

Responsible Textile Recovery Act

Textile Stewardship Informal Regulatory Concepts Workshop

Department of Resources Recycling
and Recovery (CalRecycle)

August 13, 2026



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Agenda

Introduction and Background

Allyson Williams, Environmental Program Manager, Product Stewardship Branch

Part I: Definitions

Alexander Edwards, Environmental Scientist, Product Stewardship Branch

Part II: Online Marketplaces

Travis Harper, Senior Environmental Scientist, Product Stewardship Branch

Part III: PRO Submittals

Brett Johnson, Environmental Scientist, Product Stewardship Branch

Public Feedback Regarding Workshop Content

Closing Remarks

Discussion Document

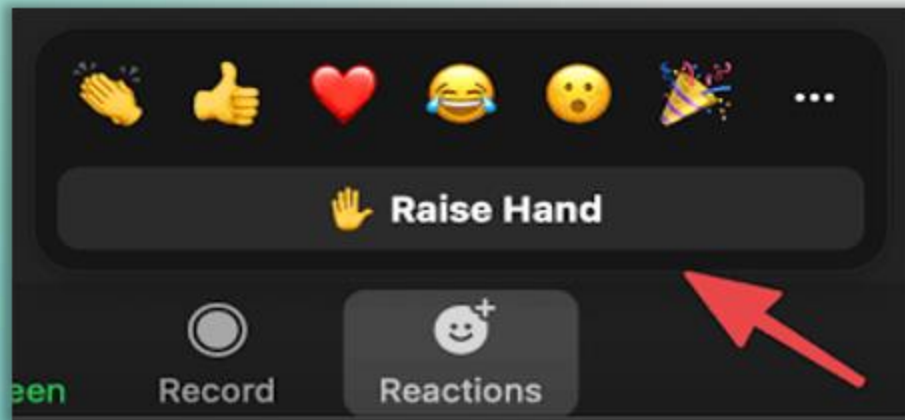
- **Part I: Definitions**
- **Part II: Online Marketplaces**
- **Part III: PRO Submittals**

Follow along in the Discussion
Document



Submitting Questions and Feedback

- To make a comment in-person, please line up at the microphone.
- To make an oral comment via Zoom, please raise your hand and the host will unmute you.
- Submit written feedback after the workshop by **August 27, 2026**, via:
 - CalRecycle's public comment portal: [Responsible Textile Recovery Act Informal Rulemaking Comment Period](#)
 - Email: Regulations@CalRecycle.ca.gov with subject line "August 2026 Textile Stewardship Informal Regulatory Concepts Workshop"

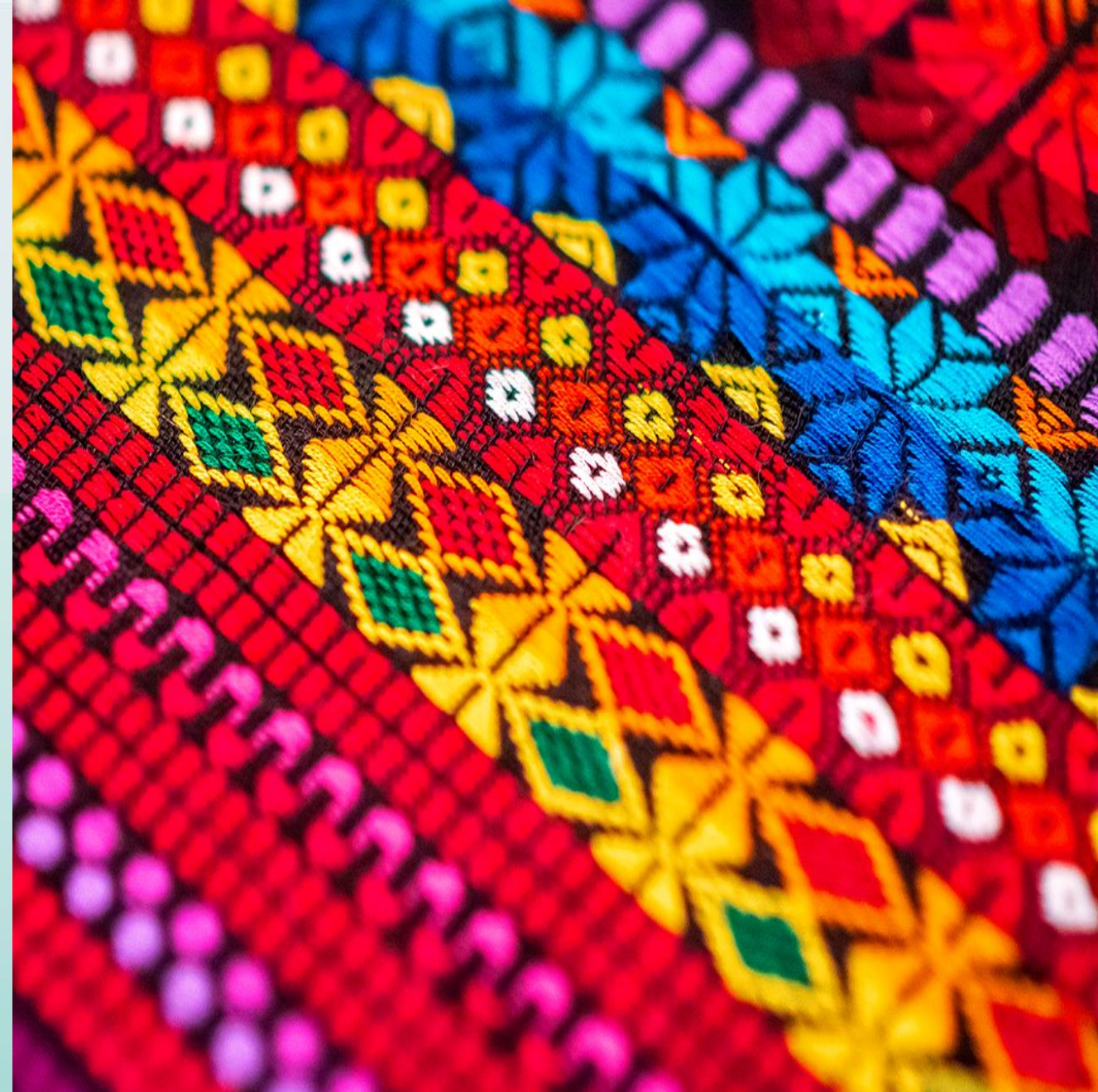


Part I: Definitions

Alexander Edwards

Department of
Resources Recycling
and Recovery

Product Stewardship
Branch



Part I: Definitions

Topic 1: Covered Products

Topic 2: Convenience Related Terms

Topic 3: Producer Related Terms

Topic 1: Covered Products

- “Fabric”
- “Yarn”
- “Fiber”
- “Footwear”
- “Undergarments”
- “Swimwear”
- “Knitted and Woven Accessories”
- “Personal Protective Equipment”
- “Fabric Window Covering”

