

Requirements for Local Jurisdiction and Recycling Service Providers and Exemption Process

July 22, 2026

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



Overview

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2. Exemption Process
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Statutory & Regulatory Obligations

Statutory & Regulatory Obligations

1. Public Resources Code (PRC) section 42060.5

- Requires all Local Jurisdictions (LJs – as defined in [PRC 42041\(m\)](#)) and Recycling Service Providers (RSPs) to collect all covered materials deemed *Recyclable* and *Compostable* on the Covered Material Categories (CMC) List
- Requires CalRecycle to establish an exemption process for materials “not practicable” to include in collection/recycling programs.
- Allows a county board of supervisors of a *Rural County* or *Rural Jurisdiction* (as defined in PRC 42649.8) to adopt a resolution to exempt those entities from the requirements of this section.

Statutory & Regulatory Obligations

1. 14 CCR section 18980.11

- Requires all LJs and RSPs to collect material no later than the date CalRecycle approves the PRO's Plan.
- Any updates to the CMC List do not impact collection obligations until at least 1-year after the update was made.
- LJs or RSPs can either use 1-year time to get ready to comply or apply for an extension or exemption for those new CMCs.

Statutory & Regulatory Obligations

1. 14 CCR section 18980.11.1

- Describes the exemption process for LJs and RSPs.
- Requires exemption to first be submitted to PRO for up to 90-day review.
- Following PRO review, exemptions are submitted to CalRecycle.
- If approved, exemptions are valid for 2-years (and can be renewed).

Statutory & Regulatory Obligations

1. 14 CCR section 18980.11.2

- Requires a *Rural County* or *Rural Jurisdiction* that has adopted a resolution to exempt that entity from collection requirements to provide a copy to CalRecycle within 14 calendar days of the adoption date.
- If those entities do not meet the definition of a *Rural County* or *Rural Jurisdiction*, they shall not be exempt from collection requirements.

Exemption Process

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 Form - Only for Local Jurisdictions](#)
 - [Create a WebPass Account](#)
 - [PEPRS Sign-in \(Recycling Service Provider\)](#)

All under one location - PEPRS

LJ or RSP submits
the application to CalRecycle*

LJ or RSP submits an
extension or exemption
request to PRO

- 1) 14 CCR section 18980.11.1(d) requires LJs or RSPs to submit the application first to all PROs and independent producers (if any).
- 2) LJ or RSP submits the request pursuant to 14 CCR section 18980.11.1(c)(1) to (4) requirements.

PRO and Independent
Producers (if any)

- 1) Pursuant to 14 CCR section 18980.11.1(d) PRO and IPs to review the request in 90 days.
- 2) 14 CCR section 18980.11.1(d)(3) allows all the parties to extend the review period if agreed upon which is allowed in PEPRS.
- 3) 14 CCR section 18980.11.1(c)(5) dictates LJs or RSPs to include the written notices and comments, if any, from PROs and IPs.

1) LJ or RSP will have access to the original extension or exemption request to edit or submit.

2) LJ or RSP submits the request pursuant to 14 CCR section 18980.11.1(c) including the written notices and comments, if any, received from PRO or IPs and an explanation of how the applicant addressed them or why it did not do so.

* If LJ or RSP concludes that the request is no longer required to be submitted because the alternative pathway that is provided by PRO pursuant to PRC 42060.4(b) provides a compliance pathway, then LJ or RSP can withdraw the application in PEPRS by providing a reason.

Application Requirements

- **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.*

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.

Exemption Submissions to CalRecycle

- 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 or withdraw it with a justification.
- CalRecycle
 - May request additional information, if necessary.
 - Will notify all interested parties about the status of the application.
 - And will provide a list of approved exemptions on public website.

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.

Additional Information and helpful context

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

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

1 - 2 of 2 items

Exemption Process in PEPRS

- Communication between the parties can be carried out using the portal, if choose to do so.
- Documents can be shared between the parties via PEPRS, if choose to do so.
- Documentation of the final comments received from the PRO including the alternative means per objection will be recorded in PEPRS.
- Notification of next steps will be sent to applicant when the review is completed or the review timeline ends whichever comes first.
- LJ and RSPs will have a database for list of requests and the final status of requests on their dashboard.

