on investments	5	
6	Donated services and use of facilities	6	
7	Investment expenses	7	
8	Prior period adjustments	8	
9	Other changes in net assets or fund balances (explain on Schedule O)	9	0.
10	Net assets or fund balances at end of year. Combine lines 3 through 9 (must equal Part X, line 32, column (B))	10	-432,296.

Part XII Financial Statements and Reporting

Check if Schedule O contains a response or note to any line in this Part XII

- 1 Accounting method used to prepare the Form 990: Cash Accrual Other _____
If the organization changed its method of accounting from a prior year or checked "Other," explain on Schedule O.
- 2a Were the organization's financial statements compiled or reviewed by an independent accountant?
If "Yes," check a box below to indicate whether the financial statements for the year were compiled or reviewed on a separate basis, consolidated basis, or both:
 Separate basis Consolidated basis Both consolidated and separate basis
- b Were the organization's financial statements audited by an independent accountant?
If "Yes," check a box below to indicate whether the financial statements for the year were audited on a separate basis, consolidated basis, or both:
 Separate basis Consolidated basis Both consolidated and separate basis
- c If "Yes" to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the audit, review, or compilation of its financial statements and selection of an independent accountant?
If the organization changed either its oversight process or selection process during the tax year, explain on Schedule O.
- 3a As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Uniform Guidance, 2 C.F.R. Part 200, Subpart F?
- b If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the required audit or audits, explain why on Schedule O and describe any steps taken to undergo such audits

	Yes	No
2a		X
2b	X	
2c	X	
3a		X
3b		

Form 990 (2022)

SCHEDULE A
(Form 990)

Department of the Treasury
Internal Revenue Service

Public Charity Status and Public Support

Complete if the organization is a section 501(c)(3) organization or a section 4947(a)(1) nonexempt charitable trust.
Attach to Form 990 or Form 990-EZ.

Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047

2022

Open to Public Inspection

Name of the organization CIRCULAR ACTION ALLIANCE	Employer identification number 92-3197259
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Part I Reason for Public Charity Status. (All organizations must complete this part.) See instructions.

The organization is not a private foundation because it is: (For lines 1 through 12, check only one box.)

- 1 A church, convention of churches, or association of churches described in **section 170(b)(1)(A)(i).**
- 2 A school described in **section 170(b)(1)(A)(ii).** (Attach Schedule E (Form 990).)
- 3 A hospital or a cooperative hospital service organization described in **section 170(b)(1)(A)(iii).**
- 4 A medical research organization operated in conjunction with a hospital described in **section 170(b)(1)(A)(iii).** Enter the hospital's name, city, and state: _____
- 5 An organization operated for the benefit of a college or university owned or operated by a governmental unit described in **section 170(b)(1)(A)(iv).** (Complete Part II.)
- 6 A federal, state, or local government or governmental unit described in **section 170(b)(1)(A)(v).**
- 7 An organization that normally receives a substantial part of its support from a governmental unit or from the general public described in **section 170(b)(1)(A)(vi).** (Complete Part II.)
- 8 A community trust described in **section 170(b)(1)(A)(vi).** (Complete Part II.)
- 9 An agricultural research organization described in **section 170(b)(1)(A)(ix)** operated in conjunction with a land-grant college or university or a non-land-grant college of agriculture (see instructions). Enter the name, city, and state of the college or university: _____
- 10 An organization that normally receives (1) more than 33 1/3% of its support from contributions, membership fees, and gross receipts from activities related to its exempt functions, subject to certain exceptions; and (2) no more than 33 1/3% of its support from gross investment income and unrelated business taxable income (less section 511 tax) from businesses acquired by the organization after June 30, 1975. See **section 509(a)(2).** (Complete Part III.)
- 11 An organization organized and operated exclusively to test for public safety. See **section 509(a)(4).**
- 12 An organization organized and operated exclusively for the benefit of, to perform the functions of, or to carry out the purposes of one or more publicly supported organizations described in **section 509(a)(1)** or **section 509(a)(2).** See **section 509(a)(3).** Check the box on lines 12a through 12d that describes the type of supporting organization and complete lines 12e, 12f, and 12g.
 - a **Type I.** A supporting organization operated, supervised, or controlled by its supported organization(s), typically by giving the supported organization(s) the power to regularly appoint or elect a majority of the directors or trustees of the supporting organization. **You must complete Part IV, Sections A and B.**
 - b **Type II.** A supporting organization supervised or controlled in connection with its supported organization(s), by having control or management of the supporting organization vested in the same persons that control or manage the supported organization(s). **You must complete Part IV, Sections A and C.**
 - c **Type III functionally integrated.** A supporting organization operated in connection with, and functionally integrated with, its supported organization(s) (see instructions). **You must complete Part IV, Sections A, D, and E.**
 - d **Type III non-functionally integrated.** A supporting organization operated in connection with its supported organization(s) that is not functionally integrated. The organization generally must satisfy a distribution requirement and an attentiveness requirement (see instructions). **You must complete Part IV, Sections A and D, and Part V.**
 - e Check this box if the organization received a written determination from the IRS that it is a Type I, Type II, Type III functionally integrated, or Type III non-functionally integrated supporting organization.
 - f Enter the number of supported organizations
- g Provide the following information about the supported organization(s).

(i) Name of supported organization	(ii) EIN	(iii) Type of organization (described on lines 1-10 above (see instructions))	(iv) Is the organization listed in your governing document?		(v) Amount of monetary support (see instructions)	(vi) Amount of other support (see instructions)
			Yes	No		
Total						

Part II Support Schedule for Organizations Described in Sections 170(b)(1)(A)(iv) and 170(b)(1)(A)(vi)

(Complete only if you checked the box on line 5, 7, or 8 of Part I or if the organization failed to qualify under Part III. If the organization fails to qualify under the tests listed below, please complete Part III.)

Section A. Public Support

Calendar year (or fiscal year beginning in)	(a) 2018	(b) 2019	(c) 2020	(d) 2021	(e) 2022	(f) Total
1 Gifts, grants, contributions, and membership fees received. (Do not include any "unusual grants.")						
2 Tax revenues levied for the organization's benefit and either paid to or expended on its behalf						
3 The value of services or facilities furnished by a governmental unit to the organization without charge						
4 Total. Add lines 1 through 3						
5 The portion of total contributions by each person (other than a governmental unit or publicly supported organization) included on line 1 that exceeds 2% of the amount shown on line 11, column (f)						
6 Public support. Subtract line 5 from line 4.						

Section B. Total Support

Calendar year (or fiscal year beginning in)	(a) 2018	(b) 2019	(c) 2020	(d) 2021	(e) 2022	(f) Total
7 Amounts from line 4						
8 Gross income from interest, dividends, payments received on securities loans, rents, royalties, and income from similar sources						
9 Net income from unrelated business activities, whether or not the business is regularly carried on						
10 Other income. Do not include gain or loss from the sale of capital assets (Explain in Part VI.)						
11 Total support. Add lines 7 through 10						
12 Gross receipts from related activities, etc. (see instructions)					12	
13 First 5 years. If the Form 990 is for the organization's first, second, third, fourth, or fifth tax year as a section 501(c)(3) organization, check this box and stop here						<input type="checkbox"/>

Section C. Computation of Public Support Percentage

14 Public support percentage for 2022 (line 6, column (f), divided by line 11, column (f))	14	%
15 Public support percentage from 2021 Schedule A, Part II, line 14	15	%
16a 33 1/3% support test - 2022. If the organization did not check the box on line 13, and line 14 is 33 1/3% or more, check this box and stop here. The organization qualifies as a publicly supported organization		<input type="checkbox"/>
b 33 1/3% support test - 2021. If the organization did not check a box on line 13 or 16a, and line 15 is 33 1/3% or more, check this box and stop here. The organization qualifies as a publicly supported organization		<input type="checkbox"/>
17a 10% -facts-and-circumstances test - 2022. If the organization did not check a box on line 13, 16a, or 16b, and line 14 is 10% or more, and if the organization meets the facts-and-circumstances test, check this box and stop here. Explain in Part VI how the organization meets the facts-and-circumstances test. The organization qualifies as a publicly supported organization		<input type="checkbox"/>
b 10% -facts-and-circumstances test - 2021. If the organization did not check a box on line 13, 16a, 16b, or 17a, and line 15 is 10% or more, and if the organization meets the facts-and-circumstances test, check this box and stop here. Explain in Part VI how the organization meets the facts-and-circumstances test. The organization qualifies as a publicly supported organization		<input type="checkbox"/>
18 Private foundation. If the organization did not check a box on line 13, 16a, 16b, 17a, or 17b, check this box and see instructions		<input type="checkbox"/>

Part III Support Schedule for Organizations Described in Section 509(a)(2)

(Complete only if you checked the box on line 10 of Part I or if the organization failed to qualify under Part II. If the organization fails to qualify under the tests listed below, please complete Part II.)

Section A. Public Support

Calendar year (or fiscal year beginning in)	(a) 2018	(b) 2019	(c) 2020	(d) 2021	(e) 2022	(f) Total
1 Gifts, grants, contributions, and membership fees received. (Do not include any "unusual grants.")					130,000.	130,000.
2 Gross receipts from admissions, merchandise sold or services performed, or facilities furnished in any activity that is related to the organization's tax-exempt purpose						
3 Gross receipts from activities that are not an unrelated trade or business under section 513						
4 Tax revenues levied for the organization's benefit and either paid to or expended on its behalf						
5 The value of services or facilities furnished by a governmental unit to the organization without charge						
6 Total. Add lines 1 through 5					130,000.	130,000.
7a Amounts included on lines 1, 2, and 3 received from disqualified persons						0.
b Amounts included on lines 2 and 3 received from other than disqualified persons that exceed the greater of \$5,000 or 1% of the amount on line 13 for the year						0.
c Add lines 7a and 7b						0.
8 Public support. (Subtract line 7c from line 6.)						130,000.

Section B. Total Support

Calendar year (or fiscal year beginning in)	(a) 2018	(b) 2019	(c) 2020	(d) 2021	(e) 2022	(f) Total
9 Amounts from line 6					130,000.	130,000.
10a Gross income from interest, dividends, payments received on securities loans, rents, royalties, and income from similar sources						
b Unrelated business taxable income (less section 511 taxes) from businesses acquired after June 30, 1975						
c Add lines 10a and 10b						
11 Net income from unrelated business activities not included on line 10b, whether or not the business is regularly carried on						
12 Other income. Do not include gain or loss from the sale of capital assets (Explain in Part VI.)						
13 Total support. (Add lines 9, 10c, 11, and 12.)					130,000.	130,000.