Topic 1: Covered Products

Statutory Background

PRC section 42984.3(a)(1): “Apparel” means clothing and accessory items intended for regular wear or formal occasions and outdoor activities. For purposes of this chapter “apparel” includes only **undergarments**, shirts, pants, skirts, dresses, overalls, bodysuits, costumes, vests, dancewear, suits, saris, scarves, tops, leggings, school uniforms, leisurewear, athletic wear, sports uniforms, **swimwear**, formal wear, onesies, bibs, **footwear**, handbags, backpacks, **knitted and woven accessories**, jackets, coats, snow pants, ski pants, and everyday uniforms for workwear.

(2) “Apparel” does not include any of the following:

(A) Personal protective equipment or clothing items for use by the United States military.

(B) Personal protective equipment worn to protect the wearer from health or environmental hazards.

Topic 1: Covered Products

Statutory Background

PRC section 42984.3 (ae)(1): “Textile article” means an item customarily used in households or businesses that are made entirely or primarily from a natural, artificial, or synthetic **fiber, yarn, or fabric**. For purposes of this chapter, “textile article” includes only blankets, curtains, **fabric window coverings, knitted and woven accessories**, towels, tapestries, bedding, tablecloths, napkins, linens, and pillows.

Topic 1: Covered Products – “Fabric”

Regulatory Concept

The department is evaluating whether to promulgate regulations to define “fabric” to clarify which textile articles are covered under the Act. A definition may specify:

1. The component materials used to create fabric.
2. The manufacturing processes through which fabric is produced.



Topic 1: Covered Products – “Fabric”

Proposed Definition

“Fabric” means fibers, filaments, yarns, or other materials that are woven, dyed, knitted, needled, felted, entangled, transformed, created by any other fabric making process, or otherwise produced from, or in combination with, any natural or manufactured fiber, yarn, or substitute thereof. “Fabric” includes textile materials that can be impregnated, coated, covered, or laminated.



Topic 1: Covered Products – “Yarn”

Regulatory Concept

The department is evaluating whether to promulgate regulations to define “yarn” to clarify which textile materials may be covered under the Act. A definition may specify:

1. The component materials used to create yarn.
2. The physical form and characteristics of yarn.
3. The manufacturing or end-use functions for which yarn is produced.



Topic 1: Covered Products – “Yarn”

Proposed Definition

“Yarn” means a continuous length of interlocked natural or synthetic fibers in a form used or capable of being used for weaving, knitting, crocheting, braiding, felting, webbing, sewing, or otherwise made into a fabric.



Topic 1: Covered Products – “Fiber”

Regulatory Concept

The department is evaluating whether to promulgate regulations to define “fiber” to clarify which materials may be covered under the Act. A definition may specify:

1. The physical characteristics of fiber.
2. The functional role of fiber in textile manufacturing.
3. The distinction between fiber, yarn, and fabric.



Topic 1: Covered Products – “Fiber”

Proposed Definition

“Fiber” means a natural, artificial, or synthetic unit of matter that is capable of being spun, woven, knitted, bonded, entangled, felted, braided, twisted, webbed, or otherwise formed into yarn, fabric, or other textile materials. Fiber is a basic structural element of covered products.



Topic 1: Covered Products – “Footwear”

Regulatory Concept

The department is evaluating whether to promulgate regulations to define “footwear” to clarify which products fall within the scope of apparel under the Act. A definition may specify:

1. The functional purpose of footwear.
2. The physical characteristics of footwear.
3. The types of products commonly understood to constitute footwear.
4. The types of products that are not considered footwear.



Topic 1: Covered Products – “Footwear”

Proposed Definition

“Footwear” means a product primarily designed to be worn on or over the foot by a person for protection, support, traction, comfort, fashion, occupational use, athletic activity, or customary everyday wear. “Footwear” includes shoes, boots, slippers, sandals, athletic shoes, cleats, roller skates, rollerblades, heels, water shoes, overshoes, and similar products intended to be worn on or over the foot.



Topic 1: Covered Products – “Undergarments”

Regulatory Concept

The department is evaluating whether to promulgate regulations to define “undergarments” to clarify which products fall within the scope of apparel under the Act. A definition may specify:

1. The customary way undergarments are worn.
2. The functional purpose of undergarments.
3. The types of products commonly understood to constitute undergarments.

Topic 1: Covered Products – “Undergarments”

Proposed Definition

“Undergarments” means clothing items primarily designed to be worn beneath other garments or in close contact with the body for support, coverage, comfort, hygiene, or layering. “Undergarments” includes underwear, briefs, boxers, bras, undershirts, slips, camisoles, shapewear, thermal underlayers, and similar garments intended to be worn in close contact to the skin.



Topic 1: Covered Products – “Swimwear”

Regulatory Concept

The department is evaluating whether to promulgate regulations to define “swimwear” to clarify which products fall within the scope of apparel under the Act. A definition may specify:

1. The intended use of swimwear.
2. The types of products commonly understood to constitute swimwear.
3. The distinction between swimwear and water-related recreational equipment or accessories.



Topic 1: Covered Products – “Swimwear”

Proposed Definition



“Swimwear” means clothing primarily designed or intended to be worn while swimming, bathing, or participating in water-related recreational activities. “Swimwear” may include, but is not limited to, swimsuits, bikinis, swim trunks, rash guards, wetsuits, and other apparel intended for water-related use. “Swimwear” does not include swim masks, swim goggles, snorkels, swim fins, or other water recreation equipment or accessories.

Topic 1: Covered Products – “Knitted and Woven Accessories”

Regulatory Concept

The department is evaluating whether to promulgate regulations to define “knitted and woven accessories” to clarify which products are included within the scope of apparel and textile articles under the Act. A definition may specify:

1. The composition of knitted and woven accessories.
2. The customary function or use of knitted and woven accessories.
3. The distinction between knitted and woven accessories and products otherwise specifically identified in statute.



