OCTOBER, 2026



DEALER COOPERATIVE STEWARDSHIP PLAN

Prepared by Circular CRV Association

Presented to CalRecycle, Division of Circular Economy

Proudly serving the dealers, recyclers, and consumers of California.

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PREFACE

Circular CRV Association ("Dealer Cooperative") is pleased to submit this Stewardship Plan to the California Department of Resources Recycling and Recovery ("CalRecycle"). This plan aligns with the requirements of the California Code of Regulations and the California Beverage Container Recycling and Litter Reduction Act ("Bottle Bill"), while introducing innovative, consumer-friendly, and sustainable solutions to expand CRV redemption access across the state.

Established in 2024 as a 501(c)(3) nonprofit entity, the Dealer Cooperative serves as the coordinating body on behalf of its participating grocer and retailer members ("Dealer Members"), ensuring compliance with California's CRV redemption mandates. By connecting grocers, redemption contractors, and key stakeholders, the Dealer Cooperative works to establish a modern, efficient, and consumer-focused redemption network across California. The organization is governed by an unpaid Board of Directors composed of representatives from the grocery and retail industries, ensuring balanced oversight and alignment with both regulatory standards and community needs.

This Stewardship Plan has been prepared in compliance with Title 14, California Code of Regulations (14 CCR), Division 2, Chapter 5, including §§ 2375, 2375.2, 2375.4, 2375.6, 2375.8, and 2380. In accordance with 14 CCR § 2375(a)(1), this plan includes all required content and has been electronically submitted to CalRecycle per 14 CCR § 2375(a)(2), with the submission date serving as the official date of receipt. Additionally, as required by 14 CCR § 2375(a)(3), the plan is publicly accessible online via http://www.circularcrv.com.

To ensure equitable access for all stakeholders, this plan adheres to the standards outlined in 14 CCR § 2375(a)(4), including Government Code Section 7405 and the Web Content Accessibility Guidelines (WCAG) 2.0. Submission of this plan also constitutes a formal declaration of compliance by the Dealer Cooperative and its members with all applicable provisions of the Beverage Container Recycling and Litter Reduction Act and associated regulations, as required under 14 CCR § 2375(b).

This Stewardship Plan outlines a commitment to innovation, environmental stewardship, and consumer convenience, establishing the foundation for a sustainable, efficient, and equitable CRV redemption network that allows Dealers to comply with the provisions of the Act while advancing California's resource recovery and recycling goals.

PART I. INFORMATIONAL CONTENTS

STATUTORY CITATION

The following section provides a detailed overview of the requirements outlined in 14 CCR § 2375.2, which specifies the necessary informational contents of a Dealer Cooperative Stewardship Plan. These requirements ensure that stewardship plans are comprehensive, transparent, and compliant with the regulatory framework under the California Beverage Container Recycling and Litter Reduction Act.

Each subsection addresses specific elements essential to the effective administration, implementation, and oversight of the Dealer Cooperative's redemption program.

SECTION OVERVIEW

To ensure clarity and consistency, the elements of this section are organized and numbered in accordance with the "Model Dealer Cooperative Stewardship Plan" document issued by CalRecycle in November 2024.

1. Federal Tax Identification Number [14 CCR § 2375.2(a)]
2. Contact Information [14 CCR § 2375.2(b)]
3. Decision-Makers [14 CCR § 2375.2(c)]
4. 501(c)(3) Verification [14 CCR § 2375.2(d)]
5. Articles of Incorporation [14 CCR § 2375.2(e)]
6. Dealer Members [14 CCR § 2375.2(f)]
7. Unserved Convenience Zones [14 CCR § 2375.2(g)]
8. Processors and Recycling Centers [14 CCR § 2375.2(h)]
9. Redemption Sites [14 CCR § 2375.2(i)]
10. Fully Operational Timeline [14 CCR § 2375.2(j)]

1. FEDERAL TAX IDENTIFICATION NUMBER

The Federal Tax Identification Number, also known as an Employer Identification Number (EIN), assigned to the Dealer Cooperative is **99-3606002**.

2. CONTACT INFORMATION

Responsibility for submission and oversight of this Stewardship Plan on behalf of the Dealer Cooperative rests with:

Brian Phillips, Executive Director
Circular CRV Association
Mailing Address: 1005 12th Street Lower 1, Sacramento, CA 95814
Phone: (855) 278-2274
E-mail: info@circularcrv.com

3. DECISION-MAKERS

Persons responsible for decisions made on behalf of the Dealer Cooperative include the Executive Director and members of the Board of Directors:

Matthew Dodson, Chairman of the Board of Directors
Ron Fong, Treasurer
Michel LeClerc, Secretary
Jacie Leavitt, Board of Directors, Member
Brian Gray, Vice Chairman
Sarah Spinelli, Board of Directors, Member
Brian Phillips, Executive Director

4. 501(c)(3) NONPROFIT VERIFICATION

The Circular CRV Association is a 501(c)(3) not-for-profit Dealer-sponsored cooperative, established to facilitate and manage the collective efforts of participating Dealer Members in achieving California CRV redemption mandates. A copy of the Determination Letter issued by the Internal Revenue Service demonstrating tax exempt status is included as Exhibit A in the Appendix.

5. ARTICLES OF INCORPORATION

The Dealer Cooperative filed its Articles of Incorporation as a not-for-profit corporation in the State of California on May 31, 2024. The file number for its Articles of Incorporation is 6208570. A copy of the filed Articles of Incorporation is included as *Exhibit B* in the Appendix of this Stewardship Plan.

6. DEALER MEMBERS

Dealer Members participate in the Dealer Cooperative to ensure their compliance with the Beverage Container Recycling and Litter Reduction Act. The Dealer Cooperative consists of Dealer Members operating in both urban and rural communities across California providing broad geographic representation.

A comprehensive list of all participating Dealer Members, including each Dealer Member's registration number, is provided in *Exhibit C* in the Appendix. As the Dealer Cooperative expands, any updates or additions to Dealer Members will be reflected in *Exhibit C* with changes communicated in accordance with CalRecycle requirements.

7. UNSERVED CONVENIENCE ZONES

A list of all unserved convenience zones in which the Dealer Cooperative will provide redemption is included as *Exhibit D* in the Appendix of this Stewardship Plan.

This list is accurate as of the date of submission for approval of this Stewardship Plan. Any changes to this list, including the addition of new unserved convenience zones where the Dealer Cooperative will provide redemption opportunities, will be updated and communicated as directed by CalRecycle.

8. PROCESSORS AND RECYCLING CENTERS

The Dealer Cooperative has established partnerships with third-party redemption contractors throughout the State of California to facilitate the redemption, collection, transportation, and processing of CRV materials in compliance with applicable laws and regulations on behalf of the Dealer Cooperative. In addition to utilizing third-party redemption contractors, the Dealer Cooperative may directly operate redemption activities through its own employees, equipment, and facilities in selected areas of California where doing so improves operational efficiency, consumer convenience, or service coverage. The term redemption contractor used throughout the Stewardship Plan is interchangeable to a third-party retained for the purposes of operating a redemption site on behalf of the Dealer Cooperative and a Dealer Cooperative employee who is responsible for the management and redemption services for the redemption site.

All CRV materials collected on behalf of the Dealer Cooperative will be transported to and processed by recycling centers and material processors certified by the State of California. The Dealer Cooperative will ensure that all CRV materials are handled, transported, and processed in accordance with applicable CalRecycle regulations and operating standards.

A list of recycling centers and corresponding certification numbers where CRV materials may be delivered is provided in *Exhibit E* in the Appendix of this Stewardship Plan. Additionally, *Exhibit F* in the Appendix lists the processors and corresponding certification numbers to whom CRV materials collected on behalf of the Dealer Cooperative may be shipped for processing.

The listings in *Exhibit E* and *Exhibit F* are accurate as of the date of submission for approval of this Stewardship Plan. Any changes to these lists, including the addition of new recycling

centers, processors, or facilities utilized by the Dealer Cooperative, will be updated and communicated as directed by CalRecycle.

9. REDEMPTION SITES

The Dealer Cooperative's redemption network is designed to provide convenient, flexible, and accessible CRV redemption opportunities across California. Many Dealer Members have elected to host or support innovative redemption methods, as defined in 14 CCR § 2370(f), to expand consumer access to CRV redemption services. These redemption methods will be strategically placed to operate in or near the Dealer Member convenience zones, providing flexible and accessible redemption opportunities.

Redemption methods within the Dealer Cooperative network will include:

- Mobile recycling units
- Reverse vending machines (RVMs)
- Bag drop systems, including Mobile Bag Drops
- Kiosks
- Recycling depots

Dealer Members who will allow these redemption methods are identified in *Exhibit G.* The list in *Exhibit G* reflects all redemption sites as of the submission date of this Stewardship Plan. As the network expands, any updates or changes will be communicated as directed by CalRecycle.

10. FULLY OPERATIONAL TIMELINE

Circular CRV Association estimates the development, placement, and operation of a fully deployed and self-sustaining network of redemption locations consistent with the definition of "fully operational" in 14 CCR Section 2370(e) – specifically, "all elements specified in [the] stewardship plan" – will be eighteen (18) months from the time the Dealer Cooperative Stewardship Plan is approved.

The Dealer Cooperative anticipates using a phased approach to become "fully operational." In the first phase, the Dealer Cooperative estimates that mobile recycling redemption solutions will be deployed in most unserved convenience zones relatively quickly: within 60 days of Stewardship Plan approval. In unserved convenience zones where mobile recycling is not possible, the Dealer Cooperative anticipates it will deploy traditional recycling kiosks, which it anticipates will take an additional 30 days to deploy. Taken together, the Dealer Cooperative anticipates being able to provide redemption opportunities in unserved convenience zones where its Dealer Members operate within 90 days of Plan approval.

Between 0 – 90 days following Plan approval, Circular CRV Association will provide monthly updates to CalRecycle that will include the following information by each unserved convenience zone:

- Dealer Name, Dealer Registration Number, and Address, and
- Name of the redemption contractor and confirmation that the redemption site is operating within the convenience zone of the Dealer member in alignment with service and performance standards as outlined in the stewardship plan, and
- Regularly scheduled services are in place, days and hours of operation posted on the Dealer Cooperative's website, and confirmation that redemption services have begun.

The Dealer Cooperative anticipates it will be able to commence quarterly reporting responsibilities to the Department at the conclusion of the first phase of its rollout.

During the second stage of its rollout, the Circular CRV Association anticipates establishing long-term, sustainable, and innovative CRV redemption methods such as bag drop, RVMs, and depots (that include innovative redemption methods) as part of its network. The Dealer Cooperative anticipates participating in the Redemption Innovation Grant Program administered by CalRecycle to acquire these assets. Table 16.9 of the Dealer Cooperative Stewardship Plan summarizes the number of each innovative redemption method the Dealer Cooperative anticipates deploying with the assistance of the Redemption Innovation Grant funds. The Dealer Cooperative will notify the Department following several milestones during the grant application process, including:

- At the time of receipt of Notice(s) to Proceed related to Circular CRV Association's Redemption Innovation Grant applications (or Notice(s) of Denial of Application); and
- At the time of deployment and subsequent operation of each innovative method at each location.

The Dealer Cooperative anticipates the addition of assets acquired through the Redemption Innovation Grant program to the existing network of mobile redemption sites and kiosks will render Circular CRV Association's Stewardship Plan "fully operational" as defined by 14 CCR Section 2370(e) at no more than eighteen (18) months following Plan approval.

PART II. SUBSTANTIVE CONTENTS

STATUTORY CITATION

The following section provides a detailed overview of the requirements outlined in 14 CCR § 2375.4, which specifies the necessary substantive contents of a Dealer Cooperative Stewardship Plan. These requirements, established by CalRecycle, ensure that stewardship plans are comprehensive, transparent, and compliant with the regulatory framework under the California Beverage Container Recycling and Litter Reduction Act. Each subsection addresses specific elements essential to the effective administration, implementation, and oversight of the Dealer Cooperative's redemption program.

SECTION OVERVIEW

To ensure clarity and consistency, the elements of this section are organized and numbered in accordance with the Model Dealer Cooperative Stewardship Plan document issued by CalRecycle in November 2024.

11. Methods of Redemption [14 CCR § 2375.4(a)]
12. Education and Outreach [14 CCR § 2375.4(b)]
13. Dispute Resolution [14 CCR § 2375.4(c)]
14. Community Input [14 CCR § 2375.4(d)]
15. Consumer Convenience [14 CCR § 2375.4(e)]
16. Beverage Container Redemption [14 CCR § 2375.4(f)]

11. METHODS OF REDEMPTION

Pursuant to 14 CCR § 2375.4(a), the Dealer Cooperative will employ a diverse range of redemption methods throughout its network to provide convenient and innovative recycling opportunities, including:

A. MOBILE RECYCLING

B. REVERSE VENDING MACHINES (RVMs)

C. BAG DROP SYSTEMS

D. KIOSKS

E. RECYCLING DEPOTS

These redemption methods are designed to complement one another, ensuring flexibility, increased convenience, and accessibility for consumers across California. By offering multiple avenues for CRV redemption, the Dealer Cooperative will meet or exceed the requirements outlined in PRC § 14578. This multi-faceted approach will increase visibility and awareness of CRV redemption opportunities for the consumer, lead to improved redemption rates, and will reduce waste, thereby diverting valuable materials from landfills and reinforcing California's environmental stewardship goals.

A. MOBILE RECYCLING

Mobile recycling is a key component of the Stewardship Plan, providing a scalable and flexible solution to rapidly deploy convenient CRV redemption opportunities on behalf of Dealer Members for consumers.

Mobile recycling units deliver fully equipped recycling and redemption services directly to convenience zones, addressing the challenges and inefficiencies of traditional fixed-location recycling centers, such as zoning restrictions, landlord acceptance, and high overhead costs. As a result, Dealer Members strongly support mobile recycling as a flexible and efficient solution.

Operated by redemption contractor partners, these mobile units will provide scheduled redemption opportunities across multiple convenience zones. By maintaining a consistent schedule, they will encourage community-based recycling habits, promote long-term consumer behavior change, and expand CRV redemption accessibility.

Through its mobile recycling program, the Dealer Cooperative can immediately expand CRV redemption services into unserved convenience zones. Modeled after the successful CalRecycle-sponsored pilot programs in Culver City and Mendocino County, the Dealer Cooperative will partner with redemption contractors to swiftly deliver flexible and efficient mobile redemption sites that advance California's waste reduction goals and promote a circular economy.

A1. Operations and Awareness

The Dealer Cooperative's redemption contractor partners will utilize bobtail trucks equipped to redeem all CRV-eligible material on a rotating schedule at Dealer Member locations in unserved convenience zones. The operating schedule, including locations, days, and times of operation, will be communicated through multiple channels:

- Signage and printed resources (e.g., on-site signage displayed at dealer entrances and redemption sites with operating hours, materials accepted and informational flyers and pamphlets, and QR codes that direct consumers to additional digital resources)
- Social media and digital resources (e.g., targeted ads, short instructional and entertaining videos, e-mail newsletters, and general posts promoting CRV redemption, supported by a mobile-friendly website with location maps, FAQs, and other relevant information)

Mobile recycling units will operate up to seven (7) days a week, including weekends, and in different unserved convenience zones each day. The units will follow a fixed weekly rotating schedule to provide consistency to consumers in these zones. Hours of operation will range from morning to afternoon and will operate for a minimum of eight (8) hours per day to accommodate varied consumer schedules and needs.

To maximize community awareness and participation, the Dealer Cooperative will tailor outreach efforts specific to the needs of each community. Mobile units will display multilingual signage in accordance with 14 CCR section 2375.4(b)(2) in the convenience zones they serve. Additionally, QR codes linking to resources in several other languages will be available to further enhance accessibility.

The Dealer Cooperative will work with local stakeholders, including city and municipal public works departments and community organizations, to inform residents of mobile recycling program schedules and locations. Community feedback will play a vital role in refining deployment strategies, ensuring the program evolves to meet the diverse and changing redemption needs of California's population.

A2. Accepted Materials, Daily Limits, and Redemption Payments

All CRV-eligible beverage containers will be accepted at all mobile recycling redemption sites. To comply with regulatory requirements, containers must be clean, empty, and properly labeled with markings such as "CA Redemption Value" or "CA CRV," and will be subject to all other regulations governing redemption, including daily load limits, of CRV materials in accordance with 14 CCR § 2535(f).

CRV Payment Methods

Redemption amounts for segregated materials will be issued to consumers in accordance with CalRecycle's document, *California Recycling Program Rates, Table 1: Recycling Centers*. The Dealer Cooperative will ensure that redemption contractors pay consumers on an individual container (one-for-one) basis, upon consumer request, for quantities of fifty (50) or fewer units of aluminum, glass, plastic, or bimetal containers, or twenty-five (25) or fewer units of bag-in-box, multilayered pouch, or paperboard carton containers.

Mobile recycling units will offer multiple CRV redemption payout options. In the near term, all mobile redemption locations will exclusively provide consumers an immediate cash payout for all redeemed CRV materials. In the longer term, the Dealer Cooperative will explore the viability of a uniform, secure digital wallet system across its entire redemption network as an additional offering.

As detailed in Section 15G of this Stewardship Plan, this digital wallet system would allow consumers to open and manage a secure digital wallet account via website or mobile app, enabling them to track balances, view transaction histories, and select their preferred payout method. In summary, consumers would have the following options for redemption from mobile recycling units:

- Cash redemption (e.g. consumers receive their CRV refund immediately in cash)
- Accumulated digital payment (e.g. consumers could accumulate their CRV refunds, enabling them to save funds and redeem larger amounts in the future, at their convenience)
- Charitable donation (e.g. consumers could donate CRV refunds to a verified charity and receive a donation receipt)
- Debit card payments (e.g., consumers could choose to have CRV refunds deposited onto a debit card, providing immediate access to funds for purchases or cash withdrawals at ATMs)

The Dealer Cooperative seeks to revitalize consumer participation in CRV redemption and recycling by introducing modern, flexible payout options and incentivized experiences that make redemption more convenient, rewarding, and accessible.

A3. Health and Safety Measures

The Dealer Cooperative will require its redemption contractor partners to implement strong health and safety measures for its mobile recycling program in compliance with applicable federal, state, and local regulations to protect the well-being of staff and consumers. These measures include:

- Regular sanitization of equipment and mobile units to ensure cleanliness and reduce contamination risks.

- Mandatory provision and use of personal protective equipment (PPE) for all staff members.
- Ongoing training programs to ensure staff is fully informed of safety protocols and updated regulatory requirements.
- All other operating standards as defined by CalOSHA or other applicable guidelines.

A4. CRV Redemption Participation and Environmental Stewardship

Mobile recycling provides an immediately scalable solution to expand CRV redemption in unserved convenience zones by eliminating physical, regulatory, and logistical barriers that have historically restricted consumer access to traditional redemption services. By providing visible and convenient mobile recycling opportunities, consumers can actively participate in environmental stewardship while easily reclaiming their CRV deposits. Increased participation will lead to higher recycling rates, reduced landfill waste, and a stronger circular economy, ensuring the efficient reuse of valuable materials across California.

B. REVERSE VENDING MACHINES (RVMs)

Reverse vending machines (RVMs) will play a role in the Dealer Cooperative's redemption network. RVMs provide an efficient, automated redemption process by validating and processing CRV-eligible beverage containers on a one-for-one basis, ensuring accurate refunds with minimal consumer effort. To accommodate different redemption needs and volume demands, the Dealer Cooperative will deploy two types of RVMs:

Single-Feed RVMs

Single-feed reverse vending machines (RVMs) provide a simple and automated redemption location, allowing consumers to deposit one CRV-eligible container at a time and receive an immediate refund. These machines are strategically placed in safe, high-traffic public areas, such as grocery store entrances, ensuring ideal visibility and convenience for the consumer. Equipped with advanced optical barcode scanning, sorting, and compaction technology, single-feed RVMs efficiently validate and process materials for recycling. They also compact aluminum, plastic, and, in some cases, glass, optimizing storage capacity and reducing transportation needs. While designed for low-to-moderate volume redemption, their precise one-unit validation process ensures accurate refunds and a seamless consumer experience.

Single-feed RVMs also provide operational flexibility, as they can be programmed to accept specific types and quantities of CRV-eligible containers based on community needs. This adaptability will enable the Dealer Cooperative to address anticipated coverage gaps within its network and implement tailored redemption locations across different convenience zones. Equipped with real-time monitoring systems, single-feed RVMs track performance metrics, issue maintenance alerts, and generate activity reports. These features will allow the Dealer Cooperative to maintain consistent service reliability, optimize operational efficiency, and proactively address any service disruptions across its network.

Several Dealer Members value the simplicity and practicality of these traditional RVMs. Their compact size allows Dealer Members to showcase a strong commitment to community and environmental responsibility while preserving a clean and attractive image for consumers. Once installed, single-feed RVMs provide a consistently visible, reliable, and accessible CRV redemption location for consumers, as part of the Dealer Cooperative's comprehensive CRV redemption strategy.

Bulk-Feed RVMs

Complementing the deployment of single-feed RVMs, the Dealer Cooperative will introduce bulk-feed RVMs as a high-capacity, automated solution designed for convenience zones-where higher redemption volumes are anticipated.

Unlike traditional RVMs, bulk-feed RVMs allow consumers to deposit large quantities of CRV-eligible containers in a single infeed. Advanced technology rapidly validates, sorts, and in some cases, compacts the material, providing a streamlined redemption process that significantly reduces wait times for consumers and maximizes storage efficiencies.

These machines are designed with simple and intuitive interfaces, ensuring a seamless and user-friendly experience. With deployment options for both indoor and outdoor mobile environments, bulk-feed RVMs offer the flexibility to address diverse community needs while supporting accessibility and convenience. Like single-feed RVMs, bulk-feed RVMs are equipped with real-time digital management systems that monitor performance, issue maintenance alerts, and generate detailed activity reports, ensuring continuous operational reliability across the Dealer Cooperative network.

Bulk-feed RVMs will strengthen the Dealer Cooperative's ability to meet California's recycling demands by providing a high-capacity, automated, consumer-friendly solution. Together, these technologies form an innovative and adaptive infrastructure that both supports the modernization of CRV redemption for consumers and will deliver a sustainable, more efficient recycling network.

B1. Operations and Awareness

The Dealer Cooperative anticipates partnering with redemption contractors to deploy, operate, and maintain RVMs in selected high-visibility locations, such as grocery store entrances, parking lots, and other high-traffic public areas to ensure reliable performance and cleanliness. Deployment will be tailored based on anticipated redemption demands, community needs, and optimized transportation routes to and from processing centers, with single-feed RVMs serving areas with steady, lower-volume activity and bulk-feed RVMs catering to high-demand locations.

- Single-feed RVMs typically have a lower holding capacity and will be monitored and serviced on a regular schedule to ensure minimal downtime. The Dealer Cooperative anticipates establishing redemption limits per customer, per day in accordance with 14 CCR § 2375.4(f)(6) on single-feed RVMs in its network. Regular maintenance will focus on emptying storage bins, monitoring compaction units, and cleaning optical scanning and compaction systems to ensure operational efficiency and minimal downtime.

- Bulk-feed RVMs will be deployed in both fixed, in-building locations and mobile unit adaptations. In-building bulk-feed RVMs will be regularly serviced and maintained. Mobile units will similarly be maintained and will operate as a ‘hub-and-spoke’ model, with CRV material collected and transported to centralized processing sites for compaction and processing, as needed. Both configurations will be equipped with real-time digital management systems to monitor performance and issue maintenance alerts as needed.

To foster community engagement and awareness of RVM benefits, the Dealer Cooperative will develop and implement targeted outreach strategies. These strategies will include:

- Signage and printed resources (e.g., on-site signage displayed at dealer entrances and redemption sites with operating hours, materials accepted and informational flyers and pamphlets, and QR codes that direct customers to additional digital resources)
- Social media and digital resources (e.g., targeted ads, short instructional and entertaining videos, e-mail newsletters, and general posts promoting CRV redemption, supported by a mobile-friendly website with location maps, FAQs, and other information)
- In-person demonstrations (e.g., on-site staff and ambassadors at redemption locations to educate consumers on new redemption technology with live demonstrations, and distributing printed resources)

By integrating advanced technology, strategic deployment, and comprehensive community outreach, the Dealer Cooperative will ensure both single-feed and bulk-feed RVMs are effective, reliable, and consumer-friendly components of its CRV redemption network.