14 First 5 years. If the Form 990 is for the organization's first, second, third, fourth, or fifth tax year as a section 501(c)(3) organization, check this box and **stop here**

Section C. Computation of Public Support Percentage

15 Public support percentage for 2022 (line 8, column (f), divided by line 13, column (f))	15	%
16 Public support percentage from 2021 Schedule A, Part III, line 15	16	%

Section D. Computation of Investment Income Percentage

17 Investment income percentage for 2022 (line 10c, column (f), divided by line 13, column (f))	17	%
18 Investment income percentage from 2021 Schedule A, Part III, line 17	18	%

19a 33 1/3% support tests - 2022. If the organization did not check the box on line 14, and line 15 is more than 33 1/3%, and line 17 is not more than 33 1/3%, check this box and **stop here**. The organization qualifies as a publicly supported organization

b 33 1/3% support tests - 2021. If the organization did not check a box on line 14 or line 19a, and line 16 is more than 33 1/3%, and line 18 is not more than 33 1/3%, check this box and **stop here**. The organization qualifies as a publicly supported organization

20 Private foundation. If the organization did not check a box on line 14, 19a, or 19b, check this box and see instructions

Part IV Supporting Organizations

(Complete only if you checked a box on line 12 of Part I. If you checked box 12a, Part I, complete Sections A and B. If you checked box 12b, Part I, complete Sections A and C. If you checked box 12c, Part I, complete Sections A, D, and E. If you checked box 12d, Part I, complete Sections A and D, and complete Part V.)

Section A. All Supporting Organizations

	Yes	No
1 Are all of the organization's supported organizations listed by name in the organization's governing documents? <i>If "No," describe in Part VI how the supported organizations are designated. If designated by class or purpose, describe the designation. If historic and continuing relationship, explain.</i>		
2 Did the organization have any supported organization that does not have an IRS determination of status under section 509(a)(1) or (2)? <i>If "Yes," explain in Part VI how the organization determined that the supported organization was described in section 509(a)(1) or (2).</i>		
3a Did the organization have a supported organization described in section 501(c)(4), (5), or (6)? <i>If "Yes," answer lines 3b and 3c below.</i>		
b Did the organization confirm that each supported organization qualified under section 501(c)(4), (5), or (6) and satisfied the public support tests under section 509(a)(2)? <i>If "Yes," describe in Part VI when and how the organization made the determination.</i>		
c Did the organization ensure that all support to such organizations was used exclusively for section 170(c)(2)(B) purposes? <i>If "Yes," explain in Part VI what controls the organization put in place to ensure such use.</i>		
4a Was any supported organization not organized in the United States ("foreign supported organization")? <i>If "Yes," and if you checked box 12a or 12b in Part I, answer lines 4b and 4c below.</i>		
b Did the organization have ultimate control and discretion in deciding whether to make grants to the foreign supported organization? <i>If "Yes," describe in Part VI how the organization had such control and discretion despite being controlled or supervised by or in connection with its supported organizations.</i>		
c Did the organization support any foreign supported organization that does not have an IRS determination under sections 501(c)(3) and 509(a)(1) or (2)? <i>If "Yes," explain in Part VI what controls the organization used to ensure that all support to the foreign supported organization was used exclusively for section 170(c)(2)(B) purposes.</i>		
5a Did the organization add, substitute, or remove any supported organizations during the tax year? <i>If "Yes," answer lines 5b and 5c below (if applicable). Also, provide detail in Part VI, including (i) the names and EIN numbers of the supported organizations added, substituted, or removed; (ii) the reasons for each such action; (iii) the authority under the organization's organizing document authorizing such action; and (iv) how the action was accomplished (such as by amendment to the organizing document).</i>		
b Type I or Type II only. Was any added or substituted supported organization part of a class already designated in the organization's organizing document?		
c Substitutions only. Was the substitution the result of an event beyond the organization's control?		
6 Did the organization provide support (whether in the form of grants or the provision of services or facilities) to anyone other than (i) its supported organizations, (ii) individuals that are part of the charitable class benefited by one or more of its supported organizations, or (iii) other supporting organizations that also support or benefit one or more of the filing organization's supported organizations? <i>If "Yes," provide detail in Part VI.</i>		
7 Did the organization provide a grant, loan, compensation, or other similar payment to a substantial contributor (as defined in section 4958(c)(3)(C)), a family member of a substantial contributor, or a 35% controlled entity with regard to a substantial contributor? <i>If "Yes," complete Part I of Schedule L (Form 990).</i>		
8 Did the organization make a loan to a disqualified person (as defined in section 4958) not described on line 7? <i>If "Yes," complete Part I of Schedule L (Form 990).</i>		
9a Was the organization controlled directly or indirectly at any time during the tax year by one or more disqualified persons, as defined in section 4946 (other than foundation managers and organizations described in section 509(a)(1) or (2))? <i>If "Yes," provide detail in Part VI.</i>		
b Did one or more disqualified persons (as defined on line 9a) hold a controlling interest in any entity in which the supporting organization had an interest? <i>If "Yes," provide detail in Part VI.</i>		
c Did a disqualified person (as defined on line 9a) have an ownership interest in, or derive any personal benefit from, assets in which the supporting organization also had an interest? <i>If "Yes," provide detail in Part VI.</i>		
10a Was the organization subject to the excess business holdings rules of section 4943 because of section 4943(f) (regarding certain Type II supporting organizations, and all Type III non-functionally integrated supporting organizations)? <i>If "Yes," answer line 10b below.</i>		
b Did the organization have any excess business holdings in the tax year? <i>(Use Schedule C, Form 4720, to determine whether the organization had excess business holdings.)</i>		

Part IV Supporting Organizations (continued)

Table with 3 columns: Question, Yes, No. Row 11: Has the organization accepted a gift or contribution from any of the following persons? Sub-rows 11a, 11b, 11c.

Section B. Type I Supporting Organizations

Table with 3 columns: Question, Yes, No. Row 1: Did the governing body, members of the governing body, officers acting in their official capacity, or membership of one or more supported organizations have the power to regularly appoint or elect at least a majority of the organization's officers, directors, or trustees at all times during the tax year? Row 2: Did the organization operate for the benefit of any supported organization other than the supported organization(s) that operated, supervised, or controlled the supporting organization?

Section C. Type II Supporting Organizations

Table with 3 columns: Question, Yes, No. Row 1: Were a majority of the organization's directors or trustees during the tax year also a majority of the directors or trustees of each of the organization's supported organization(s)?

Section D. All Type III Supporting Organizations

Table with 3 columns: Question, Yes, No. Row 1: Did the organization provide to each of its supported organizations, by the last day of the fifth month of the organization's tax year, (i) a written notice describing the type and amount of support provided during the prior tax year, (ii) a copy of the Form 990 that was most recently filed as of the date of notification, and (iii) copies of the organization's governing documents in effect on the date of notification, to the extent not previously provided? Row 2: Were any of the organization's officers, directors, or trustees either (i) appointed or elected by the supported organization(s) or (ii) serving on the governing body of a supported organization? Row 3: By reason of the relationship described on line 2, above, did the organization's supported organizations have a significant voice in the organization's investment policies and in directing the use of the organization's income or assets at all times during the tax year?

Section E. Type III Functionally Integrated Supporting Organizations

Table with 3 columns: Question, Yes, No. Row 1: Check the box next to the method that the organization used to satisfy the Integral Part Test during the year (see instructions). Sub-rows a, b, c. Row 2: Activities Test. Answer lines 2a and 2b below. Sub-rows a, b. Row 3: Parent of Supported Organizations. Answer lines 3a and 3b below. Sub-rows a, b.

Part V Type III Non-Functionally Integrated 509(a)(3) Supporting Organizations

1 Check here if the organization satisfied the Integral Part Test as a qualifying trust on Nov. 20, 1970 (*explain in Part VI*). **See instructions.**
 All other Type III non-functionally integrated supporting organizations must complete Sections A through E.

Section A - Adjusted Net Income		(A) Prior Year	(B) Current Year (optional)
1	Net short-term capital gain	1	
2	Recoveries of prior-year distributions	2	
3	Other gross income (see instructions)	3	
4	Add lines 1 through 3.	4	
5	Depreciation and depletion	5	
6	Portion of operating expenses paid or incurred for production or collection of gross income or for management, conservation, or maintenance of property held for production of income (see instructions)	6	
7	Other expenses (see instructions)	7	
8	Adjusted Net Income (subtract lines 5, 6, and 7 from line 4)	8	

Section B - Minimum Asset Amount		(A) Prior Year	(B) Current Year (optional)
1	Aggregate fair market value of all non-exempt-use assets (see instructions for short tax year or assets held for part of year):		
a	Average monthly value of securities	1a	
b	Average monthly cash balances	1b	
c	Fair market value of other non-exempt-use assets	1c	
d	Total (add lines 1a, 1b, and 1c)	1d	
e	Discount claimed for blockage or other factors (<i>explain in detail in Part VI</i>):		
2	Acquisition indebtedness applicable to non-exempt-use assets	2	
3	Subtract line 2 from line 1d.	3	
4	Cash deemed held for exempt use. Enter 0.015 of line 3 (for greater amount, see instructions).	4	
5	Net value of non-exempt-use assets (subtract line 4 from line 3)	5	
6	Multiply line 5 by 0.035.	6	
7	Recoveries of prior-year distributions	7	
8	Minimum Asset Amount (add line 7 to line 6)	8	

Section C - Distributable Amount			Current Year
1	Adjusted net income for prior year (from Section A, line 8, column A)	1	
2	Enter 0.85 of line 1.	2	
3	Minimum asset amount for prior year (from Section B, line 8, column A)	3	
4	Enter greater of line 2 or line 3.	4	
5	Income tax imposed in prior year	5	
6	Distributable Amount. Subtract line 5 from line 4, unless subject to emergency temporary reduction (see instructions).	6	
7	<input type="checkbox"/> Check here if the current year is the organization's first as a non-functionally integrated Type III supporting organization (see instructions).		

Part V Type III Non-Functionally Integrated 509(a)(3) Supporting Organizations (continued)

Section D - Distributions		Current Year
1	Amounts paid to supported organizations to accomplish exempt purposes	1
2	Amounts paid to perform activity that directly furthers exempt purposes of supported organizations, in excess of income from activity	2
3	Administrative expenses paid to accomplish exempt purposes of supported organizations	3
4	Amounts paid to acquire exempt-use assets	4
5	Qualified set-aside amounts (prior IRS approval required - <i>provide details in Part VI</i>)	5
6	Other distributions (<i>describe in Part VI</i>). See instructions.	6
7	Total annual distributions. Add lines 1 through 6.	7
8	Distributions to attentive supported organizations to which the organization is responsive (<i>provide details in Part VI</i>). See instructions.	8
9	Distributable amount for 2022 from Section C, line 6	9
10	Line 8 amount divided by line 9 amount	10

Section E - Distribution Allocations (see instructions)	(i) Excess Distributions	(ii) Underdistributions Pre-2022	(iii) Distributable Amount for 2022
1 Distributable amount for 2022 from Section C, line 6			
2 Underdistributions, if any, for years prior to 2022 (reasonable cause required - <i>explain in Part VI</i>). See instructions.			
3 Excess distributions carryover, if any, to 2022			
a From 2017			
b From 2018			
c From 2019			
d From 2020			
e From 2021			
f Total of lines 3a through 3e			
g Applied to underdistributions of prior years			
h Applied to 2022 distributable amount			
i Carryover from 2017 not applied (see instructions)			
j Remainder. Subtract lines 3g, 3h, and 3i from line 3f.			
4 Distributions for 2022 from Section D, line 7: \$			
a Applied to underdistributions of prior years			
b Applied to 2022 distributable amount			
c Remainder. Subtract lines 4a and 4b from line 4.			
5 Remaining underdistributions for years prior to 2022, if any. Subtract lines 3g and 4a from line 2. For result greater than zero, <i>explain in Part VI</i> . See instructions.			
6 Remaining underdistributions for 2022. Subtract lines 3h and 4b from line 1. For result greater than zero, <i>explain in Part VI</i> . See instructions.			
7 Excess distributions carryover to 2023. Add lines 3j and 4c.			
8 Breakdown of line 7:			
a Excess from 2018			
b Excess from 2019			
c Excess from 2020			
d Excess from 2021			
e Excess from 2022			

Schedule A (Form 990) 2022

Part VI

Supplemental Information. Provide the explanations required by Part II, line 10; Part II, line 17a or 17b; Part III, line 12; Part IV, Section A, lines 1, 2, 3b, 3c, 4b, 4c, 5a, 6, 9a, 9b, 9c, 11a, 11b, and 11c; Part IV, Section B, lines 1 and 2; Part IV, Section C, line 1; Part IV, Section D, lines 2 and 3; Part IV, Section E, lines 1c, 2a, 2b, 3a, and 3b; Part V, line 1; Part V, Section B, line 1e; Part V, Section D, lines 5, 6, and 8; and Part V, Section E, lines 2, 5, and 6. Also complete this part for any additional information. (See instructions.)

