

bag drop mobile

BCRP changes



Welcome

- Introductions
- Purpose of webinar
- Presentation process

AB 1311 Bag Drop and Mobile Unit Regulatory Changes

- New definitions and terms (ex, “anchor recycling center”)
- General requirements and certification process for a bag drop or mobile unit
- Operational requirements
- Regulations were effective 8/11/2025

Definitions (Section 2000):

- (2.7) “**Anchor recycling center**” means a recycling center that has applied to operate one or more mobile units under section 2047
 - The certification number of a mobile unit is the anchor
- (3.01) “**Bag**” means a bag, box, or other empty beverage container holder. This definition does not apply to the term “bag in box” or to subchapter 9.5

Definitions (Section 2000):

- (3.02) “**Bag drop receptacle**” a place where consumers can drop off empty beverage containers for redemption in a sealed bag. “Sealed” means the bag is secured by the consumer in such a way that loose empty beverage containers will not fall out of the bag once the bag is deposited into the bag drop receptacle
- (31.5) “**Mobile unit**” means a recycling location or locations where empty beverage containers are collected for redemption using a vehicle or receptacle that is hosted by an anchor recycling center



A variety of new models of redemption based on 2025 regulation changes.





bag drop and mobile unit
certification procedures

Certification

- Bag drop recycling centers are recycling centers found in section 14538 of the Act added by AB 1311 (2021)
 - Can be a stand-alone recycling center
 - You complete a regular RC application and a 2-page supplemental bag drop form
- Mobile Units are allowed based on the definition of recycling location, which mentions mobile
 - Must be an accessory to an anchor recycling center
 - May be staffed or utilize RVMs or bag drop technologies
 - May also pick up from consumer locations
 - Utilize a supplemental application; filed with cert application or after

Mobile Unit Applications (Section 2047):

- Current certified RC operators or new applicants can apply for mobile units.
- A Supplemental Application (CalRecycle 904) will need to be submitted to the Certification Unit via email with all the supporting documents.

Mobile Unit Applications (cont'd):

- The following are needed for your Supplemental Application to be considered complete:
 - Must have a Certification Number
 - Hours and location for the mobile units
 - A map that indicates boundaries
 - Property owner authorization for each mobile unit
 - Addresses where material is redeemed, stored & inspected
 - License plate for each vehicle/trailer used by mobile unit

Mobile Unit Applications (cont'd):

- Description that explains how the operator will handle potential issues, charge fees, and issue payments.
- Addresses where the mobile unit vehicles or receptacles are stored when not open for business.
- Proof of ownership of, or authorization to use, the mobile unit vehicle or receptacle.

Mobile Unit Applications Denials:

- Reasons for denial:
 - The anchor recycling center is on prepayment or postpayment inspection status
 - Proposes to operate in a Convenience Zone where a RC other than its anchor RC or a Pilot Project recycler operates
 - The vehicle or receptacle is already being used for another RC, pilot, or dealer cooperative
- Denials are final and not subject to reconsideration

Bag Drop Applications (Section 2045):

- You will complete a CalRecycle 902 to add a bag drop to your existing RC
- Several descriptions that explain how the operator will handle potential issues, charge fees, and issue payments as specified in section 2045(a)(16)
- CalRecycle 902 will be submitted directly to your Certification Specialist along with required supporting documentation

Additional Tidbits

- A mobile unit will not serve a zone
 - Dealers will still be subject to Option 1 or Option 2 requirements
 - A dealer cooperative may move into a zone; the mobile unit would no longer be able to operate in that zone
 - A recycling center may move into the zone
- **If the anchor RC is eligible for Handling Fees (HFs), any material redeemed at the mobile sites will also be eligible for HFs.**



bag drop

operational requirements

Bag Drop Operational Requirements (2500.2):

- Different load limits
 - 25 lbs of AL, PL, some WDS-BBP
 - 50 lbs of bag in box
 - 100 lbs of GL
- Material over limit will be scrap only
- May charge bag fees (*cannot exceed the direct cost of the bag*)
- May charge transaction fees (*cannot exceed electronic payment fee*)
- The Bag Drop receptacle must be secure so that empty beverage containers cannot be removed after being deposited

Bag Drop Operational Requirements (2500.2):

