Packaging Extended Producer Responsibility System (PEPRS)

Guidance on Registration and Application Submittals

Plastic Pollution Prevention and Packaging Producer Responsibility Act

June 2, 2026

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Guidance Document Purpose

The following actions must be taken by producers to comply with the requirements under 14 CCR section 18980.5:

- If participating in the approved producer responsibility organization (PRO) plan, register with Circular Action Alliance (CAA) and submit supply data to CAA.
- If complying individually, register with CalRecycle and apply to be an independent producer.
- If qualifying for an exemption for small producer, register with CalRecycle and apply for the small producer exemption.

This document explains how to register and submit an application in the Packaging Extended Producer Responsibility System (PEPRS) [1]. If a producer prefers to comply individually and submit an independent producer application or qualifies for the small producer exemption, an authorized representative will need to:

1. **Create** a WebPass Account using an individual email address.
    - If your email changes, a new WebPass account will be required.
2. **Activate your WebPass** by following the instructions in the confirmation email.
3. **Log in to PEPRS** with your WebPass credentials.
4. **Complete your registration information** in **PEPRS**.
5. **Submit an application, and/or update information** in **PEPRS**.

For detailed information on these application processes — and for each of these steps — review 14 CCR sections 18980.5.1 and 18980.5.2.

Step 1 — Create and Activate a CalRecycle WebPass

All online portals under CalRecycle's management require a WebPass. Producers must follow the steps on the Create a WebPass Account webpage.

After submitting information on the WebPass webpage, an activation email will be sent to your email address. Click the link in the email to activate the WebPass. You may log in to PEPRS any time after activation of your WebPass.

Step 2 — Log in to PEPRS

PEPRS webpage: secure.calrecycle.ca.gov/PEPRS. Log in to PEPRS using your WebPass account information. After signing in, you will be taken to a welcome page.

Select your entity type as "Packaging Extended Producer (EPR) Producer (Figure 1).

[1] Producers that designate a Producer Responsibility Organization (PRO) to register on their behalf, are not required to register separately in PEPRS.

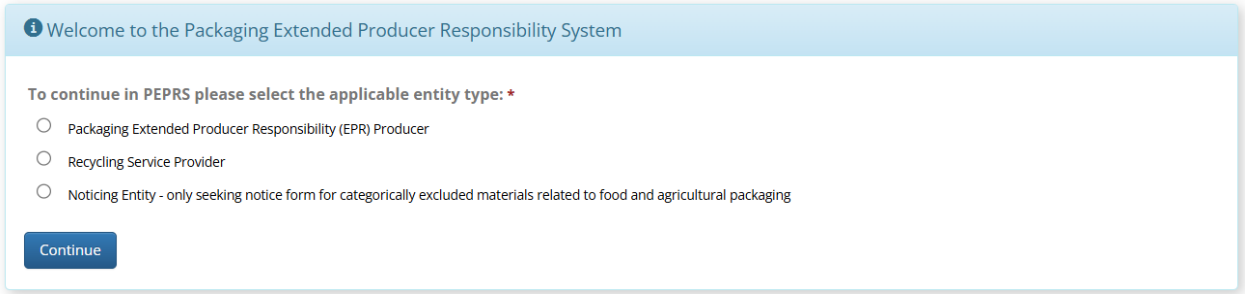


Figure 1: Screenshot of entity types on PEPRS' Welcome Page

A 'noticing entity' is any entity that notifies CalRecycle about the categorically excluded materials for food and agricultural commodity packaging. Noticing entities may not have reporting requirements, while producers with registration or reporting obligations can access the notice form via producer profile under the 'Application Submission' tab.

Review "Guidance for Submitting a Categorically Excluded Materials Notice for Food and Agricultural Commodity Packaging" on Producer Guidance Webpage for more information.