B2. Accepted Materials, Daily Limits, and Redemption Payments

Current single-feed RVMs available for deployment by the Dealer Cooperative are limited to acceptance of only CRV-eligible aluminum, glass, and PET-1 plastic bottles. These machines use either advanced optical barcode technology or artificial intelligence to verify that all redeemed materials are properly labeled with "CA Redemption Value" or "CA CRV" and comply with all regulatory redemption requirements.

To maintain operational efficiency and consistent uptime, the Dealer Cooperative may adjust material acceptance settings on certain single-feed RVMs. For example, some units may be programmed to accept only aluminum and PET-1 plastic, excluding glass. In such cases, prominent signage will be placed on the RVM to direct consumers to the nearest location where other CRV-eligible containers can be redeemed.

Additionally, the Dealer Cooperative may implement daily load limits due to the limited holding capacity of certain RVM models. To ensure consumers have access to full redemption opportunities, the Dealer Cooperative will provide clear communication and alternative redemption options in accordance with 14 CCR § 2375.4(f)(6).

CRV Payment Methods

Redemption amounts from single-feed and bulk-feed RVMs will be issued on a one-for-one basis to consumers and will offer multiple CRV redemption payout options. In the near term, all RVMs within the Dealer Cooperative's redemption network will use pre-installed payment software offered by the Dealer Cooperative's equipment manufacturing partners upon deployment. These interfaces will enable consumers to link their refunds to preferred digital payment methods, including Venmo, Zelle, or direct payment to a bank account. In the longer term, the Dealer Cooperative will explore the viability of a uniform, secure digital wallet system across its entire redemption network as an additional offering. Consumers would have the following options for redemption from RVMs:

- Accumulated digital payment (e.g. consumers could accumulate their CRV refunds, enabling them to save funds and redeem larger amounts in the future, at their convenience)
- Charitable donation (e.g. consumers could donate CRV refunds to a verified charity and receive a donation receipt)
- Debit card payments (e.g., consumers could choose to have CRV refunds deposited onto a debit card, providing immediate access to funds for purchases or cash withdrawals at ATMs)

By modernizing CRV redemption with secure, digital-first solutions, the Dealer Cooperative is focused on increasing consumer participation and streamlining the redemption process, making recycling more accessible, rewarding, and efficient.

B3. Health and Safety Measures

The Dealer Cooperative will implement comprehensive health and safety measures for all single and bulk-feed RVM machines, in compliance with applicable federal, state, and local regulations to protect the well-being of staff and consumers. These measures include:

- Regular sanitization of equipment to ensure cleanliness, reduce contamination risks, and present a clean, inviting machine for consumer use.
- Mandatory provision and use of personal protective equipment (PPE) for all staff members when servicing RVMs.
- Ongoing training programs to ensure staff are fully informed of safety protocols and updated regulatory requirements.
- All other operating standards as defined by CalOSHA or other applicable guidelines.

B4. CRV Redemption Participation and Environmental Stewardship

Integrating single-feed and bulk-feed RVMs into the Dealer Cooperative's redemption network will provide consumers with a highly visible, user-friendly CRV redemption option. By processing, sorting, and, when applicable, compacting materials, RVMs will streamline

operations and improve efficiency. As an accessible and technology-driven solution, RVMs will expand redemption opportunities while empowering Californians to actively contribute to the State's circular economy and sustainability efforts.

C. BAG DROP SYSTEMS

The Dealer Cooperative intends to deploy bag drop systems as a fundamental component of its near and long-term strategies to expand accessible, efficient, and convenient CRV redemption locations for consumers.

Bag drop systems include both physical drop-off sites as well as mobile bag drop units. Employing the use of electronic tracking software, consumers may use either designated bags pre-printed with unique, scannable identifiers to deposit CRV materials at convenient locations, or use pre-printed labels identifying the consumer's material and affixing the labels to the bags. Bag drop systems eliminate the need to wait for material processing. The bags are collected, verified, inspected, and processed later, crediting the appropriate CRV amount to the consumer upon completion.

This contactless approach offers unparalleled convenience to consumers by eliminating the wait time associated with traditional redemption methods. Many Dealer Members support installation of bag drop systems due to their practicality, as they can be placed in highly visible locations away from store entrances, function independently of store personnel, and minimize daily operational disruption. Where permanent placement of bag drop units is not feasible, mobile bag drop units can be deployed, allowing consumers to drop off bags on pre-scheduled days, with the mobile bag drop unit being removed from the site at the end of daily operations. Bag drop systems enable the collection of large volumes of CRV material while significantly lowering the labor expenses incurred with managing a mobile recycling unit or traditional recycling kiosk.

Bag drop systems have the potential to significantly increase CRV redemption rates by reducing the time barriers associated with CRV redemption. Their scalability allows for seamless deployment alongside other CRV redemption methods, functioning as part of a "hub-and-spoke" model. Bag drop systems not only increase consumer participation due to the convenience they offer but also collect and process higher volumes of CRV material when complementing or embedded into larger facilities, further enhancing the overall efficiency and capacity of the redemption network.

C1. Operations and Awareness

The Dealer Cooperative intends to deploy and manage both permanent and mobile bag drop recycling systems and related software in unserved convenience zones. These systems will be strategically placed or operated in highly visible locations to maximize consumer accessibility. To redeem CRV-eligible containers using bag drop systems and software within the Dealer Cooperative's network of redemption sites, a consumer can register an account via their smartphone and place CRV material in bags that are either pre-printed with unique QR codes that link to their account, or in bags to which labels identifying a consumer's CRV material and unique information are affixed. Once the consumer drops their material into the bag drop unit or

leaves their material with the attendant onsite at a mobile bag drop location, the material will be processed, and the CRV refunds are credited to the consumer's digital account within three (3) working days. Transparency will be enhanced through the mobile application software that will allow consumers to track the acceptance and processing of their redemptions through their account.

The Dealer Cooperative will implement targeted outreach and education strategies to educate consumers on how to effectively use bag drop systems, minimize material contamination within their bags, and ensure smooth transaction processing. These strategies will include:

- Signage and printed resources (e.g., on-site signage displayed at dealer entrances and redemption sites with operating hours and materials accepted, informational flyers and pamphlets, and QR codes that direct customers to additional digital resources)
- Social media and digital resources (e.g., targeted ads, short instructional and entertaining videos, e-mail newsletters, and general posts promoting CRV redemption, supported by a mobile-friendly website with location maps, FAQs, and other information)
- In-person demonstrations (e.g., on-site staff and ambassadors at redemption locations to educate consumers about setting up an account, demonstrating the convenience, and distributing printed resources)

As part of its commitment to advancing recycling infrastructure, the Dealer Cooperative is also exploring the integration of bag drop software at mobile redemption sites, kiosks, and eventually recycling depots. This hybrid model will combine the flexibility of mobile recycling with the convenience of bag drop systems, creating an innovative solution to enhance consumer engagement and efficiency. As with physical bag drop systems, consumers will be able to drop off CRV material at mobile redemption sites, kiosks, or recycling depots without having to wait in person for the material to be processed. Refunds for CRV materials dropped off at these sites will be credited to consumer accounts within three (3) working days.

The Dealer Cooperative believes that bag drop systems, whether deployed as mobile units, physical units, or integrated with other innovative methods of recycling, have the potential to drive significant incremental CRV redemption by simplifying and accelerating the CRV redemption process for consumers. Integrating bag drop as an additional method of redemption will enhance consumer convenience, increase participation, and support California's goal of building a highly efficient recycling infrastructure.

C2. Accepted Materials, Daily Limits, and Redemption Payments

All CRV-eligible beverage containers will be accepted at all Dealer Cooperative bag drop locations, including mobile bag drop locations and those that may be integrated with other redemption methods. To comply with regulatory requirements, containers dropped by consumers will be verified during later processing to ensure they are clean, empty, and properly labeled with markings such as "CA Redemption Value" or "CA CRV." Material will be subject to all other regulations governing redemption, including daily load limits, of CRV materials in accordance with 14 CCR § 2535(f).

CRV Payment Methods

Redemption amounts for segregated materials by weight will be issued to consumers in accordance with CalRecycle's document, *California Recycling Program Rates*. Redemption amounts redeemed using a bulk-feed RVM will be paid on a one-for-one basis. Consumers will be credited their redemption values within three (3) working days following bag drop-off through multiple CRV redemption payout options.

Bag drop systems will offer multiple CRV redemption payout options. In the near term, all bag drop units within the Dealer Cooperative's redemption network will use pre-existing payment software offered by the Dealer Cooperative's equipment and software partners upon deployment. These interfaces will enable consumers to link their refunds to preferred digital payment methods, including direct payment to a bank account. In the longer term, the Dealer Cooperative will explore the viability of a uniform, secure digital wallet system across its entire redemption network as an additional offering. With this system, consumers would have the following options for redemption from bag drop systems:

- Accumulated digital payment (e.g. consumers could accumulate their CRV refunds, enabling them to save funds and redeem larger amounts in the future, at their convenience)
- Charitable donation (e.g. consumers could donate CRV refunds to a verified charity and receive a donation receipt)
- Debit card payments (e.g., consumers could choose to have CRV refunds deposited onto a debit card, providing immediate access to funds for purchases or cash withdrawals at ATMs)

By offering convenient, consumer-driven redemption methods and complying with the three (3) business day payment rule, the Dealer Cooperative aims to foster long-term consumer engagement and increased participation in CRV redemption efforts.

C3. Health and Safety Measures

The Dealer Cooperative will implement comprehensive health and safety measures for all bag drop systems in compliance with applicable federal, state, and local regulations to protect the well-being of staff and consumers. These measures include:

- Regular sanitization of equipment to ensure cleanliness, reduce contamination risks, and present a clean, inviting unit (where applicable) for consumer use.
- Mandatory provision and use of personal protective equipment (PPE) for all staff members when servicing any bag drop recycling unit.
- Ongoing training programs to ensure staff are fully informed of relevant safety protocols and updated regulatory requirements.
- All other operating standards as defined by CalOSHA or other applicable guidelines.

C4. CRV Redemption Participation and Environmental Stewardship

Bag drop systems and associated software solutions will significantly enhance CRV redemption rates by effectively eliminating the time barriers consumers typically associate with other types of recycling methods and instead offer consumers a quick and convenient way to engage with CRV redemption. These systems will play a critical role in advancing California's circular economy by improving consumer convenience, thereby promoting a stronger and more vibrant culture of recycling across the state.

D. KIOSKS

Recycling kiosks are specialized, fixed-location collection points designed to facilitate the collection and redemption of CRV-eligible beverage containers. The Dealer Cooperative plans to leverage this well-established and widely recognized CRV redemption method, particularly at locations not directly paired with a Dealer Member's physical premises.

Originally designed to align with the State's efforts to improve recycling infrastructure, kiosks have proven to be a convenient and effective solution for consumers to redeem CRV deposits. Traditionally, kiosks have operated as fully staffed locations where consumers receive assistance with sorting, weighing, and processing their CRV materials. Recently, many kiosks have integrated innovative recycling methods, such as single-feed and bulk-feed RVMs, to enhance consumer engagement and streamline operations. The opportunity to further expand innovative redemption solutions within kiosk operations holds significant promise.

As a proven operating model, recycling kiosks have delivered accessible and reliable CRV redemption services to surrounding convenience zones for decades. Dealer Members, consumers, and CalRecycle have accumulated significant experience from kiosk operations, drawing valuable insights from both their successes and challenges. As a result, recycling kiosks naturally align with the Dealer Cooperative's Stewardship Plan when enhanced with innovative technologies and operational improvements, reinforcing their role as a trusted element in California's recycling infrastructure.

D1. Operations and Awareness

The Dealer Cooperative is committed to building upon the well-established kiosk model by addressing past inefficiencies, improving operational standards, and providing consumers with an innovative, efficient, and modern experience. The Dealer Cooperative will partner with redemption contractors with extensive experience in managing kiosks and identify optimal locations for kiosk sites. Reimagined kiosks will integrate multiple redemption methods, such as bag drop systems, single-feed and bulk-feed RVMs, and staffed assistance for material redeemed by weight to provide consumers with diverse and convenient options. The Dealer Cooperative will focus on opportunities to site kiosks in community locations beyond Dealer Member parking lots, ensuring broader geographic accessibility.

Redemption contractor partners will be responsible for staffing, servicing, and sanitizing kiosk sites in compliance with the Dealer Cooperative's standards. Staffed kiosks will provide consumers with support for container validation, refund of CRV deposits, automation

supervision, and recycling education. These kiosks will be designed for accessibility and ease of use, ensuring seamless integration into the communities they serve.

To enhance consumer engagement, the Dealer Cooperative will implement targeted outreach strategies in collaboration with redemption contractors. These strategies will include:

- Signage and printed resources (e.g., on-site signage displayed at dealer entrances and redemption sites with operating hours, materials accepted and informational flyers and pamphlets, and QR codes that direct customers to additional digital resources)
- Social media and digital resources (e.g., targeted ads, short instructional and entertaining videos, e-mail newsletters, and general posts promoting CRV redemption, supported by a mobile-friendly website with location maps, FAQs, and other information)
- In-person demonstrations (e.g., on-site staff and ambassadors at redemption locations to educate consumers about new redemption technology with live demonstrations, and distributing printed resources)

By blending innovative new technology and community outreach with a familiar but reimagined model, the Dealer Cooperative expects kiosks to continue to be an accessible, consumer-friendly, and vital part of CRV redemption infrastructure in convenience zones where they operate.

D2. Accepted Materials, Daily Limits, and Redemption Payments

All CRV-eligible beverage containers will be accepted at all kiosk locations. To comply with regulatory requirements, containers presented for redemption at kiosks by weight must be clean, empty, and properly labeled with markings such as "CA Redemption Value" or "CA CRV." Optical barcode identification technology used by single and bulk-feed RVMs will ensure that all materials redeemed are CRV-eligible. At kiosks where bag drop technology is deployed, containers deposited by consumers will be verified during processing to ensure they are clean, empty, and properly labeled. In all cases, material redeemed by consumers will be subject to all other regulations governing redemption, including daily load limits, of CRV materials in accordance with 14 CCR § 2535(f).

CRV Payment Methods

Redemption amounts for segregated materials redeemed by weight will be issued to consumers in accordance with CalRecycle's document, *California Recycling Program Rates*. The Dealer Cooperative will ensure that redemption contractors pay consumers on an individual container (one-for-one) basis, upon consumer request, for quantities of fifty (50) or fewer units of aluminum, glass, plastic, or bimetal containers, or twenty-five (25) or fewer units of bag-in-box, multilayered pouch, or paperboard carton containers. The Dealer Cooperative anticipates redemption contractors to require materials dropped off by consumers using bag drop software to be segregated by material type to be eligible to be processed by weight by the redemption contractor.

Kiosks will offer multiple CRV redemption payout options. In the near term, all kiosk locations will exclusively provide consumers with an immediate cash payout for all redeemed CRV materials, identical to the redemption process in use today. In the longer term, the Dealer Cooperative will explore the viability of a uniform, secure digital wallet system across its entire redemption network as an additional offering. With this system, consumers would have the following options for redemption from kiosks:

- Cash redemption (e.g. consumers receive their CRV refund immediately in cash)
- Accumulated digital payment (e.g. consumers could accumulate their CRV refunds, enabling them to save funds and redeem larger amounts in the future, at their convenience)
- Charitable donation (e.g. consumers could donate CRV refunds to a verified charity and receive a donation receipt)
- Debit card payments (e.g., consumers could choose to have CRV refunds deposited onto a debit card, providing immediate access to funds for purchases or cash withdrawals at ATMs)

By offering several convenient redemption options, the Dealer Cooperative intends to provide a flexible and incentivized kiosk experience to California consumers.

D3. Health and Safety Measures

The Dealer Cooperative will require its redemption contractor partners to implement comprehensive health and safety measures for the kiosk network in compliance with applicable federal, state, and local regulations to protect the well-being of staff and consumers. These measures include:

- Regular sanitization of equipment to ensure cleanliness, reduce contamination risks, and present an inviting appearance for consumers.
- Mandatory provision and use of personal protective equipment (PPE) for all staff members, as applicable, when operating any equipment.
- Ongoing training programs to ensure staff are fully informed of safety protocols and updated regulatory requirements.
- All other operating standards as defined by CalOSHA or other applicable guidelines.

D4. CRV Redemption Participation and Environmental Stewardship

The inclusion of kiosks in the Dealer Cooperative's Stewardship Plan ensures that the extensive knowledge base surrounding their operation is effectively leveraged to maximize CRV redemption within the Dealer Cooperative's network. By incorporating innovative technologies such as bag drops and RVMs into a modern, reimagined kiosk model, the Dealer Cooperative

aims to re-engage consumers who may have previously disengaged from CRV redemption due to the inefficiencies of traditional kiosks.

The flexibility to site kiosks outside Dealer Member parking lots further enhances their potential to drive consumer engagement by reaching more consumers. Through thoughtful, data-driven placement and targeted community outreach, the Dealer Cooperative will integrate kiosks into its network to expand CRV redemption opportunities into more unserved convenience zones. This approach will strengthen consumer participation and reinforce the Dealer Cooperative's mission to build a sustainable, inclusive, and efficient resource recovery system.

E. RECYCLING DEPOTS

Recycling depots are the cornerstone of the Dealer Cooperative's long-term sustainable CRV redemption strategy, representing a transformative step forward in California's recycling infrastructure. These next-generation, automated facilities embody the future of CRV redemption in California, aligning with the state's leadership in sustainability while addressing the need for modern solutions to meet California's ambitious circular economy goals.

Recycling depots are centralized collection and processing facilities designed to scale and efficiently process millions of beverage containers annually, making them an ideal solution for high-demand areas and geographic areas with a high number of unserved convenience zones. Depots offer the unique advantages of integrating traditional weigh-scale offerings as well as new technologies, including single and bulk-feed RVMs and bag drop technology, into a single, space-optimized, consumer-focused location.

These 'hubs' deliver substantial cost savings by enhancing operational efficiency and sorting accuracy. With advanced automated counting, sorting, and compaction systems, recycling depots efficiently accept and process very large numbers of CRV-eligible containers while significantly reducing the labor costs tied to traditional hand-sorting methods. Materials collected from surrounding mobile recycling units, bag drop units, and RVMs can be transported to and processed at these centralized anchor redemption centers, further enhancing operational efficiency. On-site crushing technology allows processing of larger volumes of materials and minimizes the frequency of trips to material processors, which directly lowers transportation expenses.

For consumers, recycling depots integrate and offer multiple convenient redemption options, including redemption by weight, single-feed RVMs, bulk-feed RVMs, and bag drop systems. Located in modern, clean, and optimized retail spaces within their communities, depots make CRV redemption more accessible, efficient, and consumer friendly. By combining convenience with advanced operations, recycling depots improve the experience for consumers and redemption contractors while supporting California's CRV program goals.

Members of the Dealer Cooperative are highly supportive of recycling depots. This solution moves recycling operations indoors, thereby removing the image of an outdoor redemption site from the Dealer Member's parking area. Additionally, recycling depots can be sited off premises from a Dealer location, freeing up valuable space and resources for the Dealer Member while ensuring compliance with CRV requirements without disrupting store operations. By centralizing

recycling services through depots, the Dealer Cooperative can facilitate the ability for the Dealer Member to focus on their core business while supporting California's recycling goals through efficient infrastructure.

Using state-of-the-art technology, depots can generate comprehensive aggregated data on recycled materials and identify data-driven patterns in product types and materials across specific geographic areas, offering actionable insights into recycling trends and consumer behavior. This valuable data will empower the Dealer Cooperative to support public agencies and private sector stakeholders in assessing recycling performance and identifying opportunities for improvement. By leveraging this innovative approach, recycling depots will strengthen the circular economy and advance shared sustainability goals.

By collaborating with diverse stakeholders across California's recycling and resource recovery sectors, the Dealer Cooperative envisions recycling depots as transformative hubs that redefine how Californians participate in CRV redemption. These depots will serve as high-visibility centers of innovation, delivering seamless consumer experiences that reignite the vision and excitement of California's pioneering 1986 Bottle Bill. By offering a modern, consumer-friendly experience, these facilities will encourage repeat participation while streamlining operations, thereby advancing California's leadership in sustainable resource recovery.

E1. Operations and Awareness

The Dealer Cooperative is committed to laying a strong foundation for the expansion of recycling depots throughout California. By drawing on best practices and experiences gleaned from existing recycling centers, including the Simply Recycle facility in Fair Oaks, California, the Dealer Cooperative aims to establish best-in-class operational standards while delivering seamless service for consumers. These efforts focus on enhancing the interaction between Dealer Members, consumers, and depots, fostering a more accessible, user-friendly, and efficient CRV redemption experience.

The Dealer Cooperative will identify and partner with redemption contractors with existing community ties to operate recycling depots throughout California. The Dealer Cooperative will implement consumer-focused standards and resources available in languages spoken in the communities they are located, and protocols to manage and run these depots effectively. The Dealer Cooperative will be responsible for staffing, servicing, and maintaining these depots in compliance with the Dealer Cooperative's standards. Depot staff will provide consumers with support for redemption by weight, container validation using the various innovative technologies, refund of CRV deposits, automation supervision, and recycling education. These depots will be consistently maintained and designed for accessibility and ease of use, ensuring seamless integration into the communities they serve.

To enhance consumer engagement, the Dealer Cooperative will implement a targeted outreach and education initiative to build community awareness and support for new recycling depots. This initiative will include:

- Signage and printed resources (e.g., on-site signage displayed at dealer entrances and redemption sites with operating hours, materials accepted and informational flyers and pamphlets, and QR codes that direct customers to additional digital resources)
- Social media and digital resources (e.g., targeted ads, short instructional and entertaining videos, e-mail newsletters, and general posts promoting CRV redemption, supported by a mobile-friendly website with location maps, FAQs, and other information)
- In-person demonstrations (e.g., on-site staff and ambassadors at redemption locations to educate consumers about new redemption technology with live demonstrations, and distributing printed resources)
- Traditional media and earned media (e.g., partnerships with local TV and radio stations for interviews and advertisements, direct mail campaigns to unserved convenience zones, and press releases to news outlets about milestones and initiatives)
- Stakeholder partnerships (e.g., collaborating with local governments, municipal agencies, and environmental organizations to enhance outreach through shared newsletters, public announcements, and coordinated web content)
- Community events and charitable programs (e.g., grand openings of redemption locations, facility tours for schools and residents, and CRV donation drives to local charities)

This comprehensive strategy ensures local participation and successful introduction of a recycling depot into the community, encouraging and sustaining its use by consumers.

E2. Accepted Materials, Daily Limits, and Redemption Payments

All CRV-eligible beverage containers will be accepted at all recycling depots. To comply with regulatory requirements, containers presented for redemption in a recycling depot by weight must be clean, empty, and properly labeled with markings such as "CA Redemption Value" or "CA CRV." Barcode identification technology used by single and bulk-feed RVMs will ensure that all materials redeemed are CRV-eligible. Where bag drop systems are deployed in a depot, containers redeemed by consumers will be verified during processing to ensure they are clean, empty, and properly labeled. In all cases, material redeemed by consumers will be subject to all other regulations governing redemption, including daily load limits, of CRV materials in accordance with 14 CCR § 2535(f).

CRV Payment Methods

Redemption amounts for segregated materials by weight will be issued to consumers in accordance with CalRecycle's document, *California Recycling Program Rates*. For consumers who wish to redeem material on an individual container (one-for-one) basis in quantities of fifty (50) or fewer units of aluminum, glass, or plastic, redemption value will be paid on a one-for-one basis using single-feed RVMs, or by counting by depot staff. Likewise, for consumers using bulk-feed RVMs, including bag drop, redemption value will be paid on a one-for-one basis.