Ineligible material (rejected, line breakage, etc)

1. Segregate it
2. Document it (count/weight, type, customer name and contact info)
3. Deliver it to a PR (must be kept separate, but can deliver on same truck)

Bag Drop Operational Requirements (2500.2):

Provide immediate access to any storage location upon request

Material may not be stored at a residence

Notice the consumer

- (1) Refund is not paid for packaging, contamination, containers not properly labeled with CRV message, or ineligible material
- (2) The bag drop will discount the refund value and scrap value for loads that contain non redemption material
- (3) Material can be weighed and inspected at a different location than delivery.
All deliveries are final
- (4) If using a smartphone app, website, or other electronic means to communicate or pay, the bag drop is authorized to provide such notices electronically

Bag Drop Signage:

In addition to section 2065, bag drop shall display (physical or electronic):

- Payment method
- Daily purchase limits
- Materials that cannot be redeemed through the bag drop
- Alternative recycling locations
 - If the bag drop charges fees, they must provide an alternative location where the consumer will not be charged a bag or transaction fee
- Non-operational or full container message
 - Information where the nearest RC (non-bag drop or RVM) where consumers can receive immediate payment for all EBCs
- A way to contact the operator
- Fees and payment information: timeframe for payment, how questions or complaints will be addressed, the fees charged to the consumer

Bag Drop Terms & Conditions (2500.3):

- May implement terms and conditions (T&C) to allow customers to use system
- May use a smartphone app, or other electronic means to manage consumer transactions
- May require consumers accept T&C prior to access to system
- May limit or ban consumers from accessing the system if abuse is detected
- Material from a banned consumer is scrap and shall be treated as such

A photograph of a forest with two massive, ancient-looking trees in the foreground. A person in a blue jacket and brown pants is walking between them, providing a sense of scale. The background shows a dense forest of smaller trees.

mobile unit

operational requirements

Mobile Unit Operational Requirements (2500.5):

- A mobile unit must be “tied” to an anchor recycling center
- A mobile unit must do both:
 - Arrive at the location where it will redeem at the start of the day
 - Vacate the location at the end of the day
- A mobile unit may consist of:
 - A truck or other vehicle performing redemption on-site
 - A truck or other vehicle picking up materials from consumers
 - If the bag drop charges fees, they must provide an alternative location where the consumer will not be charged a bag or transaction fee.
 - A vehicle towing a trailer consisting of RVM or bag drop receptacles

Mobile Unit Operational Requirements (2500.5):

A mobile unit shall:

- Accept all container types
- Operate within 60 days of approval
- Operate at the locations and during the hours using the methods as specified on the supplemental application
- Notify CalRecycle 10 days prior to any changes
- **Deliver all empty beverage containers to its anchor recycling center at the end of the day**
- Post specified signage (may be digital if desired)
- Specific requirements for ineligible material (like a bag drop; except must deliver to anchor RC)
- Pick up service has additional requirements
 - Receipt requirements identifying consumer

Mobile Unit Operational Requirements (2500.5):

- A mobile unit cannot:
 - Operate in a Convenience Zone where another RC, Pilot Recycler or Dealer Cooperative is operating
 - Store materials at a location other than that identified in the mobile unit supplemental application
 - Operate for a recycling center other than the anchor recycling center, a pilot recycler or a dealer cooperative

Material from a mobile unit may be eligible for HFs ONLY if the anchor RC is eligible and receives HFs

Mobile Unit Operational Requirements (2500.5):

- A mobile unit or anchor recycling center shall provide immediate access to DOR staff to any location where beverage containers are stored
- Receipts for material collected through a mobile unit will be identified with an M at the end of the certification number (ie, RC12345M) and include the actual address where the mobile unit collected said material.
 - Records from the mobile unit and anchor recycling center shall be separate from one another
 - Daily summaries should include the material accepted by its mobile unit each day

Bag Drop/ Mobile Recordkeeping Requirements (2535):

- All material received from a Reverse Vending Machine (RVM) owned or operated by the Recycling Center (RC) or from a bag drop recycling center, the RC will prepare a receipt or a log each time material is removed from the RVM or the bag drop receptacle
- RC's will maintain all their receipts and logs along with any receipts that may be issued by a machine
- The anchor recycling center will include the empty beverage containers accepted by its mobile unit each day in the daily summaries prepared by the anchor recycling center *(Section 2500.5 (j)(5))*

