

May 2025

Building California's Circular Economy: Plastic Pollution Prevention and Packaging Producer Responsibility Act Implementation

Report to the Legislature

CalRecycle 



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Table of Contents

1. Executive Summary	1
2. CalRecycle Progress.....	2
Progress on Adopting Regulations.....	2
Environmental Justice and Tribal Communities.....	3
Reports, Lists, and Analyses	4
Expanded Polystyrene Food Service Ware	7
Registration and Reporting Database	8
3. PRO Progress	8
Establishing a PRO.....	8
Producer Registration	9
PRO Plan	9
4. Advisory Board Progress	9
Appointments and Administrative Support.....	9
Advisory Board Meetings and Recommendations.....	10
Appendix I: Outreach.....	11
Appendix II: Advisory Board Members	13
Source Reference Notes.....	15

1. Executive Summary

On June 30, 2022, Governor Gavin Newsom signed SB 54 (Allen, Chapter 75, Statutes of 2022), the Plastic Pollution Prevention and Packaging Producer Responsibility Act (the Act), into law. The Act, codified in Public Resources Code sections 42040-42084, establishes enforceable goals to be achieved by 2032, including:

- Reducing single-use plastic packaging and food service ware by 25%.
- Recycling 65% of single-use plastic packaging and food service ware.
- Ensuring that 100% of single-use packaging and plastic food service ware is either recyclable or eligible to be labeled as compostable.

The Act mandates that CalRecycle report to the Legislature biennially on its progress implementing the Act. This report must describe its efforts to adopt regulations and assess whether Producer Responsibility Organizations (PRO) are on track to meet requirements. This first report provides a comprehensive update on that progress.

Since the Act went into effect on January 1, 2023, CalRecycle has undertaken numerous implementation activities. CalRecycle engaged with the public, regulated industries, environmental advocacy organizations, environmental justice and tribal communities, and other interested parties via workshops, listservs, and public meetings (see Appendix I). Furthermore, CalRecycle invited public input to develop proposed regulations through more than a year of informal workshops before commencing the initial formal rulemaking process in early 2024. As part of these outreach and implementation efforts, CalRecycle developed, or initiated development of, several key reports, lists, and analyses, including:

- A Standardized Regulatory Impact Assessment
- Environmental documents compliant with the California Environmental Quality Act
- A material characterization study
- A covered material categories list
- A statewide needs assessment

CalRecycle also began enforcement planning, and development of a registration and reporting database for producers and other relevant entities.

CalRecycle approved the Circular Action Alliance (CAA) as the Act's initial PRO. CAA has started the process of producer registration and engagement necessary to implement the PRO responsibilities under the Act. To ensure coordination and transparency, CAA meets monthly with CalRecycle to provide updates and share important information. Additionally, CAA is working closely with CalRecycle to support the development of the department's registration and reporting database.

CalRecycle appointed 16 members to the producer responsibility advisory board, which is charged with identifying barriers and solutions to creating a circular economy in California, and with advising CalRecycle, producers, and PROs on implementing the Act, creating a circular economy, and reducing single-use plastic pollution. The Act requires the board to be composed of members that represent specific interests related to single-use packaging and plastic single-use food service ware. The board meets monthly, with ongoing CalRecycle administrative support.

2. CalRecycle Progress

Progress on Adopting Regulations

Public Notice

When Governor Newsom signed the Act into law, CalRecycle informed the public through a press release to a variety of media outlets, listed in Appendix I. CalRecycle's website welcomed interested parties to join the packaging email listserv, CalRecycle's primary means of notifying the public of upcoming opportunities for engagement and public comment. CalRecycle sent the first packaging listserv announcement related to the Act on January 13, 2023, to 561 subscribers, and that listserv has increased to more than 6,700 subscribers. Additionally, CalRecycle maintains a dedicated email address, packaging@calrecycle.ca.gov, to receive and respond to inquiries from interested parties.

Regulatory Process

Initial Rulemaking Process

Initial Informal Rulemaking

Over the course of 2023, CalRecycle held 13 hybrid in-person/virtual workshops to provide information about the Act and solicit informal public comments on draft regulatory concepts (see Appendix I). CalRecycle used the comments received during these workshops to develop the proposed regulations. Additionally, CalRecycle published a Standardized Regulatory Impact Assessment ([SRIA](#))¹ on December 28, 2023, which evaluates the economic impact of the Act's proposed regulations for a set implementation period between January 1, 2025, and January 1, 2032.