Recycling depots will require significant capital investment and regulatory approval by local government and community stakeholders; as such, the Dealer Cooperative does not anticipate their full operation immediately following CalRecycle's approval of its Stewardship Plan. The Dealer Cooperative expects that by the time the first recycling depot opens, its unified digital wallet system will be fully operational and integrated to provide flexible payout options and streamlined payment processing for consumers. Through this technology, the Dealer Cooperative anticipates offering consumers multiple redemption options, including:

- Cash redemption (e.g. consumers receive their CRV refund immediately in cash)
- Accumulated digital payment (e.g. consumers could accumulate their CRV refunds, enabling them to save funds and redeem larger amounts in the future, at their convenience)
- Charitable donation (e.g. consumers could donate CRV refunds to a verified charity and receive a donation receipt)
- Debit card payments (e.g., consumers could choose to have CRV refunds deposited onto a debit card, providing immediate access to funds for purchases or cash withdrawals at ATMs)

By offering these innovative, varied, and convenient options to consumers in conjunction with a revolutionized and modern retail space, the Dealer Cooperative anticipates providing an attractive, incentivized, and engaging recycling and redemption experience for consumers.

E3. Health and Safety Measures

The Dealer Cooperative will implement comprehensive health and safety protocols to comply with applicable federal, state, and local regulations to protect the well-being of staff and consumers while operating recycling depots, such as:

- Regular sanitization of equipment to ensure cleanliness, reduce contamination risks, and ensure an inviting experience for consumers.
- Mandatory provision and use of personal protective equipment (PPE) when applicable for all staff members.
- Ongoing training programs to ensure staff are fully informed of safety protocols when using equipment as well as any applicable regulatory requirements.
- All other operating standards as defined by CalOSHA or other applicable guidelines.

E4. CRV Redemption Participation and Environmental Stewardship

Recycling depots represent the Dealer Cooperative's vision for a modern, sustainable and efficient CRV redemption network across California. By increasing accessibility, streamlining recycling processes, and reducing environmental impacts, these facilities directly support California's circular economy and ambitious resource recovery goals. Through innovative

design, strategic placement, and community engagement, recycling depots will not only improve CRV redemption rates but will also foster a culture of environmental stewardship. This commitment underscores the Dealer Cooperative’s dedication to creating a cleaner, more efficient future for all Californians.

12. EDUCATION AND OUTREACH METHODS

Consistent with 14 CCR § 2375.4, the Dealer Cooperative is committed to delivering a highly effective outreach program designed to inform target audiences about opportunities surrounding CRV redemption. To achieve this, the Dealer Cooperative will use a combination of communication methods, including:

- Signage and printed resources (e.g., on-site instructional signage displayed at dealer entrances and redemption sites with operating days, hours, types of materials accepted, as well as informational flyers and pamphlets)
- Social media and digital resources (e.g., targeted ads, short instructional and entertaining videos, and general posts promoting CRV redemption, supported by a mobile-friendly website available in several languages with FAQs and other relevant resources)
- Redemption site locator map (e.g. redemption site database integrated into the Dealer Cooperative's website with the ability to search and filter for redemption sites, methods of redemption, and accepted materials at various sites.)
- In-person demonstrations (e.g., on-site ambassadors at redemption locations promoting CRV benefits, guiding consumers on new redemption technology with live demonstrations, and distributing printed resources)
- Traditional media and earned media (e.g., partnerships with local TV and radio stations for interviews and advertisements, direct mail campaigns to underserved zones, and press releases to news outlets about milestones and initiatives)
- Stakeholder partnerships (e.g., collaborating with Dealer Members, local governments, municipal agencies, and environmental organizations to enhance outreach through shared newsletters, public announcements, and coordinated web content)
- Community events and charitable programs (e.g., grand openings of redemption locations, facility tours for schools and residents, and CRV donation drives for local charities)
- Environmental impact tracker (e.g., an interactive digital account redemption feature displaying carbon emissions saved and total bottles and cans recycled to encourage further participation and environmental education)
- Corporate responsibility partnerships (e.g., collaborations with beverage manufacturers to promote recycling and support sustainability programs)

A. MESSAGE PLATFORM

A1. "CRV, Reinvented."

The Dealer Cooperative will launch a cohesive and impactful public messaging campaign centered on its official tagline, *"*CRV, Reinvented*."*

The tagline *"CRV, Reinvented"* embodies the Dealer Cooperative's mission to align the individual efforts of its Dealer Members into a unified, efficient, and innovative redemption network that optimizes their critical role in the success of California's Bottle Bill while amplifying their collective impact on State's redemption goals. By synchronizing under a coordinated plan, Dealer Members become more effective in supporting practical, industry-inclusive solutions that benefit consumers and strengthen California's recycling ecosystem. The tagline also encapsulates the Dealer Cooperative's public benefit by its participation in the modernization of California's redemption infrastructure through delivering operational efficiencies and innovative recycling technologies, thus improving the CRV redemption experience for all Californians.

The Dealer Cooperative's tagline is meant to inspire community participation, build intrigue and excitement in CRV redemption, and engage consumers, Dealer Members, and redemption contractor partners by emphasizing innovation and accessibility. This central theme for the Dealer Cooperative's education and outreach campaign will drive meaningful improvements to CRV redemption while promoting shared responsibility and sustainable recycling for all stakeholders across California.

A2. Education and Outreach Themes

The Dealer Cooperative will use the communication methods listed above to inform and engage its target audiences on key themes surrounding recycling and CRV redemption, such as:

- Which beverage container materials are accepted, and how can they be redeemed? (e.g., outlining eligible CRV material types, detailing various redemption methods such as bag drops, mobile redemption sites, recycling depots, traditional redemption centers, etc.)
- Where can CRV-eligible material be redeemed? (e.g. Dealer Cooperative site locations, hours of operations, etc.)
- How does CRV material redemption benefit the consumer? (e.g. return of CRV deposit charged at time of purchase, cleaner local communities, promoting California's circular economy, etc.)

A3. Target Audiences

The Dealer Cooperative's outreach and education strategy will be designed to effectively communicate with key stakeholders within the CRV redemption ecosystem. The Dealer Cooperative aims to ensure equitable access to information regarding CRV redemption opportunities by tailoring its communication methods and materials for various stakeholders to enhance consumer and Dealer Member engagement, address language access opportunities, and provide relevant and actionable program information.

California Consumers

The Dealer Cooperative's messaging to consumers will focus on building awareness and accessibility of CRV redemption opportunities offered by the Dealer Cooperative. This effort will include the use of printed materials such as signs, flyers, and postings tailored to the language needs of the communities. These printed materials will feature QR codes that link to a detailed map of local redemption sites, operational hours, and accepted materials. These materials will be prominently displayed at redemption sites as well as Dealer Member locations, and will include the Dealer Cooperative's website, http://www.circularcrv.org, which will contain additional information and resources.

Social media campaigns across various platforms will promote local redemption opportunities offered by the Dealer Cooperative and educate consumers about recycling and CRV redemption. These campaigns will include in-person testimonials and content produced in various languages designed to increase consumer engagement and participation in CRV redemption throughout the State.

Dealer Members

The Dealer Cooperative's founding mission is to connect Dealer Members, redemption contractors, and the public to facilitate innovative, sustainable, and accessible redemption sites in unserved convenience zones where Dealer Members operate. To support this mission, the Dealer Cooperative will provide resources and guidance on its website to prospective Dealers interested in joining the Dealer Cooperative. As part of its outreach efforts, the Dealer Cooperative will regularly advertise in industry publications such as *California Grocer*, a magazine published by the California Grocers Association, and other retail-focused journals. These advertisements will raise awareness about the Dealer Cooperative's services and the benefits of membership. In addition, the Dealer Cooperative will maintain a consistent presence at industry events centered around Dealers to sustain visibility, continue outreach efforts, and encourage participation.

Through consistent communication and outreach, the Dealer Cooperative intends to position itself as the preferred solution for prospective Dealers seeking to meet their legal requirements related to CRV redemption. By promoting the benefits of membership, the Dealer Cooperative will encourage broader participation and collaboration by its members, thereby strengthening statewide recycling and redemption efforts.

Redemption contractors

The Dealer Cooperative will create and provide redemption contractors with signage that communicates essential information to consumers, including operating hours of redemption locations, accepted materials, and instructions for providing feedback and reporting issues. This signage will be prominently displayed at each redemption location and will appear in languages reflecting the demographics of the surrounding area to ensure accessibility.

The Dealer Cooperative will also communicate with redemption contractors to share updates on new redemption sites, opportunities for expanding services, and initiatives supporting

underserved communities. By partnering with redemption contractors who have deep knowledge of the communities and regions they serve, the Dealer Cooperative will help identify potential redemption locations in unserved convenience zones, support redemption contractors in evaluating and pursuing opportunities that align with program goals, and drive initiatives that support underserved communities. The Dealer Cooperative will also inform redemption contractors about technological advancements in redemption equipment, including variations in mobile recycling units, bag drop systems, and reverse vending machines, offering insights into innovative methods to enhance operational efficiency and consumer participation.

Through proactive communication, the Dealer Cooperative will enable redemption contractors to expand their role in the CRV program while advancing California's goals of increasing accessibility and recycling rates. This approach will strengthen the redemption network and support the development of a more efficient, accessible, and sustainable recycling system.

B. LANGUAGE ACCESS

In compliance with 14 CCR § 2375.4(b)(2), the Dealer Cooperative is committed to ensuring linguistically relevant communication with Limited-English Proficient (LEP) communities in unserved convenience zones. By leveraging Census 2020 data[1] and the California Department of Finance's Web Application[2] for identifying leading non-English languages, the Dealer Cooperative will tailor its outreach to the predominant languages spoken within each census tract where it will operate.

This targeted approach will ensure clear, accessible communication and will foster inclusivity by addressing the unique language needs of California's diverse population. For example, in addition to English, if a census tract indicates significant Cantonese and Spanish-speaking populations, materials in these languages will be provided. All printed materials will feature QR codes that link to resources available in additional languages on the Dealer Cooperative's mobile-friendly website.

[1] United States Census Bureau Population Data. Available at https://data.census.gov/profile/California?g=040XX00US06
[2] California Department of Finance, Demographic Research Unit. *Leading Non-English Languages in California.* Web Mapping Application. Published September 23, 2024. Updated December 30, 2022. Available at: https://dru-data-portal-cacensus.hub.arcgis.com/apps/edaf9becf66d4a16be9844726c29cf2f/explore

B1. Supported Languages

Educational and outreach materials will be developed in the following languages, consistent with the Dealer Cooperative's compliance with 14 CCR § 2375.4(b)(2) and the Language and Communication Access Plan (LACAP)[3]

- Arabic
- Armenian
- Assyrian Neo-Aramaic
- Cantonese
- Chaldean Neo-Aramaic
- Chinese
- Farsi
- Filipino
- Hindi
- Hmong
- Iu Mien
- Japanese
- Khmer
- Korean
- Mandarin
- Min Nan Chinese
- Portuguese
- Punjabi
- Russian
- Spanish
- Tagalog
- Telugu
- Thai
- Ukrainian
- Vietnamese

C. COMMUNITY OUTREACH EFFORTS

The Dealer Cooperative will support community-based outreach programs aimed at fostering a stronger culture of recycling across California to increase CRV redemption rates.

Targeted community outreach efforts will be conducted through activities such as workshops, public engagement, and community events. These activities might involve city-sponsored events, demonstrations for local schools, neighborhood associations, and centers of worship, all allowing flexibility for the Dealer Cooperative to tailor redemption initiatives to specific

[3] California Complete Count - Census 2020. *Language and Communication Access Plan.* Prepared by the California Complete Count - Census 2020 Office. May 17, 2019. Available at: https://census.ca.gov/wp-content/uploads/sites/4/2019/06/LACAP.pdf.

communities. The Dealer Cooperative anticipates it will collaborate with field technicians and recycling ambassadors previously employed by “CRV ConnX”, a Workforce Development Grant program funded by CalRecycle, to increase CRV redemption participation and awareness in key areas. By leveraging their industry expertise and deep ties to the communities they serve, these technicians and ambassadors will help identify underserved areas, address access barriers, and provide field insights to refine and target outreach efforts. This adaptable approach will enable the Dealer Cooperative to prioritize initiatives that improve community awareness of new redemption sites and maximize the program’s overall effectiveness.

D. WEBSITE AND REDEMPTION SITE LOCATOR

The Dealer Cooperative’s website at http://www.circularcrv.org will serve as a central resource for public access to all key aspects of the CRV redemption program. Designed with user convenience in mind, the site will provide contact information, such as phone numbers and e-mail addresses to contact Dealer Cooperative staff. An interactive map of CRV redemption opportunities and a filtered search directory to help the public quickly locate redemption sites in the Dealer Cooperative network will also be developed. Users will be able to find additional details on accepted materials, days and hours of operation, telephone numbers for redemption sites (or telephone numbers for Dealer Cooperative customer service representatives) and site-specific information.

The website will be available in English, Spanish, Mandarin Chinese, Tagalog, Korean, and Vietnamese to ensure wide accessibility for California’s diverse population. The site will also host other multilingual resources, including FAQs, instructional guides, and promotional materials, to support consumer education and engagement. The Dealer Cooperative plans to expand access with the additional languages previously mentioned in Section B1 within twelve (12) months of approval of this Stewardship Plan by CalRecycle.

Beyond supporting consumers, the website will include targeted resources for other key stakeholders, such as Dealer Members and recyclers. These resources will provide information on compliance requirements, the best operational practices, and partnership opportunities. The website will also house official program documents, such as the approved Stewardship Plan, quarterly and annual reports, and relevant laws, offering accessibility to all stakeholders.

E. TOLL-FREE SUPPORT LINE

The Dealer Cooperative will operate a toll-free support line at (855) CRV-CASH / (855) 278-2274 to answer general questions key stakeholders may have about the Dealer Cooperative and to assist the public with answering questions surrounding CRV redemption. The support line will be staffed during normal business hours on weekdays and provide access to real-time translation in Spanish and additionally supported languages as needed. Support for hearing and speech impaired consumers will also be offered to consumers using the same toll-free support line.

13. DISPUTE RESOLUTION

The Dealer Cooperative is committed to providing California consumers with an inviting, positive, and reliable experience each time consumers return CRV material at any of the locations operated by the Dealer Cooperative. The Dealer Cooperative will strive to solve all consumer concerns on-site at the time they are raised by the consumer. However, at times, consumers may wish to communicate their concerns directly to the Dealer Cooperative.

To facilitate this communication, the Dealer Cooperative has established a dispute resolution policy to address any consumer concerns regarding non-payment, underpayment, site performance, or any other issues related to the Dealer Cooperative's CRV redemption program. This policy is designed to ensure timely, fair, and equitable resolution of any concerns or disputes, thereby reinforcing consumer trust and program accountability.

The Dealer Cooperative's dispute resolution policy outlined below will be available on its website at http://www.circularcrv.org/customer-feedback.

A. FILING A COMPLAINT

Consumers will be able to file a complaint regarding any issue related to the Dealer Cooperative's redemption program through the following channels:

- A toll-free phone number allowing consumers to report concerns directly to the Dealer Cooperative: (855) CRV-CASH / (855) 278-2274
- A "Customer Feedback" form available on the Dealer Cooperative's website http://www.circularcrv.org/customer-feedback that will enable consumers to submit complaints, upload supporting documentation, and provide contact information.

These mechanisms will ensure equitable access for all community members and provide opportunities for meaningful engagement, consistent with 14 CCR § 2375.4(c).

B. ACKNOWLEDGMENT

The Dealer Cooperative will acknowledge receipt of all consumer complaints by e-mail within three (3) business days and provide a unique reference number for tracking. Upon receiving a complaint, the Dealer Cooperative will document it and log key details digitally, including the consumer's contact information, the nature of the complaint, and any supporting materials, into its complaint database to ensure accurate tracking and follow-up.

A written acknowledgment will be sent to the consumer's preferred email address, including the reference number, confirmation of receipt, contact information for further inquiries, and, when possible, an estimated timeframe for follow-up. The complaint will then be assigned to the appropriate Dealer Cooperative staff member for investigation and resolution.

C. INVESTIGATION

The Dealer Cooperative will investigate all complaints and involve relevant parties, including Dealer Cooperative staff, or redemption contractors and their staff, as necessary. Transaction records, documentation provided by the complainant, and other relevant data will be reviewed to investigate and resolve disputes and complaints involving non-payment or underpayment, and any other issues raised by consumers.

C1. Resolution and Escalation Process

The Dealer Cooperative will respond to all complainants within ten (10) business days of receiving consumers' complaints by e-mail, outlining the findings from investigations, the outcome, and any corrective actions taken. If refund discrepancies are identified, the Dealer Cooperative will ensure the consumer receives the correct refund value or appropriate compensation.

If a complainant is dissatisfied with the Dealer Cooperative's resolution, they may escalate the complaint to a Dealer Cooperative management member for further review. If the issue remains unresolved after internal escalation, the Dealer Cooperative will provide the complainant with information on how to contact and file a complaint with CalRecycle. Upon request, the Dealer Cooperative will provide CalRecycle information collected regarding the complainant's dispute.

The Dealer Cooperative is committed to resolving disputes in a fair, timely, and inclusive manner. In addition to posting its dispute resolution procedure online, information about the Dispute Resolution policy will be displayed at all redemption sites, encouraging consumers to report any issues, complaints, or concerns they have regarding program services.

D. RECORDKEEPING AND REPORTING

The Dealer Cooperative will maintain detailed records of all complaints, investigations, and resolutions for a minimum of five (5) years. Complaint data will be analyzed quarterly to identify operational trends, address systemic issues, and improve program operations.

14. COMMUNITY INPUT

The Dealer Cooperative recognizes the important role that convenient and accessible beverage container redemption plays in the communities in which it serves and operates. Listening, understanding, and reacting to the unique needs of each community will ensure long-term viability of the CRV redemption opportunities the Dealer Cooperative provides on behalf of its Dealer Members. Community feedback will drive program enhancements and ensure the Dealer Cooperative's alignment with California's redemption needs.

The Dealer Cooperative will encourage members of each community in which it operates to provide input and feedback regarding its services and the impact of these services on the community. The Dealer Cooperative will offer three options for the community to provide feedback:

- A toll-free phone number allowing consumers to report issues and concerns directly to the Dealer Cooperative: (855) CRV-CASH / (855) 278-2274
- A "Customer Feedback" form available on the Dealer Cooperative's website http://www.circularcrv.org/customer-feedback that will enable members of the community to communicate electronically with the Dealer Cooperative
- Surveys conducted by the Dealer Cooperative to align with community needs, measure impact and satisfaction, improve existing solutions, and identify new outreach and service opportunities

These mechanisms will ensure equitable access for all community members and provide opportunities for meaningful engagement, consistent with 14 CCR § 2375.4(d).

The Dealer Cooperative will acknowledge receipt of community input submitted through any of the channels above within three (3) business days by e-mail, provided the consumer supplies clear and legible contact information and explicitly requests follow-up. Where appropriate and at the Dealer Cooperative's discretion, valuable comments may prompt follow-up, and a Dealer Cooperative representative may contact the individual for additional input. The Dealer Cooperative will maintain records of all feedback received for a minimum of five (5) years.

15. CONSUMER CONVENIENCE

The Dealer Cooperative is committed to addressing factors that directly impact consumer convenience at all its redemption locations. In compliance with 14 CCR § 2375.4(e), the Dealer Cooperative aims to enhance the redemption experience for consumers, thereby encouraging increased participation and support of California's resource recovery goals by prioritizing safety, cleanliness, parking availability, and accessibility.

A. SAFETY AND CLEANLINESS

At staffed redemption sites, the Dealer Cooperative will maintain operations centered around cleanliness and safety. Dealer Cooperative field staff will perform regular, unannounced site visits to all its locations to ensure the following conditions are met:

- The area surrounding the site is regularly swept to remove debris such as trash and leaves, and the area is pressure-washed as needed to remove any buildup of unwanted substances.
- Collected trash is disposed of in waste bins that are securely sealed, and a sweep of the location is performed at the end of each operating day to ensure the location is left clean while not in operation.
- The site is free of tripping hazards such as uneven asphalt or concrete, cracks, potholes, etc. In the event these hazards exist, ensure the use of safety cones or other barriers to prevent accidents.
- The surrounding parking and operating areas are equipped with ample lighting.
- Implementation and enforcement of safety protocols to minimize queuing, prevent litter and ensure efficient site operations.

The Dealer Cooperative field staff will also perform site visits to unstaffed redemption locations to verify the equipment and surrounding area is operational, clean, and free of damage, debris, and graffiti. If any hazards are noticed during a site visit, the Dealer Cooperative will work closely with the Dealer Member or property management team to promptly resolve any safety concerns. These inspections will also evaluate lighting, signage visibility, and the availability of waste disposal bins, ensuring each site is functional and consumer friendly.

B. PARKING AVAILABILITY

The Dealer Cooperative will ensure sufficient and accessible parking is available to accommodate consumers at staffed redemption sites. These sites will be typically located in larger retail shopping center parking lots or locations with high foot traffic that can accommodate several vehicles and easy traffic flow. Parking accessibility, including access to handicapped parking, will be reviewed during each site visit performed by Dealer Cooperative field staff. Suggestions for improvement will be made as necessary and will be reviewed during subsequent site visits.

Where unstaffed redemption locations are placed, the Dealer Cooperative field staff will ensure that the equipment is easily accessible, and parking is readily available. Any concerns that are noted during these site visits will be communicated to the Dealer Member or to the Dealer Cooperative management staff to resolve promptly.

C. ACCESSIBILITY VIA PUBLIC TRANSPORTATION AND WALKING

To support consumer accessibility, the Dealer Cooperative will prioritize operating redemption sites located near main thoroughfares. These locations will be highly visible and well-suited for consumers that may arrive by public transportation or on foot without the need for additional accommodation.

D. SITE DESIGN AND LAYOUT

To ensure efficiency and ease of use at redemption sites, the Dealer Cooperative will optimize the layout of redemption facilities using directional signage and operating “Best Practices” aimed at facilitating a quick and efficient redemption experience. These will be reviewed and reinforced during regular site visits performed by Dealer Cooperative field staff.

E. CONSUMER FEEDBACK AND IMPROVEMENTS

In alignment with 14 CCR § 2375.4(d), the Dealer Cooperative will solicit consumer feedback to improve the convenience and effectiveness of its redemption network services. Consumers will be encouraged to provide their comments through multiple channels, including:

- Customer feedback forms available online on the Dealer Cooperative website
- Direct contact with a Dealer Cooperative representative via a toll-free phone number displayed at all site locations
- Direct surveys conducted by the Dealer Cooperative

By leveraging these varied outreach mechanisms, the Dealer Cooperative will ensure broader and more immediate collection of valuable insights. All feedback will be reviewed quarterly to identify trends, address concerns, and implement necessary adjustments, ensuring continuous improvements in consumer convenience and satisfaction across the redemption network.

F. COMMITMENT TO CONVENIENCE

By actively addressing opportunities related to consumer convenience, the Dealer Cooperative is dedicated to creating an easy and inclusive CRV-redemption experience in convenience zones where it operates. This commitment will ensure that CRV redemption locations managed by the Dealer Cooperative remain attractive, convenient, accessible, and widely used, driving greater participation by the public in California’s circular resource recovery program.

G. DIGITAL WALLET AND REDEMPTION PAYMENTS

The Dealer Cooperative will explore the integration of a digital wallet solution equipped with redemption payment functionality housed within one unified mobile application to provide consumers with a single, secure, and integrated redemption and payment platform accessible across all Dealer Cooperative redemption sites. This potential solution is intended to enhance consumer convenience by offering secure, cash-equivalent payment options to consumers, while also evaluating whether the introduction of digital payment methods contributes to increased consumer participation in CRV redemption.