A photograph of a forest with two massive sequoia trees in the foreground. A person in a blue jacket and brown pants is walking between the trees, providing a sense of scale. The text "the differences RC vs MU vs BD" is overlaid on the image.

the differences
RC vs MU vs BD

| | Recycling Center | Mobile Unit | Bag Drop |
|---|---|---|--|
| Payment | Cash, check, voucher | Electronic, voucher | Electronic, check (Delayed) |
| Method of Payment | Weight or Count | Count | Weight or Count |
| Weight Limits | 100 lbs AL, PL 1000 lbs GL 25 lbs pouch/paperboard* 50 lbs bag in a box* | Depends on method | 25# AL, PL, pouch/ paperboard 50# of bag in box 100# of glass |
| Ineligible Materials (rejected, line breakage, previously baled, OOS, etc) | Must not accept OOS or previously baled Others are scrap only | Must not accept OOS or previously baled Others are scrap only | Must exclude and cannot pay CRV Must separate to take to PR |

*WDS-BBP



Photos of a bag drop unit and a mobile unit receptacle.





The Forms

Mobile Unit & Bag Drop



Bag Drop Addition to Recycling Center

Notification to CalRecycle of the addition of a bag drop to a certified recycling center.

Certification Number: RC _____ Effective Date of New Bag Drop: _____

Answer the following questions regarding the new bag drop. Use additional pages if necessary.

a) Describe how you will identify and handle rejected, line breakage, previously baled, and out-of-state materials.

b) Describe how you will handle opened bags, unmarked bags, or loose empty beverage containers.

c) List the electronic methods used to communicate with customers, including websites, smartphone applications, or other electronic means.
If using smartphone applications, specify the name of the platform used and whether the application is made available on a public app store, directly from the app developer, or through another method.

Provide a copy of your smartphone application or website's Terms and Conditions.

d) Describe the method of payment of the refund value within three (3) of the recycling center's business days. Include a description of non-cash forms of payments.

e) Will you charge a bag fee?* Yes No If yes, what is the fee? \$ _____

f) Will you charge a transaction fee?* Yes No If yes, what is the fee? \$ _____

**Bag fees and transaction fees are subject to the restrictions in section 2500.2(c) of Title 14 of the California Code of Regulations*

g) Describe how customer material is uniquely identified.

h) Describe how the recycling center will comply with the consumer daily weight limits.

Will the bag drop have the same hours as the recycling center? Yes No

If yes, skip to signature. If no, provide bag drop operational hours:

Accepts material 24 hours a day, 7 days a week

If accepting 24/7, skip to signature.

Monday Hours: Open: _____ am/pm Close _____ am/pm

Or: Open All Day Closed Mondays Same as Staffed RC Hours

Tuesday Hours: Open: _____ am/pm Close _____ am/pm

Or: Open All Day Closed Mondays Same as Staffed RC Hours

Wednesday Hours: Open: _____ am/pm Close _____ am/pm

Or: Open All Day Closed Mondays Same as Staffed RC Hours

Thursday Hours: Open: _____ am/pm Close _____ am/pm

Or: Open All Day Closed Mondays Same as Staffed RC Hours

Friday Hours: Open: _____ am/pm Close _____ am/pm

Or: Open All Day Closed Mondays Same as Staffed RC Hours

Saturday Hours: Open: _____ am/pm Close _____ am/pm

Or: Open All Day Closed Mondays Same as Staffed RC Hours

Sunday Hours: Open: _____ am/pm Close _____ am/pm

Or: Open All Day Closed Mondays Same as Staffed RC Hours

Signature

Printed Name


Date

Please email the completed form to [Your Certification Specialist](mailto:YourCertificationSpecialist@CalRecycle.ca.gov) or DORCertFileRoom@CalRecycle.ca.gov

or, Mail to: CalRecycle/Division of Recycling/Certification Unit
1001 I St, MS 9A, Sacramento, CA 95814

This form is provided for your convenience and the included information may be submitted in an alternative format.