Initial Formal Rulemaking

61-day Comment Period, (March 8, 2024 – May 8, 2024): In February 2024, CalRecycle initiated the formal rulemaking process to adopt the proposed regulations. The California Regulatory Notice Register published the official notice of the proposed rulemaking on March 8, 2024. CalRecycle extended the comment period beyond the required 45 days, responsive to the requests of numerous interested parties, to end on May 8, 2024. CalRecycle received 228 submissions from entities including the PRO, the producer responsibility advisory board, environmental advocacy groups, local governments, waste and recycling services providers, potentially regulated businesses, and industry trade organizations.

21-day Comment Period (October 14, 2024 – November 4, 2024): CalRecycle revised the proposed regulations in response to the comments received and published the revised proposed regulations for a 15-day public comment period starting on October 14, 2024. In response to several requests, CalRecycle extended the comment period beyond the required 15-days to end on November 4, 2024. CalRecycle received 140 public comment submissions.

15-day Comment Period (December 2, 2024 – December 17, 2024): CalRecycle revised the proposed regulations in response to comments and released the revised proposed regulations for a final 15-day comment period ending on December 17, 2024. CalRecycle received 77 public comment submissions.

The Governor is directing CalRecycle to restart these regulations to ensure California’s bold recycling law can achieve its goal of cutting plastic pollution and is implemented fairly — minimizing costs for small businesses and working families as much as possible. As the new regulatory process proceeds, CalRecycle will continue to work with interested parties to develop rules that ensure successful implementation of California’s plastic and packaging law.

New Rulemaking Process

As directed by Governor Newsom, CalRecycle has initiated a new rulemaking process.

CalRecycle is currently in an informal rulemaking phase, during which the department will engage with the public and revise the regulations and associated rulemaking documents. Once refined, CalRecycle will submit updated rulemaking documents to the Office of Administrative Law (OAL) to initiate a new formal rulemaking process.

New Regulatory Workshop

CalRecycle is hosting an informal regulatory workshop on Tuesday, May 27, 2025, from 10:00 AM - 4:00 PM (PT). The purpose of this workshop is to informally consult with the public, the regulated community, and other interested parties to solicit feedback regarding the regulations. More information will be forthcoming through the listserv and will be available on the [SB 54 Plastic Pollution Prevention and Packaging Producer Responsibility Act Permanent Regulations rulemaking webpage](#) prior to the meeting.

Environmental Justice and Tribal Communities

In the Act, the Legislature found and declared that the human health and environmental impacts of plastic pollution and fossil fuel extraction disproportionately affect disadvantaged and low-income communities. To address this finding, CalRecycle considered environmental justice communities and issues when designing the regulations, focusing on minimizing adverse effects, strengthening protections, and enhancing support and access for communities while minimizing the impacts of waste.

CalRecycle continues to conduct targeted outreach to disadvantaged and low-income communities, as well as California Native American tribes (Tribes), to ensure their perspectives and needs are considered during regulation development and program implementation.

For example, CalRecycle presented information about the Act and received valuable feedback from community members and participating environmental justice organizations, including Bayview Hunters Point Identifying Violations Affecting Neighborhoods Network, Los Angeles Environmental Justice Network, Leadership Counsel for Justice and Accountability, and Valley Improvement Projects.

As part of the rulemaking process, CalRecycle engaged with Tribes, including co-hosting an event with Robinson Rancheria Pomo Indians of California and the Native American Fiber Program. Representatives from various Tribes throughout the state attended the event. CalRecycle also met with the U.S. EPA Southern California Regional Tribal Operations Committee Region 9 and the CalEPA Tribal Advisory Committee to foster collaboration and learning.

Reports, Lists, and Analyses

CEQA

CalRecycle awarded a contract on April 29, 2024, to a contractor to assist with preparation of the documents required to comply with the California Environmental Quality Act (CEQA), analyzing the effects of adopting the proposed regulations. CalRecycle issued a notice of preparation² (NOP) for a draft EIR on July 12, 2024, and determined that a programmatic environmental impact report³ (PEIR) is necessary. The purpose of the PEIR is to inform the department, other governmental decision-makers, and the public about:

- Potentially significant environmental impacts of the regulations, as well as of the reasonably foreseeable methods of compliance by the regulated community.*
- Potentially feasible mitigation for any identified impacts.
- Reasonably foreseeable alternative means of compliance with the regulations, which would avoid or eliminate identified impacts.