Topic 1: Covered Products – “Knitted and Woven Accessories”

Proposed Definition

“Knitted and woven accessories” means products that are knitted, woven, braided, crocheted, felted, or otherwise constructed from fiber, yarn, fabric, or other materials and are commonly used as wearable, decorative, functional, or household accessory items. “Knitted and woven accessories” may include, but are not limited to, hats, scarves, belts, headbands, neck gaiters, bandanas, ties, suspenders, tote bags, jewelry, rugs, throws, shower curtains, protective textile covers for furniture such as sofa covers and slip covers, and similar products.



Topic 1: Covered Products – “Personal Protective Equipment (PPE)”

Regulatory Concept

The department is evaluating whether to promulgate regulations to define the term “personal protective equipment” to clarify which products are excluded from apparel under the Act. The department is evaluating whether a definition should identify:

1. The intended protective purpose of PPE.
2. The types of hazards against which PPE is designed to protect.
3. The performance standards associated with PPE.



Topic 1: Covered Products – “Personal Protective Equipment (PPE)”

Proposed Definition

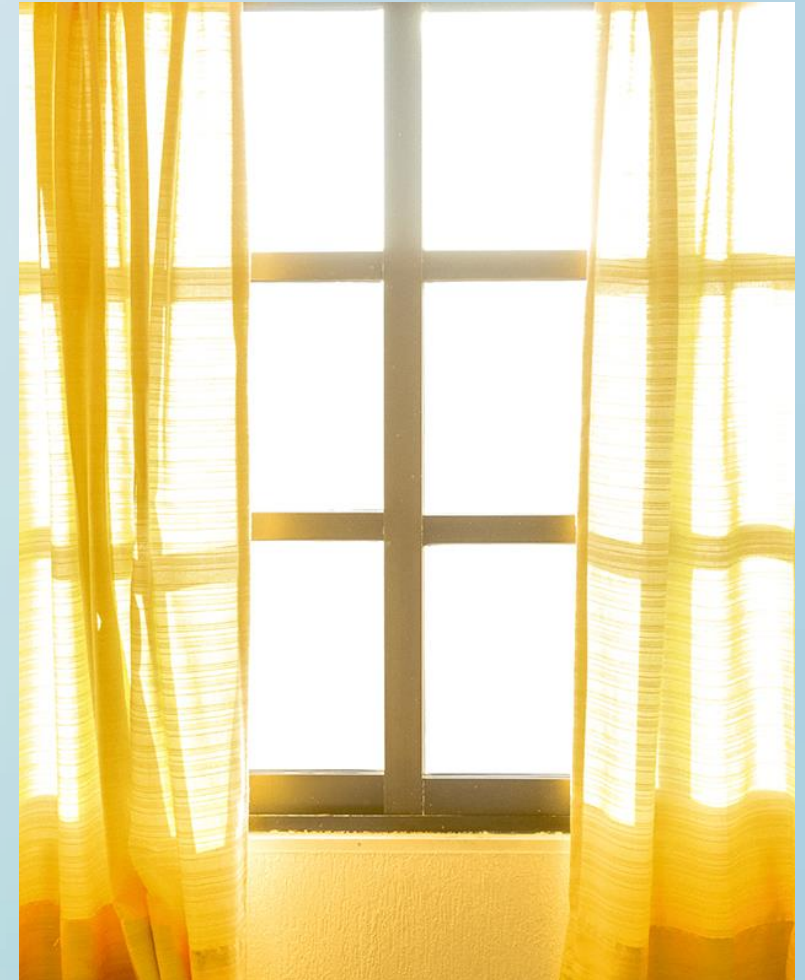
“Personal protective equipment” or “PPE” means specialized covered products primarily designed and intended to protect the wearer from health, safety, environmental, occupational, chemical, biological, radiological, mechanical, or physical hazards and that conform to recognized safety and performance standards appropriate to the covered product type, such as the American National Standards Institute (ANSI) or other equivalent consensus standards. “PPE” may include, but is not limited to, protective gloves, protective footwear, protective headgear such as hard hats and helmets, face shields, respirators, protective gowns, high visibility safety apparel, protective eyewear, protective barriers, bullet proof vests, body armor, and similar products designed primarily for hazard protection.

Topic 1: Covered Products – “Fabric Window Coverings”

Regulatory Concept

The department is evaluating whether to promulgate regulations to define “window covering” to clarify which products are included within the scope of textile articles under the Act and which products are excluded. A definition may specify:

1. The composition of window coverings.
2. The distinction between fabric window coverings and mechanized window covering systems.



Topic 1: Covered Products – “Fabric Window Coverings”

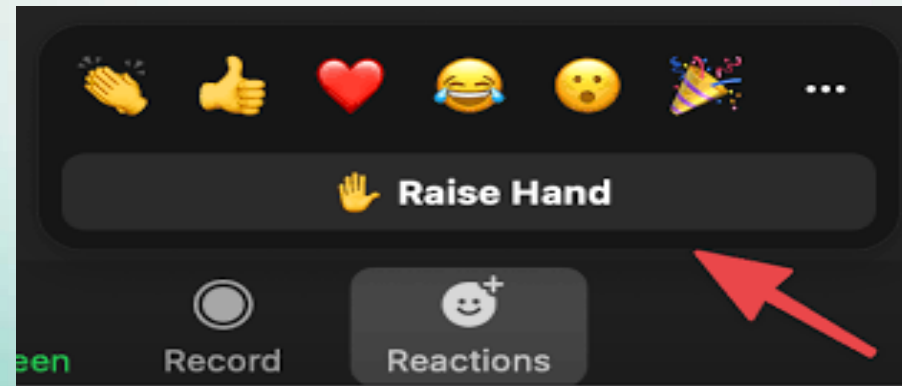
Proposed Definition



“Fabric window covering” means a product made of fabric, yarn or fiber and is designed or intended to cover, shade, block, filter, insulate, decorate, or otherwise modify a window. Window coverings include, but are not limited to, curtains, drapes, roller shades, roll-up style shades, and traverse-rod panels. “Fabric window covering” does not include an automated, motorized, battery, or manual window covering that is operated using an electric motor or other automated system, or manually adjusted by pulling cords or lifting mechanisms pursuant to PRC section 42984.3(i)(2)(D).

Questions and Comments

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Topic 1: Covered Products

Request for Feedback

1. How should the department specify the covered product definitions to clearly distinguish covered products from noncovered or excluded products and avoid unintended inclusion or exclusion?
2. What physical characteristics, material properties, manufacturing processes, functional attributes, or intended uses should be considered to introduce and refine covered product definitions?
3. What existing federal, international, scientific, industry standards, or classification systems should the department consider when developing or refining covered product definitions?