Step 3 — Register as a Producer in PEPRS

All producers must register with CalRecycle pursuant to 14 CCR section 18980.5, including the producers qualifying for Small Producer Exemption, unless registration is completed by an approved PRO. Start your Packaging EPR Producer Registration. Provide information in line with 14 CCR section 18980.10(a)(1) such as legal entity name, **Federal Employer Identification Number (EIN)**[2] or a **Customs Assigned Importer Number (CAIN)**[3], primary contact information, and business and mailing addresses. If preferred, also provide alternative contact information.

If a producer is an international business that is not required to obtain an EIN and does not import products into the United States, the producer may submit an internationally recognized identification number used for international trade or taxation purposes, accompanied by appropriate documentation. Such documentation must be issued by the authorized entity that assigned the identification number and must clearly display the number, its intended purpose, and the legal entity name, which must correspond exactly to the registered producer's name.

[2] If the producer does not hold a Federal EIN, visit Internal Revenue Service | get an EIN Webpage for more information.
[3] CAIN is a unique identifier issued by U.S. Customs and Border Protection if a foreign importer without a Federal EIN is the producer.

Step 4 — Submit an application

After registration, producers should acknowledge that they have read the information regarding the California Public Records Act and protection of trade secrets (Figure 2).

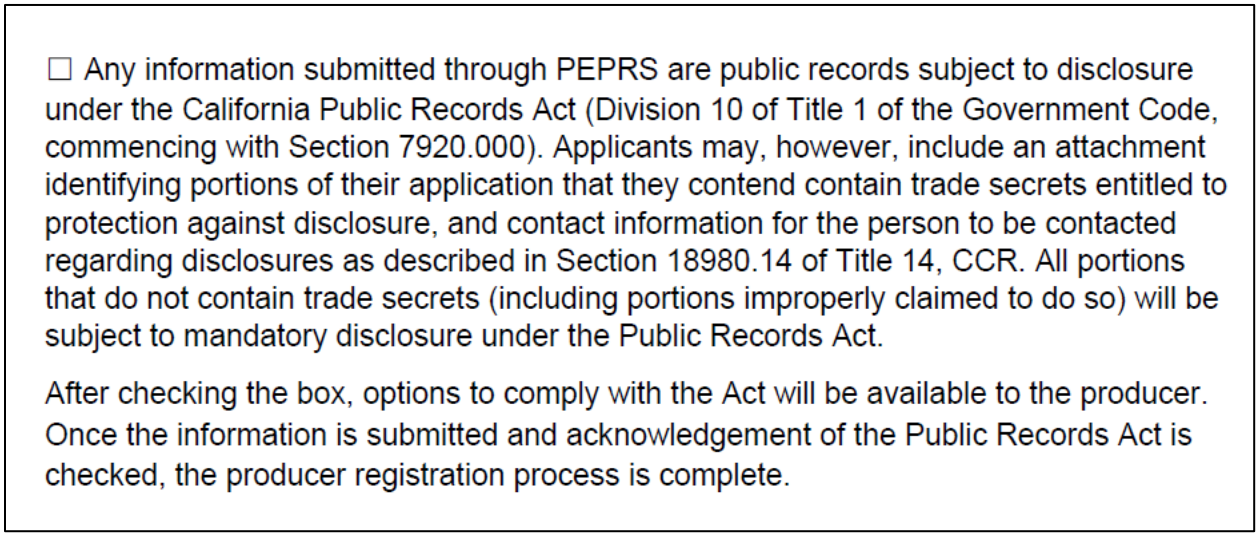


Figure 2: Acknowledgement of reading the trade secret information submission process

After checking the box, review the options listed for the next steps to comply with the Act. Select one that applies or navigate to the Application Submission tab in the Producer Profile and click the applicable option to start your application process.

Information on Application Submissions

PEPRS Application Limitations:

PEPRS does not allow a producer to submit both Small Producer Exemption, and Independent Producer applications at the same time. Likewise, if you clicked “affiliated with PRO” because you are a participant producer and opted to be a ‘reporting entity’ to complete your own registration with CalRecycle, you cannot submit a Small Producer Exemption or Independent Producer application.