The Dealer Cooperative will prioritize consumer security, accessibility, and regulatory compliance with any potential implementation of digital payment systems. To assess the viability of digital payments via mobile application, the Dealer Cooperative will:

- Research and vet third-party service providers with success and specialization in consumer financial applications and transaction management
- Ensure provider compliance with all applicable regulations, including consumer data protection, transaction security, and financial oversight requirements
- Evaluate the impact on consumer experience and accessibility across different redemption methods

Research, Evaluation, and Implementation Timeline

The Dealer Cooperative will conduct an initial evaluation phase followed by a staged research and testing process, ensuring flexibility based on findings and regulatory considerations.

- Phase 1: Research and feasibility. (0–6 months post-Plan approval)
    - Identify financial technology service providers and review available solutions
    - Assess legal and regulatory compliance requirements for digital payment integration
    - Conduct preliminary industry research to evaluate consumer demand and technical feasibility
- Phase 2: Pilot exploration and limited testing. (6–12 months post-Plan approval, if determined feasible)
    - Select pilot locations to evaluate digital payment processing within controlled environments
    - Engage with consumers, retailers, and regulatory stakeholders to gather feedback
    - Ensure data security, compliance testing, and operational safeguards are in place before further expansion

- Phase 3: Broader consideration and potential expansion. (12–24 months post-Plan approval, contingent on pilot results)
    - Assess pilot performance and determine whether to pursue wider implementation
    - Refine technical integration, consumer education, and accessibility measures based on findings
    - Establish final recommendations for long-term digital payment strategies aligned with consumer and regulatory needs

By implementing a phased, research-driven approach to a potential digital wallet offering, the Dealer Cooperative can ensure the solution, if deemed viable, will meet consumer expectations, adhere to all applicable regulatory requirements, and contribute to improving operational efficiencies while helping to improve statewide CRV redemption rates.

16. BEVERAGE CONTAINER REDEMPTION

A. MATERIAL REDEMPTION METHODS

The Dealer Cooperative will utilize the redemption methods below and previously outlined in this Stewardship Plan to ensure acceptance and redemption of all CRV-eligible beverage container materials, in compliance with 14 CCR § 2375.4(f)(1):

- Mobile recycling units will provide staffed, on-site redemption services and will accept all CRV-eligible containers. These units will provide convenient redemption opportunities in unserved convenience zones where Dealer Members operate.
- Single-feed reverse vending machines (RVMs) will provide automated redemption services and will accept aluminum cans, PET-1 plastic bottles, and in some cases, glass bottles. These machines will be strategically located in high-traffic areas in unserved convenience zones to maximize convenience and accessibility.
- Bulk-feed reverse vending machines (RVMs), especially those deployed in a mobile environment, will provide high-capacity, automated redemption by accepting large quantities of CRV-eligible containers in a single infeed simultaneously. These machines will quickly validate, sort, and in some cases, compact materials, reducing wait times for consumers and maximizing storage efficiency for redemption contractors.
- Kiosks will provide staffed redemption services and will accept all CRV-eligible containers. Kiosks will ensure comprehensive redemption opportunities for all container types in unserved convenience zones near Dealer Member locations.
- Bag drop systems will provide streamlined, unstaffed redemption services that allow consumers to redeem all CRV beverage types in pre-printed bags that are dropped off for later processing and redemption, thereby reducing consumer wait times experienced at traditional kiosks or mobile recycling centers. Physical bag drop units will be located in highly visible areas in unserved convenience zones where Dealer Members operate.
- Mobile bag drop units will combine the flexibility of mobile recycling units that can operate in several convenience zones with the functionality of bag drop systems that allow consumers to drop off pre-labeled bags of CRV material for later processing and redemption.
- Recycling depots will provide high-volume redemption services that accept all CRV-eligible material, using single-feed and in-building bulk-feed RVMs, bag drop services, and traditional weigh services.

B. REDEMPTION CAPACITY ASSESSMENT

The Dealer Cooperative is comprised of individual Dealer Members. Collectively, these members sold 1,498,983,579 CRV-eligible units between August 1, 2023, and July 31, 2024. This total serves as the baseline redemption capacity requirement and establishes the minimum

number of containers the Dealer Cooperative must be capable of redeeming annually to maintain compliance with 14 CCR § 2375.4(f)(2).

To assess the redemption capacity of its network, the Dealer Cooperative evaluated each of the innovative methods of recycling it anticipates deploying using two benchmarks:

- Benchmark 1: CalRecycle's Economic and Fiscal Impact Statement (STD 399) concerning Dealer Cooperatives.[4] This statement estimated annual containers redeemed per unit (method of recycling) using comments from stakeholders received during informal workshops.
- Benchmark 2: Industry redemption contractor insights. These insights include information provided by redemption contractors partnering with the Dealer Cooperative that currently employ various types of recycling methods, as well as specifications and insights provided by manufacturers of the various technologies the Dealer Cooperative will implement to provide redemption opportunities to consumers for CRV-eligible material.

1. MOBILE RECYCLING

***Table 16.1**: Mobile Recycling Benchmarks*

MOBILE RECYCLING	Annual Container Redemption Capacity	Total Sites Full Operation	Annual Containers Redeemed (Capacity)	Annual Containers Redeemed (%)
Benchmark 1	6,000,000	25	150,000,000	10.01%
Benchmark 2[5]	12,138,310	25	303,457,000	20.247%

CalRecycle's Economic and Fiscal Impact Statement (STD 399) concerning Dealer Cooperatives estimates that a typical mobile recycling redemption option can process approximately 6,000,000 units annually. However, estimates based on actual field conditions, including variations in material composition, compaction levels, and operational handling

[4] Department of Resources Recycling and Recovery – Dealer Registration and Dealer Cooperatives Permanent Regulations Economic and Fiscal Impact Statement (STD 399) Supplemental Information. Document available at https://www2.calrecycle.ca.gov/Docs/Web/127365&sa=U&ved=2ahUKEwjX2cOy16eLAxU4FVkFHT2oOmgQFnoECAQQAg&usg=AOvVaw2j6_YjRReUrqkdc5n7xoSq.

[5] Estimates based on 27.71 CRV units in one cubit foot; using one 26-foot box truck with a nine-foot by nine-foot door operating per day; 58,357 units per day, operating 4 days per week, for 52 weeks per year.

practices suggest that 27.71 beverage containers per cubic foot can be reasonably stored in a mobile unit (e.g. box truck).

The capacity metric was developed through empirical analysis of operational data, including:

- Observation of fully loaded mobile recycling vehicles delivering material to certified processors;
- Measurement of total inbound weights by material type (e.g., aluminum, PET, glass);
- Conversion of material weights into estimated container counts using standard units-per-pound assumptions; and
- Calculation of container density relative to the usable storage area within mobile collection vehicles.

This approach ensures that capacity estimates are grounded in actual operating conditions, including material mix, compaction levels, and handling practices.

Applying this approach using one standard 26-foot box truck yields an annual capacity of 12,138,310 units. The Dealer Cooperative has identified, at a minimum, 25 mobile recycling routes it will operate across its network following CalRecycle's approval of its Stewardship Plan. Once deployed, these sites will represent a combined annual redemption capacity of between 150,000,000 and 303,457,000 CRV-eligible units. These figures correspond to an annual redemption potential of between 10.01% and 20.24% of the total number of individual CRV units sold by Member Dealers between August 1, 2023 and July 31, 2024.

Mobile recycling will offer redemption contractors the flexibility to meet consumer demand by rotating operations through multiple unserved convenience zones each week. This adaptability will allow the Dealer Cooperative to position mobile recycling as a scalable first-phase solution to rapidly expand CRV redemption capacity. Mobile recycling will play an integral role in the Dealer Cooperative's initial strategy to provide additional consumer convenience not currently offered in existing unserved convenience zones.

2. SINGLE-FEED REVERSE VENDING MACHINES (RVMs)

***Table 16.2**: Single-Feed RVM Benchmarks*

SINGLE-FEED RVMs	Annual Container Redemption Capacity	Total Sites in Full Operation	Annual Containers Redeemed (Capacity)	Annual % of Containers Redeemed (Capacity)
Benchmark 1	600,000	20	12,000,000	0.80%
Benchmark 2	4,121,280	20	82,425,600	5.50%

CalRecycle's Economic and Fiscal Impact Statement (STD 399) concerning Dealer Cooperatives estimates that a typical single-feed Reverse Vending Machine (RVM) can process

approximately 600,000 containers annually. According to operational specifications of the most common single-feed RVM models manufactured by four potential Dealer Cooperative technology partners, each a worldwide leader in RVM manufacturing, the Dealer Cooperative estimates that a single-feed RVM in its network will have the capacity to process an average of 4,121,280 containers annually.

This estimate considers the average throughput of each of the most common machines in use across multiple markets at 39.75 containers per minute, 8 hours of operating time daily over 360 days a year, and assumes a 40% downtime for maintenance, transaction processing, and other interruptions.[6]

The Dealer Cooperative estimates it will operate 20 single-feed RVMs across its network within 12 months of CalRecycle's approval of its Stewardship Plan. This will represent a combined annual redemption capacity of between 12,000,000 and 82,425,600 CRV-eligible units. These figures correspond to an annual redemption potential of between 0.80% and 5.50% of the total number of individual CRV units sold by Dealer Members between August 1, 2023, and July 31, 2024.

3. BULK-FEED REVERSE VENDING MACHINES (RVMs) – MOBILE DEPLOYMENT

***Table 16.3**: Bulk-Feed RVM (Mobile) Benchmarks*

BULK-FEED RVMs	Annual Container Redemption Capacity	Total Sites in Full Operation	Annual Containers Redeemed (Capacity)	Annual % of Containers Redeemed (Capacity)
Benchmark 1	n/a	n/a	n/a	n/a
Benchmark 2	11,980,800	16	191,692,800	12.79%

CalRecycle's Economic and Fiscal Impact Statement (STD 399) concerning Dealer Cooperatives does not provide a benchmark redemption capacity for bulk-feed reverse vending machines. According to operational specifications provided by multiple manufacturers of bulk-feed RVM equipment, the Dealer Cooperative estimates that each of these units deployed as mobile units within its network will have the capacity to process 11,980,800 containers annually.

This estimate assumes a processing capability of 200 containers per minute spanning 8 operating hours each day for 208 days per year (4 days per week) and assumes a 40% downtime for maintenance, transaction processing, and other interruptions.[7]

[6] Data based on equipment specifications provided by TOMRA, MachineX, Olyns, and Envipco (January 2025).
[7] Data based on equipment specifications provided by RecycleTek (February 2025)

The Dealer Cooperative estimates it will operate 16 mobile, bulk-feed RVMs across its network within 12 months of CalRecycle's approval of its Stewardship Plan. Together, this deployment will represent a combined annual redemption capacity of 191,692,800 CRV-eligible units. These figures correspond to an annual redemption potential of 12.79% of the total number of individual CRV units sold by Dealer Members between August 1, 2023, and July 31, 2024.

4. KIOSKS

***Table 16.4**: Kiosk Benchmarks*

KIOSKS	Annual Container Redemption Capacity	Total Sites in Full Operation	Annual Containers Redeemed (Capacity)	Annual % of Containers Redeemed (Capacity)
Benchmark 1	6,000,000	15	90,000,000	6.00%
Benchmark 2[8]	6,788,842 – 13,988,064	15	189,897,113	12.67%

CalRecycle's Economic and Fiscal Impact Statement (STD 399) concerning Dealer Cooperatives estimates that a typical recycling kiosk can process approximately 6,000,000 containers annually. Recycling kiosks are well-established redemption sites in California, and extensive data is available concerning them. This data allows the Dealer Cooperative to establish more precise benchmarks for total redemption capacity as it deploys its fleet of kiosks within its network.

Pursuant to a California Public Records Act request, CalRecycle provided the Dealer Cooperative with data on the total weight and number of containers redeemed at "Recycling Centers" (kiosks) in rural and urban zones between July 2023 and June 2024. The data indicates that an average rural recycling kiosk redeems 6,788,842 CRV-eligible containers annually, while an urban recycling kiosk redeems 13,988,064 CRV-eligible containers annually. Of the 1,339 kiosks operating during this period, 18.45% (n=247) were located in rural zones, and 81.55% (n=1,092) operated in urban zones. To estimate annual redemption capacity, the Dealer Cooperative applied this same urban-to-rural proportion to its proposed kiosk operations, ensuring an accurate and data-driven approach to capacity planning and deployment.

The Dealer Cooperative estimates it will operate 15 traditional kiosks across its network within 90 days of CalRecycle's approval of its Stewardship Plan. These kiosks will represent a combined annual redemption ability of between 90,000,000 and 189,897,113 CRV-eligible units, corresponding to an annual redemption potential of between 6.00% and 12.67% of the total

[8] Data provided by CalRecycle (January 2025) through Public Records Request R002992-011325

number of individual CRV units sold by Dealer Members between August 1, 2023, and July 31, 2024.

While the numbers displayed above are substantial, they do not represent a kiosk's true total redemption capacity, as many currently operating kiosks are limited in both operating hours and days. Additionally, the dataset provided by CalRecycle includes only six months of redemption data encompassing the expanded CRV-eligible containers—such as wine bottles, hard spirits, and boxes—which became eligible for redemption on January 1, 2024. As a result, the actual redemption capacity of kiosks within the Dealer Cooperative network is likely significantly higher than these figures suggest. However, to satisfy the requirements of 14 CCR § 2375.4(f), the Dealer Cooperative has elected to rely solely on the data set provided by CalRecycle.

5. BAG DROP SYSTEMS

***Table 16.5**: Bag Drop System Benchmarks*

BAG DROP SYSTEMS	Annual Container Redemption Capacity	Total Sites in Full Operation	Annual Containers Redeemed (Capacity)	Annual % of Containers Redeemed (Capacity)
Benchmark 1	6,000,000	55	330,000,000	22.01%
Benchmark 2[9]	3,689,280	55	202,910,400	13.54%

CalRecycle's Economic and Fiscal Impact Statement (STD 399) concerning Dealer Cooperatives estimates that a standalone bag drop collection unit can process approximately 6,000,000 containers annually. While bag drop systems are not yet widely used in the State of California, they have been successfully deployed in several regions across the United States. Several of the Dealer Cooperative's technology partners manufacture bag drop units, allowing the Dealer Cooperative to leverage manufacturer specifications to develop a more accurate benchmark for estimating annual redemption capacity.

Although bag drop units are typically standalone solutions, the technology can also be integrated into other redemption models, such as mobile recycling, kiosks, and recycling depots, providing alternative consumer engagement opportunities and capturing additional CRV material that might otherwise go unredeemed.

For the purposes of estimating redemption capacity pursuant to 14 CCR § 2375.4(f), the Dealer Cooperative estimates traditional standalone bag drop systems deployed in its network to have an annual capacity of redeeming 3,689,280 CRV-eligible units. This estimate falls below the benchmark set by CalRecycle's Economic and Fiscal Impact Statement, as the Dealer

[9] Data based on equipment specifications provided by Clynk and MachineX (January 2025).

Cooperative estimates that bag drop collection units employed in its network will be smaller in cubic volume than traditional units placed elsewhere in the nation due to limited space constraints on or near Dealer parking lots. Notably, this number assumes substantial consumer participation once the technology has been fully integrated into the convenience zone it is placed.

The Dealer Cooperative estimates it will operate 90 traditional standalone bag drop systems across its network within 12 months of CalRecycle's approval of its Stewardship Plan. Placement of these units will represent a combined annual redemption capacity of between 202,910,400 and 330,000,000 CRV-eligible containers. These figures correspond to an annual redemption potential of between 13.54% and 22.01% of the total number of individual CRV units sold by Dealer Members between August 1, 2023, and July 31, 2024.

6. MOBILE BAG DROP SYSTEMS

Table 16.6: *Mobile Bag Drop Benchmarks*

MOBILE BAG DROP	Annual Container Redemption Capacity	Total Sites Full Operation	Annual Containers Redeemed (Capacity)	Annual Containers Redeemed (%)
Benchmark 1	n/a	n/a	n/a	n/a
Benchmark 2	3,203,200	35	112,112,000	7.48%

Mobile Bag Drop systems allow consumers to deposit pre-filled bags of eligible beverage containers at designated locations during scheduled service windows. These systems are typically deployed using cargo vans, box trucks, or other mobile units equipped to receive, store, and transport bagged materials securely. Collected materials are transported to facilities where bags are sorted, counted, and reconciled. Payment to consumers is issued electronically based on verified container counts, consistent with program requirements.

CalRecycle's Economic and Fiscal Impact Statement (STD 399) concerning Dealer Cooperatives does not provide a benchmark redemption capacity for mobile bag drop. However, empirical data gathered from a redemption contractor currently operating a mobile bag drop program with one 22-foot cargo van indicates an annual capacity of 3,203,200 units.

The Dealer Cooperative has identified at least 35 mobile recycling routes it will operate across its network after approval of its Stewardship Plan. Once deployed, these sites will represent a combined annual redemption capacity of 112,112,000 CRV-eligible units. This figure corresponds to an annual redemption potential of 7.48% of the total number of individual CRV units sold by Member Dealers between August 1, 2023 and July 31, 2024.

7. RECYCLING DEPOTS

***Table 16.7**: Recycling Depot Benchmarks*

RECYCLING DEPOTS	Annual Container Redemption Capacity	Total Sites in Full Operation	Annual Containers Redeemed (Capacity)	Annual % of Containers Redeemed (Capacity)
Benchmark 1	n/a	n/a	n/a	n/a
Benchmark 2[10]	63,763,200	9	573,868,800	38.28%

Recycling depots integrate traditional weigh-scale redemption services and innovative technologies, including single and bulk-feed RVMs and bag drop technology, into one physical location. CalRecycle's Economic and Fiscal Impact Statement (STD 399) concerning Dealer Cooperatives does not include benchmark data relevant to recycling depots, and at the time of submission of this Stewardship Plan, only one recycling depot is operating in the State. Therefore, reliable historical data relevant to recycling depots is not yet available. However, recycling depots have been in operation for several years throughout the United States and data from these operations can be used to determine annual redemption capacity of recycling depots within the Dealer Cooperative's proposed network.

The total redemption capacity of a recycling depot is determined by the quantity and type of equipment installed, as well as the daily operating hours of that equipment. Consistent utilization time directly increases a depot's overall redemption capacity. Recycling depots typically incorporate a combination of redemption technologies, including traditional weigh scales, single-feed RVMs, bulk-feed RVMs, and bag drop collection units, all integrated with sorting technology to efficiently process and redeem CRV materials. The Dealer Cooperative estimates that a typical recycling depot within its network will be equipped with one (1) single-feed RVM, one (1) bag drop collection unit, two (2) bulk-feed RVMs, and one (1) weigh scale to maximize operational efficiency and consumer convenience.

Within a recycling depot, the bag drop system operates differently from a traditional standalone bag drop unit. At a recycling depot, consumers can drop off bagged CRV-eligible materials for processing later. The material is then counted and sorted using a bulk-feed RVM to provide the maximum operational efficiency. Therefore, the capacity of this equipment is equivalent to the capacity of a bulk-feed RVM.

Using specifications provided by two globally recognized manufacturers of redemption sorting equipment designed to operate in recycling depots, the Dealer Cooperative estimates a typical

[10] Data based on equipment specifications provided by MachineX, TOMRA (January 2025).

depot in its network will be capable of redeeming 63,763,200 CRV-eligible containers annually, as detailed below:

***Table 16.8**: Recycling Depot Capacity by Equipment*

RECYCLING DEPOT EQUIPMENT	Average Unit Capacity per Minute of Operation	Total Annual Capacity
Single-feed RVM	45	4,665,600
Bulk-feed RVM (2)	125	36,720,000
Bag drop system	125	8,640,000
Weigh scale	100	13,737,600
TOTAL	-	**63,763,200**

The Dealer Cooperative estimates it will operate 9 recycling depots across its network within 18 months of CalRecycle's approval of its Stewardship Plan, with additional depots planned for operation in subsequent years. These depots will represent a combined annual redemption capacity of 573,868,800 CRV-eligible units, corresponding to an annual redemption potential of 38.28% of the total number of individual CRV units sold by Dealer Members between August 1, 2023, and July 31, 2024.

7. TOTAL REDEMPTION CAPACITY

The table below is an aggregate of each redemption method the Dealer Cooperative expects to deploy and the corresponding calculated capacity of each method. This table demonstrates that, at full operation, the Dealer Cooperative's network is designed to achieve an annual redemption capacity of 1,664,495,663 CRV-eligible containers in optimal conditions, exceeding the baseline requirement established by Dealer Member annual sales of 1,498,983,579 CRV-eligible units. The redemption capacity of 110.50% aligns with the obligation to meet or surpass the minimum redemption volume required under 14 CCR § 2375.4(f).

***Table 16.9**: Aggregate Redemption Capacity by Method*

METHOD OF REDEMPTION	Units Deployed	Benchmark #1	Benchmark #2	Projected Redemption Capacity
Mobile recycling	25	150,000,000	303,457,000	10.01%-20.24%
Single-feed RVM	20	12,000,000	82,425,600	0.80%-5.50%
Bulk-feed RVM	16	n/a	191,692,800	12.79%
Kiosks	15	90,000,000	189,897,113	6.00%-12.67%
Bag drop systems	55	330,000,000	202,910,400	22.01%-13.54%
Mobile Bag Drop	35	n/a	112,112,000	7.48%
Recycling depots	9	n/a	573,868,800	38.28%
TOTAL	**175**	**582,000,000**	**1,664,495,663**	**51.61%-110.50%**

C. CONSUMER CONVENIENCE

The Dealer Cooperative is committed to ensuring consumer convenience comparable to the requirements of PRC § 14571 and § 14571.9 of the California Beverage Container Recycling and Litter Reduction Act, as defined in 14 CCR § 2370(a)(1) or (2) when fully operational, consistent with the definition of "fully operational" in 14 CCR Section 2370(e). This commitment includes providing either of the following in each unserved convenience zone:

- Operating for a minimum of 30 hours per week, including at least five (5) hours outside traditional business hours (Monday to Friday 9 a.m. to 5 p.m.) or,
- Provide services that include all of the following:
  - At least eight (8) hours per week on one business day (Monday to Friday) and
  - At least five (5) hours per week during periods other than from Monday to Friday from 9 a.m. to 5 p.m. and
  - At least eight (8) hours per week during a Saturday or Sunday.

This commitment also includes providing at least one redemption location in each unserved convenience zone that provides immediate payment of the refund value for a minimum of ten (10) hours per week, including at least five (5) hours on a Saturday or Sunday between 9 a.m. and 5 p.m. and accepting loads up to the daily redemption limits set forth in 14 CCE section 2535(f).

During the first 12 months following approval of its Stewardship Plan, the Dealer Cooperative will rely heavily on mobile recycling units to provide redemption opportunities in unserved convenience zones where its Dealer members operate. These mobile units will operate for at least eight (8) hours per day, including Saturdays and/or Sundays, will operate on a scheduled, consistent route, and will be hosted on Dealer Member premises that can accommodate them. Where a Dealer Member cannot host a mobile solution, the Dealer Cooperative will assess the feasibility of establishing a mobile solution within a one-mile radius of the Dealer Member. These solutions will include one of the following:

- Mobile recycling units operating equivalently to those operating at on-site Dealer member operations, or
- Kiosks operating 30 or more hours per week.

In addition to these mobile and kiosk solutions, the Dealer Cooperative will further improve convenience following the first 12 months of operations through the procurement and implementation of:

- Single-feed and bulk-feed reverse vending machines that provide automated and immediate redemption services for consumers to maximize convenience and accessibility, and
- Bag drop systems, which allow consumers to redeem all CRV-eligible materials. While both attended and unattended bag drops do not provide immediate payment, the Dealer Cooperative will comply with the three (3) working day consumer refund window, and
- Recycling depots, strategically placed to provide comprehensive coverage and serve as consumer-friendly, sustainable redemption hubs

The Dealer Cooperative will ensure transparency by clearly communicating redemption site locations and operating hours through:

- Education and outreach campaign and materials
- Online resources, website, and directory accessible to all consumers

By aligning operations with the standards set forth in 14 CCR § 2370(a), the Dealer Cooperative will ensure compliance with the Beverage Container Recycling and Litter Reduction Act, while delivering accessible, convenient, and sustainable recycling solutions for California.