Horizontal lines for supplemental information input.

Schedule B
(Form 990)

Department of the Treasury
Internal Revenue Service

Schedule of Contributors

Attach to Form 990 or Form 990-PF.
Go to www.irs.gov/Form990 for the latest information.

OMB No. 1545-0047

2022

Name of the organization

CIRCULAR ACTION ALLIANCE

Employer identification number

92-3197259

Organization type (check one):

Filers of:

Section:

Form 990 or 990-EZ

501(c)(3) (enter number) organization

4947(a)(1) nonexempt charitable trust **not** treated as a private foundation

527 political organization

Form 990-PF

501(c)(3) exempt private foundation

4947(a)(1) nonexempt charitable trust treated as a private foundation

501(c)(3) taxable private foundation

Check if your organization is covered by the **General Rule** or a **Special Rule**.

Note: Only a section 501(c)(7), (8), or (10) organization can check boxes for both the General Rule and a Special Rule. See instructions.

General Rule

For an organization filing Form 990, 990-EZ, or 990-PF that received, during the year, contributions totaling \$5,000 or more (in money or property) from any one contributor. Complete Parts I and II. See instructions for determining a contributor's total contributions.

Special Rules

For an organization described in section 501(c)(3) filing Form 990 or 990-EZ that met the 33 1/3% support test of the regulations under sections 509(a)(1) and 170(b)(1)(A)(vi), that checked Schedule A (Form 990), Part II, line 13, 16a, or 16b, and that received from any one contributor, during the year, total contributions of the greater of **(1)** \$5,000; or **(2)** 2% of the amount on (i) Form 990, Part VIII, line 1h; or (ii) Form 990-EZ, line 1. Complete Parts I and II.

For an organization described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one contributor, during the year, total contributions of more than \$1,000 exclusively for religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals. Complete Parts I (entering "N/A" in column (b) instead of the contributor name and address), II, and III.

For an organization described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one contributor, during the year, contributions *exclusively* for religious, charitable, etc., purposes, but no such contributions totaled more than \$1,000. If this box is checked, enter here the total contributions that were received during the year for an *exclusively* religious, charitable, etc., purpose. Don't complete any of the parts unless the **General Rule** applies to this organization because it received *nonexclusively* religious, charitable, etc., contributions totaling \$5,000 or more during the year \$ _____

Caution: An organization that isn't covered by the General Rule and/or the Special Rules doesn't file Schedule B (Form 990), but it **must** answer "No" on Part IV, line 2, of its Form 990; or check the box on line H of its Form 990-EZ or on its Form 990-PF, Part I, line 2, to certify that it doesn't meet the filing requirements of Schedule B (Form 990).

Name of organization CIRCULAR ACTION ALLIANCE	Employer identification number 92-3197259
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Part I Contributors (see instructions). Use duplicate copies of Part I if additional space is needed.

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
1	KEURIG DR PEPPER 53 SOUTH AVENUE BURLINGTON, MA 01803	\$ 32,500.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
2	THE COCA-COLA COMPANY PO BOX 1734 ATLANTA, GA 30301	\$ 32,500.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
3	GENERAL MILLS 1 GENERAL MILLS BLVD GOLDEN VALLEY, MN 55426	\$ 32,500.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
4	TARGET ENTERPRISE 1000 NICOLLET MALL MINNEAPOLIS, MN 55401	\$ 32,500.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
	_____ _____ _____	\$ _____	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
	_____ _____ _____	\$ _____	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)

Name of organization CIRCULAR ACTION ALLIANCE	Employer identification number 92-3197259
---	---

Part II Noncash Property (see instructions). Use duplicate copies of Part II if additional space is needed.

(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
	_____	\$ _____	_____
	_____	\$ _____	_____
	_____	\$ _____	_____
	_____	\$ _____	_____
	_____	\$ _____	_____
	_____	\$ _____	_____
	_____	\$ _____	_____
	_____	\$ _____	_____

Name of organization CIRCULAR ACTION ALLIANCE	Employer identification number 92-3197259
---	---

Part III Exclusively religious, charitable, etc., contributions to organizations described in section 501(c)(7), (8), or (10) that total more than \$1,000 for the year from any one contributor. Complete columns (a) through (e) and the following line entry. For organizations completing Part III, enter the total of exclusively religious, charitable, etc., contributions of \$1,000 or less for the year. (Enter this info. once.) \$ _____
Use duplicate copies of Part III if additional space is needed.

(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is held
(e) Transfer of gift			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	
(e) Transfer of gift			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	
(e) Transfer of gift			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	
(e) Transfer of gift			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	
(e) Transfer of gift			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	

SCHEDULE D
(Form 990)

Department of the Treasury
Internal Revenue Service

Supplemental Financial Statements

Complete if the organization answered "Yes" on Form 990,
Part IV, line 6, 7, 8, 9, 10, 11a, 11b, 11c, 11d, 11e, 11f, 12a, or 12b.
Attach to Form 990.

Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047

2022

Open to Public
Inspection

Name of the organization **CIRCULAR ACTION ALLIANCE** Employer identification number **92-3197259**

Part I Organizations Maintaining Donor Advised Funds or Other Similar Funds or Accounts. Complete if the organization answered "Yes" on Form 990, Part IV, line 6.

	(a) Donor advised funds	(b) Funds and other accounts
1 Total number at end of year		
2 Aggregate value of contributions to (during year)		
3 Aggregate value of grants from (during year)		
4 Aggregate value at end of year		
5 Did the organization inform all donors and donor advisors in writing that the assets held in donor advised funds are the organization's property, subject to the organization's exclusive legal control?		<input type="checkbox"/> Yes <input type="checkbox"/> No
6 Did the organization inform all grantees, donors, and donor advisors in writing that grant funds can be used only for charitable purposes and not for the benefit of the donor or donor advisor, or for any other purpose conferring impermissible private benefit?		<input type="checkbox"/> Yes <input type="checkbox"/> No

Part II Conservation Easements. Complete if the organization answered "Yes" on Form 990, Part IV, line 7.

1 Purpose(s) of conservation easements held by the organization (check all that apply).
 Preservation of land for public use (for example, recreation or education) Preservation of a historically important land area
 Protection of natural habitat Preservation of a certified historic structure
 Preservation of open space

2 Complete lines 2a through 2d if the organization held a qualified conservation contribution in the form of a conservation easement on the last day of the tax year.

	Held at the End of the Tax Year
a Total number of conservation easements	2a
b Total acreage restricted by conservation easements	2b
c Number of conservation easements on a certified historic structure included in (a)	2c
d Number of conservation easements included in (c) acquired after July 25, 2006, and not on a historic structure listed in the National Register	2d

3 Number of conservation easements modified, transferred, released, extinguished, or terminated by the organization during the tax year _____

4 Number of states where property subject to conservation easement is located _____

5 Does the organization have a written policy regarding the periodic monitoring, inspection, handling of violations, and enforcement of the conservation easements it holds?

6 Staff and volunteer hours devoted to monitoring, inspecting, handling of violations, and enforcing conservation easements during the year _____

7 Amount of expenses incurred in monitoring, inspecting, handling of violations, and enforcing conservation easements during the year _____

8 Does each conservation easement reported on line 2(d) above satisfy the requirements of section 170(h)(4)(B)(i) and section 170(h)(4)(B)(ii)?

9 In Part XIII, describe how the organization reports conservation easements in its revenue and expense statement and balance sheet, and include, if applicable, the text of the footnote to the organization's financial statements that describes the organization's accounting for conservation easements.

Part III Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets.

Complete if the organization answered "Yes" on Form 990, Part IV, line 8.

1a If the organization elected, as permitted under FASB ASC 958, not to report in its revenue statement and balance sheet works of art, historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of public service, provide in Part XIII the text of the footnote to its financial statements that describes these items.

b If the organization elected, as permitted under FASB ASC 958, to report in its revenue statement and balance sheet works of art, historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of public service, provide the following amounts relating to these items:

(i) Revenue included on Form 990, Part VIII, line 1 \$ _____

(ii) Assets included in Form 990, Part X \$ _____

2 If the organization received or held works of art, historical treasures, or other similar assets for financial gain, provide the following amounts required to be reported under FASB ASC 958 relating to these items:

a Revenue included on Form 990, Part VIII, line 1 \$ _____

b Assets included in Form 990, Part X \$ _____

LHA For Paperwork Reduction Act Notice, see the Instructions for Form 990.

Schedule D (Form 990) 2022

Part III Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets (continued)

- 3 Using the organization's acquisition, accession, and other records, check any of the following that make significant use of its collection items (check all that apply):
- a Public exhibition
 - b Scholarly research
 - c Preservation for future generations
 - d Loan or exchange program
 - e Other _____
- 4 Provide a description of the organization's collections and explain how they further the organization's exempt purpose in Part XIII.
- 5 During the year, did the organization solicit or receive donations of art, historical treasures, or other similar assets to be sold to raise funds rather than to be maintained as part of the organization's collection? Yes No

Part IV Escrow and Custodial Arrangements. Complete if the organization answered "Yes" on Form 990, Part IV, line 9, or reported an amount on Form 990, Part X, line 21.

- 1a Is the organization an agent, trustee, custodian or other intermediary for contributions or other assets not included on Form 990, Part X? Yes No
- b If "Yes," explain the arrangement in Part XIII and complete the following table:
- | | Amount |
|---------------------------------|--------|
| c Beginning balance | 1c |
| d Additions during the year | 1d |
| e Distributions during the year | 1e |
| f Ending balance | 1f |
- 2a Did the organization include an amount on Form 990, Part X, line 21, for escrow or custodial account liability? Yes No
- b If "Yes," explain the arrangement in Part XIII. Check here if the explanation has been provided on Part XIII

Part V Endowment Funds. Complete if the organization answered "Yes" on Form 990, Part IV, line 10.