CalRecycle hosted a PEIR scoping meeting on July 22, 2024, to present key elements of the anticipated CEQA review and to solicit feedback from responsible and trustee agencies, and other interested parties. Prior to the release of the draft PEIR, CalRecycle also consulted with Tribes in compliance with Assembly Bill 52 (Gato, Chapter 532, Statutes 2014). CalRecycle published the draft PEIR on November 4,

* Pub. Resources Code section 21159 mandates this analysis whenever CalRecycle undertakes environmental review associated with the adoption of a rule or regulation establishing a performance standard.

2024, for a 45-day public comment period, and the department held a public hearing on November 19, 2024, to solicit further input from interested parties.

Covered Material Categories List

CalRecycle hosted three public workshops (see Appendix I) to solicit feedback regarding the covered material categories list (CMC list), which clarifies to the packaging industry, the public, and all interested parties how the department groups similar types and forms of packaging and food service ware which the Act regulates. These categories are used for a variety of requirements in the Act, including data reporting, measuring source reduction, and calculating recycling rates.

CalRecycle established and refined the categories using information from existing producer reporting systems, sorting categories and findings from the material characterization study required by SB 343 (Allen, Chapter 507, Statutes of 2021), other established categorization systems relevant to materials covered by the Act, and feedback from interested parties at public workshops.

CalRecycle published the CMC list on December 28, 2023, with categories deemed recyclable and compostable, then published the CMC list⁴ on July 1, 2024, by material type and form. Both are available on the [covered material categories webpage](#). The department will update the list at least annually until 2032, as required by the Act. By January 1, 2026, CalRecycle will expand and republish the list to additionally include recycling rates.

Covered Material Categories Deemed Recyclable

The Act relies on the criteria established by SB 343 (Allen, Chapter 507, Statutes of 2021) to assess the recyclability of each covered material category. To evaluate recyclability, CalRecycle gathered information from local jurisdictions, conducted surveys, and performed material characterization studies at large volume transfer or processing (LVTP) facilities. For a covered material category to be considered recyclable, two conditions must be met:

1. Recycling programs in jurisdictions representing at least 60% of the state's population must collect the material types and forms.
2. LVTP facilities serving at least 60% of recycling programs statewide must sort the materials into defined streams that are sent to, and reclaimed at, a facility that meets the requirements of the Basel Convention.

As required by the Act, CalRecycle submitted a [Report to the Legislature](#)⁵ on December 28, 2023, on the recyclability status of covered material categories.

Covered Material Categories Deemed Compostable

The Act required CalRecycle to evaluate, by January 1, 2024, which covered material categories satisfy the requirements to be deemed compostable. Covered materials are deemed compostable if they are eligible to be labeled compostable in accordance with

the requirements set forth in Public Resources Code Chapter 5.7 (commencing with section 42355).

As required by the Act, CalRecycle posted a [Covered Material Categories List \(with categories deemed recyclable or compostable\)](#)⁶ on its website on December 28, 2023.

Material Characterization Study

The Act requires CalRecycle to conduct and publish a disposal-based material characterization study to determine the approximate amount of covered material disposed of in California landfills. CalRecycle awarded a contract on October 22, 2024, to a contractor to sample, sort, and determine the approximate amount of material covered by the Act which are disposed of in California landfills.

CalRecycle will publish the preliminary findings by July 1, 2025, solicit public comment for at least 30 days, and publish the final findings within 60 calendar days of the close of the public comment period.

Needs Assessment

Starting on January 1, 2026, and repeating at least every five years, CalRecycle must publish a [statewide needs assessment](#) in collaboration with the PRO, local jurisdictions, recycling service providers, and processors. The assessment will determine the actions and investments needed for California to meet the Act's requirements for all covered materials.

The needs assessment will be designed to inform the PRO plan and budget and evaluate the current status of:

- Collection of materials covered by the Act
- Processing of materials through recycling and composting systems
- End markets and market development
- Source reduction efforts including reuse and refill systems
- Product and material design for recyclability
- Consumer education

CalRecycle held five public workshops and engaged in various meetings in 2023 and 2024 to solicit feedback on developing the needs assessment from a variety of entities including the PRO, local jurisdictions, recycling service providers, processors, environmental justice groups and community-based organizations, Tribes, and other interested parties (see Appendix I).

