

Requirements for Local Jurisdiction and Recycling Service Providers and Exemption Process

June 17, 2026

SB 54 (Allen, Ch. 75, Statutes of 2022)



Overview

1. Guidance Video
2. Additional Information and Helpful Context
3. Resources & Next Steps
4. Q&A



Guidance Video

Link to guidance video: [SB 54 Extensions & Exemptions Process for Local & Rural Jurisdictions or Recycling Service Providers](#)

Additional Information and helpful context

Application Requirements

- 14 CCR section 18980.11.1(d) requires LJs or RSPs to submit the application first to all PROs and independent producers (if any).
- 14 CCR section 18980.11.1(d)(3) allows all the parties to extend the review period if agreed upon.
- 14 CCR section 18980.11.1(c)(5) dictates LJs or RSPs to include the written notices and comments, if any, from PROs and independent producers.
- PRC 42060.4(b) requires PRO to be responsible for arranging alternatives means for collection, processing, storage and transportation of covered, materials if objecting an exemption request.

Application Requirements (cont'd)

- **To demonstrate something is *impracticable* for collection, we recommend reviewing 14 CCR, section 18980.11.1(c). This requires a description with supporting documentation of the following:**
 - *The specific local conditions, circumstances, and challenges that make it impracticable for the local jurisdiction or recycling service provider to include the specified covered material or covered material categories in their collection and recycling programs.*
 - *The description must demonstrate that the identified material cannot practicably be included in the collection and recycling programs.*
 - *The description must also address, at a minimum, the necessity of the exemption with respect to the following considerations: program efficacy; technological or economic limitations; legal restrictions or requirements; effects on the environment, environmental justice, worker health and safety; public health; hazardous waste generation; and transportation safety.*

All under one location - PEPRS

- **Packaging Extended Producer Responsibility System (PEPRS) will allow LJs or RSPs to**
 - **Provide an exemption request to PROs and independent producers**
 - **Submit an exemption application to CalRecycle**
 - **Links to resources:**
 - [Packaging EPR Contact - Only for Local Jurisdictions](#)
 - [Create a WebPass Account](#)
 - [PEPRS Sign-in](#)

Exemption Request

- **Once an exemption request is submitted by LJs or RSPs,**
 - Request will be forwarded to contacts of the PRO and Independent producers.
 - Notification email will be sent to local jurisdiction representatives regarding the status of the request.
 - Notification email will be sent to all parties regarding 90-day (30-day for the renewal) review timeline, parties when agreed upon can select a new deadline (final review date) through PEPRS.

Exemption Request (cont'd)

- Once an exemption request is submitted by LJs or RSPs,
 - Communication between the parties can be carried out using the portal, if choose to do so.
 - Documentation of the final comments received from the PRO including the alternative means per objection, or independent producers will be recorded in PEPRS.
 - Notification of next steps will be sent to applicant when the review timeline ends.

Exemption Submissions

- Once the previous steps are completed PEPRS will assist LJs or RSPs to,
 - Edit the original request reviewed by the PRO or independent producers, if necessary.
 - LJs or RSPs to submit the application to CalRecycle.
 - CalRecycle to:
 - Request additional information, if necessary.
 - Notify all interested parties about the status of the application.
 - Provide a list of approved exemptions on public website.

Local Jurisdiction – Packaging EPR Contact

[Home](#) » [Packaging-EPR](#) » Packaging EPR Contact Request

Packaging EPR Contact Request

Packaging Extended Producer Responsibility (EPR) Contact: These individuals may include local jurisdiction employees, joint powers of authority (JPA) staff, and also other external partners of the jurisdiction. These individuals may receive correspondence regarding requirements of California's [Plastic Pollution Prevention and Packaging Producer Responsibility Act](#). Each local jurisdiction or regional agency (RA) can submit two contacts as a Packaging EPR Contact who will be required to create an account in PEPRS.

RA members may jointly select a Packaging EPR Contact by selecting the Regional Agency and selecting all included local jurisdictions.

Forms need to be completed and submitted to CalRecycle per local jurisdiction or RA. All fields must be completed and required.

Regional Agency

Jurisdiction(s) *

Email *

☐ Are you a CalRecycle WebPass holder?