PART III. PERFORMANCE STANDARDS

STATUTORY CITATION

The following section provides a detailed overview of the requirements outlined in 14 CCR § 2375.6, which specify the necessary performance standards of a Dealer Cooperative Stewardship Plan. These requirements, established by CalRecycle, ensure that stewardship plans are comprehensive, transparent, and compliant with the regulatory framework under the California Beverage Container Recycling and Litter Reduction Act. Each subsection addresses specific elements essential to the effective administration, implementation, and oversight of the Dealer Cooperative's redemption program.

SECTION OVERVIEW

To ensure clarity and consistency, the elements of this section are organized and numbered in accordance with the Model Dealer Cooperative Stewardship Plan document issued by CalRecycle in November 2024.

17. Geographic Spread of Redemption Sites [14 CCR § 2375.6(a)]
18. Redemption Capacity [14 CCR § 2375.6(b)]
19. Redemption Amount [14 CCR § 2375.6(c)]
20. Average Wait Time [14 CCR § 2375.6(d)]

17. GEOGRAPHIC SPREAD OF REDEMPTION SITES

The Dealer Cooperative's approach to its geographic distribution of redemption sites is driven by its commitment to equitable access and consumer convenience in unserved convenience zones where Dealers that elect to join the Dealer Cooperative operate. Guided by 14 CCR § 2375.6(a), this Dealer-focused and data-driven placement strategy ensures that easily accessible redemption sites are conveniently placed in unserved convenience zones in which Dealer Members operate.

To meet the requirements of 14 CCR § 2375.6(a), the benchmark criteria for geographic coverage is as follows:

- Whenever possible, the Dealer Cooperative will place one or more redemption methods in the parking lot where each Dealer Cooperative Member operates to maximize consumer convenience pursuant to Public Resources Code sections 14578(a)(2) and 14578.5(c)(3)(A), and subject to the requirements in 14 CCR sections 2370(a), 2375.4(f)(4), and 2375.4(f)(6).
- In the event at least one redemption method cannot be placed in the parking lot of a Dealer Member, the Dealer Cooperative will identify an alternative location within a one mile (1.0) radius of the Dealer Member's place of business where at least one redemption method can operate.
- The Dealer Cooperative anticipates instances where placement of a redemption method either in the parking lot or within a one-mile radius of one Dealer Cooperative Member ("hosting Member") will satisfy the requirements of 14 CCR section 2375.4(f)(3) and (4) for another Dealer Cooperative Member operating within the convenience zone of the first Dealer Cooperative Member ("non-hosting Member").

To guide placement decisions in the case where a Dealer Member cannot accommodate at least one innovative method of redemption, the Dealer Cooperative will leverage geospatial mapping tools, Google Maps, and publicly available U.S. Census 2020 tract data and resources from CalRecycle's Model Cooperative Stewardship Plan[11], to identify optimal redemption site locations that provide convenience comparable to the requirements of Section 14571 of the California Beverage Container Recycling and Litter Reduction Act as defined in Section 2370(a).

- Geospatial Mapping Software to layer Census data and incorporate Dealer Member, redemption contractor, and processor locations, as well as other relevant data sets such as visual representations of convenience zones.
- U.S. Census 2020 tract data to determine total population and geographic boundaries within unserved convenience zones

[11] California State Geoportal for Location-based Data: https://gis.data.ca.gov/ and United States Census Bureau Population Data: https://data.census.gov/profile/California?g=040XX00US06

- Google Maps to validate proposed site placements, accessibility, and feasibility in urban and rural zones

By combining these various data sets, the Dealer Cooperative will create actionable, descriptive maps that identify gaps in convenience coverage and ensure that each site is placed within a one (1.0) mile radius of the Dealer Member. Each proposed placement will be evaluated for accessibility, visibility, and community compatibility, with adjustments made as needed to align with both regulatory requirements and consumer convenience.

For example, a Dealer Member store situated in a dense urban area may have limited parking lot or sidewalk space, making it unsuitable for hosting a mobile redemption site or other on-site redemption option. Additional considerations regarding the site might need to be addressed such as public safety, sanitation, and potential loitering around the site, which can further complicate placement decisions and impede the success of expanding CRV redemption options. Using data sets and leveraging mapping software, the Dealer Cooperative will help facilitate stakeholder engagement by providing a transparent and easily shareable visual representation of proposed sites for collaboration with Dealer Members, local governments, and community groups.

The Dealer Cooperative will calculate the geographic spread performance standard by establishing that each Dealer Cooperative Member either:

- Has one or more redemption methods placed in its parking lot, or one or more redemption methods placed no further than within a one-mile radius of its place of business; or,
- Is located within a one-mile radius of another Dealer Cooperative Member that has one or more redemption methods placed in the other Dealer Cooperative Member's parking lot or placed within a one-mile radius of the other Dealer Member's place of business.

For each unserved convenience zone in which the Dealer Cooperative will operate, Circular CRV Association will submit a quarterly report that includes the following:

- A list of all Dealer Cooperative Members hosting redemption sites; and for each:
    - The type of redemption method(s) used at each redemption site;
    - The number of redemption method(s) at each redemption site; and
    - The number of redemption sites in the unserved convenience zone where the Dealer Member operates.
- A list of all Dealer Cooperative Members not hosting redemption sites; and for each:
    - The number of redemption sites in the unserved convenience zone where the Dealer member operates; and
    - The distance from the non-hosting Dealer Member to the nearest redemption site within the unserved convenience zone where the non-hosting Dealer Member operates.

By leveraging data-driven strategies and fostering collaboration among Dealer Members, community groups, and the public, the Dealer Cooperative will ensure a convenient, efficient and consumer-focused redemption network. This adaptive approach not only ensures

compliance with 14 CCR § 2375.6(a) but also reflects the Dealer Cooperative's commitment to sustainability, equity, and consumer convenience while addressing the diverse needs of urban, suburban, and rural convenience zones.

18. REDEMPTION CAPACITY

The Dealer Cooperative is committed to developing and maintaining a redemption network capable of redeeming, at a minimum, 100 percent of the beverage containers sold by Dealer Members into the unserved convenience zones where they operate. As outlined in Section 16 of this Stewardship Plan, the Dealer Cooperative's redemption network must redeem approximately 1.50 billion beverage containers annually to comply with 14 CCR § 2375.4(f)(2).

Achieving this scale of redemption capacity in the Dealer Cooperative network requires the strategic deployment of high-capacity equipment and innovative redemption methods designed to maximize container intake, transaction efficiency, and most importantly consumer convenience. Mobile recycling units, single and bulk-feed RVMs, bag drops, and depots are scalable solutions that can be tailored to the unique capacity needs of each convenience zone and will provide fast, reliable, and engaging redemption experiences that minimize wait times and enhance overall consumer satisfaction.

A. EQUIPMENT OPERABLE TIME

The Dealer Cooperative recognizes that the effectiveness of high-capacity solutions largely depends on their continuous functionality and accessibility. To ensure this continuous functionality, the Dealer Cooperative will actively monitor daily redemption activity across all unserved convenience zones where the Dealer Cooperative operates and will use a benchmark of 98% operable time across its network, excluding interruptions resulting from normal operations and maintenance, and interruptions caused by natural disasters or unsafe operating conditions, as its measure of success.

Equipment malfunctions or interruptions in regular recycling schedules can reduce redemption capacity by limiting consumer access. Identifying and immediately addressing potential service disruptions is critical to ensuring network success. When disruptions occur, the Dealer Cooperative will promptly investigate the cause, work with its redemption contractor partners where applicable to resolve the issue, and implement corrective measures such as reallocating resources, increasing staffing levels, or deploying alternative methods of redemption to address service gaps.

To measure network performance to the 98% operable time benchmark and thereby ensure a 100% redemption capacity for each unserved convenience zone, the Dealer Cooperative will measure the redemption capacity performance standard for each unserved convenience zone in which its dealer members operate by assessing and reporting quarterly to the Department the following information:

- Measurement of Redemption Site Capacity:
    - The type and quantity of redemption method(s) deployed at each Dealer Member location;
    - The redemption capacity by quarter of each of the redemption method(s) deployed at each Dealer Member location, as submitted in Section 16 of the Dealer Cooperative Stewardship Plan;

    - Calculating the total capacity for all redemption methods at a redemption site by aggregating each machine's quarterly capacity, presented as a number.
- The total number of CRV units sold by each Dealer Member each quarter, presented as a number.
- Compare the quarterly redemption capacity by location to the quarterly number of CRV units sold by location, presented as a percentage.
- Aggregate both the quarterly redemption capacity at all locations and the total number of CRV units sold by all locations, presented as a percentage.

The Dealer Cooperative will also foster a culture of self-reporting and encourage prompt notification of service disruptions. This ensures timely corrective actions and minimizes impact on consumers. By maintaining a proactive approach to management of the entire network, coupled with collaboration, the Dealer Cooperative will ensure its redemption network remains fully operational and capable of meeting the 100 percent redemption capacity standard required under 14 CCR § 2375.6(b).

19. REDEMPTION AMOUNT

Pursuant to 14 CCR § 2375.6(c), the Dealer Cooperative is committed to developing CRV redemption infrastructure and operational support to achieve, at a minimum, an 80 percent redemption rate for beverage containers sold by Dealer Members in unserved convenience zones.

Achieving this redemption rate requires the Dealer Cooperative to invest in and strategically deploy high-capacity equipment and innovative redemption methods designed to maximize beverage container intake, transaction efficiency, and overall consumer participation. In the near term, the Dealer Cooperative will prioritize the immediate deployment of easily deployable solutions such as mobile recycling units and kiosks, offering convenient, fast, and reliable redemption options tailored to the specific needs of each unserved zone to achieve compliance. Over the long term, the Dealer Cooperative will expand its network by investing in and introducing high-capacity redemption systems, including integrative bag drop programs, single-feed and bulk-feed RVMs, and recycling depots equipped with advanced technologies, ensuring scalable growth and compliance with the required 80% redemption rate. By introducing and scaling high-capacity redemption methods and enhancing operational efficiency, the Dealer Cooperative will drive consumer participation and improve redemption rates across unserved convenience zones.

To complement its high-capacity equipment strategy, the Dealer Cooperative will execute targeted outreach and advertising campaigns to raise consumer awareness of available redemption opportunities and encourage community participation rates within the Dealer Cooperative's network. As detailed in Section 12 of this Stewardship Plan, this outreach will include community engagement, educational materials, and promotions via traditional and digital media.

To further ensure progress toward achieving the 80 percent redemption goal, Dealer Cooperative field staff will conduct regular site visits and provide real-time oversight. During these visits, field staff will monitor site performance by reviewing daily redemption data, equipment functionality, and transaction efficiency to identify and resolve any operational issues that could hinder redemption capacity. The Dealer Cooperative will collaborate with redemption contractors to troubleshoot equipment malfunctions, optimize site layout to increase throughput, identify potential opportunities for increased community awareness and outreach, and address staffing needs to minimize wait times and maximize container intake. Field staff will also evaluate consumer interactions and satisfaction levels, offering recommendations for improvements in service or additional staff training as necessary. Finally, field staff will compile their findings during each visit in order to assess progress made during subsequent visits.

By addressing and documenting these key areas, the Dealer Cooperative will ensure its redemption network remains fully functional, consumer-friendly, and capable of supporting long-term growth aimed at achieving the 80 percent redemption target. These combined outreach and oversight efforts will drive consumer participation and ensure compliance with 14 CCR § 2375.6(c).

To measure progress and ensure compliance with redemption requirements, the Dealer Cooperative will submit quarterly reports to CalRecycle that detail redemption performance for each convenience zone. For each unserved convenience zone, these reports will include:

- Total CRV units redeemed by each method of recycling measured
- Total CRV units sold by Dealer Members in each convenience zone
- Comparison of these two measures

These reports will assist the Dealer Cooperative in identifying convenience zones with consistent redemption rate underperformance. This visibility will allow for recommendations for improvements to infrastructure, staffing, or outreach to enhance redemption rates and service reliability. The Dealer Cooperative will partner closely with redemption contractor partners as well as CalRecycle to implement targeted strategies to address gaps and improve redemption rate outcomes where appropriate. By maintaining a proactive and collaborative approach to maximizing redemption in its network, the Dealer Cooperative can ensure success while supporting California’s recycling goals.

20. AVERAGE WAIT TIME

Pursuant to 14 CCR § 2375.6(d), the Dealer Cooperative is committed to ensuring a positive consumer experience by maintaining quick and efficient redemption transactions with acceptable consumer wait times.

The Dealer Cooperative has established a benchmark for consumer wait times by combining findings from a 2018 study conducted by CalRecycle and the Regents University of California with proprietary data gathered from internal surveys conducted in early 2025 among the Dealer Cooperative's redemption contractor and manufacturer partners. The CalRecycle study, presented to the California State Legislature, found that consumers using staffed recycling centers experienced an average wait time of 10 minutes per transaction and indicated a willingness to wait up to 16 minutes to redeem their material[12]. The Dealer Cooperative's internal surveys, conducted in January 2025 with redemption contractor partners and manufacturers, provided critical insights into consumer redemption behaviors, transaction patterns, and recycling equipment utilization across the state. These findings confirmed that wait times are largely determined by the volume of customers and the availability of staff to assist them. These internal surveys revealed that consumer wait times across the Dealer Cooperative's partnership network were approximately 10 minutes[13] per transaction, a benchmark consistent with established CalRecycle research presented to the California State Legislature.

By aggregating these datasets from key stakeholders in the California redemption ecosystem, the Dealer Cooperative has set its benchmark for acceptable consumer wait times in its network at between five (5) and ten (10) minutes.

The Dealer Cooperative will assess average wait times across its redemption network through direct monitoring during on-site visits as well as through consumer feedback. Wait times will be measured by using time-stamped observations, queue counting, and built-in transaction logs from automated systems like RVMs and kiosks. These efforts will be supplemented with consumer feedback gathered through feedback forms submitted by consumers via the Dealer Cooperative's website. The Dealer Cooperative will also standardize best practices in both consumer-facing processes and internal operations to ensure consistency and efficiency across the network, with the goal of further reducing consumer wait time throughout its network.

To measure network performance against the five (5) to ten (10) minute benchmark, the Dealer Cooperative will submit quarterly reports to CalRecycle that detail consumer wait-time performance across its network. These reports will include:

- Average wait times observed at redemption sites by Dealer Cooperative field staff
- Any relevant feedback received by consumers through feedback forms

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[12] Peter Berck et al., *Convenient Beverage Container Recycling in California: A Report to the California State Legislature*, Regents of the University of California, July 2, 2018. Prepared pursuant to agreement DRR15053 with CalRecycle.

[13] Aggregate calculation of Circular CRV Association internal surveys conducted in January 2025 with redemption contractor and manufacturer partners.

- An analysis of all sites exceeding the ten (10) minute maximum benchmark wait time, and any operational improvements or resource adjustments made to reduce it. Factors that will be considered when making any adjustments include, but are not limited to:
    - Adding additional high-capacity redemption methods
    - Adding experienced staff to speed processing time
    - Adjusting daily operating hours
    - Adding additional redemption sites within the convenience zone

The Dealer Cooperative will identify and address factors that increase consumer wait times. Where feasible, the Dealer Cooperative will actively engage with relevant stakeholders and other industry partners to make operational improvements to streamline the redemption process and enhance efficiency and consumer satisfaction. This commitment will help ensure a faster, more efficient, and consumer-focused redemption process while maintaining compliance with 14 CCR § 2375.6(d).

PART IV. BUDGET

STATUTORY CITATION

The following section provides a detailed overview of the requirements outlined in 14 CCR § 2375.8, which specify the necessary budget and funding requirements of a Dealer Cooperative Stewardship Plan. These requirements, established by CalRecycle, ensure that stewardship plans are comprehensive, transparent, and compliant with the regulatory framework under the California Beverage Container Recycling and Litter Reduction Act. Each subsection addresses specific elements essential to the effective administration, implementation, and oversight of the Dealer Cooperative's redemption program.

SECTION OVERVIEW

To ensure clarity and consistency, the elements of this section are organized and numbered in accordance with the Model Dealer Cooperative Stewardship Plan document issued by CalRecycle in November 2024.

21. Anticipated Costs [14 CCR § 2375.8(a)]
22. Funding Level and Reserves [14 CCR § 2375.8(b)]

21. ANTICIPATED COSTS

In accordance with 14 CCR § 2375.8, the Dealer Cooperative has developed a comprehensive budget to support the administration and implementation of its Stewardship Plan. The Dealer Cooperative raises revenue by assessing annual membership fees on its Dealer Members, which are collected and renewed at the start of each calendar year under the terms of a membership agreement. These fees are designed to exclusively support the operation and administration of the Dealer Cooperative and its related activities, ensuring the successful execution of its obligations as defined by the California Beverage Container Recycling and Litter Reduction Act.

The accompanying budget table in *Exhibit H* provides an itemized list of anticipated costs, as required under 14 CCR § 2375.8(a). These costs cover key categories defined in 14 CCR § 2381(c)(6), such as program administration, outreach, education, and compliance activities. The table details the monetary amounts allocated for each category and outlines how the funds have been used since January 1, 2025, and how they will be used through June 2026 to achieve the objectives of the Stewardship Plan.

The Dealer Cooperative is committed to responsibly managing its financial resources and delivering practical, effective solutions to meet the state's CRV redemption goals.

22. FUNDING LEVEL AND RESERVES

The Dealer Cooperative's funding mechanism of assessing yearly membership fees on member participants is designed to provide a balanced and fair distribution of costs allocated to Dealer Members while incentivizing Dealer participation in providing consumers with convenient and accessible redemption opportunities. This structure supports the Dealer Cooperative's long-term sustainability and encourages ongoing collaboration with Dealer Members. The Dealer Cooperative estimates necessary annual funding of $3,000,000 to operate its Stewardship Plan.

Pursuant to 14 CCR § 2375.8(b), the Dealer Cooperative has established a funding strategy designed to prudently and responsibly cover its budgeted costs while maintaining adequate monetary reserves. These reserves are critical to ensuring the Dealer Cooperative's ability to operate proactively and sustainably while buttressing against unforeseen operating deficits. The initial reserve amount to be set aside in the first year of the Dealer Cooperative's operations is targeted at $500,000, funded in the first financial quarter of 2025, as shown in the table above.

In the very unlikely event that no Dealer Member renews their membership at the end of 2025, the Dealer Cooperative projects a structural deficit of approximately $1,500,000 on January 1, 2026, for operations throughout 2026, as detailed in Table 22.1 below:

***Table 22.1**: Monetary Reserve Funds*

MONETARY RESERVE FUNDS	Amount ($, '000s)
Anticipated Operating Costs *January 1, 2025 – December 31, 2025*	3,095
Operating Surplus *December 31, 2025*	33
Budget Reserve *December 31, 2025*	510
Total Cash on Hand *December 31, 2025*	643
Surplus / (Deficit) *January 1, 2026* *(excludes one-time expenses in Yr 1)*	(1,507)

In such a scenario, the Dealer Cooperative would take immediate measures to reduce operating expenses beginning January 1, 2026, and adjust operations to mitigate the deficit without

affecting services offered to the consumer. Structural deficits caused by this or any other reason will be addressed through several means, including the assessment of supplemental membership fees to participating Dealers at a level that will cover the full amount of the deficit, budget adjustments, cost reductions, or additional funding mechanisms approved by the Dealer Cooperative's Board of Directors, ensuring the program remains sustainable and effective for its members and the consumer. The Dealer Cooperative does not anticipate such an outcome, as enhanced regulatory enforcement is expected to drive additional Dealers Members to join the Dealer Cooperative.

Conversely, surplus operating funds generated through operations will be reinvested into program enhancements that are approved by the Dealer Cooperative's Board of Directors. These investments may include website enhancements to provide better access to redemption information, hiring additional staff to support operations and outreach, expanding community engagement programs to increase CRV awareness and participation, and acquiring capital assets with the goal of assisting redemption contractors to reduce operating expenses while providing redemption opportunities in unserved convenience zones on behalf of Dealer Members.

Grant Funding

The Dealer Cooperative's annual budget estimate does not include any revenue from grant funding. However, the Dealer Cooperative is pursuing a long-term funding strategy that includes applying for public and private grant opportunities to support the deployment, operational, and management costs of its CRV redemption network.

Public funding opportunities, such as CalRecycle's Beverage Container Redemption Innovation Grant program (RIG), will be a key component of the Dealer Cooperative's strategy. RIG grants support start-up costs for innovative redemption solutions that align with the Dealer Cooperative's redemption strategy, such as mobile recycling units, bag drop systems, and scalable long-term investments like high-capacity redemption depots and automated technologies. RIG grants are typically reimbursable, requiring upfront costs to be covered before reimbursement. To accommodate this, the Dealer Cooperative anticipates it will, at times, deploy its reserve funds to bridge the financial gap by covering eligible expenses such as equipment acquisition and deployment costs. Once assets are acquired, redemption contractors' financial burden will be significantly reduced, enabling the rapid expansion of consumer access to CRV redemption opportunities according to the Dealer Cooperative's operational timeline.

By securing and managing public grant funding the Dealer Cooperative can ensure the financial sustainability and efficient statewide deployment of scalable, consumer-focused redemption sites. The Dealer Cooperative's strategy of securing public funding will reduce operating expenses while maximizing the impact of public funds. The result will be a more sustainable, efficient, and innovative redemption network that expands access and drives long-term growth across California.

To complement public funding, the Dealer Cooperative will seek private funding from philanthropic organizations, foundations, and other non-governmental entities aligned with its

mission. Private funding will help bridge gaps in public funding by supporting projects that expand community access to CRV redemption, invest in critical infrastructure, and drive innovation in public goods. These additional funds will strengthen the Dealer Cooperative's ability to acquire essential assets, implement targeted consumer outreach programs, and maintain financial sustainability and operational readiness. By engaging the private sector and civil society organizations, the Dealer Cooperative can leverage shared responsibility for environmental stewardship and maximize contributions from key stakeholders committed to developing sustainable, long-term recycling infrastructure across California, driving progress toward a more sustainable future.

By diversifying its funding sources through a combination of public and private grant opportunities, the Dealer Cooperative will reduce its reliance on any single funding stream, creating a resilient financial foundation for a next-generation recycling infrastructure network in California. This network will be capable of adapting to evolving market and political conditions and while ensuring long-term sustainability and growth.

The Dealer Cooperative is committed to accountability and proper communication throughout the grant funding and implementation process, meeting all requirements established by CalRecycle and other public funding sources. For private grant funding, the Dealer Cooperative will provide appropriate acknowledgment of the philanthropic organization or grant source in its quarterly and annual reports. The Dealer Cooperative is dedicated to delivering innovative and financially sustainable CRV redemption opportunities that advance California's ambitious resource recovery and environmental stewardship goals.

PART V. RECORDKEEPING PROCESSES

STATUTORY CITATION

The following section provides a detailed overview of the requirements outlined in 14 CCR § 2380, which specify the recordkeeping requirements of a Dealer Cooperative Stewardship Plan. These requirements, established by CalRecycle, ensure that stewardship plans are comprehensive, transparent, and compliant with the regulatory framework under the California Beverage Container Recycling and Litter Reduction Act. Each subsection addresses specific elements essential to the effective administration, implementation, and oversight of the Dealer Cooperative's redemption program.

SECTION OVERVIEW

To ensure clarity and consistency, the elements of this section are organized and numbered in accordance with the Model Dealer Cooperative Stewardship Plan document issued by CalRecycle in November 2024.

23. Records of Redemption Transactions [14 CCR § 2380(b)]
24. Location of Records [14 CCR § 2380(f)(1)]

23. RECORDS OF REDEMPTION TRANSACTIONS

A. BEVERAGE CONTAINER TRANSACTIONS

The Dealer Cooperative will ensure that all beverage container redemption transactions are properly prepared and retained in accordance with 14 CCR § 2380(b). To do this, the Dealer Cooperative will gather, legibly record, and store the following information for each CRV redemption transaction conducted on behalf of the Dealer Cooperative:

Consumer Details

- First name
- Last name
- Signature
- If the redemption transaction is completed using an unstaffed RVM or bag drop, the consumer's name and 'signature consent' obtained at the time the consumer initiated their digital account with the Dealer Cooperative will serve as the consumer's name and signature.