As part of the needs assessment, the Act requires CalRecycle to establish a baseline for the 25% source reduction requirement by January 1, 2025. This baseline represents the amount of plastic covered material that was sold, offered for sale, or distributed in the state in the 2023 calendar year. The baseline was published on December 31,

2024, and was reported both by weight (tons of plastic in plastic covered materials) and by number of plastic components in plastic covered materials.

CalRecycle conducted research and accepted public comments about how to establish the source reduction baseline and on the department's proposed approach to the needs assessment at four public workshops (see Appendix I). To establish the source reduction baseline, CalRecycle awarded a contract on June 24, 2024. CalRecycle's contractor gathered data from new and existing data sources, performed a gap analysis to identify areas of incomplete or missing data, and estimated the source reduction baseline.

Expanded Polystyrene Food Service Ware

Goals of the Act

The Act requires producers to demonstrate all EPS covered material meet specified recycling rates in order to continue selling, distributing, or importing EPS food service ware in California. To avoid this prohibition, producers must demonstrate to CalRecycle that all EPS covered material meets the following recycling rates by the following dates:

- 25% by January 1, 2025
- 30% by January 1, 2028
- 50% by January 1, 2030
- 65% by January 1, 2032

In September 2024, CalRecycle sent informational notices to more than 50 likely EPS food service ware producers and 25 industry organizations associated with plastics, food service, or expanded polystyrene products. These notices gave a reminder of the statutory deadline approaching January 1, 2025, and provided information on how these entities could learn more about the law.

CalRecycle Enforcement

CalRecycle is authorized to enforce all requirements of the Act. If EPS food service ware producers sell, distribute, or import EPS food service ware without demonstrating all EPS covered material meets the required recycling rates, the producers may be subject to CalRecycle enforcement actions.

As part of the enforcement process, CalRecycle may conduct investigations, issue notices of violation, and assess penalties to any entity, including producers of EPS food service ware.⁷

In April 2025, CalRecycle sent a listserv with the following message: "To continue selling expanded polystyrene (EPS) food service ware in the state, EPS food service ware producers must demonstrate that all EPS covered material meets a 25% recycling rate as of January 1, 2025. To date, this requirement has not been met.

“As a result, EPS producers are prohibited from selling, offering for sale, distributing, or importing EPS food service ware, like single-use takeout containers and cups, in or into California”.

As of the date of this report, CalRecycle is focusing on providing assistance and education to impacted entities and has not made any compliance determinations.

Registration and Reporting Database

The Act requires PROs, participating producers, and producers complying individually to register in CalRecycle’s Recycling and Disposal Reporting System (RDRS) or a CalRecycle-established alternative reporting system. CalRecycle solicited comments on existing reporting systems in a public workshop[†] and determined that RDRS would not fully support the Act’s required data reporting. Therefore, CalRecycle began developing a new database in February 2024 known as the Packaging Extended Producer Responsibility System to provide a portal for:

1. Producers and PROs to electronically register and submit reports, exemption requests, and other documents.
2. Local jurisdictions and recycling service providers to submit applications for exemptions and request extensions for compliance deadlines.
3. CalRecycle to track implementation, communication, and compliance processes.

The new database is expected to be fully functional following the adoption of the regulations.

3. PRO Progress

Establishing a PRO

On September 29, 2023, CalRecycle opened the application process for California’s packaging PRO, with a submission deadline of January 1, 2024. Following a thorough review, CalRecycle announced on January 8, 2024, the approval of Circular Action Alliance (CAA) as California’s first PRO for single-use packaging and plastic food service ware.

CAA is a 501(c)(3) nonprofit organization founded by 20 companies from the food, beverage, consumer goods, and retail sectors in response to the passage of packaging EPR laws throughout the nation. In addition to being the approved PRO in California, CAA also serves in this capacity in Colorado and Maryland and was the only

[†] See Appendix I, Registration and Reporting Database

prospective PRO to submit a program plan in Oregon. CAA seeks to expand its role as the PRO in all U.S. states enacting paper and packaging EPR laws.