Topic 2: Convenience Related Terms

- “Permanent Collection Site”
- “Temporary Collection Site”
- “Reasonable Geographic Spread”



Topic 2: Convenience Related Terms

Statutory Background

PRC section 42984.3(g): “Collection site” means a **permanent** or **temporary** location operated by an authorized collector at which covered products are collected and prepared for transport in accordance with the requirements of this chapter.

PRC section 42984.10(d): A description of how the PRO will provide for a free and convenient dropoff or collection system for covered products, which shall include **permanent collection sites** and may include **temporary collection sites** and mail-back options, in each county of the state that meets both of the following requirements:

- (1) Provides for a minimum of 10 **permanent collection sites** or one **permanent collection site** per 25,000 people, whichever is greater, except as provided below:
- (2) Provides for a **reasonable geographic spread** of **permanent collection sites** and an explanation for the geographic spread.

Topic 2: Convenience Related Terms – “Permanent Collection Site”

Regulatory Concept

The department is evaluating whether to promulgate regulations to define “permanent collection site” to clarify minimum operational expectations under the Act. A definition may specify:

1. The characteristics of a permanent collection site.
2. The operational availability of the collection site.
3. The scope of covered products accepted at the site.
4. A minimum number of hours each week that covered products are accepted at the site.

Topic 2: Convenience Related Terms – “Permanent Collection Site”

Proposed Definition

“Permanent collection site” means a fixed location in the state where all covered products may be dropped off at no cost during the regular operating hours that the location is open to the public. The operating hours shall be no less than 40 hours each week.

For permanent collection sites operated by retailers, “regular operating hours” means the days and hours that retail location is open to the public.



Topic 2: Convenience Related Terms – “Temporary Collection Site”

Regulatory Concept

The department is evaluating whether to promulgate regulations to define “temporary collection site” to clarify the operational characteristics of temporary collection opportunities under the Act. A definition may specify:

1. The duration and non-permanent nature of the collection activity.
2. The operational characteristics of temporary collection events or locations.

Topic 2: Convenience Related Terms – “Temporary Collection Site”

Proposed Definition

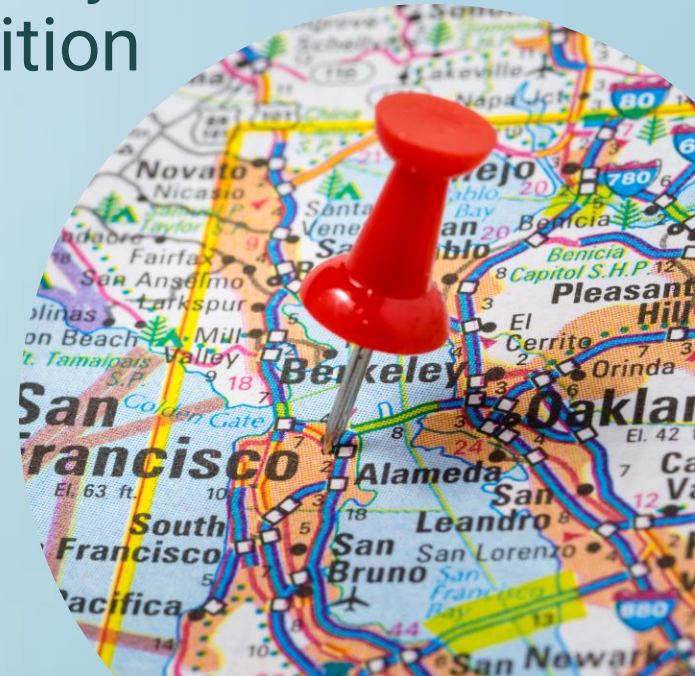
“Temporary collection site” means a non-permanent fixed or non-fixed location or collection event in the state where covered products may be dropped off at no cost.



Topic 2: Convenience Related Terms – “Reasonable Geographic Spread” Regulatory Concept

The department is evaluating whether to promulgate regulations to define “reasonable geographic spread” to clarify expectations for the placement and accessibility of permanent collection sites under the Act. A definition may specify:

1. The proximity of permanent collection site to a specified percentage of California residents.



Topic 2: Convenience Related Terms – “Reasonable Geographic Spread”

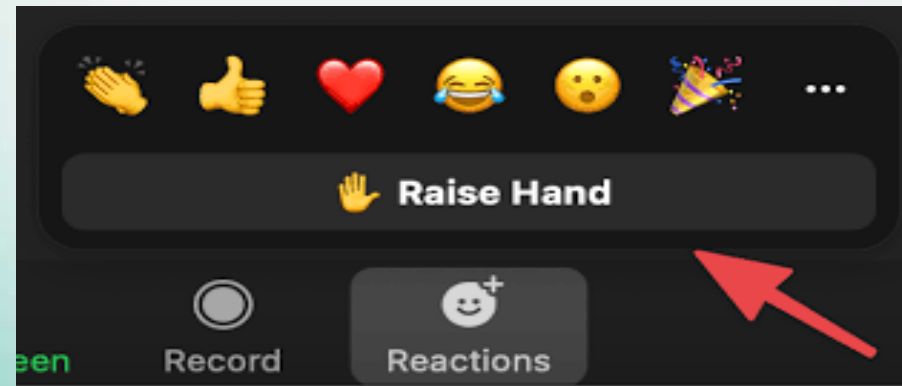
Proposed Definition

“Reasonable geographic spread” means the PRO provides at least one permanent collection site within a 15-mile radius of at least 95 percent of California residents in each county while also meeting the county specific minimum number of permanent collection sites described in PRC section 42984.10(d)(1).



Questions and Comments

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Topic 2: Convenience Related Terms

Request for Feedback

1. What additional factors should the department consider when defining “permanent collection site” and “temporary collection site” to ensure consistency across locations?
2. What challenges may arise for collectors or PROs if permanent collection sites are required to accept all covered products during regular operating hours?
3. What metrics should be considered when evaluating whether collection opportunities are spread appropriately?
4. What other approaches or best practices from existing statewide programs should the department consider to support a convenient and accessible statewide collection network?