Transaction Details

- Date of the transaction
- Address of the transaction location
- Method of redemption (e.g., RVM, bag drop, etc.)
- Total payment amount made to the customer, by material type

For any non-CRV-eligible material received from consumers at any redemption site, the Dealer Cooperative will ensure to record and maintain the following information for each non-CRV transaction:

- Date the material is received
- An explanation for the refund value not being paid to a customer (e.g., system failure, material ineligibility for refund, unidentifiable customer)
- Total weight or count of materials by material type
- Explanation of how the material received was managed
- The amount of scrap value paid to the customer, if any

B. REDEMPTION TRANSACTION RECORD AUDITS

During unannounced site visits to locations operating on its behalf, Dealer Cooperative field staff will conduct regular audits of redemption transaction records. These audits will ensure all transactions recorded on behalf of the Dealer Cooperative are in full compliance with the

requirements outlined in 14 CCR § 2380(b). During each visit, field staff will review individual transaction records spanning a minimum (3) three-week period.

Records found to be out of compliance will be promptly addressed and a formal warning will be issued specifying the corrective actions needed. If there is a continued failure to comply with the recordkeeping requirements at any point within the succeeding twelve (12) months, the Dealer Cooperative will begin employee termination procedures in accordance with the governing law, or, in the case where a redemption contractor fails to comply, the Dealer Cooperative will issue a formal "Notice to Terminate Partnership." This notice will be communicated to CalRecycle as required by regulatory guidelines.

24. LOCATION OF RECORDS

The Dealer Cooperative is required to comply and to ensure that its redemption contractors adhere to all requirements set forth in 14 CCR § 2380(e) regarding the storage of beverage container redemption transactions.

As part of their agreement with the Dealer Cooperative, redemption contractor partners will securely store all original redemption transaction records at the physical redemption site, or at alternative offsite facilities and will be required to notify the Dealer Cooperative of the storage location. While each redemption contractor partner follows its own established record-keeping practices, the Dealer Cooperative will strictly enforce that records of all CRV transactions completed on its behalf are also maintained by the redemption contractor partner in physical paper form, even if initially generated electronically, to comply with regulatory requirements. Partner compliance with these record retention standards is critical to the Dealer Cooperative's oversight, regulatory compliance, and the overall success of its redemption network.

Records of all redemption transactions will be protected from debris, moisture, contamination, exposure to hazardous waste, fire, and theft. Additionally, records of transactions performed on behalf of the Dealer Cooperative will be kept separate from non-Dealer Cooperative transactions. Audits will be performed regularly by Dealer Cooperative field staff to ensure compliance with the requirements outlined in 14 CCR § 2380(e).

Pursuant to 14 CCR § 2380(f)(1), the Dealer Cooperative will ensure CalRecycle will have immediate access to CRV transaction records. For onsite audits at redemption sites performed by CalRecycle, original records are required to be available for immediate review upon request. Additionally, records of any CRV redemption transactions will be made available, upon request from CalRecycle, at the following locations:

1. Circular CRV Association
   1005 12th Street Lower 1
   Sacramento, CA 95814
2. Circular CRV Association
   1020 N Lake Street
   Burbank, CA 91502

The Dealer Cooperative will ensure delivery of any record requested by CalRecycle within (10) days of the request being made. Additionally, the Dealer Cooperative will ensure all beverage container redemption records will be retained by the Dealer Cooperative's redemption contractor partners for a minimum period of five (5) years as required under 14 CCR § 2085(b).

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APPENDIX

EXHIBIT A: IRS Determination Letter

Department of the Treasury
Internal Revenue Service
Tax Exempt and Government Entities
P.O. Box 2508
Cincinnati, OH 45201

Date:
04/14/2025
Employer ID number:
99-3606002
Person to contact:
Name: Edwina 0. Mccurdy
ID number: 0203280
Telephone: 877-829-5500
Accounting period ending:
December 31
Public charity status:
170(b)(1)(A)(vi)
Form 990 / 990-EZ / 990-N required:
Yes
Effective date of exemption:
May 31, 2024
Contribution deductibility:
Yes
Addendum applies:
No
DLN:
26053689004264

CIRCULAR CRV ASSOCIATION
1020 N LAKE STREET
BURBANK, CA 91502-1624

Dear Applicant:

We're pleased to tell you we determined you're exempt from federal income tax under Internal Revenue Code (IRC) Section 501(c)(3). Donors can deduct contributions they make to you under IRC Section 170. You're also qualified to receive tax deductible bequests, devises, transfers or gifts under Section 2055, 2106, or 2522. This letter could help resolve questions on your exempt status. Please keep it for your records.

Organizations exempt under IRC Section 501(c)(3) are further classified as either public charities or private foundations. We determined you're a public charity under the IRC Section listed at the top of this letter.

If we indicated at the top of this letter that you're required to file Form 990/990-EZ/990-N, our records show you're required to file an annual information return (Form 990 or Form 990-EZ) or electronic notice (Form 990-N, thee-Postcard). If you don't file a required return or notice for three consecutive years, your exempt status will be automatically revoked.

If we indicated at the top of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

For important information about your responsibilities as a tax-exempt organization, go to www.irs.gov/charities. Enter "4221-PC" in the search bar to view Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, which describes your recordkeeping, reporting, and disclosure requirements.

Sincerely,

Stephen A. Martin
Director, Exempt Organizations
Rulings and Agreements

EXHIBIT B: Articles of Incorporation

6208570

STATE OF CALIFORNIA
Office of the Secretary of State
ARTICLES OF INCORPORATION
CA NONPROFIT CORPORATION
PUBLIC BENEFIT

California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 657-5448

For Office Use Only

-FILED-

File No.: 6208570

Date Filed: 5/31/2024

Corporation Name

Corporation Name	Circular CRV Association

Initial Street Address of Principal Office of Corporation

Principal Address	1020 N LAKE STREET BURBANK, CA 91502

Initial Mailing Address of Corporation

Mailing Address	1020 N LAKE STREET BURBANK, CA 91502
Attention	

Agent for Service of Process

Agent Name	Dale Stern
Agent Address	621 CAPITOL MALL, 18TH FLOOR SACRAMENTO, CA 95814

Purpose Statement

This corporation is a Nonprofit Public Benefit Corporation and is not organized for the private gain of any person. It is organized under the Nonprofit Public Benefit Corporation Law for: Public purposes

Additional Statements

The specific purpose of this corporation is to See Attached

This corporation is organized and operated exclusively for the purposes set forth within the meaning of Internal Revenue Code section 501(c)(3).

No substantial part of the activities of this corporation shall consist of carrying on propaganda, or otherwise attempting to influence legislation, and this corporation shall not participate or intervene in any political campaign (including the publishing or distribution of statements) on behalf of any candidate for public office.

The property of this corporation is irrevocably dedicated to the purposes set forth herein and no part of the net income or assets of this corporation shall ever inure to the benefit of any director, officer or member thereof or to the benefit of any private person.

Upon the dissolution or winding up of this corporation, its assets remaining after payment, or provision for payment, of all debts and liabilities of this corporation shall be distributed to a nonprofit fund, foundation or corporation which is organized and operated exclusively for charitable, educational and/or religious purposes and which has established its tax-exempt status under Internal Revenue Code section 501(c)(3).

Notwithstanding any of the above statements of purpose and powers, this corporation shall not, except to an insubstantial degree, engage in any activities or exercise any powers that are not in furtherance of the specific purpose of this corporation.

Additional information and signatures set forth on attached pages, if any, are incorporated herein by reference and made part of these Articles of Incorporation.

Electronic Signature

☒ I declare that I am the person who executed this instrument, which execution is my act and deed.

Matthew Dodson — Signature

05/31/2024 — Date

B2781-7934 05/31/2024 1:17 PM Received by California Secretary of State

ATTACHMENT
TO
ARTICLES OF INCORPORATION OF A NONPROFIT PUBLIC BENEFIT CORPORATION
OF
CIRCULAR CRV ASSOCIATION

Article Additional Statements Paragraph 1:

The Specific Purpose of the corporation is to operate as a stewardship organization formed to provide redemption opportunities under California Public Resources Code Section 14578.

B2781-7936 05/31/2024 1:17 PM Received by California Secretary of State

EXHIBIT C: List of Dealer Cooperative Members

EXHIBIT C: LIST OF DEALER COOPERATIVE MEMBERS

Dealer (Store) Name	Dealer Registration Number	Dealer Street Address	City	State	ZIP Code	Convenience Zone Status
365 by Whole Foods	DR270366.001	2121 Cloverfield Blvd	Santa Monica	CA	90404	Unserved
Cardenas Markets	DR146607.001	330 Bellam Blvd	San Rafael	CA	94901	Unserved
Cardenas Markets	DR146608.001	1731 E Bayshore Rd	East Palo Alto	CA	94303	Unserved
Cardenas Markets	DR147201.001	727 1st St	Gilroy	CA	95112	Unserved
Cardenas Markets	DR150574.001	1070 S White Rd	San Jose	CA	95127	Unserved
Cardenas Markets	DR181678.001	31952 Mission Trl	Lake Elsinore	CA	92530	Unserved
Costco	DR100244.001	4500 W Shaw Ave	Fresno	CA	93722	Unserved
Costco	DR102360.001	951 Palomar Airport Rd	Carlsbad	CA	92011	Unserved
Costco	DR102414.001	33961 Doheny Park Rd	San Juan	CA	92675	Unserved
Costco	DR102662.001	1000 N Rengstorff Ave	Mountain View	CA	94043	Unserved
Costco	DR106550.001	895 E H St	Chula Vista	CA	91910	Unserved
Costco	DR107096.001	13111 Peyton Dr	Chino Hills	CA	91709	Unserved
Costco	DR107643.001	1099 E Hospitality Ln	San Bernardino	CA	92408	Unserved
Costco	DR107701.001	5101 Business Center Dr	Fairfield	CA	94534	Unserved
Costco	DR107713.001	220 Sylvania Ave	Santa Cruz	CA	95060	Unserved
Costco	DR107718.001	22633 Savi Ranch Pkwy	Yorba Linda	CA	92887	Unserved
Costco	DR108135.001	7100 N Abby St	Fresno	CA	93720	Unserved
Costco	DR112131.001	1800 Cavitt Dr	Folsom	CA	95630	Unserved
Costco	DR112457.001	12155 Tech Center Dr	Poway	CA	92064	Unserved
Costco	DR112588.001	43621 Pacific Commons Blvd	Fremont	CA	94538	Unserved
Costco	DR112697.001	101 N Beach Blvd	La Habra	CA	90631	Unserved
Costco	DR114398.001	1405 W Cameron Ave	Visalia	CA	93277	Unserved
Costco	DR189348.001	28505 Hesperian Blvd	Hayward	CA	94545	Unserved
Costco	DR250868.001	2640 Lomita Blvd	Torrance	CA	90505	Unserved
Costco	DR257006.001	2395 E Lacey Blvd	Hanford	CA	93230	Unserved
Costco	DR353459.001	3881 East Commerce Way	Natomas	CA	95834	Unserved
Costco	DR50054.001	2345 Fenton Pkwy	San Diego	CA	92108	Unserved
Costco	DR88518.001	1616 E Hammer Ln	Stockton	CA	95210	Unserved
Costco	DR91062.001	198 Plaza Dr	Vallejo	CA	94591	Unserved
Costco	DR98790.001	4605 Morena Blvd	San Diego	CA	92117	Unserved
Costco	DR98793.001	1900 Davis St	San Leandro	CA	94577	Unserved
Costco	DR107703.001	7095 Market Place Drive	Goleta	CA	93117	Unserved
Costco	DR108118.001	3250 W Grant Line Rd	Tracy	CA	95304	Unserved
Costco	DR111480.001	72-800 Dinah Shore Drive	Palm Desert	CA	92211	Unserved
Costco	DR271818.001	1700 S. Bradley Rd	Santa Maria	CA	93454	Unserved
Costco	DR330629.001	35875 Warm Springs Pkwy	Murrieta	CA	92563	Unserved
Costco	DR339827.001	4101 Sierra College Blvd	Loomis	CA	95650	Unserved
Costco	DR94078.001	101 Town Center Pkwy	Santee	CA	92071	Unserved
Costco	DR98856.001	300 Vintage Way	Novato	CA	94945	Unserved
Costco	DR107700.001	1600 El Camino Real	South San Francisco	CA	94080	Unserved
Costco	DR410580.001	5151 Heidorn Ranch Rd	Brentwood	CA	94513	Unserved
Food 4 Less	DR91814.001	1329 N Lake Ave	Pasadena	CA	91104	Unserved
Food 4 Less	DR92286.001	3210 E Anaheim St	Long Beach	CA	90804	Unserved
Food 4 Less	DR94591.001	9430 Cuyamaca St	Santee	CA	92071	Unserved
Food 4 Less (FoodsCo)	DR93679.001	1465 S Broadway	Santa Maria	CA	93454	Unserved
Gualala Supermarket	DR88238.001	39225 S Highway 1	Gualala	CA	95445	Unserved
Holiday Market	DR104213.001	3315 Placer St	Redding	CA	96001	Unserved
Holiday Market	DR302767.001	21656 Higgins Rd	Auburn	CA	95602	Unserved
Holiday Market	DR91877.001	16981 Placer Hills Rd	Meadow Vista	CA	95722	Unserved
Holiday Market	DR91720.001	9350 Deschutes Rd	Palo Cedro	CA	96073	Unserved
Holiday Market	DR405344.001	3055 Shasta View Dr	Redding	CA	96002	Unserved
Jensen's Foods	PENDING	955 Catalina Blvd	San Diego	CA	92106	Unserved
Marukai Market	DR193228.001	12121 W Pico Blvd	Los Angeles	CA	90064	Unserved
Oliver's Market	DR100908.001	560 Montecito Ctr	Santa Rosa	CA	95409	Unserved
Ralphs Grocery Co.	DR100042.001	903 S El Camino Real	San Clemente	CA	92672	Unserved
Ralphs Grocery Co.	DR100801.001	1020 University Ave	San Diego	CA	92103	Unserved
Ralphs Grocery Co.	DR101427.001	8657 Villa La Jolla Dr	La Jolla	CA	92037	Unserved
Ralphs Grocery Co.	DR101495.001	11727 W Olympic Blvd	Los Angeles	CA	90064	Unserved
Ralphs Grocery Co.	DR101509.001	1233 N La Brea Ave	West Hollywood	CA	90038	Unserved
Ralphs Grocery Co.	DR101532.001	6290 E Pacific Coast Hwy	Long Beach	CA	90803	Unserved
Ralphs Grocery Co.	DR101548.001	1644 Cloverfield Blvd	Santa Monica	CA	90404	Unserved
Ralphs Grocery Co.	DR116294.001	11361 National Blvd	Los Angeles	CA	90064-3796	Unserved
Ralphs Grocery Co.	DR116300.001	3601 E Foothill Blvd	Pasadena	CA	91107-3121	Unserved
Ralphs Grocery Co.	DR116307.001	14440 Burbank Blvd	Van Nuys	CA	91401-4823	Unserved
Ralphs Grocery Co.	DR116309.001	12842 Ventura Blvd	Studio City	CA	91604-2369	Unserved
Ralphs Grocery Co.	DR116320.001	23841 Malibu Rd	Malibu	CA	90265-4644	Unserved
Ralphs Grocery Co.	DR116328.001	4444 University Pkwy	San Bernardino	CA	92407	Unserved
Ralphs Grocery Co.	DR116336.001	10901 Ventura Blvd	Studio City	CA	91604	Unserved
Ralphs Grocery Co.	DR116347.001	49908 Jefferson St	Indio	CA	92201	Unserved
Ralphs Grocery Co.	DR116366.001	10525 4S Commons Dr	San Diego	CA	92127	Unserved
Ralphs Grocery Co.	DR85927.001	14049 Ventura Blvd	Sherman Oaks	CA	91423	Unserved
Ralphs Grocery Co.	DR86201.001	17840 Ventura Blvd	Encino	CA	91316	Unserved
Ralphs Grocery Co.	DR86292.001	1930 N Lakewood Blvd	Long Beach	CA	90815-2714	Unserved
Ralphs Grocery Co.	DR86926.001	3345 Sports Arena Blvd	San Diego	CA	92110	Unserved
Ralphs Grocery Co.	DR88376.001	12057 Wilshire Blvd	Los Angeles	CA	90025	Unserved
Ralphs Grocery Co.	DR90564.001	160 N Lake Ave	Pasadena	CA	91101-1836	Unserved
Ralphs Grocery Co.	DR91075.001	260 S La Brea Ave	Los Angeles	CA	90036	Unserved
Ralphs Grocery Co.	DR91318.001	3075 S Archibald Ave	Ontario	CA	91761-9000	Unserved
Ralphs Grocery Co.	DR91697.001	7257 W Sunset Blvd	West Hollywood	CA	90046-3409	Unserved

EXHIBIT C: LIST OF DEALER COOPERATIVE MEMBERS

Dealer (Store) Name	Dealer Registration Number	Dealer Street Address	City	State	ZIP Code	Convenience Zone Status
Ralphs Grocery Co.	DR92571.001	2930 E 4th St	Long Beach	CA	90814	Unserved
Ralphs Grocery Co.	DR93954.001	24871 Del Prado	Dana Point	CA	92629	Unserved
Ralphs Grocery Co.	DR94056.001	10900 Magnolia Blvd	North Hollywood	CA	91601	Unserved
Ralphs Grocery Co.	DR94172.001	21909 Ventura Blvd	Woodland Hills	CA	91364	Unserved
Ralphs Grocery Co.	DR94556.001	305 W Imperial Hwy	Brea	CA	92821	Unserved
Ralphs Grocery Co.	DR90527.001	211 E Foothill Blvd	Arcadia	CA	91006	Unserved
Ralphs Grocery Co.	DR94542.001	5601 Wilshire Blvd	Los Angeles	CA	90036	Unserved
Ralphs Grocery Co.	DR116333.001	24975 Pico Canyon Rd	Stevenson Ranch	CA	91381	Unserved
Surf Supermarket	DR88237.001	39250 S Highway 1	Gualala	CA	95445	Unserved
Trader Joe's	DR116135.001	845 Browning St	Redding	CA	96003	Unserved
Trader Joe's	DR104528.001	3212 Pico Blvd	Santa Monica	CA	90405	Unserved
Trader Joe's	DR105591.001	475 Foothill Blvd	La Canada	CA	91011	Unserved
Trader Joe's	DR105716.001	263 S La Brea Ave	Los Angeles	CA	90036	Unserved
Trader Joe's	DR105722.001	10130 Riverside Dr	Toluca Lake	CA	91602	Unserved
Trader Joe's	DR105810.001	2545 Pacific Coast Hwy	Torrance	CA	90505	Unserved
Trader Joe's	DR106042.001	1170 Forest Ave	Pacific Grove	CA	93950	Unserved
Trader Joe's	DR107676.001	955 Rancho Pkwy	Arroyo Grande	CA	93420	Unserved
Trader Joe's	DR1073478.001	363 Carmen Dr	Camarillo	CA	93010	Unserved
Trader Joe's	DR107680.001	17640 Burbank Blvd	Encino	CA	91316	Unserved
Trader Joe's	DR107689.001	1761 S Elena Ave	Redondo Beach	CA	90277	Unserved
Trader Joe's	DR107691.001	1090 University Ave	San Diego	CA	92103	Unserved
Trader Joe's	DR112027.001	8086 E Coast Hwy	Newport Beach	CA	92657	Unserved
Trader Joe's	DR112028.001	345 S Lake Ave	Pasadena	CA	91101	Unserved
Trader Joe's	DR112095.001	467 N Rosemead Blvd	Pasadena	CA	91107	Unserved
Trader Joe's	DR112142.001	5000 Folsom Blvd	Sacramento	CA	95819	Unserved
Trader Joe's	DR112476.001	850 E Bidwell St	Folsom	CA	95630	Unserved
Trader Joe's	DR112477.001	19655 Yorba Linda Blvd	Yorba Linda	CA	92886	Unserved
Trader Joe's	DR113084.001	5451 Lone Tree Wy	Brentwood	CA	94513	Unserved
Trader Joe's	DR113955.001	878 Eastlake Pkwy	Chula Vista	CA	91914	Unserved
Trader Joe's	DR113956.001	17035 Laurel Rd	Morgan Hill	CA	95037	Unserved
Trader Joe's	DR113957.001	1111 Rossi Rd	Templeton	CA	93465	Unserved
Trader Joe's	DR114062.001	2401 Truxtun Rd	Point Loma	CA	92106	Unserved
Trader Joe's	DR114592.001	475 W Foothill Blvd	Claremont	CA	91711	Unserved
Trader Joe's	DR115558.001	1000 Glendon Ave	Los Angeles	CA	90024	Unserved
Trader Joe's	DR115747.001	1303 S Bradley Rd	Santa Maria	CA	93454	Unserved
Trader Joe's	DR116134.001	2052 Redwood Hwy	Greenbrae	CA	94904	Unserved
Trader Joe's	DR139015.001	855 El Camino Real	Palo Alto	CA	94301	Unserved
Trader Joe's	DR139016.001	1600 N Vine St	Los Angeles	CA	90028	Unserved
Trader Joe's	DR139018.001	11755 W Olympic Blvd	Los Angeles	CA	90064	Unserved
Trader Joe's	DR139028.001	9850 Hibert St	San Diego	CA	92131	Unserved
Trader Joe's	DR145885.001	31176 Hawthorne Blvd	Rcho Palos Verdes	CA	90275	Unserved
Trader Joe's	DR165493.001	2462 Honolulu Ave	Montrose	CA	91020	Unserved
Trader Joe's	DR166829.001	175 S Fairfax Ave	Los Angeles	CA	90036	Unserved
Trader Joe's	DR258170.001	7310 Santa Monica Blvd	West Hollywood	CA	90046	Unserved
Trader Joe's	DR276656.001	23741 Calabasas Rd	Calabasas	CA	91302	Unserved
Trader Joe's	DR295964.001	2101 W Imperial Hwy	La Habra	CA	90631	Unserved
Trader Joe's	DR299978.001	2300 Wilshire Blvd	Santa Monica	CA	90403	Unserved
Trader Joe's	DR319516.001	500 S. Broadway	Santa Monica	CA	90401	Unserved
Trader Joe's	DR85719.001	11976 Ventura Blvd	Studio City	CA	91604	Unserved
Trader Joe's	DR85933.001	14119 Riverside Dr	Sherman Oaks	CA	91423	Unserved
Trader Joe's	DR87361.001	570 Munras Ave	Monterey	CA	93940	Unserved
Trader Joe's	DR87369.001	5727 College Ave	Oakland	CA	94618	Unserved
Trader Joe's	DR88858.001	5269 Prospect Rd	San Jose	CA	95129	Unserved
Trader Joe's	DR89071.001	10850 National Blvd	West Los Angeles	CA	90064	Unserved
Trader Joe's	DR89755.001	8657 Villa La Jolla Dr	La Jolla	CA	92037	Unserved
Trader Joe's	DR94475.001	1875 S Bascom Ave	Campbell	CA	95008	Unserved
Trader Joe's	DR95201.001	613 Mission St	South Pasadena	CA	91030	Unserved
Trader Joe's	DR99196.001	3225 Cleveland Ave	Santa Rosa	CA	95403	Unserved
Trader Joe's	DR342934.001	9680 Mission Gorge Rd	Santee	CA	92071	Unserved
Walmart	DR102696.001	705 College Blvd	Oceanside	CA	92057	Unserved
Walmart	DR108777.001	13487 Camino Canada	El Cajon	CA	92021	Unserved
Walmart	DR109373.001	1919 Davis Street	San Leandro	CA	94577	Unserved
Walmart	DR110307.001	3382 Murphy Canyon Road	San Diego	CA	92123	Unserved
Walmart	DR111444.001	710 Dennery Road	San Diego	CA	92154	Unserved
Walmart	DR111979.001	37140 47th St E	Palmdale	CA	93552	Unserved
Walmart	DR111984.001	7065 N Ingram Ave	Fresno	CA	93650	Unserved
Walmart	DR112300.001	25450 The Old Road	Stevenson Ranch	CA	91381	Unserved
Walmart	DR112574.001	27931 Kelly Johnson Pkwy	Santa Clarita	CA	91355	Unserved
Walmart	DR113096.001	250 S 12th Ave	Hanford	CA	93230	Unserved
Walmart	DR176556.001	1550 Leucadia Blvd	Encinitas	CA	92024	Unserved
Walmart	DR197834.001	5454 Crossings Dr	Rocklin	CA	95677	Unserved
Walmart	DR201360.001	275 W Ventura Blvd	Camarillo	CA	93010	Unserved
Walmart	DR223827.001	1804 E Ashlan Ave	Fresno	CA	93726	Unserved
Walmart	DR264796.001	8270 Delta Shores Cir	Sacramento	CA	95832	Unserved
Walmart	DR278134.001	4080 W Shaw Ave	Fresno	CA	93722	Unserved
Walmart	DR94080.001	170 Town Center Parkway	Santee	CA	92071	Unserved
Walmart	DR99748.001	150 Beach Rd	Marina	CA	93933	Unserved
Walmart	DR108994.001	1515 Dana Dr	Redding	CA	96003	Unserved
Walmart	DR193153.001	501 Sereno Dr	Vallejo	CA	94589	Unserved