	(a) Current year	(b) Prior year	(c) Two years back	(d) Three years back	(e) Four years back
1a Beginning of year balance					
b Contributions					
c Net investment earnings, gains, and losses					
d Grants or scholarships					
e Other expenditures for facilities and programs					
f Administrative expenses					
g End of year balance					

- 2 Provide the estimated percentage of the current year end balance (line 1g, column (a)) held as:
- a Board designated or quasi-endowment _____%
 - b Permanent endowment _____%
 - c Term endowment _____%
- The percentages on lines 2a, 2b, and 2c should equal 100%.
- 3a Are there endowment funds not in the possession of the organization that are held and administered for the organization by:
- | | Yes | No |
|--|--------|----|
| (i) Unrelated organizations | 3a(i) | |
| (ii) Related organizations | 3a(ii) | |
| b If "Yes" on line 3a(ii), are the related organizations listed as required on Schedule R? | 3b | |
- 4 Describe in Part XIII the intended uses of the organization's endowment funds.

Part VI Land, Buildings, and Equipment.

Complete if the organization answered "Yes" on Form 990, Part IV, line 11a. See Form 990, Part X, line 10.

Description of property	(a) Cost or other basis (investment)	(b) Cost or other basis (other)	(c) Accumulated depreciation	(d) Book value
1a Land				
b Buildings				
c Leasehold improvements				
d Equipment				
e Other				

Total. Add lines 1a through 1e. (Column (d) must equal Form 990, Part X, column (B), line 10c.) 0.

Part VII Investments - Other Securities.

Complete if the organization answered "Yes" on Form 990, Part IV, line 11b. See Form 990, Part X, line 12.

(a) Description of security or category (including name of security)	(b) Book value	(c) Method of valuation: Cost or end-of-year market value
(1) Financial derivatives		
(2) Closely held equity interests		
(3) Other		
(A)		
(B)		
(C)		
(D)		
(E)		
(F)		
(G)		
(H)		
Total. (Col. (b) must equal Form 990, Part X, col. (B) line 12.)		

Part VIII Investments - Program Related.

Complete if the organization answered "Yes" on Form 990, Part IV, line 11c. See Form 990, Part X, line 13.

(a) Description of investment	(b) Book value	(c) Method of valuation: Cost or end-of-year market value
(1)		
(2)		
(3)		
(4)		
(5)		
(6)		
(7)		
(8)		
(9)		
Total. (Col. (b) must equal Form 990, Part X, col. (B) line 13.)		

Part IX Other Assets.

Complete if the organization answered "Yes" on Form 990, Part IV, line 11d. See Form 990, Part X, line 15.

(a) Description	(b) Book value
(1)	
(2)	
(3)	
(4)	
(5)	
(6)	
(7)	
(8)	
(9)	
Total. (Column (b) must equal Form 990, Part X, col. (B) line 15.)	

Part X Other Liabilities.

Complete if the organization answered "Yes" on Form 990, Part IV, line 11e or 11f. See Form 990, Part X, line 25.

1. (a) Description of liability	(b) Book value
(1) Federal income taxes	
(2)	
(3)	
(4)	
(5)	
(6)	
(7)	
(8)	
(9)	
Total. (Column (b) must equal Form 990, Part X, col. (B) line 25.)	

2. Liability for uncertain tax positions. In Part XIII, provide the text of the footnote to the organization's financial statements that reports the organization's liability for uncertain tax positions under FASB ASC 740. Check here if the text of the footnote has been provided in Part XIII ...

Part XI Reconciliation of Revenue per Audited Financial Statements With Revenue per Return.

Complete if the organization answered "Yes" on Form 990, Part IV, line 12a.

1	Total revenue, gains, and other support per audited financial statements		1	130,000.
2	Amounts included on line 1 but not on Form 990, Part VIII, line 12:			
a	Net unrealized gains (losses) on investments	2a		
b	Donated services and use of facilities	2b		
c	Recoveries of prior year grants	2c		
d	Other (Describe in Part XIII.)	2d		
e	Add lines 2a through 2d	2e		0.
3	Subtract line 2e from line 1		3	130,000.
4	Amounts included on Form 990, Part VIII, line 12, but not on line 1:			
a	Investment expenses not included on Form 990, Part VIII, line 7b	4a		
b	Other (Describe in Part XIII.)	4b		
c	Add lines 4a and 4b	4c		0.
5	Total revenue. Add lines 3 and 4c. (This must equal Form 990, Part I, line 12.)		5	130,000.

Part XII Reconciliation of Expenses per Audited Financial Statements With Expenses per Return.

Complete if the organization answered "Yes" on Form 990, Part IV, line 12a.

1	Total expenses and losses per audited financial statements		1	562,296.
2	Amounts included on line 1 but not on Form 990, Part IX, line 25:			
a	Donated services and use of facilities	2a		
b	Prior year adjustments	2b		
c	Other losses	2c		
d	Other (Describe in Part XIII.)	2d		
e	Add lines 2a through 2d	2e		0.
3	Subtract line 2e from line 1		3	562,296.
4	Amounts included on Form 990, Part IX, line 25, but not on line 1:			
a	Investment expenses not included on Form 990, Part VIII, line 7b	4a		
b	Other (Describe in Part XIII.)	4b		
c	Add lines 4a and 4b	4c		0.
5	Total expenses. Add lines 3 and 4c. (This must equal Form 990, Part I, line 18.)		5	562,296.

Part XIII Supplemental Information.

Provide the descriptions required for Part II, lines 3, 5, and 9; Part III, lines 1a and 4; Part IV, lines 1b and 2b; Part V, line 4; Part X, line 2; Part XI, lines 2d and 4b; and Part XII, lines 2d and 4b. Also complete this part to provide any additional information.

PART X, LINE 2:

CIRCULAR ACTION ALLIANCE IS EXEMPT FROM THE PAYMENT OF INCOME TAXES ON ITS EXEMPT ACTIVITIES UNDER THE PROVISIONS OF SECTION 501(C)(3) OF THE INTERNAL REVENUE CODE. UNDER THESE PROVISIONS, NO TAX IS IMPOSED ON ANY INCOME RELATED TO THE ORGANIZATION'S TAX-EXEMPT PURPOSE. THE ORGANIZATION HAS DETERMINED THAT IT DOES NOT HAVE ANY MATERIAL UNRECOGNIZED TAX BENEFITS OR OBLIGATIONS AS OF DECEMBER 31, 2022. THE ORGANIZATION IS SUBJECT TO ROUTINE AUDITS BY TAXING JURISDICTIONS; HOWEVER, THERE ARE CURRENTLY NO AUDITS FOR ANY TAX PERIODS IN PROGRESS. THE ORGANIZATION'S FEDERAL AND STATE INCOME TAX RETURNS ARE SUBJECT TO EXAMINATION BY THE INTERNAL REVENUE SERVICE AND STATE TAX AUTHORITIES, GENERALLY FOR A PERIOD OF THREE YEARS AFTER THE RETURNS ARE FILED.

SCHEDULE L
(Form 990)

Transactions With Interested Persons

OMB No. 1545-0047

Complete if the organization answered "Yes" on Form 990, Part IV, line 25a, 25b, 26, 27, 28a, 28b, or 28c, or Form 990-EZ, Part V, line 38a or 40b.

2022

Attach to Form 990 or Form 990-EZ.

Open To Public Inspection

Go to www.irs.gov/Form990 for instructions and the latest information.

Department of the Treasury
Internal Revenue Service

Name of the organization **CIRCULAR ACTION ALLIANCE** Employer identification number **92-3197259**

Part I Excess Benefit Transactions (section 501(c)(3), section 501(c)(4), and section 501(c)(29) organizations only).

Complete if the organization answered "Yes" on Form 990, Part IV, line 25a or 25b, or Form 990-EZ, Part V, line 40b.

1	(a) Name of disqualified person	(b) Relationship between disqualified person and organization	(c) Description of transaction	(d) Corrected?	
				Yes	No

- 2 Enter the amount of tax incurred by the organization managers or disqualified persons during the year under section 4958 \$ _____
- 3 Enter the amount of tax, if any, on line 2, above, reimbursed by the organization \$ _____

Part II Loans to and/or From Interested Persons.

Complete if the organization answered "Yes" on Form 990-EZ, Part V, line 38a or Form 990, Part IV, line 26; or if the organization reported an amount on Form 990, Part X, line 5, 6, or 22.

(a) Name of interested person	(b) Relationship with organization	(c) Purpose of loan	(d) Loan to or from the organization?		(e) Original principal amount	(f) Balance due	(g) In default?		(h) Approved by board or committee?		(i) Written agreement?	
			To	From			Yes	No	Yes	No	Yes	No
THE COCA-COLA C	MEMBER	INITIAL	X		500,000.	500,000.		X	X		X	
NIAGARA BOTTLIN	MEMBER	INITIAL	X		250,000.	250,000.		X	X		X	
Total						\$ 750,000.						

Part III Grants or Assistance Benefiting Interested Persons.

Complete if the organization answered "Yes" on Form 990, Part IV, line 27.

(a) Name of interested person	(b) Relationship between interested person and the organization	(c) Amount of assistance	(d) Type of assistance	(e) Purpose of assistance

SEE PART V FOR CONTINUATIONS

Part IV Business Transactions Involving Interested Persons.

Complete if the organization answered "Yes" on Form 990, Part IV, line 28a, 28b, or 28c.

(a) Name of interested person	(b) Relationship between interested person and the organization	(c) Amount of transaction	(d) Description of transaction	(e) Sharing of organization's revenues?	
				Yes	No

Part V Supplemental Information.

Provide additional information for responses to questions on Schedule L (see instructions).

SCHEDULE L, PART II, LOANS TO AND FROM INTERESTED PERSONS:

(A) NAME OF PERSON: THE COCA-COLA COMPANY

(C) PURPOSE OF LOAN: INITIAL STARTUP COST ASSISTANCE

(A) NAME OF PERSON: NIAGARA BOTTLING

(C) PURPOSE OF LOAN: INITIAL STARTUP COST ASSISTANCE

**SCHEDULE O
(Form 990)**

Department of the Treasury
Internal Revenue Service

Supplemental Information to Form 990 or 990-EZ

Complete to provide information for responses to specific questions on
Form 990 or 990-EZ or to provide any additional information.
Attach to Form 990 or Form 990-EZ.
Go to www.irs.gov/Form990 for the latest information.

OMB No. 1545-0047

2022

Open to Public
Inspection

Name of the organization

CIRCULAR ACTION ALLIANCE

Employer identification number

92-3197259

FORM 990, PART VI, SECTION A, LINE 6:

THE ORGANIZATION HAS ONE CLASS OF MEMBERS, THE FOUNDING MEMBERS. FOUNDING MEMBERS ARE THOSE COMPANIES WHO HAVE BEEN APPROVED BY THE BOARD TO BE A FOUNDING MEMBER, AGREED TO SUPPORT THE PURPOSES OF THE ORGANIZATION, AND ENTERED INTO A MEMBERSHIP AGREEMENT.

FORM 990, PART VI, SECTION A, LINE 7A:

FOUNDING MEMBERS ARE ELIGIBLE TO APPONT ONE DIRECTOR TO SERVE ON THE BOARD.

FORM 990, PART VI, SECTION B, LINE 11B:

THE FORM 990 IS PREPARED BY AN INDEPENDENT ACCOUNTING FIRM, AND REVIEWED BY THE ENTIRE BOARD BEFORE FILING WITH THE IRS.

FORM 990, PART VI, SECTION B, LINE 12C:

THE ORGANIZATION HAS ADOPTED A CONFLICT OF INTEREST POLICY THAT IS REVIEWED BY THE BOARD AT LEAST ANNUALLY.