Example Recycling Service Provider Dashboard

Local Jurisdiction and Recycling Service Provider Exemption or Extension Applications

Testing RSP (Recycling Service Provider)

Export to Excel

Request new Exemption or Extension

	Application Type	Jurisdictions Represented	Status	Created On	Requested On	Submitted On	Reviewed by CalRecycle On
				↑			
→ Select	Exemption/Extension Application for LJs and RSPs	Sacramento, Sacramento County/City of Citrus Heights Regional Agency	PRO Review Completed	07/16/2026 08:57:24 AM	07/16/2026 09:01:34 AM		
→ Select	Exemption/Extension Application for LJs and RSPs	Elk Grove, Folsom, Sacramento-Unincorporated	Requested	07/16/2026 01:41:08 PM	07/16/2026 01:56:55 PM		

1

10 items per page

1 - 2 of 2 items

➤ **A new feature** has been added for Recycling Service Providers, allowing them to identify a specific service area within a Local Jurisdiction to which the exemption request will apply.

Resources & Next Steps

Resources & Next Steps



Sign up for our Listserv



Visit our SB 54 Webpage



E-mail packaging@calrecycle.ca.gov



**Guidance Video on LJ/RSP Extension and
Exemption Applications**

Local Jurisdiction and Recycling Service Provider Exemption or Extension Application

Please clearly print or type your responses.

Attach additional pages or supplemental documents as necessary.

Note: All supporting materials must be clearly labeled, referenced, and organized to correspond with the selected criteria. CalRecycle reserves the right to request additional information or clarification.

Disclaimer: *Use of this form is mandatory. However, it is based on legal authority that was effective as of the date of publication, and it is subject to revision based on changes in applicable laws. CalRecycle may require the applicant to submit additional information to supplement the application. In the event of any conflict between this document and any statutory or regulatory provision, the statutory or regulatory provision controls. This document is not intended to issue new statutory interpretations or to provide explanations not dictated by formal regulations. Specific factual scenarios are addressed on a case-by-case basis.*

This document is not a waiver of any rights or remedies available to CalRecycle. Applicants are encouraged to seek the assistance of legal counsel regarding compliance with all laws applicable to their particular circumstances

This is an application for local jurisdictions and recycling providers applying for an exemption or an extension pursuant to Section 18980.11.1 of Article 11 of Chapter 11.1 of Division 7 of Title 14 of the California Code of Regulations (14 CCR section 18980.11.1). If applicant is a rural county or a rural jurisdiction pursuant to Public Resources Code (PRC) section 42649.8, a copy of an adopted resolution can be submitted via this application pursuant to Section 18980.11.2 of Article 11 of Chapter 11.1 of Division 7 of Title 14 of the California Code of Regulations (14 CCR section 18980.11.2).

Please note that, an “extension” differs from an “exemption” only in that an exemption becomes effective upon approval and exempts the applicant from the requirement for two years, whereas an extension may be granted before the collection requirement has taken effect and results in delaying the requirement’s applicability for two years beyond when it otherwise would have taken effect. For purposes of this application, “exemption” also refers to an “extension.”

Your application will be forwarded to approved PRO(s) and Independent Producer(s), if any are approved by the time of the application. No exemption or extension application, or renewal request, for either shall be submitted to CalRecycle until the local jurisdiction or recycling provider has provided all PROs and Independent Producers with the application, or advance notice of the renewal request. All PROs and Independent Producers shall have 90 days to review an application or request an extension for review (and 30 days to review a notice of renewal request). See 14 CCR section 18980.11.1(d).