Topic 3: Producer Related Terms

- “Annual Aggregate Global Turnover”
- “Small Seller”



Topic 3: Producer Related Terms– “Annual Aggregate Global Turnover”

Statutory Background

PRC section 42984.3(s)(8): “Producer” does not include a seller with less than one million dollars (\$1,000,000) in **annual aggregate global turnover** adjusted annually pursuant to the California Consumer Price Index for All Urban Consumers for all items, as determined by the Department of Industrial Relations. The aggregate global turnover of a producer within the meaning of this chapter shall be calculated by adding together the respective turnovers of all of the following:

Topic 3: Producer Related Terms– “Annual Aggregate Global Turnover”

Regulatory Concept

The department is evaluating whether to promulgate regulations defining “annual aggregate global turnover” to clarify how seller revenue should be evaluated for statutory exemptions. A definition may specify:

1. The types of revenue included in the calculation.
2. How turnover is assessed across related entities or business structures.

Topic 3: Producer Related Terms– “Annual Aggregate Global Turnover”

Proposed Definition

“Annual aggregate global turnover” means the total annual gross revenue generated by a seller and any affiliated entities, subsidiaries, parent companies, or commonly controlled business entities, regardless of whether the revenue is generated from sales of covered products or from sales occurring within or outside the state.



Topic 3: Producer Related Terms– “Small Seller”

Statutory Background

PRC section 42984.3(s)(8): “Producer” does not include a **seller with less than one million dollars (\$1,000,000) in annual aggregate global turnover** adjusted annually pursuant to the California Consumer Price Index for All Urban Consumers for all items, as determined by the Department of Industrial Relations. The aggregate global turnover of a producer within the meaning of this chapter shall be calculated by adding together the respective turnovers of all of the following:



Topic 3: Producer Related Terms– “Small Seller” Regulatory Concept



The department is evaluating whether to promulgate regulations defining “small seller” to assist entities in determining which sellers are not “producers” under the Act. Items under evaluation include:

1. Criteria for qualifying as a small seller.

Topic 3: Producer Related Terms– “Small Seller”

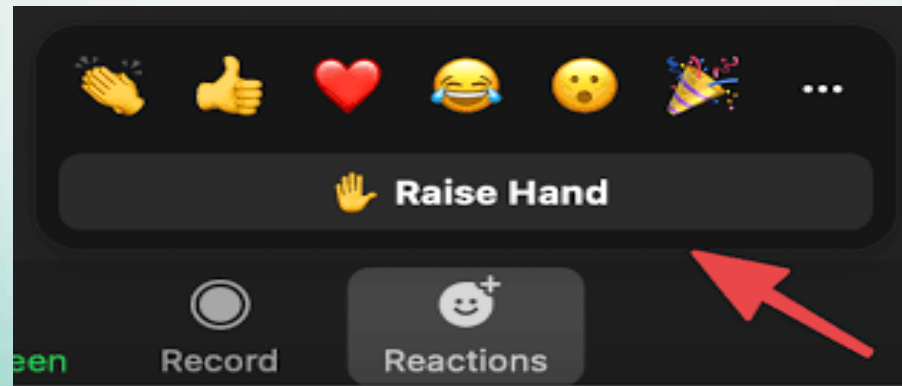
Proposed Definition

“Small seller” means a seller that qualifies for exclusion from the definition of “producer” pursuant to PRC section 42984.3(s)(8).



Questions and Comments

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Topic 3: Producer Related Terms

Request for Feedback

1. What business structures (e.g., franchises, subsidiaries, licensing relationships) require additional clarification when calculating annual aggregate global turnover?
2. What challenges may arise in determining which affiliated or commonly controlled entities must be included in annual aggregate global turnover calculations?
3. What criteria should be considered to demonstrate which entities sell less than one million dollars in covered products?

Part II: Online Marketplaces



**Department of Resources
Recycling and Recovery
Product Stewardship Branch**

Travis Harper

Part II: Online Marketplaces

Topic 1: Annual Notification Deadline

Topic 2: Notification Process

Topic 3: Notification Requirements

Topic 4: Amount of Sales

Topic 5: Third-Party Seller Information



Topic 1: Online Marketplaces

Statutory Background

PRC section 42984.27: An online marketplace **shall annually** do the following in accordance with regulations adopted by the department pursuant to Section 42984.2:

(a)(1) Notify the department and the PRO of all third-party sellers with sales of covered products over one million dollars (\$1,000,000) sold on their online marketplace in the **preceding year and provide all required information**. If a third-party seller does not have any sales in California during the preceding year then the online marketplace shall not provide their information to the department.

(2) The **amount of sales described in paragraph (1)** includes only those transactions through the online marketplace for which payment is processed by the online marketplace directly or through its payment processor.

(b) **Provide all third-party sellers described in (a) with the information on requirements of law** as provided by the PRO pursuant to paragraph (8) of subdivision (g) of Section 42984.10.

Topic 1: Online Marketplaces – Annual Notification Deadline for Online Marketplaces Regulatory Concept

The department is evaluating whether to promulgate regulations establishing reporting requirements for online marketplaces to identify third-party sellers that meet reporting thresholds. A requirement may specify the annual submission date for online marketplaces.



Topic 2: Online Marketplaces – Notification Process

Regulatory Concept

The department is evaluating whether to promulgate regulations specifying how online marketplaces must notify the department and the PRO of third-party sellers meeting statutory reporting thresholds. An approach may specify:

1. Electronic submission of notifications.
2. Use of a standardized electronic form or reporting portal to gather information for both the department and the PRO.

Topic 3: Online Marketplaces – Notification Requirements

Regulatory Concept

The department is evaluating whether to promulgate regulations specifying the information online marketplaces must provide when notifying the department and the PRO of third-party sellers meeting statutory reporting thresholds. Requirements may include:

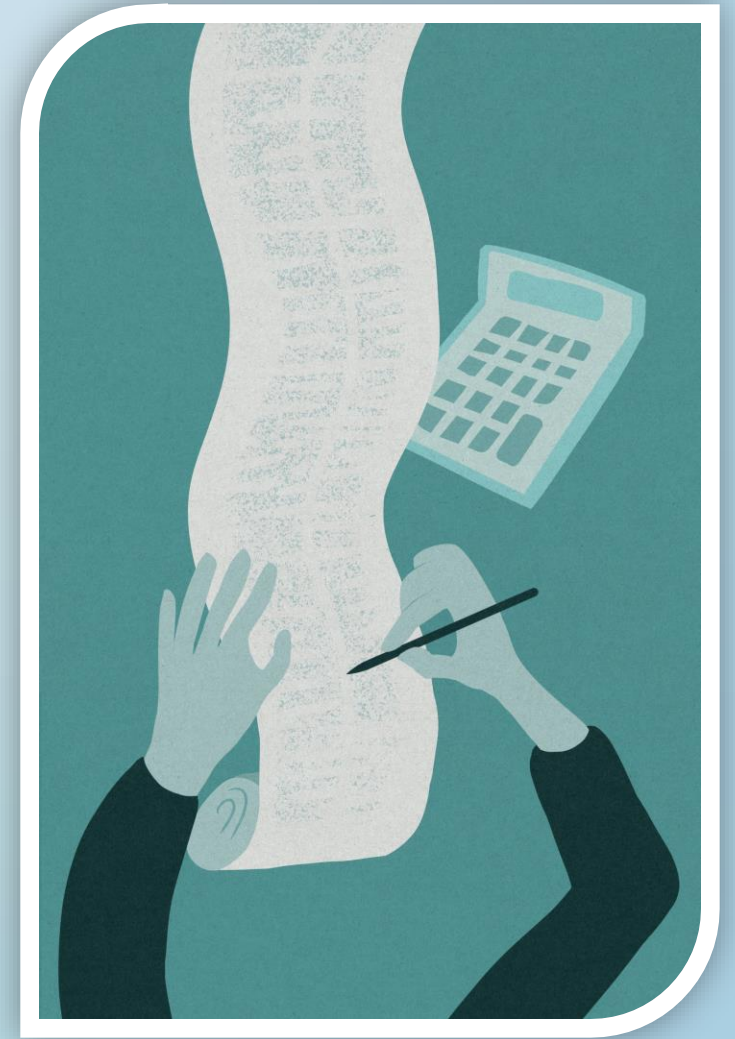
1. Seller name, DBA, and contact information.
2. Physical and mailing addresses.
3. Relevant brand information by covered product type.
4. Sales in the preceding calendar year.
5. Additional information needed to accurately identify third-party sellers.

Topic 4: Online Marketplaces – Amount of Sales

Regulatory Concept

The department is evaluating whether to promulgate regulations specifying how online marketplaces must calculate and report sales for third-party sellers meeting statutory thresholds. Requirements may specify:

1. Reporting a single total for all covered product sales, or
2. Reporting sales by covered product category, with category totals summed to determine the overall amount.



Topic 5: Online Marketplaces – Third-Party Seller Information

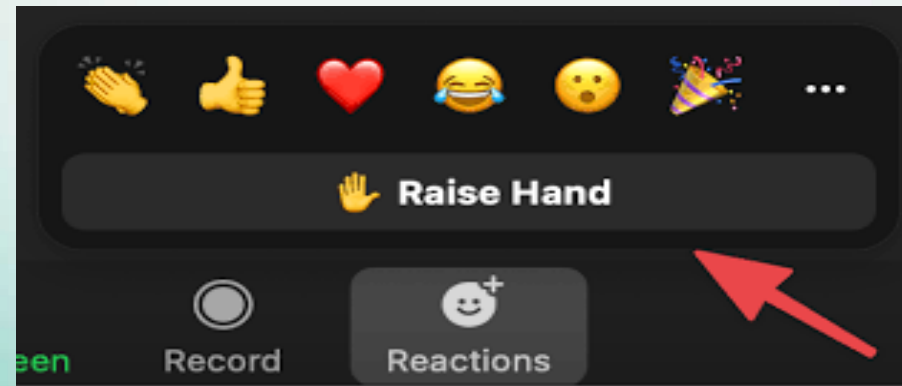
Regulatory Concept

The department is evaluating whether to promulgate regulations specifying how online marketplaces must provide compliance information to third-party sellers. An approach may specify:

1. Methods for delivering compliance information.
2. Timing and frequency of seller notifications.
3. Recordkeeping requirements for documenting outreach.

Questions and Comments

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Part II: Online Marketplaces

Request for Feedback

1. What should be the due date for online marketplace annual notification?
2. How should seller thresholds be evaluated where sellers operate across multiple online marketplaces?
3. What records should online marketplaces maintain to support compliance verification?
4. How should online marketplaces comply with reporting requirements if they do not process payments directly?
5. How should online marketplaces demonstrate compliance with the requirement to provide third-party sellers information?

Part III: PRO Submittals



**Department of Resources
Recycling and Recovery
Product Stewardship Branch**

Brett Johnson

Part III: PRO Submittals

Topic 1: Electronic Submissions and Accessibility

Topic 2: Confidential Proprietary Information

Topic 3: Producer and Brand Lists

Topic 4: Needs Assessments

Topic 5: Producer Responsibility Plans, Substantial Changes, & Plan Reviews

Topic 6: Annual Reports

Topic 7: Notice of Stewardship Program Implementation Status

Topic 1: PRO Submittals – Electronic Submissions and Accessibility

Statutory Background

PRC section 42984.5(a): No later than 30 days after the effective date of the regulations implementing this chapter, individual producers or the PRO shall provide to the department, in a **form and manner established by the department**, a list of brands of covered products that each producer sells, distributes for sale, imports for sale, or offers for sale in or into the state.

PRC section 42984.8(a): Within 12 months of the effective date of the regulations adopted by the department pursuant to Section 42984.2, a PRO shall develop and submit to the department a complete plan, in a **form and manner determined by the department**, in accordance with the requirements of this chapter, for the collection, transportation, repair, sorting, recycling, and the safe and proper management of covered products in the state. No PRO serving more than one producer may limit its stewardship plan for covered products to the covered products of the producers participating in that stewardship program.

PRC section 42984.17: A PRO shall annually submit to the department, in the **form and manner and by the date determined by the department**, an annual report and make that report publicly available on the PRO's internet website. The report shall include at minimum, all of the following information for the preceding calendar year unless otherwise specified:

Topic 1: PRO Submittals – Electronic Submissions and Accessibility

Regulatory Concept

The department is evaluating whether to promulgate regulations establishing uniform electronic submission and accessibility standards for all documents submitted under the Act. A framework may include:

1. Procedures for electronic submission of documents.
2. Use of specific department email address(es) or online submission portals and defined submission/receipt processes.
3. Acceptable file formats and document standards to support consistent review and record management.
4. Adhere to accessibility requirements.
5. Identifying the electronic submission date as the official date of receipt.
6. Requiring true and correct information under penalty of perjury.