FORM 990, PART VI, SECTION B, LINE 15:

IN REVIEWING AND APPROVING THE COMPENSATION OF ANY COVERED INDIVIDUALS, THE CORPORATION'S BOARD

OF DIRECTORS, OR A DELEGATED COMMITTEE OF THE BOARD (REFERRED TO AS THE "APPROVAL BODY" BELOW),

WILL UTILIZE THE FOLLOWING PROCESS:

1. IMPARTIAL DECISION MAKERS. THE COMPENSATION ARRANGEMENT MUST BE APPROVED IN

ADVANCE (BEFORE ANY PAYMENT IS MADE) BY THE APPROVAL BODY OF THE

LHA For Paperwork Reduction Act Notice, see the Instructions for Form 990 or 990-EZ.

Schedule O (Form 990) 2022

Name of the organization

CIRCULAR ACTION ALLIANCE

Employer identification number

92-3197259

CORPORATION

COMPOSED ENTIRELY OF INDIVIDUALS WHO DO NOT HAVE A CONFLICT OF INTEREST

WITH RESPECT TO

THE COMPENSATION ARRANGEMENT (EXAMPLE: NEITHER THE EXECUTIVE WHOSE

COMPENSATION IS

BEING DETERMINED NOR ANY OF HIS/HER FAMILY MEMBERS MAY BE PRESENT DURING

THE

DISCUSSION/DEBATE OR PARTICIPATE IN THE VOTE).

2. COMPARABILITY DATA. WHEN THE APPROVAL BODY IS CONSIDERING COMPENSATION

TO

COVERED INDIVIDUALS, IT MUST RELY ON COMPARABILITY DATA THAT DEMONSTRATE

THE FAIR MARKET

VALUE OF THE COMPENSATION IN QUESTION. FOR EXAMPLE, WHEN CRAFTING

COMPENSATION

PACKAGES, THE APPROVAL BODY MUST SECURE DATA THAT DOCUMENTS COMPENSATION

LEVELS FOR

SIMILARLY QUALIFIED INDIVIDUALS IN LIKE POSITIONS AT LIKE ORGANIZATIONS.

THIS DATA MAY

INCLUDE THE FOLLOWING:

A) EXPERT COMPENSATION STUDIES BY INDEPENDENT FIRMS;

B) WRITTEN JOB OFFERS FOR POSITIONS AT SIMILAR ORGANIZATIONS;

C) DOCUMENTED TELEPHONE CALLS ABOUT SIMILAR POSITIONS AT BOTH NONPROFIT AND

FOR-PROFIT

ORGANIZATIONS; AND

D) INFORMATION OBTAINED FROM THE IRS FORM 990 FILINGS OF SIMILAR

ORGANIZATIONS.

3. CONCURRENT DOCUMENTATION. THE APPROVAL BODY MUST DOCUMENT HOW IT REACHED

ITS

Name of the organization CIRCULAR ACTION ALLIANCE	Employer identification number 92-3197259
--	--

DECISIONS, INCLUDING THE DATA ON WHICH IT RELIED. TO QUALIFY AS CONCURRENT DOCUMENTATION, WRITTEN OR ELECTRONIC RECORDS OF THE APPROVAL BODY (SUCH AS MEETING

MINUTES) MUST NOTE:

- A) THE TERMS OF THE COMPENSATION AND THE DATE IT WAS APPROVED;
- B) THE MEMBERS OF THE APPROVAL BODY WHO WERE PRESENT DURING THE DEBATE ON THE COMPENSATION THAT WAS APPROVED AND THOSE WHO VOTED ON IT;
- C) THE COMPARABILITY DATA OBTAINED AND RELIED UPON AND HOW THE DATA WAS OBTAINED;
- AND
- D) ANY ACTIONS TAKEN WITH RESPECT TO CONSIDERATION OF THE COMPENSATION BY ANYONE WHO IS OTHERWISE A MEMBER OF THE APPROVAL BODY BUT WHO HAD A CONFLICT OF INTEREST WITH RESPECT TO THE DECISION ON THE COMPENSATION.

FORM 990, PART VI, SECTION C, LINE 19:
THE ORGANIZATIONS GOVERNING DOCUMENTS, CONFLICT OF INTEREST POLICY, AND FINANCIAL STATEMENTS ARE MADE AVAILABLE UPON REQUEST.

FORM 990, PART IX, LINE 11G, OTHER FEES:
CONSULTING FEES:

PROGRAM SERVICE EXPENSES	0.
MANAGEMENT AND GENERAL EXPENSES	556,073.
FUNDRAISING EXPENSES	0.
TOTAL EXPENSES	556,073.
TOTAL OTHER FEES ON FORM 990, PART IX, LINE 11G, COL A	556,073.

Name of the organization CIRCULAR ACTION ALLIANCE	Employer identification number 92-3197259
--	--

FORM 990, PART XII, LINE 2C:

THE BOARD HAS OVERSIGHT OF THE AUDIT.

The following page contains a screen shot of an email FROM Jeffrey J Bezzo (jjbezzo@scj.com) TO Susan Towle, with CC to ron@clearstrategy.ca, hansted.il@pg.com, driesinger@niagrawater.com, glenn@vistalake.com.

Subject: FW: Completed: Completed with DocuSign: 990 eFile Authorization Forms

Sent on: Tuesday, November 14, 2023 10:29:27 AM

The forwarded email is from DocuSign dse_NA4@docusign.net, and was sent on Tuesday November 14, 2023 4:24 AM. It was forwarded to Jeffrey J Bezzo (JJBezzo@scj.com) with the subject (Completed: Complete with DocuSign: 990 eFile Authorization Forms).

The message from DocuSign is, "Your document has been completed: View Completed Document, David Sherdel (dsherdel@dembojones.com) All Parties have completed Complete with DocuSign: 990 eFile Authorization Forms

Summary of IRS form 8879-TE for CAA, 2022

The IRS does not provide an ADA accessible form 8879-TE, and the current 8879-TE form is locked, preventing any tagging or accessibility modifications. So in lieu of an accessible version of 8879-TE, the CAA team composed this summary.

Form 8879-TE is the IRS 2022 e-file Signature Authorization for a Tax Exempt Entity. Fields input by CAA in the header area include:

- Name of filer: Circular Action Alliance
- EIN: 9203197259
- Name and title of officer or person subject to tax: Jeff Bezzo, Treasurer

Part 1: Type of Return and Return Information:

- 1a Form 990 is Checked.
- 1B Total revenue = 130,000

Part 2: Declaration and Signature Authorization of Officer or Person Subject to Tax

- Under penalties of perjury, I declare that, X=Selected, I am an officer of the above entity and that I have examined a copy of the 2022 electronic return and accompanying schedules and statements, and, to the best of my knowledge and belief, they are true, correct, and complete. I further declare that the amount in Part I above is the amount shown on the copy of the electronic return. I consent to allow my intermediate service provider, transmitter, or electronic return originator (ERO) to send the return to the IRS and to receive from the IRS (a) an acknowledgement of receipt or reason for rejection of the transmission, (b) the reason for any delay in processing the return or refund, and (c) the date of any refund. If applicable, I authorize the U.S. Treasury and its designated Financial Agent to initiate an electronic funds withdrawal (direct debit) entry to the financial institution account indicated in the tax preparation software for payment of the federal taxes owed on this return, and the financial institution to debit the entry to this account. To revoke a payment, I must contact the U.S. Treasury Financial Agent at 1-888-353-4537 no later than 2 business days prior to the payment (settlement) date. I also authorize the financial institutions involved in the processing of the electronic payment of taxes to receive confidential information necessary to answer inquiries and resolve issues related to the payment. I have selected a personal identification number (PIN) as my signature for the electronic return and, if applicable, the consent to electronic funds withdrawal.
- PIN: Check only one box. X=Selected, I authorize Dembo Jones, P.C. (ERO firm name) to enter my PIN 20171
- Signature of officer or person subject to tax: Ink signature of Jeffrey Bezzo, date 11/14/2023

Part 3: Certification and Authentication:

- ERO's EFIN/PIN = 52693517100
- ERO's Signature = Dembo Jones, P.C. (typed), date 11/13/2023

Bottom Margin contains the following eSignature notation:

- 14511113 758104 201710.001 2022.05000 CIRCULAR ACTION ALLIANCE 201710.1

Form **8879-TE**

IRS e-file Signature Authorization for a Tax Exempt Entity

OMB No. 1545-0047

For calendar year 2022, or fiscal year beginning _____, 2022, and ending _____, 20____

2022

Department of the Treasury
Internal Revenue Service

Do not send to the IRS. Keep for your records.
Go to www.irs.gov/Form8879TE for the latest information.

Name of filer

CIRCULAR ACTION ALLIANCE

EIN or SSN

92-3197259

Name and title of officer or person subject to tax **JEFF BEZZO**
TREASURER

Part I Type of Return and Return Information

Check the box for the return for which you are using this Form 8879-TE and enter the applicable amount, if any, from the return. Form 8038-CP and Form 5330 filers may enter dollars and cents. For all other forms, enter whole dollars only. If you check the box on line 1a, 2a, 3a, 4a, 5a, 6a, 7a, 8a, 9a, or 10a below, and the amount on that line for the return being filed with this form was blank, then leave line 1b, 2b, 3b, 4b, 5b, 6b, 7b, 8b, 9b, or 10b, whichever is applicable, blank (do not enter -0-). But, if you entered -0- on the return, then enter -0- on the applicable line below. Do not complete more than one line in Part I.

1a Form 990 check here <input checked="" type="checkbox"/>	b Total revenue, if any (Form 990, Part VIII, column (A), line 12)	1b <u>130,000.</u>
2a Form 990-EZ check here <input type="checkbox"/>	b Total revenue, if any (Form 990-EZ, line 9)	2b _____
3a Form 1120-POL check here <input type="checkbox"/>	b Total tax (Form 1120-POL, line 22)	3b _____
4a Form 990-PF check here <input type="checkbox"/>	b Tax based on investment income (Form 990-PF, Part V, line 5)	4b _____
5a Form 8868 check here <input type="checkbox"/>	b Balance due (Form 8868, line 3c)	5b _____
6a Form 990-T check here <input type="checkbox"/>	b Total tax (Form 990-T, Part III, line 4)	6b _____
7a Form 4720 check here <input type="checkbox"/>	b Total tax (Form 4720, Part III, line 1)	7b _____
8a Form 5227 check here <input type="checkbox"/>	b FMV of assets at end of tax year (Form 5227, Item D)	8b _____
9a Form 5330 check here <input type="checkbox"/>	b Tax due (Form 5330, Part II, line 19)	9b _____
10a Form 8038-CP check here <input type="checkbox"/>	b Amount of credit payment requested (Form 8038-CP, Part III, line 22)	10b _____

Part II Declaration and Signature Authorization of Officer or Person Subject to Tax

Under penalties of perjury, I declare that I am an officer of the above entity or I am a person subject to tax with respect to (name of entity) _____, (EIN) _____ and that I have examined a copy of the 2022 electronic return and accompanying schedules and statements, and, to the best of my knowledge and belief, they are true, correct, and complete. I further declare that the amount in Part I above is the amount shown on the copy of the electronic return. I consent to allow my intermediate service provider, transmitter, or electronic return originator (ERO) to send the return to the IRS and to receive from the IRS (a) an acknowledgement of receipt or reason for rejection of the transmission, (b) the reason for any delay in processing the return or refund, and (c) the date of any refund. If applicable, I authorize the U.S. Treasury and its designated Financial Agent to initiate an electronic funds withdrawal (direct debit) entry to the financial institution account indicated in the tax preparation software for payment of the federal taxes owed on this return, and the financial institution to debit the entry to this account. To revoke a payment, I must contact the U.S. Treasury Financial Agent at 1-888-353-4537 no later than 2 business days prior to the payment (settlement) date. I also authorize the financial institutions involved in the processing of the electronic payment of taxes to receive confidential information necessary to answer inquiries and resolve issues related to the payment. I have selected a personal identification number (PIN) as my signature for the electronic return and, if applicable, the consent to electronic funds withdrawal.