Supplemental Application for Mobile Recycling

CalRecycle 

Supplemental Application

Mobile Unit Extension of Recycling Center

SECTION 1 – ANCHOR SITE INFORMATION

1. RC Number of Anchor Site (leave blank if applying for anchor as well): RC
Note: An anchor site must be staffed during its hours of operation. It cannot be only a bag drop or RVM.
 Fill out a separate Application for every Mobile Unit site.

SECTION 2 – MOBILE UNIT INFORMATION

Contact Convenience Zone Unit to check on Handling Fee Eligibility:
HFSiteEligibility@CalRecycle.ca.gov or (916)322-2231

1. Is the Anchor Site eligible for handling fees? Yes No
 If yes, what is the basis for the eligibility?
 Nonprofit Convenience Zone Recycler Supermarket Site Rural Region Recycler

Provide Mobile Unit Address

Street Address _____ Suite/Unit _____

City _____ County _____ Zip _____ Nearest Cross Street _____

2. Type of usage agreement*: Own Rent Donated Space Other
 *For each location where CRV is handled: You must include a copy of the current lease, tax or mortgage statement, or use agreement that clearly lists the applicant, the property owner, and the facility location, and grants permission to use the space for recycling purposes.

Property Owner First Name* _____ Last Name _____ Phone _____
 () _____

Mailing Street Address _____ Suite/Apt _____ City _____ State _____ Zip _____

3. Hours of Operational (circle am/pm). Below, fill out the Actual Days and Hours this site is open .

| | |
|---|--|
| Monday <input type="checkbox"/> Closed This Day | Friday <input type="checkbox"/> Closed This Day |
| Open: _____ am/pm Close _____ am/pm | Open: _____ am/pm Close _____ am/pm |
| Tuesday <input type="checkbox"/> Closed This Day | Saturday <input type="checkbox"/> Closed This Day |
| Open: _____ am/pm Close _____ am/pm | Open: _____ am/pm Close _____ am/pm |
| Wednesday <input type="checkbox"/> Closed This Day | Sunday <input type="checkbox"/> Closed This Day |
| Open: _____ am/pm Close _____ am/pm | Open: _____ am/pm Close _____ am/pm |
| Thursday <input type="checkbox"/> Closed This Day | |
| Open: _____ am/pm Close _____ am/pm | |

If monthly, describe monthly schedule: _____

Provide all addresses that are used for any location where there is: **Inspection, Material Storage, Mobile Unit Storage, and Sorting**. Use Additional Pages as Necessary

4. Check all that apply for the following address:
 Inspection Material Storage Mobile Unit Storage Sorting
 Street Address _____ Suite/Unit _____

City _____ County _____ Zip _____ Nearest Cross Street _____

5. Type of usage agreement*: Own Rent Donated Space Other
 Property Owner First Name* _____ Last Name _____ Phone _____
 () _____

Mailing Street Address _____ Suite/Apt _____ City _____ State _____ Zip _____

6. Is the mobile unit a Vehicle? Yes No
 If yes, provide the following information. If no, proceed to section 3.
Include a copy of proof of ownership or current lease/rental agreement
 Will this same vehicle/trailer be used at different sites? Yes No
 Mobile Unit Vehicle License Plate Number (LPN): _____
 If a trailer: License Plate Number of Trailer: _____
 License Plate Number of Towing Vehicle: _____
 Trailer's Permanent Trailer Identification Number: _____

7. Will this mobile unit collect CRV material from consumers? Yes No
 If yes, provide a map and describe the geographic boundaries in which it will operate: _____

SECTION 3 – PROGRAM INFORMATION

Answer all questions. If non-applicable to your program, write "N/A" on the line.

a) Describe how you will identify and handle rejected, line breakage, previously baled, and out-of-state materials.

b) Describe how you will handle opened bags, unmarked bags, or loose empty beverage containers.

2025 Regulations:

[Beverage Container Recycling Laws - CalRecycle Home Page](#)

AB1311:

[Bill Text: CA AB1311 | 2021-2022 | Regular Session | Chaptered | LegiScan](#)

Proposed regulation text (new containers):

[SB 1013 Addition of New Beverage Containers Permanent Regulations - CalRecycle Home Page](#)

Certification Unit

(916) 324-8598

DORCertFileRoom@calrecycle.ca.gov

Forms

[Forms - CalRecycle Home Page](#)

Resources



Questions?