Topic 2: PRO Submittals – Confidential Proprietary Information

Statutory Background

PRC section 42984.8(f): The approved plan shall be a public record, **except that financial or sales data reported to the department by the PRO is not a public record for purposes of the California Public Records Act** (Division 10 (commencing with Section 7920.000) of Title 1 of the Government Code) and shall not be open to public inspection. The department may release financial or sales data in summary form only so the information cannot be attributable to a specific producer or distributor or to any other entity.

Topic 2: PRO Submittals – Confidential Proprietary Information

Regulatory Concept

The department is evaluating whether to promulgate regulations establishing standardized procedures for confidentiality claims. A framework may include:

1. Processes for designating information submitted to the Department is exempt from disclosure at the time of submission.
2. Requiring legal basis for confidentiality claims.
3. Procedures for submitting redacted versions for public release.
4. Specifying that non-designated information is deemed subject to mandatory disclosure.

Topic 3: PRO Submittals – Producer and Brand Lists

Statutory Background

PRC section 42984.5(a): No later than 30 days after the effective date of the regulations implementing this chapter, individual producers or the PRO shall provide to the department, in a form and manner established by the department, **a list of brands of covered products that each producer sells**, distributes for sale, imports for sale, or offers for sale in or into the state.

(b) A producer or PRO **shall update the list described in subdivision (a) and provide the updated list** to the department on or before January 15 of each year or upon request of the department.

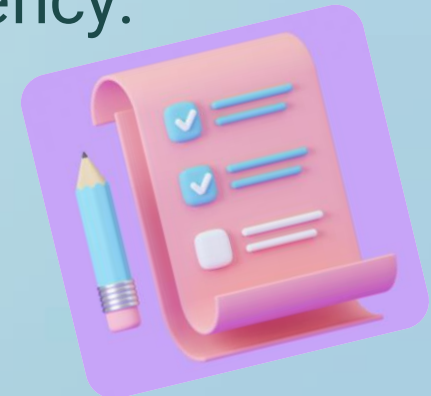
PRC section 42984.17(e): An updated list of producers participating in the plan and an updated list of the names and contact information, including email address, telephone number, and physical and mailing addresses of producers and brands of covered products covered under the plan.

Topic 3: PRO Submittals – Producer and Brand Lists

Regulatory Concept

The department is evaluating whether to promulgate regulations establishing requirements for producer and brand list submissions. A framework may include:

1. Specifying required information, including producer name, associated brands, covered products, and contact information.
2. Identifying required file format and structure.
3. Establishing procedures for submissions and update frequency.
4. Setting recordkeeping expectations to ensure accurate and complete compliance information.
5. Establishing criteria for department rejection of a list.



Topic 4: PRO Submittals – Needs Assessments

Statutory Background

PRC section 42984.6(a)(1): A PRO shall prepare the initial statewide needs assessment designed to determine the necessary steps and investment needed for covered products, to achieve the requirements of this chapter. **Needs assessments, or components thereof, shall be updated every five years or as necessary to ensure the requirements of this chapter are met.** An initial needs assessment for covered products shall be completed before the completion and approval of any producer responsibility plan for covered products. The PRO may select an independent third-party contractor to complete the needs assessment.

Topic 4: PRO Submittals – Needs Assessments

Regulatory Concept

The department is evaluating whether to promulgate regulations establishing procedures for developing and submitting needs assessments under the Act. A framework may include:

1. Requiring PRO to post on its website upon submission to the department.
2. Specifying criteria for department approval.
3. Establishing procedures for resubmitting needs assessments following conditional approval or disapproval.
4. Establishing procedures and deadlines for updates to the needs assessment no less than every five years.



Topic 5: PRO Submittals – Producer Responsibility Plans, Substantial Changes, and Plan Reviews Statutory Overview

PRC section 42984.8(a): Within 12 months of the effective date of the regulations adopted by the department pursuant to Section 42984.2, a PRO shall develop and **submit to the department a complete plan**, in a form and manner determined by the department, in accordance with the requirements of this chapter, for the collection, transportation, repair, sorting, recycling, and the safe and proper management of covered products in the state. No PRO serving more than one producer may limit its stewardship plan for covered products to the covered products of the producers participating in that stewardship program.

(e) A PRO with an approved plan **shall submit any proposed substantial change to the plan** to the department for approval employing the procedures set forth in this section.

PRC section 42984.12(b): If a PRO determines that revisions to the plan are necessary, the PRO **shall submit to the department a revised plan for review and approval** employing the procedures set forth in Section 42984.8. The stewardship organization shall submit the revised plan to the department pursuant to this subdivision at least 12 months prior to the review deadline outlined in subdivision (c). The revised plan shall include a cover letter that summarizes the revisions to the plan within 90 days of the review deadline outlined pursuant to subdivision (a).

Topic 5: PRO Submittals – Producer Responsibility Plans, Substantial Changes, and Plan Reviews Regulatory Concept

The department is evaluating whether to promulgate regulations establishing procedures for developing, submitting, and revising stewardship plans under the Act. A framework may include:

1. Requiring submittals in Portal Document Format.
2. Requiring PRO to post the plan on its website upon submission.
3. Specifying the submittal process.
4. Specifying processes for identifying and submitting substantial plan changes for approval.
5. Establishing expectations for departmental review, resubmittal, and plan changes.

Topic 6: PRO Submittals – Annual Reports

Statutory Background

PRC section 42984.16(b): The PRO shall include the independent audit in its annual report submitted to the department pursuant to Section 42984.17 commencing within 18 months of plan approval by the department. The department shall review the audit for compliance with this chapter and consistency with the PRO's plan.