PIN: check one box only

I authorize **DEMBO JONES, P.C.** to enter my PIN **20171**
ERO firm name Enter five numbers, but do not enter all zeros

as my signature on the tax year 2022 electronically filed return. If I have indicated within this return that a copy of the return is being filed with a state agency(ies) regulating charities as part of the IRS Fed/State program, I also authorize the aforementioned ERO to enter my PIN on the return's disclosure consent screen.

As an officer or person subject to tax with respect to the entity, I will enter my PIN as my signature on the tax year 2022 electronically filed return. If I have indicated within this return that a copy of the return is being filed with a state agency(ies) regulating charities as part of the IRS Fed/State program, I will enter my PIN on the return's disclosure consent screen.

Signature of officer or person subject to tax

Jeffery J. Bezzo

Date

11/14/2023

Part III Certification and Authentication

ERO's EFIN/PIN. Enter your six-digit electronic filing identification number (EFIN) followed by your five-digit self-selected PIN.

52693517100

Do not enter all zeros

I certify that the above numeric entry is my PIN, which is my signature on the 2022 electronically filed return indicated above. I confirm that I am submitting this return in accordance with the requirements of Pub. 4163, Modernized e-File (MeF) Information for Authorized IRS e-file Providers for Business Returns.

ERO's signature **DEMBO JONES, P.C.**

Date

11/13/2023

ERO Must Retain This Form - See Instructions

Do Not Submit This Form to the IRS Unless Requested To Do So

LHA For Privacy Act and Paperwork Reduction Act Notice, see instructions.

Form **8879-TE** (2022)

Summary of IRS Form 990 for CAA, 2022

This IRS form 990 and supporting Schedules do not meet ADA accessibility requirements, since the IRS does not provide accessible versions for all Form 990 schedules. Therefore, the following is a text-only summary of IRS form 990 including schedules A, B, D, L, and O.

IRS Form 990, page 1

Section A: Form 990 Return of Organization Exempt from Income Tax, 2022

Section B: Initial Return Box = CHECKED

Section C: Name of Organization = CIRCULAR ACTION ALLIANCE, 20 F STREET, NW, 7TH FLOOR, WASHINGTON, DC 20001

- D. EIN: 92-3197259
- E. Telephone Number: 262-497-7712
- F. Name and Address of principal officer: Jeff Bezzo, Address = Same as above
- G. Gross Receipts: \$130,000.
- H(a): Is this a group return for subordinates? NO=Checked
- I. Tax-exempt status: 501(c)(3) = CHECKED
- J. Website: CIRCULARACTION.ORG
- K. Form of Organization: Corporation = Checked
- L. Year of formation = 2022
- M. State of legal domicile = DC

Part 1: Summary

Activities and Governance:

- 1: Briefly describe the organization's mission or most significant activities: Answer= WORKING TOGETHER TO CREATE A CIRCULAR EXONOMY FOR PAPER & PACKAGING
- 3: Number of voting members of the governing body = 7
- 4: Number of independent voting members of the governing body = 7
- 5: Total number of individuals employed in calendar year 2022 = 0
- 6: Total number of volunteers (estimate if necessary) = 7

Revenue:

- 8: Contributions and grants = \$130,000.
- 12: Total revenue = \$130,000.

Expenses:

- 17: Other expenses = \$562,296.
- 18: Total expenses = \$562,296.
- 19: Revenue less expenses = -\$432,296.

Net Assets or Fund Balances:

- 20: Total assets = \$750,000.
- 21: Total liabilities = \$1,182,296.
- 22: Net assets or fund balances = -\$432,296.

Part 2: Signature Block

Signature of officer = Jeff Bezzo, Treasurer (typed)

Paid Preparer Use Only = David J Sherdel, CPA; PTIN = P01306021; Firm's Name = Dembo Jones, P.C., 6116 EXECUTIVE BLVD., SUITE 500, NORTH BETHESDA, MD 20852, Phone = 301-770-5100

May the IRS discuss this return with the preparer shown above? Yes=CHECKED

IRS Form 990, page 2, CIRCULAR ACTION ALLIANCE 92-3197259

1. Briefly describe the organization's mission: CAA'S VISION IS TO BE AN APPROVED PRO IN ALL STATES THAT HAVE ENACTED EPR LAWS FOR PAPER AND PACKAGING TO DELIVER HARMONIZED BEST-IN-CLASS COMPLIANCE SERVICES,

Summary of IRS Form 990 for CAA, 2022

SCALE INNOVATION, AND BUILD SYSTEMS THAT HELP BOTH COMPANIES AND CONSUMERS WASTE LESS AND RECYCLE MORE.

2. Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ? NO=Checked
3. Did the organization cease conducting, or make significant changes in how it conducts, any program services? NO=Checked
4. Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses. Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported.
- 4a. Response: THE ORGANIZATION OPERATES ON BEHALF OF STATE GOVERNMENTS COMMUNITY LEVEL, POST-CONSUMER PAPER, PACKAGING, AND FOOD SERVICE WARE ITEMS STEWARDSHIP PROGRAMS WHERE AUTHORIZED OR MANDATED BY LOCAL AND STATE LEGISLATION. THE PROGRAMS CONDUCT PUBLIC OUTREACH AND PROVIDE EDUCATION TO BUSINESSES, CONSUMERS, THE PUBLIC, AND OTHER RELEVANT STAKEHOLDERS ON REDUCING WASTE, HOW TO RECYCLE, AND HOW TO INCREASE THE RECYCLING OF PACKAGING MATERIALS. THE ORGANIZATION WILL ALSO ENGAGE SERVICE PROVIDERS TO FACILITATE THE COLLECTION, TRANSPORTATION, AND RECYCLING OF POST-CONSUMER PAPER, PACKAGING, AND PACKAGING-LIKE ITEMS FOR THE PURPOSE OF MINIMIZING THE ENVIRONMENTAL IMPACT OF SUCH ITEMS.

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IRS Form 990, page 3

Part IV Checklist of Required Schedules. A total of four (4) items on this page received a response of YES

- **Item 1, Response = YES:** Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes," complete Schedule A
- **Item 2, Response = YES:** Is the organization required to complete Schedule B, Schedule of Contributors?
- **Item 11f, Response = YES:** Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? If "Yes," complete Schedule D, Part X
- **Item 12a, Response = YES:** Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," complete Schedule D, Parts XI and XII

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IRS Form 990, page 4

Part IV Checklist of Required Schedules, continued. A total of two (2) items on this page received a response of YES

- **Item 26, Response = YES:** Did the organization report any amount on Part X, line 5 or 22, for receivables from or payables to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons? If "Yes" complete schedule L, Part II
- **Item 39, Response = YES:** Did the organization complete Schedule O and provide explanations on Schedule O for Part VI, lines 11b and 19? Note: All Form 990 filers are required to complete Schedule O

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IRS Form 990, page 5

Part V Statements Regarding Other IRS Filings and Tax Compliance. All responses = NO, there are zero YES responses.

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Summary of IRS Form 990 for CAA, 2022

IRS Form 990, page 6

Part VI Governance, Management, and Disclosure. For each "Yes" response to lines 2 through 7b below, and for a "No" response to line 8a, 8b, or 10b below, describe the circumstances, processes, or changes on Schedule O. See instructions. **Check = YES:** Check if Schedule O contains a response or note to any line in this Part VI.

Section A. Governing Body and Management

- **Item 6, Response = YES:** Did the organization have members or stockholders?
- **Item 7a, Response = YES:** Did the organization have members, stockholders, or other persons who had the power to elect or appoint one or more members of the governing body?
- **Item 8a, Response = YES:** Did the organization contemporaneously document the meetings held or written actions undertaken during the year by the following: The governing body?
- **Item 8b, Response = YES:** Did the organization contemporaneously document the meetings held or written actions undertaken during the year by the following: Each committee with authority to act on behalf of the governing body?

Section B: Policies

- **Item 11a, Response = YES:** Has the organization provided a complete copy of this Form 990 to all members of its governing body before filing the form?
- **Item 12a, Response = YES:** Did the organization have a written conflict of interest policy?
- **Item 12b, Response = YES:** Were officers, directors, or trustees, and key employees required to disclose annually interests that could give rise to conflicts?
- **Item 12c, Response = YES:** Did the organization regularly and consistently monitor and enforce compliance with the policy? If "Yes," describe on Schedule O how this was done.
- **Item 13, Response = YES:** Did the organization have a written whistleblower policy?
- **Item 14, Response = YES:** Did the organization have a written document retention and destruction policy?
- **Item 15a, Response = YES:** Did the process for determining compensation of the following persons include a review and approval by independent persons, comparability data, and contemporaneous substantiation of the deliberation and decision? The organization's CEO, Executive Director, or top management official
- **Item 15b, Response = YES:** Did the process for determining compensation of the following persons include a review and approval by independent persons, comparability data, and contemporaneous substantiation of the deliberation and decision? Other officers or key employees of the organization. If "Yes" to line 15a or 15b, describe the process on Schedule O.

Section C: Disclosure

- **Item 17, Response = NONE:** List the states with which a copy of this Form 990 is required to be filed
- **Item 18, Response = UPON REQUEST:** Section 6104 requires an organization to make its Forms 1023 (1024 or 1024-A, if applicable), 990, and 990-T (section 501(c)(3)s only) available for public inspection. Indicate how you made these available.
- **Item 20:** State the name, address, and telephone number of the person who possesses the organization's books and records. THE ORGANIZATION - 262-497-7712, 20 F STREET, NW, 7TH FLOOR, WASHINGTON, DC 20001.

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IRS Form 990, page 7

Part VII Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors

Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees

- **Item 1a = CHECKED:** Check this box if neither the organization nor any related organization compensated any current officer, director, or trustee.

Summary of IRS Form 990 for CAA, 2022

Name and Title	Average Hours per week	Position	Reportable Compensation from the Organization	Reportable compensation from related organizations	Estimated amount of other compensation from the organization and related organizations
(1) CHARLIE SCHWARZE, Chair	2	Individual Trustee or Director = YES Officer = YES	0	0	0
(2) STEPHANIE POTTER, Director	1	Individual Trustee or Director = YES	0	0	0
(3) KIRSTEN WITT, Director	1	Individual Trustee or Director = YES	0	0	0
(4) ANKE BOYKIN, Director	1	Individual Trustee or Director = YES	0	0	0
(5) JOHN BREEDLOVE, Secretary	2	Individual Trustee or Director = YES Officer = YES	0	0	0
(6) RACHEL GOLDSTEIN, Director	1	Individual Trustee or Director = YES	0	0	0
(7) NEIL MENEZESN Vice Chair	2	Individual Trustee or Director = YES Officer = YES			

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IRS Form 990, page 8

Part VII Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors (continued)

- **Item 2, Response = 0:** Total number of individuals (including but not limited to those listed above) who received more than \$100,000 of reportable compensation from the organization
- **Item 3, Response = NO:** Did the organization list any former officer, director, trustee, key employee, or highest compensated employee on line 1a?
- **Item 4, Response = NO:** For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000?
- **Item 5, Response = NO:** Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization?