First Name *

Last Name *

Organization *

Title *

Mailing Address (Street or PO Box) *

City *

County *

Zip Code *

Area code and phone number *

☐ Add Additional Contact

We need to make sure you are not a robot. Click the "I'm not a robot" check box below.

☐ I'm not a robot 

Local Jurisdiction is defined as a City, county, city/count, regional agency or a special solid waste district.

- CalRecycle is requesting local jurisdictions to identify a Packaging EPR representative to be assigned in PEPRS.
- Submit a Packaging EPR Contact Request form to identify an authorized local jurisdiction representative who:
 - May submit an exemption request and the exemption application (as well as renewal);
 - Get application notifications and updates;
 - For an application submitted by the local jurisdiction or
 - For an application submitted by a recycling service provider
 - Will review the submitted application with the PRO.

Verification of Packaging EPR Contact

- For validation purposes, CalRecycle will verify the information provided in the forms and assign the Packaging EPR Contacts to local jurisdiction.
- Once assigned, the following notification email will be sent out to each contact.

Hello [Contact Name and Last Name],

This email address has been associated with the **Packaging Extended Producer Responsibility System (PEPRS)**. With this association, you may log in to PEPRS using your CalRecycle WebPass and manage all local jurisdictions linked to your account. Once available in PEPRS, the **Local Jurisdiction/Recycling Service Provider Extension or Exemption Application (Application)** may be submitted either by the Packaging EPR contact or by a Recycling Service Provider (RSP), pursuant to 14 CCR, section 18980.11(c). If an RSP submits the Application, the Packaging EPR Contact will serve as the "individual representing the local jurisdiction," as required under 14 CCR, section 18980.11.1(c)(2)(A), and will receive notifications regarding the application status. PEPRS will assist local jurisdictions throughout the process—from providing the Application to the Producer Responsibility Organization and Independent Producer, through submission to CalRecycle.

If you do not have a CalRecycle WebPass, please visit CalRecycle's [Create a WebPass webpage](#) and follow the instructions. For your convenience, the PEPRS link is: <https://secure.calrecycle.ca.gov/PEPRS/>

Please email PEPRS@calrecycle.ca.gov if you have any comments, questions, or need to update contact information associated with this account.

Thank you,
CalRecycle's PEPRS Team

Requirements of Recycling Service Providers

- Pursuant to 14 CCR 18980.11.1(c)(2), if the applicant is a recycling service provider, it must notify each local jurisdiction to which it provides services that would be affected by the extension or exemption of its intent to request the exemption. The applicant shall obtain the following information and include it in the application:
 - Contact information (name, phone number, and email address) for an individual representing the local jurisdiction. The individual identified must be authorized by the jurisdiction to receive all communications regarding the request.
 - A description of each local jurisdiction's involvement in the application process, including, at minimum, when the applicant notified the local jurisdiction of the intent to submit the application.

RSP– Packaging EPR Contact

➤ How RSPs can benefit from LJs using Packaging EPR Contact Form:

- Allows the RSP filling out an application to identify the appropriate LJ contact when submitting an application on their behalf.

List all local jurisdictions to which the applicant provides services that would be affected by the exemption. For each local jurisdiction, provide contact information for an individual representing the local jurisdiction and a description of their involvement in the application process, including, at a minimum, the date on which the applicant gave notice of its intent to submit this exemption application.

☒ Export to Excel

* Representative Last Name*	Representative Phone Country Calling Code	Representative Phone Number*	Representative Email Address*	Description of Involvement and/or Date Contacted*	
	(United States) +1				X Delete
Green	(United States) +1	5104065149	mgreen@alamedaca.gov		X Delete

1

10

items per page

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Bulk Exemption Submissions

- **PEPRS provides flexibility for LJs or RSPs to submit bulk exemptions in any format they need, if all the following applies.**
 - The applicable Covered Material Categories (CMCs) and related covered materials are the same for each Jurisdiction.
 - The applicable CMCs and related covered materials listed clearly in the bulk application document.
 - The necessity and justification of the exemption request for each LJ per each CMC or covered material are the same.
 - Lastly, all the information required under 14 CCR section 18980.11.1(c)(3), (4) and (5)* included in bulk submission document.

Resources & Next Steps



Sign up for our Listserv



Visit our SB 54 Webpage



E-mail packaging@calrecycle.ca.gov



[CalRecycle's Extensions, Exemptions and Exclusions Website](#)