Once you start an application, you can either save and edit it later, delete it if it is no longer needed, or submit it to CalRecycle with all the required information.

Information Required for Small Producer Exemption and Independent Producer Applications:

The following lists summarize the required information for Small Producer Exemption and Independent Producer applications, as seen on the forms, but are not exhaustive lists:

Small Producer Exemption Application

1. If applicable, provide California Corporation or LLC number.
2. Provide contact information for the person completing the application.
3. Enter the amount of total gross annual sales (U.S. dollar) in California, as found on the most recent calendar year's tax returns.

   Note 1: Provide proof of sales: Upload CDTFA-401-A, or any form filed with the federal (IRS) or State of California (Franchise Tax Board) taxing authority for the most recent calendar year. If you do not have a recent tax return, provide audited financial statements. Acceptable documentation may include:

   - An Enterprise Resource Planning (ERP) report or ledger report identifying sales attributed to California (ship-to or benefit received in California).
   - Corroborating documents such as carrier delivery records, marketplace-generated California summaries, and/or payment processor reports.
   - Balance sheets.
   - Income and/or cash flow statements.
   - A signed attestation (or CPA letter) certifying the California-only gross sales and the methodologies used to determine those amounts.
4. Enter type of business activities: retail, wholesale, other. If ‘other’ is checked describe the business activities.
5. Enter and describe how the business is conducted; online and/or physical location.
6. Describe the types of products the business sells, offers for sale, or distributes in the state.
7. Describe the extent to which the business acquires products from out-of-state suppliers.
8. Describe the degree to which you own the brands or trademarks associated with the products your business sells, offers for sale, or distributes.

   Note 2: May include any documentation, such as trademark registration certificates.
9. Upload any necessary documentation to justify the basis of qualification for the small producer exemption. If applicable, upload a document regarding protection of trade secrets (see Figure 2).

Independent Producer Application

1. Provide contact information for the person completing the application.
2. Provide information on the type of business activities conducted.
3. **If a licensee**, provide the necessary information regarding the license, such as: mark, serial number, license number, registration number, registration date, and status.
4. Enter and describe how the business is conducted, online and/or at a physical location.
5. Identify covered material categories (CMCs) for all covered material that the business sells, offers for sale, or distributes in California.

   Note 1: The latest published CMC list will be available in the system.
   Note 2: For details on how to identify material class, type and form, review the latest Covered Material Categories Producer Reporting Guidance document on the SB 54 Covered Material Categories List Webpage.
6. To qualify as an Independent Producer, the producer must meet criteria described under Public Resources Code section 42051(b)(2)(A)(i) through (iii) or demonstrate a recycling rate of 65% for three consecutive years prior to January 1, 2027, and on and after that date demonstrate a recycling rate of at or over 70% annually. The producer will select the option that satisfies the requirement. Upload any necessary justification.
   Note 3: If your covered material and CMC are made exclusively of plastic or are a nonplastic material with a plastic component, you can choose to demonstrate either option. If your covered material and CMC are nonplastic or without any plastic component, you can only demonstrate the recycling rate requirement.
   Note 4: If you choose to demonstrate the recycling rate and have more than one CMC, you must upload a document that demonstrates each CMC's recycling rate separately, as required, for three consecutive years, including calculations and methodology.
7. Upload any necessary documentation as described above. If applicable, upload a document regarding protection of trade secrets (see Figure 2).

Abbreviations

- CAA: Circular Action Alliance
- CCR: California Code of Regulations
- CDTFA: California Department of Tax and Fee Administration
- CMC: Covered Material Category
- CPA: Certified Public Accountant
- ERP: Enterprise Resource Planning
- IRS: Internal Revenue Service
- LLC: Limited Liability Company
- PEPRS: Packaging Extended Producer Responsibility System
- PRO: Producer Responsibility Organization
- The Act: Plastic Pollution Prevention and Packaging Producer Responsibility