Summary of IRS Form 990 for CAA, 2022

Section B. Independent Contractors

- **Item 1:** Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization. Report compensation for the calendar year ending with or within the organization's tax year.

Name and Business Address	Description of Services	Compensation
CLEAR STRATEGY INC, 189 GLEN CEDAR ROAD, TORONTO, ON, CANADA M6C-3G9		\$555,598.

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IRS Form 990, page 9

Part VIII Statement of Revenue

- **Item 1f = 130,000:** Contributions, Gifts, Grants: All other contributions, gifts, grants, and similar amounts not included above, Total Revenue
- **Item 1h = 130,000:** Contributions, Gifts, Grants: Total Revenue
- **Item 12 = 130,000:** Total Revenue

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IRS Form 990, page 10

Part IX Statement of Functional Expenses

- Item 11b, Fees for services (non-employees): Legal: \$6,223. = (A) Total Expenses; \$6,223 = (C) Management and general expenses
- Item 11g, Fees for services (non-employees): Other: \$556,073 = (A) Total Expenses; \$556,073 = (C) Management and general expenses
- Item 25, Total Functional Expenses: \$562,296 = (A) Total Expenses; \$562,296 = (C) Management and general expenses

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IRS Form 990, page 11

Part X Balance Sheet

Assets

- **Item 3 = \$750,000:** Pledges and grants receivable, net (end of year)
- **Item 16 = \$0:** Total Assets (beginning of year)
- **Item 16 = \$750,000:** Total Assets (end of year)

Liabilities

- **Item 17 = \$432,296:** Accounts payable and accrued expenses (end of year)
- **Item 22 = \$750,000:** Loans and other payables to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons (end of year)
- **Item 26 = \$0.:** Total liabilities (beginning of year)
- **Item 26 = \$1,182,296.:** Total liabilities (end of year)

Summary of IRS Form 990 for CAA, 2022

Net Assets or Fund Balances

- **Item 27 = -\$432,296:** Net assets without donor restrictions (end of year)
- **Item 32 = \$0.:** Total net assets or fund balances (beginning of year)
- **Item 32 = -\$432,296:** Total net assets or fund balances (end of year)
- **Item 33 = \$0.:** Total liabilities and net assets/fund balances (beginning of year)
- **Item 33 = \$750,000:** Total liabilities and net assets/fund balances (end of year)

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IRS Form 990, page 12

Part XI Reconciliation of Net Assets

- **Item 1 = \$130,000:** Total revenue (must equal Part VIII, column (A), line 12)
- **Item 2 = \$562,296:** Total expenses (must equal Part IX, column (A), line 25)
- **Item 3 = -\$432,296:** Revenue less expenses. Subtract line 2 from line 1
- **Item 4 = \$0:** Net assets or fund balances at beginning of year (must equal Part X, line 32, column (A))
- **Item 9 = \$0:** Other changes in net assets or fund balances (explain on Schedule O)
- **Item 10 = -\$432,296:** Net assets or fund balances at end of year. Combine lines 3 through 9 (must equal Part X, line 32, column (B))

Part XII Financial Statements and Reporting

- **CHECK = YES:** Check if Schedule O contains a response or note to any line in this Part XII
- **Item 1 = Accrual (checked):** Accounting Method used to prepare the Form 990
- **Item 2a = NO:** Were the organization's financial statements compiled or reviewed by an independent accountant?
- **Item 2b = YES:** Were the organization's financial statements audited by an independent accountant?
- **Item 2b = Separate basis is checked:** If "Yes," check a box below to indicate whether the financial statements for the year were audited on a separate basis, consolidated basis, or both:
- **Item 2c = YES:** If "Yes" to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the audit, review, or compilation of its financial statements and selection of an independent accountant?
- **Item 3a = NO:** As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Uniform Guidance, 2 C.F.R. Part 200, Subpart F?
- Bottom Scan line: 14511113 758104 201710.001 2022.05000 CIRCULAR ACTION ALLIANCE 201710.1

IRS Schedule A Form 990 – Public Charity Status and Public Support, page 1

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

Part I Reason for Public Charity Status

- **Item 10 = CHECKED:** An organization that normally receives (1) more than 33 1/3% of its support from contributions, membership fees, and gross receipts from activities related to its exempt functions, subject to certain exceptions; and (2) no more than 33 1/3% of its support from gross investment income and unrelated business taxable income (less section 511 tax) from businesses acquired by the organization after June 30, 1975.

IRS Schedule A Form 990 – Public Charity Status and Public Support, page 2

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

Part II Support Schedule for Organizations Described in Sections 170(b)(1)(A)(iv) and 170(b)(1)(A)(vi)

Summary of IRS Form 990 for CAA, 2022

- Section A. Public Support = blank
- Section B. Total Support = blank
- Section C. Computation of Public Support Percentage = blank

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IRS Schedule A Form 990 – Public Charity Status and Public Support, page 3

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

Part III: Support Schedule for Organizations Described in Section 509(a)(2)

Section A. Public Support

- **Item 1, column (e) 2022 = \$130,000:** Gifts, grants, contributions, and membership fees received.
- **Item 1, column (f) Total = \$130,000:** Gifts, grants, contributions, and membership fees received.
- **Item 6, column (e) 2022 = \$130,000:** Total.
- **Item 6, column (f) Total = \$130,000:** Total.
- **Item 7a, column (f) Total = \$0:** Amounts included on lines 1, 2, and 3 received from disqualified persons
- **Item 7b, column (f) Total = \$0:** Amounts included on lines 2 and 3 received from other than disqualified persons that exceed the greater of \$5,000 or 1% of the amount on line 13 for the year
- **Item 7c, column (f) Total = \$0:** Add lines 7a and 7b
- **Item 8, column (f) Total = \$130,000:** Public Support.

Section B. Total Support

- **Item 9, column (e) 2022 = \$130,000:** Amounts from line 6.
- **Item 9, column (f) Total = \$130,000:** Amounts from line 6.
- **Item 13, column (e) 2022 = \$130,000:** Total Support
- **Item 13, column (f) Total = \$130,000:** Total Support
- **Item 14, Box = CHECKED:** First 5 years. If the Form 990 is for the organization's first, second, third, fourth, or fifth tax year as a section 501(c)(3) organization, check this box and stop here.
- Bottom scan line: 14511113 758104 201710.001 2022.05000 CIRCULAR ACTION ALLIANCE 201710.1

IRS Schedule A Form 990 – Public Charity Status and Public Support, page 4

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

Part IV: Supporting Organizations

Section A. All Supporting Organizations

- No entries, no data entered.
- Bottom scan line: 14511113 758104 201710.001 2022.05000 CIRCULAR ACTION ALLIANCE 201710.1

IRS Schedule A Form 990 – Public Charity Status and Public Support, page 5

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

Part IV: Supporting Organizations (continued)

Section B. Type I Supporting Organizations

Summary of IRS Form 990 for CAA, 2022

- No entries, no data entered.

Section C. Type II Supporting Organizations

- No entries, no data entered.

Section D. Type III Supporting Organizations

- No entries, no data entered.

Section E. Type III Functionally Integrated Supporting Organizations

- No entries, no data entered.

- Bottom scan line: 14511113 758104 201710.001 2022.05000 CIRCULAR ACTION ALLIANCE 201710.1

IRS Schedule A Form 990 – Public Charity Status and Public Support, page 6

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

Part V: Type III Non-Functionally Integrated 509(a)(3) Supporting Organizations

Section A. Adjusted Net Income

- No entries, no data entered.

Section B. Minimum Asset Amount

- No entries, no data entered.

Section C. Distributable Amount

- No entries, no data entered.

- Bottom scan line: 14511113 758104 201710.001 2022.05000 CIRCULAR ACTION ALLIANCE 201710.1

IRS Schedule A Form 990 – Public Charity Status and Public Support, page 7

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

Part V: Type III Non-Functionally Integrated 509(a)(3) Supporting Organizations (continued)

Section D. Distributions

- No entries, no data entered.

Section E. Distribution Allocations

- No entries, no data entered.

- Bottom scan line: 14511113 758104 201710.001 2022.05000 CIRCULAR ACTION ALLIANCE 201710.1

IRS Schedule A Form 990 – Public Charity Status and Public Support, page 8

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

Part VI: Supplemental Information

- No entries, no data entered.

- Bottom scan line: 14511113 758104 201710.001 2022.05000 CIRCULAR ACTION ALLIANCE 201710.1

Summary of IRS Form 990 for CAA, 2022

IRS Schedule B Form 990, Schedule of Contributors, page 1

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

- **Organization Type, 501(c)(3) is CHECKED:** Filers of: Form 990 or 990-EZ
- **General Rule is CHECKED:** For an organization filing Form 990, 990-EZ, or 990-PF that received, during the year, contributions totaling \$5,000 or more (in money or property) from any one contributor. Complete Parts I and II. See instructions for determining a contributor's total contributions.

- Bottom scan line: 14511113 758104 201710.001 2022.05000 CIRCULAR ACTION ALLIANCE 201710.1

IRS Schedule B Form 990, Schedule of Contributors, page 2

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

Part I: Contributors

No.	Name, address, and Zip	Total contributions	Type of contribution
1	KEURIG DR PEPPER 53 SOUTH AVENUE BURLINGTON, MA 01803	\$32,500.	Person
2	THE COCA-COLA COMPANY PO BOX 1734 ATLANTA, GA 30301	\$32,500.	Person
3	GENERAL MILLS 1 GENERAL MILLS BLVD GOLDEN VALLEY, MN 55426	\$32,500.	Person
4	TARGET ENTERPRISE 1000 NICOLLET MALL MINNEAPOLIS, MN 55401	\$32,500.	Person

- Bottom scan line: 14511113 758104 201710.001 2022.05000 CIRCULAR ACTION ALLIANCE 201710.1

IRS Schedule B Form 990, Schedule of Contributors, page 3

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

Part II: Noncash Property

- No entries, no data entered.

- Bottom scan line: 14511113 758104 201710.001 2022.05000 CIRCULAR ACTION ALLIANCE 201710.1

Summary of IRS Form 990 for CAA, 2022

IRS Schedule B Form 990, Schedule of Contributors, page 4

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

Part III: Exclusively religious, charitable, etc., contributions to organizations described in section 501(c)(7), (8), or (10) that total more than \$1,000 for the year from any one contributor.

- No entries, no data entered.
- Bottom scan line: 14511113 758104 201710.001 2022.05000 CIRCULAR ACTION ALLIANCE 201710.1

IRS Schedule D Form 990, Supplemental Financial Statements, page 1

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

Part I: Organizations Maintaining Donor Advised Funds or Other Similar Funds or Accounts.

- No entries, no data entered.

Part II: Conservation Easements.

- No entries, no data entered.

Part III: Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets.