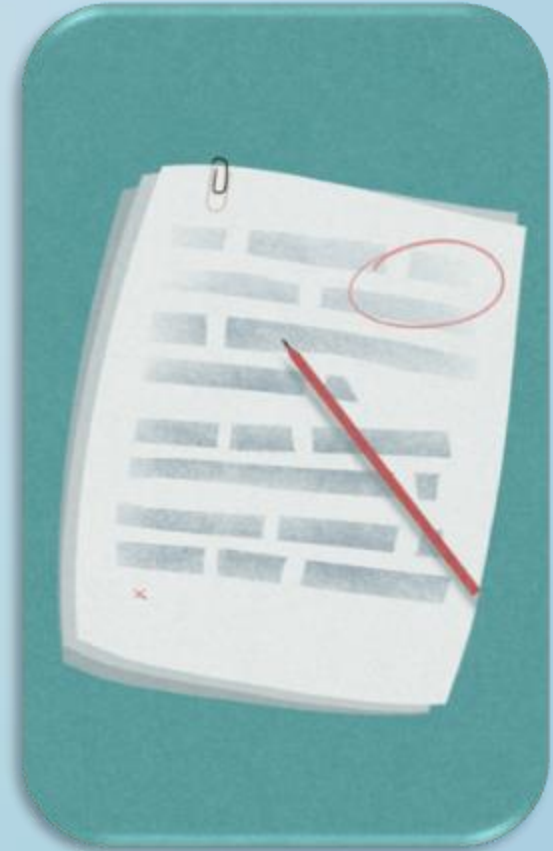
PRC section 42984.17: A PRO shall annually submit to the department, in the form and manner and by the date determined by the department, an annual report and make that report publicly available on the PRO's internet website. The report shall include at minimum, all of the following information for the preceding calendar year unless otherwise specified:

Topic 6: PRO Submittals – Annual Reports

Regulatory Concept

The department is evaluating whether to promulgate regulations establishing standardized procedures for annual report submittals. A framework may include:

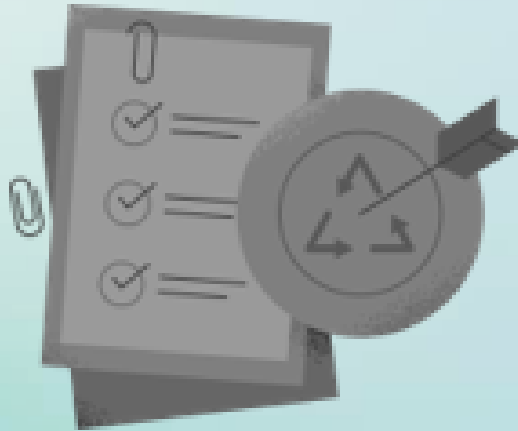
1. Establishing a due date for annual report submissions.
2. Requiring submittals in Portal Document Format.
3. Establishing procedures for resubmittals.
4. Identifying formatting standards.
5. Specifying criteria for the department determining if annual reports are compliant or noncompliant.



Topic 7: PRO Submittals – Notice of Producer Responsibility Plan Implementation Status

Statutory Background

PRC section 42984.9: The PRO shall fully implement the approved plan within 12 months of the department's approval of the plan pursuant to Section 42984.8.



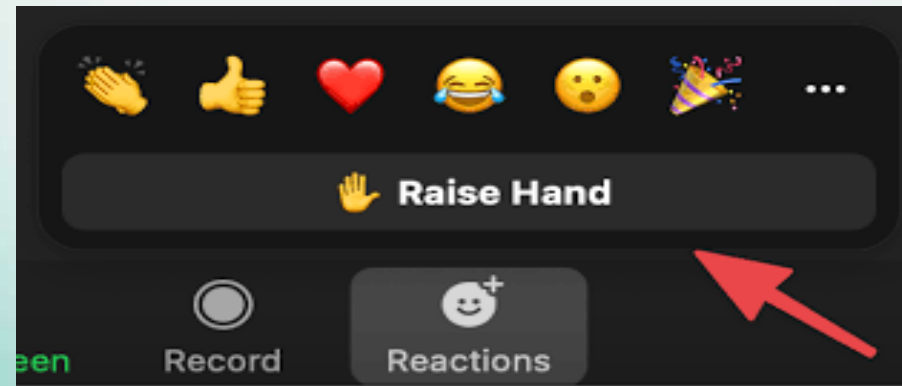
Topic 7: PRO Submittals – Notice of Stewardship Program Implementation Status Regulatory Concept

The department is evaluating whether to promulgate regulations establishing requirements related to the PRO demonstrating the plan is fully implemented. Requirements under evaluation include:

1. Submitting to CalRecycle and posting on the PRO website a notice demonstrating whether full implementation was achieved within 12 months of plan approval.
2. Certifying implementation status and providing key information (e.g., producers, collection sites, service providers, website address).
3. Signing and submitting a PDF notice to CalRecycle under penalty of perjury.

Questions and Comments

- To make a comment in-person, please line up at the podium.
- To make an oral comment via Zoom, please raise your hand and the host will unmute you.



Part III: PRO Submittals

Request for Feedback

1. What additional administrative or procedural requirements the department should consider to support implementation and enforcement of the PRO submittal requirements?
2. What is an appropriate deadline for annual report submittals?



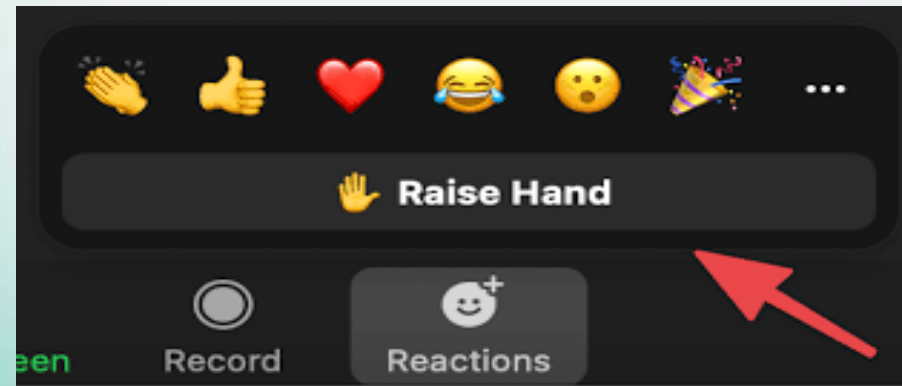
Request for Feedback

CalRecycle is requesting feedback regarding all topics presented in this workshop and any other related items in statute that interested parties think need to be clarified.



Questions and Comments

- To make a comment in-person, please line up at the podium.
- To make an oral comment via Zoom, please raise your hand and the host will unmute you.



Opportunity for Written Feedback

Written Feedback and questions may be submitted after the workshop, in one of the following ways:

- CalRecycle's public comment portal: [Responsible Textile Recovery Act Informal Rulemaking Comment Period](#)
- Email to Regulations@CalRecycle.ca.gov with subject line "August 2026 Textile Stewardship Informal Regulatory Concepts Workshop"

Please submit written comments by **August 27, 2026**.





Ways to stay informed



Sign-up for Email Updates:
[Textile Stewardship Listserv](#)



Questions about textile stewardship:
Textiles@CalRecycle.ca.gov



Textile Stewardship Webpage:
<https://calrecycle.ca.gov/epr/textiles>