Section 0 –Entity Identification

Entity Name:	Please enter the county (or counties) entity provides services at:
Physical Address:	

Section I –Local Jurisdiction or Recycling Service Provider Contact Information

Contact Information for Individual Submitting the Application	
First Name:	Last Name:
Title:	
Mailing Address:	
City:	State:
Zip Code:	
E-mail Address:	
Phone Number:	

If Different, Contact Information for the Individual to be Contacted Concerning the Requested Exemption.	
First Name:	Last Name:
Title:	
Mailing Address:	
City:	State:
Zip Code:	
E-mail Address:	
Phone Number:	

1. Which type of application or notification is being submitted? Please select the one that applies.		
☐ Exemption or Extension Application for Local Jurisdiction or Recycling Service Provider (hereby application will be called Exemption for Local Jurisdiction or Recycling Service Provider).		☐ Exemption for Rural Jurisdictions
1a. If this application is being submitted for several local jurisdictions or submitted by a recycling service provider, provide the following information or check the box below. ☐ This application is only for one local jurisdiction (if you check this box, no additional information is needed regarding the individuals represented in this application) 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.		
Local Jurisdictions: 1. 2. 3.	Representative contact name, email, and phone number: 1. 2. 3.	Description of involvement and/or date contacted: 1. 2. 3.
1b. Do you want to upload one bulk application document for all listed local jurisdictions in question 1a? If yes, confirm by checking the appropriate boxes. ☐ Uploading a bulk application document that includes the required information listed below. ☐ The applicable Covered Material Categories (CMCs) and related covered materials are the same and listed in the bulk application document. ☐ The necessity and justification of the exemption request for each Local Jurisdiction per each CMC or covered material are the same and provided in the bulk application document pursuant to the requirements under 14 CCR section 18980.11.1(c)(4). ☐ By checking this box I confirm that I have read and understood the responsibilities to upload a bulk application and provide all detailed information pursuant to 14 CCR section 18980.11.1.		
1c. If application is for the Rural Jurisdictions, confirm by checking both boxes. ☐ Applicant meets the definition of rural jurisdiction as defined in PRC section 42649.8. ☐ Attached a certified copy of the adopted resolution. Notify CalRecycle within 14 days of adoption.		

If 1b. is selected and confirmed by the applicant with the attached document, the application ends here.

If "Exemption for Rural Jurisdictions" is selected, 1c is confirmed with the attached document, the application ends here.

Section II – Request for Covered Materials / Covered Material Categories

2. List each specific Covered Material Category (CMC) from the most recently published CMC list (available at www.calrecycle.ca.gov/packaging/packaging-epr/cmclist)

Note: This application is for only for those CMCs that are deemed recyclable or compostable or both.

	Category ID	Material Class	Material Type	Form	Recyclable	Compostable	List Specific Covered Material(s) that may be included under the Category ID	List all the Jurisdictions from Q1a that are requesting the exemption for this CMC
1								
2								
3								
4								
5								

Section III – Necessity and Justification of the Application

3. For each specific Covered Material Categories, explain in detail, the necessity of the exemption with respect to the following considerations. If a consideration is not relevant to the necessity of the exemption, you may respond “Not applicable.”

FOR IT: Please include a Drop-down here to auto-populate each CMC listed in section 2 and they need to respond to each question in this section per CMC.

i. Efficacy of current collection and recycling programs:

ii. Technological and economic limitations:
iii. Legal restrictions or requirements:
iv. Effects on the environment, environmental justice, worker health and safety, and public health:
v. Hazardous waste generation:
vi. Transportation safety:
vii. Describe the specific local conditions, circumstances, and challenges (e.g., absence of responsible end markets to ultimately recycle the material) that make inclusion of the CMC or covered materials in the affected collection and recycling programs impracticable (i.e., not possible).

Section IV – Producer Responsibility Organization (PRO) and Independent Producer Review

This section only applies to the requirement under 14 CCR section 18980.11(c)(5) therefore will be visible in PEPRS after PRO or IP's review period ends. LJ or RSP must address their comments or objections or explains why not need to be addressed before submitting application to CalRecycle.

Each PRO and independent producer may submit comments to the applicant concerning the assertion that collection is impracticable and the relevant conditions, circumstances, and challenges. If the PRO or any independent producers submitted comments, explain how each was addressed or, if not addressed, why doing so was unnecessary. Attach documentation.

If the PRO or any independent producer objects:

Attach “alternative means” documentation provided by objected parties (scope; facilities/permits; service level and schedule; funding; contacts; Memorandum of Understanding (MOU), contracts, maps, schedules).