- No entries, no data entered.
- Bottom scan line: 14511113 758104 201710.001 2022.05000 CIRCULAR ACTION ALLIANCE 201710.1

IRS Schedule D Form 990, Supplemental Financial Statements, page 2

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

Part III: Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets (continued)

- No entries, no data entered.

Part IV: Escrow and Custodial Arrangements.

- No entries, no data entered.

Part V: Endowment Funds.

- No entries, no data entered.

Part VI: Land, Buildings, and Equipment.

- No entries, no data entered.

Total = 0

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IRS Schedule D Form 990, Supplemental Financial Statements, page 3

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

Part VII: Investments – Other Securities.

Summary of IRS Form 990 for CAA, 2022

- No entries, no data entered.

Part VIII: Investments – Program Related.

- No entries, no data entered.

Part IX: Other Assets.

- No entries, no data entered.

Part X: Other Liabilities.

- **Item 2 = CHECKED:** Liability for uncertain tax positions. In Part XIII, provide the text of the footnote to the organization's financial statements that reports the organization's liability for uncertain tax positions under FASB ASC 740. Check here if the text of the footnote has been provided in Part XIII
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IRS Schedule D Form 990, Supplemental Financial Statements, page 4

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

Part XI: Reconciliation of Revenue per Audited Financial Statements With Revenue per Return.

- **Item 1 = 130,000:** Total revenue, gains, and other support per audited financial statements.
- **Item 2 = 0:** Amounts included on line 1 but not on Form 990, Part VIII, line 12
- **Item 3 = 130,000:** Subtract line 2e from 1
- **Item 4c = 0:** Amounts included on form 990, Part VIII, add lines 4a and 4b
- **Item 5 = 130,000:** Total Revenue.

Part VIII: Reconciliation of Expenses per Audited Financial Statements With Expenses per Return.

- **Item 1 = 562,296:** Total expenses and losses per audited financial statements
- **Item 2e = 0:** Amounts included on line 1 but not on Form 990, Part IX, line 25, add lines 2a through 2d
- **Item 3 = 562,296:** Subtract line 2e from 1
- **Item 4c = 0:** Amounts included on Form 990, Part IX, line 25, but not on line 1, add lines 4a and 4b
- **Item 5 = 562,296:** Total Expenses

Part XIII Supplemental Information

- **PART X, LINE 2:**
- CIRCULAR ACTION ALLIANCE IS EXEMPT FROM THE PAYMENT OF INCOME TAXES ON ITS EXEMPT ACTIVITIES UNDER THE PROVISIONS OF SECTION 501(C)(3) OF THE INTERNAL REVENUE CODE. UNDER THESE PROVISIONS, NO TAX IS IMPOSED ON ANY INCOME RELATED TO THE ORGANIZATION'S TAX-EXEMPT PURPOSE. THE ORGANIZATION HAS DETERMINED THAT IT DOES NOT HAVE ANY MATERIAL UNRECOGNIZED TAX BENEFITS OR OBLIGATIONS AS OF DECEMBER 31, 2022. THE ORGANIZATION IS SUBJECT TO ROUTINE AUDITS BY TAXING JURISDICTIONS; HOWEVER, THERE ARE CURRENTLY NO AUDITS FOR ANY TAX PERIODS IN PROGRESS.
- THE ORGANIZATION'S FEDERAL AND STATE INCOME TAX RETURNS ARE SUBJECT TO EXAMINATION BY THE INTERNAL REVENUE SERVICE AND STATE TAX AUTHORITIES, GENERALLY FOR A PERIOD OF THREE YEARS AFTER THE RETURNS ARE FILED.
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Summary of IRS Form 990 for CAA, 2022

IRS Schedule D Form 990, Supplemental Financial Statements, page 5

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

Part XIII Supplemental Information (Continued)

- No entries, no data entered.
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IRS Schedule L Form 990, Transactions With Interested Persons, page 1

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

Part I Excess Benefit Transactions.

- No entries, no data entered.

Part II Loans to and/or From Interested Persons.

(a) Name of interested person	(b) Relationship with organization	(c) Purpose of Loan	(d) Loan to or from the organization?	(e) Original principal amount	(f) Balance Due	(g) In default?	(h) Approved by board or committee?	(i) Written agreement?
The Coca-Cola C	Member	Initial	To=Checked	500,000	500,000	No=Checked	Yes=Checked	Yes=Checked
Niagara Bottlin	Member	Initial	To=Checked	250,000	250,000	No=Checked	Yes=Checked	Yes=Checked

Total=\$750,000: (f) Balance Due

Part III: Grants or Assistance Benefiting Interested Persons.

- No entries, no data entered.

Bottom Margin note: SEE PART V FOR CONTINUATIONS

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IRS Schedule L Form 990, Transactions With Interested Persons, page 2

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

Part IV Business Transactions Involving Interested Persons

- No entries, no data entered.

Part V Supplemental Information

- Provide additional information for responses to questions on Schedule L (see instructions)
- SCHEDULE L, PART II, LOANS TO AND FROM INTERESTED PERSONS:
- (A) NAME OF PERSON: THE COCA-COLA COMPANY
- (C) PURPOSE OF LOAN: INITIAL STARTUP COST ASSISTANCE
- (A) NAME OF PERSON: NIAGARA BOTTLING
- (C) PURPOSE OF LOAN: INITIAL STARTUP COST ASSISTANCE
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Summary of IRS Form 990 for CAA, 2022

IRS Schedule O Form 990, Supplemental Information to Form 990, page 1

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

FORM 990, PART VI, SECTION A, LINE 6:

THE ORGANIZATION HAS ONE CLASS OF MEMBERS, THE FOUNDING MEMBERS. FOUNDING MEMBERS ARE THOSE COMPANIES WHO HAVE BEEN APPROVED BY THE BOARD TO BE A FOUNDING MEMBER, AGREED TO SUPPORT THE PURPOSES OF THE ORGANIZATION, AND ENTERED INTO A MEMBERSHIP AGREEMENT.

FORM 990, PART VI, SECTION A, LINE 7A:

FOUNDING MEMBERS ARE ELIGIBLE TO APPOINT ONE DIRECTOR TO SERVE ON THE BOARD.

FORM 990, PART VI, SECTION B, LINE 11B:

THE FORM 990 IS PREPARED BY AN INDEPENDENT ACCOUNTING FIRM, AND REVIEWED BY THE ENTIRE BOARD BEFORE FILING WITH THE IRS.

FORM 990, PART VI, SECTION B, LINE 12C:

THE ORGANIZATION HAS ADOPTED A CONFLICT OF INTEREST POLICY THAT IS REVIEWED BY THE BOARD AT LEAST ANNUALLY.

FORM 990, PART VI, SECTION B, LINE 15:

IN REVIEWING AND APPROVING THE COMPENSATION OF ANY COVERED INDIVIDUALS, THE CORPORATION'S BOARD OF DIRECTORS, OR A DELEGATED COMMITTEE OF THE BOARD (REFERRED TO AS THE "APPROVAL BODY" BELOW), WILL UTILIZE THE FOLLOWING PROCESS:

1. IMPARTIAL DECISION MAKERS. THE COMPENSATION ARRANGEMENT MUST BE APPROVED IN ADVANCE (BEFORE ANY PAYMENT IS MADE) BY THE APPROVAL BODY OF THE

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IRS Schedule O Form 990, Supplemental Information to Form 990, page 2 (a)

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

CORPORATION COMPOSED ENTIRELY OF INDIVIDUALS WHO DO NOT HAVE A CONFLICT OF INTEREST WITH RESPECT TO THE COMPENSATION ARRANGEMENT (EXAMPLE: NEITHER THE EXECUTIVE WHOSE COMPENSATION IS BEING DETERMINED NOR ANY OF HIS/HER FAMILY MEMBERS MAY BE PRESENT DURING THE DISCUSSION/DEBATE OR PARTICIPATE IN THE VOTE).

2. COMPARABILITY DATA. WHEN THE APPROVAL BODY IS CONSIDERING COMPENSATION TO COVERED INDIVIDUALS, IT MUST RELY ON COMPARABILITY DATA THAT DEMONSTRATE THE FAIR MARKET VALUE OF THE COMPENSATION IN QUESTION. FOR EXAMPLE, WHEN CRAFTING COMPENSATION PACKAGES, THE APPROVAL BODY MUST SECURE DATA THAT DOCUMENTS COMPENSATION LEVELS FOR SIMILARLY QUALIFIED INDIVIDUALS IN LIKE POSITIONS AT LIKE ORGANIZATIONS. THIS DATA MAY INCLUDE THE FOLLOWING:

- A) EXPERT COMPENSATION STUDIES BY INDEPENDENT FIRMS;
- B) WRITTEN JOB OFFERS FOR POSITIONS AT SIMILAR ORGANIZATIONS;
- C) DOCUMENTED TELEPHONE CALLS ABOUT SIMILAR POSITIONS AT BOTH NONPROFIT AND FOR-PROFIT ORGANIZATIONS; AND
- D) INFORMATION OBTAINED FROM THE IRS FORM 990 FILINGS OF SIMILAR ORGANIZATIONS.

3. CONCURRENT DOCUMENTATION. THE APPROVAL BODY MUST DOCUMENT HOW IT REACHED ITS

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Summary of IRS Form 990 for CAA, 2022

IRS Schedule O Form 990, Supplemental Information to Form 990, page 2 (b)

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

DECISIONS, INCLUDING THE DATA ON WHICH IT RELIED. TO QUALIFY AS CONCURRENT DOCUMENTATION, WRITTEN OR ELECTRONIC RECORDS OF THE APPROVAL BODY (SUCH AS MEETING MINUTES) MUST NOTE:

- A) THE TERMS OF THE COMPENSATION AND THE DATE IT WAS APPROVED;
- B) THE MEMBERS OF THE APPROVAL BODY WHO WERE PRESENT DURING THE DEBATE ON THE COMPENSATION THAT WAS APPROVED AND THOSE WHO VOTED ON IT;
- C) THE COMPARABILITY DATA OBTAINED AND RELIED UPON AND HOW THE DATA WAS OBTAINED; AND
- D) ANY ACTIONS TAKEN WITH RESPECT TO CONSIDERATION OF THE COMPENSATION BY ANYONE WHO IS OTHERWISE A MEMBER OF THE APPROVAL BODY BUT WHO HAD A CONFLICT OF INTEREST WITH RESPECT TO THE DECISION ON THE COMPENSATION.

FORM 990, PART VI, SECTION C, LINE 19:

THE ORGANIZATIONS GOVERNING DOCUMENTS, CONFLICT OF INTEREST POLICY, AND FINANCIAL STATEMENTS ARE MADE AVAILABLE UPON REQUEST.

FORM 990, PART IX, LINE 11G, OTHER FEES:

CONSULTING FEES:

- PROGRAM SERVICE EXPENSES 0.
- MANAGEMENT AND GENERAL EXPENSES 556,073.
- FUNDRAISING EXPENSES 0.
- TOTAL EXPENSES 556,073.
- TOTAL OTHER FEES ON FORM 990, PART IX, LINE 11G, COL A 556,073.

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IRS Schedule O Form 990, Supplemental Information to Form 990, page 2 (c)

Name of Organization = CIRCULAR ACTION ALLIANCE, EIN = 92-3197259

FORM 990, PART XII, LINE 2C:

THE BOARD HAS OVERSIGHT OF THE AUDIT.

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