EXHIBIT C: LIST OF DEALER COOPERATIVE MEMBERS

Dealer (Store) Name	Dealer Registration Number	Dealer Street Address	City	State	ZIP Code	Convenience Zone Status
Walmart	DR114979.001	250 Wildcat Dr	Brawley	CA	92227	Unserved
Whole Foods	DR101460.001	1425 Montana Ave	Santa Monica	CA	90403	Unserved
Whole Foods	DR101484.001	4520 Sepulveda Blvd	Sherman Oaks	CA	91403	Unserved
Whole Foods	DR102905.001	8825 Villa La Jolla Dr	La Jolla	CA	92037	Unserved
Whole Foods	DR102995.001	711 University Ave	San Diego	CA	92103	Unserved
Whole Foods	DR103016.001	11737 San Vicente Blvd	Los Angeles	CA	90049	Unserved
Whole Foods	DR103019.001	283 Broadway St	Laguna Beach	CA	92651	Unserved
Whole Foods	DR103068.001	6350 W 3rd St	Los Angeles	CA	90036	Unserved
Whole Foods	DR104202.001	800 Del Monte Ctr	Monterey	CA	93940	Unserved
Whole Foods	DR104618.001	201 W Napa St	Sonoma	CA	95476	Unserved
Whole Foods	DR105083.001	405 N Pacific Coast Hwy	Redondo Beach	CA	90277	Unserved
Whole Foods	DR106886.001	21347 Ventura Blvd	Woodland Hills	CA	91364	Unserved
Whole Foods	DR106971.001	100 Sunset Dr	San Ramon	CA	94583	Unserved
Whole Foods	DR107205.001	650 W Shaw Ave	Fresno	CA	93704	Unserved
Whole Foods	DR112032.001	1050 Gayley Ave	Los Angeles	CA	90024	Unserved
Whole Foods	DR112047.001	2201 Wilshire Blvd	Santa Monica	CA	90403	Unserved
Whole Foods	DR114029.001	465 S Arroyo Pkwy	Pasadena	CA	91105	Unserved
Whole Foods	DR114066.001	760 S Sepulveda Blvd	El Segundo	CA	90245	Unserved
Whole Foods	DR137321.001	390 Coddingtown Mall	Santa Rosa	CA	95401	Unserved
Whole Foods	DR137327.001	3761 State St	Santa Barbara	CA	93105	Unserved
Whole Foods	DR154250.001	270 Palladio Pkwy	Folsom	CA	95630	Unserved
Whole Foods	DR173456.001	415 Newport Center Dr	Newport Beach	CA	92660	Unserved
Whole Foods	DR181603.001	2600 Via De La Valle	Del Mar	CA	92014	Unserved
Whole Foods	DR219591.001	44459 Town Center Way	Palm Desert	CA	92260	Unserved
Whole Foods	DR230244.001	12746 W Jefferson Blvd	Playa Vista	CA	90094	Unserved
Whole Foods	DR250954.001	3301 E Imperial Hwy	Brea	CA	92823	Unserved
Whole Foods	DR274541.001	3401 W Olive Ave	Burbank	CA	91505	Unserved
Whole Foods	DR276314.001	2153 W Baseline Rd	Upland	CA	91784	Unserved
Whole Foods	DR296539.001	6400 E Pacific Coast Hwy	Long Beach	CA	90803	Unserved
Whole Foods	DR360967.001	14311 Ventura Blvd	Sherman Oaks	CA	91423	Unserved
Whole Foods	DR86754.001	3000 Telegraph Ave	Berkeley	CA	94705	Unserved
Whole Foods	DR89307.001	774 Emerson St	Palo Alto	CA	94301	Unserved
Whole Foods	DR90082.001	225 Lincoln Blvd	Venice	CA	90291	Unserved
Whole Foods	DR91889.001	1690 S Bascom Ave	Campbell	CA	95008	Unserved
Whole Foods	DR92137.001	3751 E Foothill Blvd	Pasadena	CA	91107	Unserved
Whole Foods	DR97381.001	2655 Pacific Coast Hwy	Torrance	CA	90505	Unserved
Whole Foods	DR335696.001	23401 Civic Center Way	Malibu	CA	90265	Unserved
Whole Foods	DR360960.001	12905 Riverside Dr	Sherman Oaks	CA	91423	Unserved
Whole Foods	DR102952.001	340 3rd St	San Rafael	CA	94901	Unserved
Whole Foods	DR90365.001	911 Soquel Ave	Santa Cruz	CA	95062	Unserved
Whole Foods	DR92209.001	15980 Los Gatos Blvd	Los Gatos	CA	95032	Unserved
World Market	DR371288.001	1080 Hilltop Drive	Redding	CA	96003	Unserved

EXHIBIT D: Redemption Sites in Unserved Convenience Zones

EXHIBIT D: REDEMPTION SITES IN UNSERVED CONVENIENCE ZONES

Dealer (Store) Name	Dealer Convenience Zone Number	Dealer Street Address	City	State	ZIP Code
365 by Whole Foods	196863	2121 Cloverfield Blvd	Santa Monica	CA	90404
Cardenas Markets	13101	727 First St.	Gilroy	CA	95112
Cardenas Markets	34800	330 Bellam Blvd.	San Rafael	CA	94901
Cardenas Markets	13030	31952 Mission Trl	Lake Elsinore	CA	92530
Costco	11799	951 Palomar Airport Rd	Carlsbad	CA	92011
Costco	11668	13111 Peyton Dr	Chino Hills	CA	91709
Costco	11722	895 E H St	Chula Vista	CA	91910
Costco	11580	5101 Business Center Dr	Fairfield	CA	94534
Costco	11069	1800 Cavitt Dr	Folsom	CA	95630
Costco	10239	43621 Pacific Commons Blvd	Fremont	CA	94538
Costco	10037	7100 N Abby St	Fresno	CA	93720
Costco	12230	4500 W Shaw Ave	Fresno	CA	93722
Costco	11578	7095 Market Place Dr	Goleta	CA	93117
Costco	173854	2395 East Lacey Blvd	Hanford	CA	93230
Costco	76810	28505 Hesperian Blvd	Hayward	CA	94545
Costco	11082	101 N Beach Blvd	La Habra	CA	90631
Costco	267896	4101 Sierra College Blvd	Loomis	CA	95650
Costco	279912	3881 East Commerce Way	Natomas	CA	95834
Costco	11787	1000 N Rengstorff Ave	Mountain View	CA	94043
Costco	264901	35875 Warm Springs Pkwy	Murrieta	CA	92563
Costco	10733	300 Vintage Way	Novato	CA	94945
Costco	11224	72800 Dinah Shore Dr	Palm Desert	CA	92211
Costco	11133	12155 Tech Center Dr	Poway	CA	92064
Costco	11601	1099 E Hospitality Ln	San Bernardino	CA	92408
Costco	11071	2345 Fenton Pkwy	San Diego	CA	92108
Costco	12281	4605 Morena Blvd	San Diego	CA	92117
Costco	10203	33961 Doheny Park Rd	San Juan Capistrano	CA	92675
Costco	12279	1900 Davis St	San Leandro	CA	94577
Costco	11570	220 Sylvania Ave	Santa Cruz	CA	95060
Costco	198866	1700 S Bradley Rd	Santa Maria	CA	93454
Costco	10562	101 Town Center Pkwy	Santee	CA	92071
Costco	13457	1616 E Hammer Ln	Stockton	CA	95210
Costco	150846	2640 Lomita Ave	Torrance	CA	90505
Costco	11249	3250 W Grant Line Rd	Tracy	CA	95304
Costco	12980	198 Plaza Dr	Vallejo	CA	94591
Costco	10941	1405 W Cameron Ave	Visalia	CA	93277
Costco	11566	22633 Savi Ranch Pkwy	Yorba Linda	CA	92887
Costco	11581	1600 El Camino Real	South San Francisco	CA	94080
Costco	300922	5151 Heidorn Ranch Rd	Brentwood	CA	94513
Food 4 Less	12459	3210 E Anaheim St	Long Beach	CA	90804
Food 4 Less	12568	1329 N Lake Ave	Pasadena	CA	91104
Food 4 Less (FoodsCo)	12639	1465 S Broadway	Santa Maria	CA	93454
Gualala Supermarket	13493	39225 CA 1	Gualala	CA	95445
Holiday Market	224882	21656 Higgins Road	Auburn	CA	95602
Holiday Market	12027	3315 Placer Street	Redding	CA	96001
Holiday Market	12552	16981 Placer Hills Road	Meadow Vista	CA	95722
Holiday Market	12584	9350 Deschutes Rd	Palo Cedro	CA	96073
Holiday Market	297920	3055 Shasta View Dr	Redding	CA	96002
Jensen's Foods	10449	955 Catalina Blvd	San Diego	CA	92106
Oliver's Market	11022	560 Montecito Center	Santa Rosa	CA	95409
Ralphs Grocery Co.	10134	17840 Ventura Blvd.	Encino	CA	91316
Ralphs Grocery Co.	10289	12842 Ventura Blvd.	Studio City	CA	91604-2369
Ralphs Grocery Co.	10300	12057 Wilshire Blvd.	Los Angeles	CA	90025
Ralphs Grocery Co.	10793	8657 Villa La Jolla Drive	La Jolla	CA	92037
Ralphs Grocery Co.	10836	1930 N. Lakewood Blvd.	Long Beach	CA	90815-2714
Ralphs Grocery Co.	11282	10525 4S Commons Dr.	San Diego	CA	92127
Ralphs Grocery Co.	11614	49908 Jefferson St.	Indio	CA	92201
Ralphs Grocery Co.	11698	10901 Ventura Blvd.	Studio City	CA	91604
Ralphs Grocery Co.	11826	1644 Cloverfield Ave.	Santa Monica	CA	90404
Ralphs Grocery Co.	11840	6290 E. Pacific Cst Hwy	Long Beach	CA	90803
Ralphs Grocery Co.	11867	11727 Olympic Blvd.	Los Angeles	CA	90064
Ralphs Grocery Co.	11934	1020 University Ave.	San Diego	CA	92103
Ralphs Grocery Co.	11966	4444 University Parkway	San Bernardino	CA	92407
Ralphs Grocery Co.	11971	23841 W. Malibu Road	Malibu	CA	90265-4644
Ralphs Grocery Co.	11992	14440 Burbank Blvd.	Van Nuys	CA	91401-4823
Ralphs Grocery Co.	12002	3601 E. Foothill Blvd.	Pasadena	CA	91107-3121
Ralphs Grocery Co.	12007	11361 National Blvd.	Los Angeles	CA	90064-3796
Ralphs Grocery Co.	12148	21909 Ventura Blvd.	Woodland Hills	CA	91364
Ralphs Grocery Co.	12177	10900 Magnolia Blvd.	No. Hollywood	CA	91601
Ralphs Grocery Co.	12197	24871 Del Prado	Dana Point	CA	92629
Ralphs Grocery Co.	12235	903 S. El Camino Real	San Clemente	CA	92672
Ralphs Grocery Co.	12381	305 W. Imperial Hwy	Brea	CA	92821

EXHIBIT D: REDEMPTION SITES IN UNSERVED CONVENIENCE ZONES

Dealer (Store) Name	Dealer Convenience Zone Number	Dealer Street Address	City	State	ZIP Code
Ralphs Grocery Co.	12589	7257 W. Sunset Blvd.	West Hollywood	CA	90046-3409
Ralphs Grocery Co.	12938	3075 S. Archibald Bldg. C	Ontario	CA	91761-9000
Ralphs Grocery Co.	12978	260 S. La Brea Ave.	Los Angeles	CA	90036
Ralphs Grocery Co.	13049	160 N. Lake Ave.	Pasadena	CA	91101-1836
Ralphs Grocery Co.	13647	14049 Ventura Blvd.	Sherman Oaks	CA	91423
Ralphs Grocery Co.	13723	3345 Sports Arena Blvd.	San Diego	CA	92110
Ralphs Grocery Co.	13058	211 E. Foothill Blvd	Arcadia	CA	91006
Ralphs Grocery Co.	10929	24975 Pico Canyon Rd	Stevenson Ranch	CA	91381
Walmart	11217	37140 47th Street East	Palmdale	CA	93552
Walmart	11395	250 South 12th Avenue	Hanford	CA	93230
Walmart	287913	3382 Murphy Canyon Road	San Diego	CA	92123
Walmart	17749	705 College Blvd	Oceanside	CA	92057
Walmart	82827	13487 Camino Canada	El Cajon	CA	92021
Walmart	87817	150 Beach Road	Marina	CA	93933
Walmart	90840	27931 Kelly Johnson Parkway	Santa Clarita	CA	91355
Walmart	142845	7064 North Ingram Avenue	Fresno	CA	93650
Walmart	287914	710 Dennery Road	San Diego	CA	92154
Walmart	287915	1919 Davis Street	San Leandro	CA	94577
Walmart	88819	1515 Dana Dr	Redding	CA	96003
Walmart (NHM)	74823	275 West Ventura Blvd	Camarillo	CA	93010
Walmart	81814	501 Sereno Dr	Vallejo	CA	94589
Walmart	11267	250 Wildcat Dr	Brawley	CA	92227
Whole Foods	11875	4520 Sepulveda Blvd.	Sherman Oaks	CA	91403
Whole Foods	151847	3301 E Imperial Hwy	Brea	CA	92823
Whole Foods	210874	2153 W Baseline Rd	Upland	CA	91784
Whole Foods	13520	3000 Telegraph Ave	Berkeley	CA	94705
Whole Foods	11064	774 Emerson St	Palo Alto	CA	94301
Whole Foods	12548	1690 S Bascom Ave	Campbell	CA	95008
Whole Foods	12035	800 Del Monte Ctr	Monterey	CA	93940
Whole Foods	15755	390 Coddingtown Ctr	Santa Rosa	CA	95401
Whole Foods	11002	340 3rd St	San Rafael	CA	94901
Whole Foods	13082	911 Soquel Ave	Santa Cruz	CA	95062
Whole Foods	12475	15980 Los Gatos Blvd	Los Gatos	CA	95032

EXHIBIT E: Recycling Centers Where Dealer Cooperative Ships Materials

EXHIBIT E
RECYCLING CENTER WHERE DEALER COOPERATIVE SHIPS MATERIALS

RC Identification	Recycling Centers	Facility Address	Facility City	State	ZIP
RC18653.001	Cal Pac Recycling Inc	703 Emerson Ave	Calexico	CA	92231
RC306659.001	CRV Recycling Solutions	7511 Orangethorpe Ave	Buena Park	CA	90621
RC306662.001	CRV Recycling Solutions	1800 E Collins Ave	Orange	CA	92867
RC307663.001	CRV Recycling Solutions	8888 Chapman Ave	Garden Grove	CA	92841
RC307673.001	CRV Recycling Solutions	851 N Harbor Blvd	La Habra	CA	90631
RC307676.001	CRV Recycling Solutions	17050 Van Buren Blvd	Riverside	CA	92504
RC307679.001	CRV Recycling Solutions	26892 La Paz Rd	Aliso Viejo	CA	92656
RC307682.001	CRV Recycling Solutions	9225 Magnolia Ave	Riverside	CA	92503
RC307685.001	CRV Recycling Solutions	6160 Arlington Ave	Riverside	CA	92504
RC307688.002	CRV Recycling Solutions	2790 Hamner Ave	Norco	CA	92860
RC308154.001	CRV Recycling Solutions	1786 E Lugonia Ave	Redlands	CA	92374
RC308157.001	CRV Recycling Solutions	11365 Bryant St	Yucaipa	CA	92399
RC308160.001	CRV Recycling Solutions	18140 Arrow Blvd	Fontana	CA	92335
RC308163.001	CRV Recycling Solutions	2053 E Washington St	Colton	CA	92324
RC308182.001	CRV Recycling Solutions	1536 Barton Rd	Redlands	CA	92373
RC308188.001	CRV Recycling Solutions	16750 Lakeshore Dr	Lake Elsinore	CA	92530
RC308191.001	CRV Recycling Solutions	1155 Calimesa Blvd	Calimesa	CA	92320
RC308218.001	CRV Recycling Solutions	31813 Temecula Pkwy	Temecula	CA	92592
RC308633.001	CRV Recycling Solutions	25904 Newport Rd	Menifee	CA	92584
RC308801.002	CRV Recycling Solutions	15222 Summit Ave	Fontana	CA	92336
RC308810.001	CRV Recycling Solutions	2660 Park Center Dr	Simi Valley	CA	93065
RC308837.001	CRV Recycling Solutions	14168 Hwy 395	Adelanto	CA	92301
RC374683.001	CRV Recycling Solutions	990 Ave Vista Hermosa	San Clemente	CA	92673
RC374687.001	CRV Recycling Solutions	7135 El Camino Real	Atascadero	CA	93422
RC388445.001	CRV Recycling Solutions	11990 Los Osos Valley Rd	San Luis Obispo	CA	93405
RC388456.001	CRV Recycling Solutions	1430 Beaumont Ave	Beaumont	CA	92223
RC390461.001	CRV Recycling Solutions	78630 Highway 111	La Quinta	CA	92253
RC390465.001	CRV Recycling Solutions	2430 River Rd	Norco	CA	92860
RC390469.001	CRV Recycling Solutions	3770 Mission Ave	Oceanside	CA	92058
RC393614.001	CRV Recycling Solutions	977 Kendall Dr	San Bernardino	CA	92407
RC393618.001	CRV Recycling Solutions	1085 W. Highland Ave	San Bernardino	CA	92405
RC393626.001	CRV Recycling Solutions	27160 Sun City Blvd	Sun City	CA	92586
RC393932.001	CRV Recycling Solutions	34460 Yucaipa Blvd	Yucaipa	CA	92399
RC393936.001	CRV Recycling Solutions	210 E Stetson Ave	Hemet	CA	92543
RC393940.001	CRV Recycling Solutions	37218 E 47th St	Palmdale	CA	93550
RC394124.001	CRV Recycling Solutions	9750 19th St	Alta Loma	CA	91737
RC394128.001	CRV Recycling Solutions	780 Sycamore Ave	Vista	CA	92083
RC394132.001	CRV Recycling Solutions	14425 Moreno Beach Dr	Moreno Valley	CA	92555
RC394136.001	CRV Recycling Solutions	32281 Mission Trail	Lake Elsinore	CA	92530
RC394140.001	CRV Recycling Solutions	8640 Alondra Blvd	Paramount	CA	90723
RC394144.001	CRV Recycling Solutions	14250 Chino Hills Pkwy	Chino Hills	CA	91709
RC396153.001	CRV Recycling Solutions	43396 State Highway 74	Hemet	CA	92544
RC396622.001	CRV Recycling Solutions	81056 Highway 111	Indio	CA	92201
RC397473.001	CRV Recycling Solutions	1271 N. State St	San Jacinto	CA	92583
RC297188.001	Everyday Recycling	1616 W Katella Ave	Anaheim	CA	92802
RC297191.001	Everyday Recycling	3900 Chicago Ave	Riverside	CA	92507
RC297194.001	Everyday Recycling	14738 La Paz Dr	Victorville	CA	92395
RC297197.001	Everyday Recycling	16266 Bear Valley Rd	Victorville	CA	92392
RC377137.001	Hambro Recycling	6719 Eastside Rd	Anderson	CA	96007
RC383733.001	Hambro Recycling	20645 Gas Point Rd	Cottonwood	CA	96022
RC385586.001	Hambro Recycling	2301 Balls Ferry Rd	Anderson	CA	96007
RC265475.001	Ivan's Recycling	7825 Lichen Dr	Citrus Heights	CA	95621
RC272517.001	Our Planet Recycling Sf	445V Bayshore Blvd	San Francisco	CA	94124
RC147035.001	Ponce Recycling	123 E Lomita Blvd	Carson	CA	90745