Since February 2024, CalRecycle has met monthly with CAA to ensure effective communication and collaboration on fulfilling the Act's requirements. These efforts include refining the covered material categories list, developing data reporting and information technology systems, conducting a comprehensive needs assessment, and exploring opportunities to align EPR approaches with other states and countries.

Producer Registration

Producer registration is essential for the success of any EPR program, as it enables the PRO to gather information needed to develop its Producer Responsibility Plan. To streamline registration efforts across multiple states, CAA utilized Colorado's mandatory October 1, 2024, producer registration deadline to also capture producers obligated under other state EPR laws, including California's, by allowing potential producers to indicate the states in which they operate during registration. As part of its revised Oregon program plan submitted on September 27, 2024, CAA identified over 1,200 registered producers who may also participate in the California program and expects additional registrations to follow.

PRO Plan

The Act requires the PRO to draft a plan and budget for CalRecycle's approval. Producers must participate in an approved PRO plan by January 1, 2027, or they cannot sell, offer for sale, import, or distribute covered material in the state. In preparation, CAA has been conducting public engagement campaigns to raise awareness and bolster producer registration. Additionally, CAA has been gathering data from registered producers and conducting outreach to local jurisdictions and recycling service providers to inform the development of the plan, budget, and fee schedule.

4. Advisory Board Progress

Appointments and Administrative Support

The Act required CalRecycle to appoint members to a 16-member advisory board to identify barriers and solutions to creating a circular economy and advise CalRecycle, producers, and PROs on implementing the Act. CalRecycle received and reviewed 63 applications, appointed 15 board members prior to the July 1, 2023, statutory deadline, and appointed the PRO representative upon CAA's approval in January 2024. Board members names, affiliations, and categorical representations are listed in Appendix II.

CalRecycle maintains a dedicated [advisory board webpage](#) with information on the roles and responsibilities of the board, board membership, and archived meeting materials. At the board's request, CalRecycle hosts hybrid meetings at the CalEPA

building, facilitates online participation through a web-based conference platform and webcasting on CalRecycle’s website, and provides audio visual services. Additionally, CalRecycle leads roll calls and voting, moderates online comments from interested parties, and provides the board with meeting outcomes and digitally accessible documents for the board’s online repository.

Advisory Board Meetings and Recommendations

The board held 13 hybrid public meetings in 2024, compliant with the requirements of the Bagley-Keene Open Meeting Act. At its inaugural meeting on February 2, 2024, the board elected a chair, vice chair, and secretary, and created an online repository to house board documents, such as meeting agendas and notes. The board established subcommittees to work on initial recommendations regarding key barriers and solutions to creating a circular economy.

Appendix I: Outreach

Outreach efforts to help implement the Act include those listed below.

Public Notice

These media channels provided public notice of the Act's passage:

- The LAist (a podcast)
- The Los Angeles Times
- The New York Times
- CalMatters
- Waste Dive
- Plastic News
- Plastics Today
- Food Packaging Forum
- South Shore Recycling Cooperative
- The National Law Review
- The Plastic Pollution Coalition

Regulatory Workshops

CalRecycle's [Past Events](#) webpage for the Act provides detailed information on all regulatory workshops, including a listing of the topics covered in each meeting, as well as links to discussion documents and slide decks.

Source Reduction Baseline Workshops

- May 31, 2023 – Feedback on approaches and explore data sources
- September 27, 2023 – SB 54 Producers and Source Reduction Study information
- December 14, 2023 – SB 54 Producers and Source Reduction Study request for proposal (RFP) details
- May 1, 2024 – Updated Needs Assessment Source Reduction Baseline Study details and feedback on proposed study constraint aspects

Needs Assessment Studies

- February 28, 2023 – Studies, timeline, and public engagement overview
- July 24-25, 2023 – High-level background, process, timeline, and next steps
- September 27, 2023 – Background information and discuss two studies
- December 14, 2023 – Needs assessment and studies overview, and provide data
- May 1, 2024 – Needs assessment development details, contracted studies process overview, and proposed engagement and collaboration discussion

Covered Material Categories

- June 28, 2023 – CMC list, covered material categories requirements background information, and get public feedback

- September 27, 2023 – CMC list second draft, covered material categories background information, and get feedback
- May 1, 2024 – Covered material categories background information, updated timeline, proposed covered material categories updates, and changes to covered material categories published in December 2023

Environmental Justice and Tribal Engagement

CalRecycle reached out to the following environmental justice and tribal groups to engage and inform them about the Act.