EXHIBIT E
RECYCLING CENTER WHERE DEALER COOPERATIVE SHIPS MATERIALS

RC Identification	Recycling Centers	Facility Address	Facility City	State	ZIP
RC148327.002	Ponce Recycling	11660 Firestone Blvd	Norwalk	CA	90650
RC170016.001	Ponce Recycling	6040 Venice Blvd	Los Angeles	CA	90034
RC170081.001	Ponce Recycling	650 E Carson St	Carson	CA	90745
RC187842.001	Ponce Recycling	10801 Prairie Ave	Inglewood	CA	90303
RC260331.001	Ponce Recycling	17305 Valley Blvd	La Puente	CA	91744
RC260783.001	Ponce Recycling	9954 Sierra Ave	Fontana	CA	92335
RC267657.001	Ponce Recycling	1098 N State College Blvd	Anaheim	CA	92806
RC272729.001	Ponce Recycling	1150 E Vista Way	Vista	CA	92084
RC276633.001	Ponce Recycling	19800 Hawthorne Blvd	Torrance	CA	90503
RC293159.001	Ponce Recycling	1101 Huntington Dr	Arcadia	CA	91007
RC293396.002	Ponce Recycling	1645 W Holt Ave	Pomona	CA	91768
RC293443.001	Ponce Recycling	2291 W Malvern Ave	Fullerton	CA	92833
RC293446.001	Ponce Recycling	1040 E Bastanchury Rd	Fullerton	CA	92835
RC293631.002	Ponce Recycling	1413 Hawthorne Blvd	Redondo Beach	CA	90278
RC295660.001	Ponce Recycling	21751 Lake Forest Dr	Lake Forest	CA	92630
RC295663.001	Ponce Recycling	18405 Brookhurst St	Fountain Valley	CA	92708
RC295666.001	Ponce Recycling	26901 Aliso Creek Rd	Aliso Viejo	CA	92656
RC295669.001	Ponce Recycling	12470 Seal Beach Blvd	Seal Beach	CA	90740
RC295672.001	Ponce Recycling	19081 Goldenwest St	Huntington Beach	CA	92648
RC295681.001	Ponce Recycling	22333 Sherman Way	Canoga Park	CA	91303
RC295684.001	Ponce Recycling	14400 Culver Dr	Irvine	CA	92604
RC295693.001	Ponce Recycling	22915 Victory Blvd	West Hills	CA	91307
RC295702.001	Ponce Recycling	1150 N Pepper Ave	Colton	CA	92324
RC295708.001	Ponce Recycling	500 Hacienda Dr	Vista	CA	92081
RC295711.001	Ponce Recycling	2652 Jamacha Rd	El Cajon	CA	92019
RC295714.001	Ponce Recycling	3963 E Thousand Oaks Blvd	Thousand Oaks	CA	91362
RC295717.001	Ponce Recycling	5241 Warner Ave	Huntington Beach	CA	92649
RC295720.001	Ponce Recycling	312 Euclid Ave	San Diego	CA	92114
RC295724.001	Ponce Recycling	915 S Brookhurst St	Anaheim	CA	92804
RC295727.001	Ponce Recycling	250 W Esplanade Dr	Oxnard	CA	91335
RC295730.001	Ponce Recycling	710 N Rose Dr	Placentia	CA	92870
RC295733.001	Ponce Recycling	27730 Santa Margarita Pkwy	Mission Viejo	CA	92691
RC295736.001	Ponce Recycling	1100 N San Fernando Blvd	Burbank	CA	91504
RC295739.001	Ponce Recycling	780 Otay Lakes Rd	Chula Vista	CA	91910
RC295742.001	Ponce Recycling	11875 Carmel Mountain Rd	San Diego	CA	92128
RC295745.001	Ponce Recycling	7420 Broadway St	Lemon Grove	CA	91945
RC295748.001	Ponce Recycling	101 W Los Angeles Ave	Moorpark	CA	93021
RC295751.001	Ponce Recycling	660 Palomar St	Chula Vista	CA	91911
RC295754.001	Ponce Recycling	1500 N Moorpark Rd	Thousand Oaks	CA	91360
RC295757.001	Ponce Recycling	3011 Alta View Dr	San Diego	CA	92139
RC295760.001	Ponce Recycling	1776 Victoria Ave	Ventura	CA	93003
RC295763.001	Ponce Recycling	25104 Marguerite Pkwy	Mission Viejo	CA	92675
RC295766.001	Ponce Recycling	1320 E 30Th St	National City	CA	91950
RC295769.001	Ponce Recycling	3455 Del Mar Heights Rd	San Diego	CA	92130
RC295772.001	Ponce Recycling	638 Camino De Los Mares	San Clemente	CA	92673
RC295775.001	Ponce Recycling	1733 E Palm Canyon Dr	Palm Springs	CA	92264
RC296138.001	Ponce Recycling	306 Twin Oaks Valley Rd	San Marcos	CA	92078
RC298945.001	Ponce Recycling	1018 Casitas Pass Rd	Carpinteria	CA	93013
RC308781.001	Ponce Recycling	13321 South St	Cerritos	CA	90703
RC310434.001	Ponce Recycling	201 W Arbor Vitae St	Inglewood	CA	90301
RC316056.001	Ponce Recycling	2040 E Valley Pkwy	Escondido	CA	92027
RC365330.001	Ponce Recycling	19725 Colima Rd	Rowland Heights	CA	91748
RC14358.001	Ponce Recycling Inc	5212 W Adams Blvd	Los Angeles	CA	90016
RC304512.001	Recycle Planet Inc	6935 Power Inn Rd	Sacramento	CA	95828

EXHIBIT E
RECYCLING CENTER WHERE DEALER COOPERATIVE SHIPS MATERIALS

RC Identification	Recycling Centers	Facility Address	Facility City	State	ZIP
RC13239.001	Recycling Innovations	20001 Roscoe Blvd	Winnetka	CA	91306
RC142061.001	Recycling Innovations	10201 Reseda Blvd	Northridge	CA	91324
RC179104.001	Recycling Innovations	8464 Reseda Blvd	Northridge	CA	91324
RC261647.001	Recycling Spot	115 Technology Dr	Irvine	CA	92618
RC292188.001	Recycling Spot Of Lakewood	20137 Pioneer Blvd	Lakewood	CA	90715
RC308511.001	S & L Recycling	7949 Hwy 99E	Los Molinos	CA	96055
RC376898.001	S & L Recycling	440 Antelope Blvd	Red Bluff	CA	96080
RC3768989.001	S & L Recycling	440 Antelope Blvd.	Red Bluff	CA	96080
RC88452.001	S & L Recycling	2642 Hwy 32	Butte	CA	95973
RC248567.001	Sunset Recycling Center	1314 W Francisquito Ave	West Covina	CA	91790
RC257758.001	Sunset Recycling Center	2469 Via Campo St	Montebello	CA	90640
RC292807.001	Sunset Recycling Center	16505 Sierra Lakes Pkwy	Fontana	CA	92336
RC292816.001	Sunset Recycling Center	5401 Katella Ave	Cypress	CA	90720
RC294674.001	Sunset Recycling Center	10531 Carmenita Rd	Santa Fe Springs	CA	90670
RC294683.001	Sunset Recycling Center	1470 E Highland Ave	San Bernardino	CA	92404
RC295141.001	Sunset Recycling Center	315 E Alessandro Blvd	Riverside	CA	92508
RC295212.001	Sunset Recycling Center	12804 La Mirada Blvd	La Mirada	CA	90638
RC296454.001	Sunset Recycling Center	13525 Lakewood Blvd	Downey	CA	90242
RC296457.001	Sunset Recycling Center	20060 Ventura Blvd	Woodland Hills	CA	91364
RC296460.001	Sunset Recycling Center	5951 Del Amo Blvd	Lakewood	CA	90713
RC296463.001	Sunset Recycling Center	3455 Sepulveda Blvd	Torrance	CA	90505
RC296466.001	Sunset Recycling Center	9470 Las Tunas Dr	Temple City	CA	91780
RC296469.001	Sunset Recycling Center	14919 Whittier Blvd	Whittier	CA	90605
RC296472.001	Sunset Recycling Center	12222 Carson St	Hawaiian Gardens	CA	90716
RC296475.001	Sunset Recycling Center	8626 Firestone Blvd	Downey	CA	90241
RC296478.001	Sunset Recycling Center	7810 Norwalk Blvd	Whittier	CA	90606
RC296481.001	Sunset Recycling Center	330 N Atlantic Blvd	Monterey Park	CA	91754
RC296613.001	Sunset Recycling Center	27760 N Mcbean Pkwy	Valencia	CA	91354
RC296616.001	Sunset Recycling Center	914 W Orangethorpe Ave	Fullerton	CA	92832
RC296622.001	Sunset Recycling Center	4250 Van Buren Blvd	Riverside	CA	92503
RC296625.001	Sunset Recycling Center	3000 Baldwin Park Blvd	Baldwin Park	CA	91706
RC296628.001	Sunset Recycling Center	33145 Temecula Pkwy	Temecula	CA	92592
RC296631.001	Sunset Recycling Center	12660 Limonite	Corona	CA	92880
RC296634.001	Sunset Recycling Center	23801 Washington Ave	Murrieta	CA	92562
RC296637.001	Sunset Recycling Center	7369 Milliken Ave	Rancho Cucamonga	CA	91730
RC296640.001	Sunset Recycling Center	1821 N Hacienda Blvd	La Puente	CA	91744
RC296643.001	Sunset Recycling Center	26529 Highland Ave	Highland	CA	92346
RC300119.001	Sunset Recycling Center	13051 Victory Blvd	Valley Glen	CA	91606
RC300251.001	Sunset Recycling Center	151 W Baseline Rd	Rialto	CA	92376
RC303353.001	Sunset Recycling Center	79795 Hwy 111	La Quinta	CA	92253
RC304206.001	Sunset Recycling Center	2070 W Redlands Blvd	Redlands	CA	92373
RC305184.001	Sunset Recycling Center	1691 E 6Th St	Beaumont	CA	92223
RC305850.001	Sunset Recycling Center	345 Williams Ave	San Francisco	CA	94124
RC307943.001	Sunset Recycling Center	1688 N Perris Blvd	Perris	CA	92571
RC309388.001	Sunset Recycling Center	82124 Us Highway 111	Indio	CA	92201
RC310750.001	Sunset Recycling Center	10790 Macarthur Blvd	Oakland	CA	94605
RC314853.001	Sunset Recycling Center	32401 Camino Capistrano	San Juan Capistrano	CA	92675
RC346998.001	Sunset Recycling Center	2910 Broadway	Oakland	CA	94611
RC397236.001	Sunset Recycling Center	30023 Date Palm Dr	Cathedral City	CA	92234
RC398872.001	Sunset Recycling Center	399 Lewelling Blvd	San Leandro	CA	94579
RC12143.001	Valley Recycling	21061 Sherman Way	Canoga Park	CA	91303
RC305196.001	Guido's Recycling	10020 Live Oak Blvd	Live Oak	CA	95953

EXHIBIT F: Dealer Cooperative Processors

EXHIBIT F: DEALER COOPERATIVE PROCESSORS

PR Identification	Processor Name	Address	City	State	ZIP
PR0004.001	Allan Co	2607 E Woodward St	Fresno	CA	93721
PR0005.001	Allan Co	14618 Arrow Hwy	Baldwin Park	CA	91706
PR0011.001	Main Street Fibers Inc	608 E Main St	Ontario	CA	91761
PR0015.001	Basic Fibres Inc	6019 S Manhattan Pl	Los Angeles	CA	90047
PR0108.001	Potential Industries Inc	922 East E St	Wilmington	CA	90744
PR0175.001	Men Cal	941 E 4Th St	Santa Ana	CA	92701
PR0271.001	Sun Valley Paper Stock Inc	8701 San Fernando Rd	Sun Valley	CA	91352
PR0308.001	Allan Co	5165 Convoy St	San Diego	CA	92111
PR0346.001	Allan Co	2540 S Main St	Santa Ana	CA	92707
PR0424.001	Standard Industries	1905 Lirio Ave	Ventura	CA	93004
PR0438.001	San Diego Fibers Corp	4040 Lockridge St	San Diego	CA	92102
PR0466.001	Tzeng Long Usa Inc	2801 S Vail Ave	City Of Commerce	CA	90040
PR0513.001	Ming's Resource Corporation	3316 47Th Ave	Sacramento	CA	95824
PR0526.001	Allan Co	2525 S Sunland Ave	Fresno	CA	93725
PR144451.001	Ming's Resource Corporation	8380 Florin Rd	Sacramento	CA	95828
PR151838.001	Bedford Enterprises Inc	1940 W Betteravia Rd	Santa Maria	CA	93455
PR18653.001	Cal Pac Recycling Inc	703 Emerson Ave	Calexico	CA	92231
PR251307.001	Ming's Resource East Bay Corp	3495 Breakwater Ct	Hayward	CA	94545
PR304512.001	Recycle Planet Inc	6935 Power Inn Rd	Sacramento	CA	95828
PR325213.001	Recyclewise	17071 Hercules St	Hesperia	CA	92345
PR340285.001	Recyclewise	3250 E Frontera St	Anaheim	CA	92806
PR147249.001	Universal Service Recycling Inc	3200 S El Dorado St	Stockton	CA	95206
PR147532.001	Radius Recycling Inc	11665 Berryessa Rd	San Jose	CA	95133
PR18905.001	Radius Recycling Inc	12000 Folsom Blvd	Rancho Cordova	CA	95742
PR0039.001	Sims Metal Management	1800 Monterey Hwy	San Josse	CA	95112
PR377137.001	Hambro Recycling - Anderson	6719 Eastside Rd	Anderson	CA	96007

EXHIBIT G: Dealer Cooperative Redemption Sites

EXHIBIT G: DEALER COOPERATIVE REDEMPTION SITES

Dealer (Store) Name	Location's Convenience Zone Number	Dealer Registration Number	Dealer Street Address	City	State	ZIP Code
365 by Whole Foods	196863	DR270366.001	2121 Cloverfield Blvd	Santa Monica	CA	90404
Cardenas Markets	13101	DR147201.001	727 1st St	Gilroy	CA	95112
Cardenas Markets	34800	DR146607.001	330 Bellam Blvd.	San Rafael	CA	94901
Cardenas Markets	13030	DR181678.001	31952 Mission Trl	Lake Elsinore	CA	92530
Costco	11799	DR102360.001	951 Palomar Airport Rd	Carlsbad	CA	92011
Costco	11668	DR107096.001	13111 Peyton Dr	Chino Hills	CA	91709
Costco	11722	DR106550.001	895 E H St	Chula Vista	CA	91910
Costco	11580	DR107701.001	5101 Business Center Dr	Fairfield	CA	94534
Costco	11069	DR112131.001	1800 Cavitt Dr	Folsom	CA	95630
Costco	10239	DR112588.001	43621 Pacific Commons Blvd	Fremont	CA	94538
Costco	10037	DR108135.001	7100 N Abby St	Fresno	CA	93720
Costco	12230	DR100244.001	4500 W Shaw Ave	Fresno	CA	93722
Costco	11578	DR107703.001	7095 Market Place Dr	Goleta	CA	93117
Costco	173854	DR257006.001	2395 E Lacey Blvd	Hanford	CA	93230
Costco	76810	DR189348.001	28505 Hesperian Blvd	Hayward	CA	94545
Costco	11082	DR112697.001	101 N Beach Blvd	La Habra	CA	90631
Costco	267896	DR339827.001	4101 Sierra College Blvd	Loomis	CA	95650
Costco	279912	DR353459.001	3881 East Commerce Way	Natomas	CA	95834
Costco	11787	DR102662.001	1000 N Rengstorff Ave	Mountain View	CA	94043
Costco	264901	DR330629.001	35875 Warm Springs Pkwy	Murrieta	CA	92563
Costco	10733	DR98856.001	300 Vintage Way	Novato	CA	94945
Costco	11224	DR111480.001	72800 Dinah Shore Dr	Palm Desert	CA	92211
Costco	11133	DR112457.001	12155 Tech Center Dr	Poway	CA	92064
Costco	11601	DR107643.001	1099 E Hospitality Ln	San Bernardino	CA	92408
Costco	11071	DR50054.001	2345 Fenton Pkwy	San Diego	CA	92108
Costco	12281	DR98790.001	4605 Morena Blvd	San Diego	CA	92117
Costco	10203	DR102414.001	33961 Doheny Park Rd	San Juan Capistrano	CA	92675
Costco	12279	DR98793.001	1900 Davis St	San Leandro	CA	94577
Costco	11570	DR107713.001	220 Sylvania Ave	Santa Cruz	CA	95060
Costco	198866	DR271818.001	1700 S Bradley Rd	Santa Maria	CA	93454
Costco	10562	DR94078.001	101 Town Center Pkwy	Santee	CA	92071
Costco	13457	DR88518.001	1616 E Hammer Ln	Stockton	CA	95210
Costco	150846	DR250868.001	2640 Lomita Blvd	Torrance	CA	90505
Costco	11249	DR108118.001	3250 W Grant Line Rd	Tracy	CA	95304
Costco	12980	DR91062.001	198 Plaza Dr	Vallejo	CA	94591
Costco	10941	DR114398.001	1405 W Cameron Ave	Visalia	CA	93277
Costco	11566	DR107718.001	22633 Savi Ranch Pkwy	Yorba Linda	CA	92887
Costco	11581	DR107700.001	1600 El Camino Real	South San Francisco	CA	94080
Costco	300922	DR410580.001	5151 Heidorn Ranch Rd	Brentwood	CA	94513
Food 4 Less	12459	DR92286.001	3210 E Anaheim St	Long Beach	CA	90804
Food 4 Less	12568	DR91814.001	1329 N Lake Ave	Pasadena	CA	91104
Food 4 Less (FoodsCo)	12639	DR93679.001	1465 S Broadway	Santa Maria	CA	93454
Gualala Supermarket	13493	DR88238.001	39225 S Highway 1	Gualala	CA	95445
Holiday Market	224882	DR302767.001	21656 Higgins Road	Auburn	CA	95602
Holiday Market	12552	DR91877.001	16981 Placer Hills Rd	Meadow Vista	CA	95722
Holiday Market	12027	DR104213.001	3315 Placer Street	Redding	CA	96001
Holiday Market	12584	DR91720.001	9350 Deschutes Rd	Palo Cedro	CA	96073
Holiday Market	297920	DR405344.001	3055 Shasta View Dr	Redding	CA	96002
Jensen's Foods	10449	PENDING	955 Catalina Blvd	San Diego	CA	92106
Oliver's Market	11022	DR100908.001	560 Montecito Ctr	Santa Rosa	CA	95409
Ralphs Grocery Co.	12381	DR94556.001	305 W Imperial Hwy	Brea	CA	92821
Ralphs Grocery Co.	12197	DR93954.001	24871 Del Prado	Dana Point	CA	92629
Ralphs Grocery Co.	10134	DR86201.001	17840 Ventura Blvd	Encino	CA	91316
Ralphs Grocery Co.	11614	DR116347.001	49908 Jefferson St	Indio	CA	92201
Ralphs Grocery Co.	10793	DR101427.001	8657 Villa La Jolla Dr	La Jolla	CA	92037
Ralphs Grocery Co.	10836	DR86292.001	1930 N Lakewood Blvd	Long Beach	CA	90815-2714
Ralphs Grocery Co.	11840	DR101532.001	6290 E Pacific Coast Hwy	Long Beach	CA	90803
Ralphs Grocery Co.	10300	DR88376.001	12057 Wilshire Blvd	Los Angeles	CA	90025
Ralphs Grocery Co.	11867	DR101495.001	11727 W Olympic Blvd	Los Angeles	CA	90064
Ralphs Grocery Co.	12007	DR116294.001	11361 National Blvd	Los Angeles	CA	90064-3796
Ralphs Grocery Co.	12978	DR91075.001	260 S La Brea Ave	Los Angeles	CA	90036
Ralphs Grocery Co.	11971	DR116320.001	23841 Malibu Rd	Malibu	CA	90265-4644
Ralphs Grocery Co.	12177	DR94056.001	10900 Magnolia Blvd	No. Hollywood	CA	91601
Ralphs Grocery Co.	12938	DR91318.001	3075 S Archibald Ave	Ontario	CA	91761-9000
Ralphs Grocery Co.	12002	DR116300.001	3601 E Foothill Blvd	Pasadena	CA	91107-3121
Ralphs Grocery Co.	13049	DR90564.001	160 N Lake Ave	Pasadena	CA	91101-1836
Ralphs Grocery Co.	11966	DR116328.001	4444 University Pkwy	San Bernardino	CA	92407
Ralphs Grocery Co.	12235	DR100042.001	903 S El Camino Real	San Clemente	CA	92672

EXHIBIT G: DEALER COOPERATIVE REDEMPTION SITES

Dealer (Store) Name	Location's Convenience Zone Number	Dealer Registration Number	Dealer Street Address	City	State	ZIP Code
Ralphs Grocery Co.	11282	DR116366.001	10525 4S Commons Dr	San Diego	CA	92127
Ralphs Grocery Co.	11934	DR100801.001	1020 University Ave	San Diego	CA	92103
Ralphs Grocery Co.	13723	DR86926.001	3345 Sports Arena Blvd	San Diego	CA	92110
Ralphs Grocery Co.	11826	DR101548.001	1644 Cloverfield Blvd	Santa Monica	CA	90404
Ralphs Grocery Co.	13647	DR85927.001	14049 Ventura Blvd	Sherman Oaks	CA	91423
Ralphs Grocery Co.	10289	DR116309.001	12842 Ventura Blvd	Studio City	CA	91604-2369
Ralphs Grocery Co.	11698	DR116336.001	10901 Ventura Blvd	Studio City	CA	91604
Ralphs Grocery Co.	11992	DR116307.001	14440 Burbank Blvd	Van Nuys	CA	91401-4823
Ralphs Grocery Co.	12589	DR91697.001	7257 W Sunset Blvd	West Hollywood	CA	90046-3409
Ralphs Grocery Co.	12148	DR94172.001	21909 Ventura Blvd	Woodland Hills	CA	91364
Ralphs Grocery Co.	13058	DR90527.001	211 E Foothill Blvd	Arcadia	CA	91006
Ralphs Grocery Co.	10929	DR116333.001	24975 Pico Canyon Rd	Stevenson Ranch	CA	91381
Walmart	82827	DR108777.001	13487 Camino Canada	El Cajon	CA	92021
Walmart	142845	DR111984.001	7065 N Ingram Ave	Fresno	CA	93650
Walmart	11395	DR113096.001	250 S 12th Ave	Hanford	CA	93230
Walmart	87817	DR99748.001	150 Beach Rd	Marina	CA	93933
Walmart	17749	DR102696.001	705 College Blvd	Oceanside	CA	92057
Walmart	287913	DR110307.001	3382 Murphy Canyon Road	San Diego	CA	92123
Walmart	287914	DR111444.001	710 Dennery Road	San Diego	CA	92154
Walmart	287915	DR109373.001	1919 Davis Street	San Leandro	CA	94577
Walmart	90840	DR112574.001	27931 Kelly Johnson Pkwy	Santa Clarita	CA	91355
Walmart	11217	DR111979.001	37140 47th Street East	Palmdale	CA	93552
Walmart	88819	DR108994.001	1515 Dana Dr	Redding	CA	96003
Walmart (NHM)	74823	DR201360.001	275 West Ventura Blvd	Camarillo	CA	93010
Walmart	81814	DR193153.001	501 Sereno Dr	Vallejo	CA	94589
Walmart	11267	DR114979.001	250 Wildcat Dr	Brawley	CA	92227
Whole Foods	13520	DR86754.001	3000 Telegraph Ave	Berkeley	CA	94705
Whole Foods	151847	DR250954.001	3301 E Imperial Hwy	Brea	CA	92823
Whole Foods	12548	DR91889.001	1690 S Bascom Ave	Campbell	CA	95008
Whole Foods	12035	DR104202.001	800 Del Monte Ctr	Monterey	CA	93940
Whole Foods	11064	DR89307.001	774 Emerson St	Palo Alto	CA	94301
Whole Foods	15755	DR137321.001	390 Coddingtown Ctr	Santa Rosa	CA	95401
Whole Foods	11875	DR101484.001	4520 Sepulveda Blvd.	Sherman Oaks	CA	91403
Whole Foods	210874	DR276314.001	2153 W Baseline Rd	Upland	CA	91784
Whole Foods	11002	DR102952.001	340 3rd St	San Rafael	CA	94901
Whole Foods	13082	DR90365.001	911 Soquel Ave	Santa Cruz	CA	95062
Whole Foods	12475	DR92209.001	15980 Los Gatos Blvd	Los Gatos	CA	95032

EXHIBIT H: Budget Estimate FY2025-2026

EXHIBIT H: BUDGET ESTIMATE FY 2025 – 2026

Table 21.1 *Itemized Anticipated Costs ($ '000s)*

DESCRIPTION	Q1 '25	Q2 '25	Q3 '25	Q4 '25	FY2025 Total	Q1 '26	Q2 '26	Q2 '26 YTD
Administrative costs[1]	131	104	205	235	675	213	240	453
Professional services[2]	62	32	244	194	432	232	194	426
Education and outreach[3]	-	-	90	90	180	70	70	140
Technology and Equipment[4]	8	2	651	76	737	76	76	152
Partnerships[5]	-	1	-	-	11	-	5	5
Operational costs[6]	380	-	45	45	470	30	30	60
Reserve	500	-	-	-	500	-	-	-
TOTAL EXPENSES	1,081	139	1,235	640	3,095	603	615	1,219
TOTAL REVENUE	750	750	750	878	3,128	750	750	1,500
BALANCE FORWARD	(331)	611	(485)	238	33	147	135	281

[1] Includes Dealer Cooperative employee salaries, associated taxes and employee health and welfare benefits, company travel expense, and insurance coverage (Officers and Directors, Worker's Compensation, etc).
[2] Includes services agreements with third party entities to provide various administrative, technical, and field support, legal services, lobbying services, and various consulting fees related to operations, which includes grant writing and submission.
[3] Includes costs associated with required signage at redemption sites, direct mailings, social media outreach expense, and other methods to communicate to consumers about the availability of redemption methods at Dealer Cooperative Member sites.
[4] includes: hardware and software expense for administrative operations, and costs associated with the development, acquisition, and ongoing maintenance of transaction and recordkeeping software capable of fulfilling all reporting requirements as well as capabilities to act as a unified, digital wallet for consumers when engaging with services provided by Circular CRV Association.
[5] Includes: membership expense for various business and other industry trade associations and groups.
[6] Includes: repayment of loans made to commence Cooperative operations (loans fully repaid in Q1 – 2025), and all other minor expenses that do not fall into any of the aforementioned categories.