- Bayview Hunters Point IVAN (Identifying Violations Affecting Neighborhoods) Network
- The Leadership Counsel for Justice and Accountability facility hosted policy advocate, Thomas Helme, who is also co-founder and project director of Valley Improvement Projects and a SB 54 advisory board member (March 21, 2024)
- Los Angeles Environmental Justice Network (April 24, 2024)
- Big Valley Band of Pomo Indians and Robinson Rancheria Pomo Indians of California, with Fred Briones, chief executive officer of the Native American Fiber Program and SB 54 advisory board member (April 8, 2024)

Appendix II: Advisory Board Members

Listed below are the 16 advisory board member categories the members represent, the appointed members' names, titles, and the advisory board position they currently hold.

#	Industry or Association Represented	Name	Title	Position
1	Statewide city association (nominated)	Timothy Burroughs	Executive Director of StopWaste	Chair
2	Environmental protection organization	Doug Kobold	Executive Director of the California Product Stewardship Council	Vice Chair
3	Recycling service provider or an association of recycling service providers	Veronica Pardo	Regulatory Affairs Director of Resource Recovery Coalition of California	Secretary
4	Statewide rural county association (nominated)	Tedd Ward	Director of Del Norte Solid Waste Management Authority	Member
5	Ocean advocacy organization	Miho Ligare	Plastic Pollution Policy Manager of Surfrider Foundation	Member
6	Environmental justice organization	Thomas A. Helme	Co-Founder and Project Director of Valley Improvement Projects	Member
7	Disadvantaged or low-income community or rural area	Fred Briones	Chief Executive Officer of Native American Fiber Program	Member
8	Materials recovery facility located within the State of California	Christy Pestoni	Director of Government Affairs of Waste Connections	Member
9	Composting industry operating in the State of California	Neil S. Edgar	Executive Director of California Compost Coalition	Member

#	Industry or Association Represented	Name	Title	Position
10	Manufacturer that produces third-party certified compostable covered material	Erin Levine	Resource Recovery Manager-West of World Centric	Member
11	Manufacturer of covered materials of different material types utilizing postconsumer recycled content	Patrick Keenan	Associate Packaging Principal Engineer of General Mills	Member
12	Manufacturer of covered materials of different material types utilizing postconsumer recycled content	Wes Carter	President and Co-Founder of Atlantic Packaging Corp.	Member
13	Manufacturer of covered materials of different material types utilizing postconsumer recycled content	Ajit Perera	Vice President of Post Consumer Operations of Talco Plastics, Inc.	Member
14	Statewide association representing the retail sector (nominated)	Rachel Michelin	President and Chief Executive Officer of the California Retailers Association	Non-voting member
15	Statewide association representing the grocery sector (nominated)	Timothy James	Director of Local Government Relations of the California Grocers Association	Non-voting member
16	Producer responsibility organization	Shane Buckingham	EPR Program Planning Lead of Circular Action Alliance	Non-voting member

Source Reference Notes

¹ CalRecycle, *Proposed Regulations for the Plastic Pollution Prevention and Packaging Producer Responsibility Act, Standardized Regulatory Impact Assessment (SRIA)*, December 28, 2023, <https://www2.calrecycle.ca.gov/Docs/Web/127320> (May 2, 2024).

² CalRecycle, *Notice of Preparation of an Environmental Impact Report and Public Scoping Meeting*. June 12, 2024, <https://ceganet.opr.ca.gov/2024070487>.

³ CalRecycle, *Draft Program Environmental Impact Report, Proposed Regulations for the Plastic Pollution Prevention and Packaging Producer Responsibility Act*. November 4, 2024, <https://ceganet.opr.ca.gov/2024070487/2>.

⁴ CalRecycle, *Update to Covered Material Categories (CMC)*. July 1, 2024, <https://www2.calrecycle.ca.gov/Docs/Web/128190>.

⁵ CalRecycle, *Recyclability Status of Covered Material Categories SB 54 Report to the Legislature*, December 2023, <https://www2.calrecycle.ca.gov/Publications/Details/1730>.

⁶ CalRecycle, *Covered Material Categories List (with categories deemed recyclable or compostable)*, December 28, 2023, <https://www2.calrecycle.ca.gov/Docs/Web/126582>.

⁷ PRC section 42081(a)(1)