

# Textile PRO Application Workshop

September 9, 2025

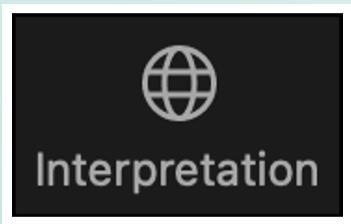
California Department of  
Resources Recycling and Recovery



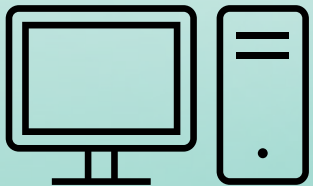
# Interpretation Services | Servicios de Interpretación



**In Person – Ask our team for a translation headset**  
**En persona – Solicite asistencia si necesita audífonos de traducción**



**Zoom – Select your language on the Interpretation icon**  
**Zoom - Seleccione su idioma en el icono Interpretación**



**Webcast - <https://video.calepa.ca.gov/#/>**  
**Transmisión en línea - <https://video.calepa.ca.gov/#/>**

# Disclaimer

*This communication is neither intended to, nor does it constitute definitive legal counseling, conclusions, or advice in any way. Instead, the contents of this communication and any analysis, guidance, or other information is intended to objectively address the question(s) presented based on the current existing, known facts and legal authority as described to and understood by the author and/or CalRecycle at the time of this communication. Please be advised that any relevant facts or legal authority or authorities that are undisclosed or unknown at the time of this communication may affect or alter any analysis, guidance, or other information herein. Please be further advised that any analysis, guidance, or other information herein may be subject to change and/or correction based on changed facts or legal authority, actual or understood, subsequent to the time of this communication. No analysis, guidance, or other information herein should be construed as a waiver of any rights or remedies available to CalRecycle. Recipients of this communication are encouraged to seek the assistance of legal counsel to comply with applicable state law based on current facts and circumstances.*

# Join CalRecycle's Textile Team

CalRecycle is currently recruiting two Environmental Scientists to co-lead the development and implementation of the Responsible Textile Recovery Act.

- Scan the QR Code for more information
- Apply by September 17, 2025





# Agenda

---

## **Opening Remarks**

Karen Kayfetz, Branch Chief of the Product Stewardship Branch

## **Part I: Statutory Overview of the Producer Responsibility Organization**

Brett Johnson, Environmental Scientist

Product Stewardship Branch

## **Part II: PRO Application Overview**

Emily Wang, Senior Environmental Scientist

Product Stewardship Branch

# **Part I. Statutory Overview of the Producer Responsibility Organization**

---

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

---

**Brett Johnson**  
Environmental Scientist

# Producer Responsibility Organization

“Producer responsibility organization” or “PRO” means an organization that is exempt from taxation under Section 501(c)(3) of the federal Internal Revenue Code of 1986, is formed for the purpose of implementing a plan to meet the requirements of the Responsible Textile Recovery Act and is approved by the department.



See *PRC* section 42984.3(t)

# Producer Responsibility Organization (cont.)

- By January 1, 2026, producers of covered products shall form and join a PRO for the purposes of complying with this chapter.
- The governing body of the PRO shall submit an application to the department describing how the PRO meets the requirements to be an approved PRO, as described in PRC section 42984.4(a).
- If the department approves the PRO, the PRO shall proceed to carry out the requirements of this chapter.
- If applications for more than one PRO are submitted to the department by January 1, 2026, the department shall determine which proposed PRO can most effectively implement this chapter.

*See PRC section 42984.4(a)*



# Responsibilities of the PRO (1 of 3)

- Prepare an initial statewide needs assessment and update every five years.
- Submit and annually update a list of brands of covered products that each producer sells.
- Develop and submit a producer responsibility plan.
- Include a contingency plan in the event the plan expires or is revoked.
- Set eco-modulated fees for participant producers to fully fund the program.



*See PRC sections 42984.5 – 42984.18*

# Responsibilities of the PRO (2 of 3)

- Achieve performance standards outlined in the plan or established by CalRecycle.
- Submit annual reports describing:
  - How the PRO is implementing the plan.
  - How the PRO complied with the requirements of the statute and regulations.
- Maintain board minutes, books, and records of the activities and transactions of the PRO.

*See PRC sections 42984.6 – 42984.18*

# Responsibilities of the PRO (3 of 3)

- Submit an annual independent audit including:
  - Audited Financial statements
  - PRO's compliance with the Act
  - PRO's adherence to, execution of, and consistency with its plan.
- Report information regarding non-compliance by a participant producer.



See PRC sections 42984.6 – 42984.18

# Minimum Qualifications of a PRO

- Exempt from taxation under section 501(c)(3) of the federal Internal Revenue Code of 1986. (PRC section 42984.3(t))
- Governing board consists of producers that are diverse in size and type and represent the diversity of covered products placed in the market by those entities. The governing board may include ex officio members involved in collection, sorting, repair, reuse, recycling, or management of covered products. (PRC section 42984.4(a)(2)(A))
- Adequate financial responsibility and financial controls in place, such as fraud prevention measures and an audit schedule. (PRC section 42984.4(a)(2)(B))



# Part II. PRO Application Overview

---

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

---

**Emily Wang**  
Senior Environmental Scientist

# Background on the PRO Application

Pursuant to PRC section 42984.4(a)(1), CalRecycle is required to receive applications from prospective PROs.

CalRecycle developed an application to facilitate this process.

In this presentation, we will go through:

- Application form
- Supporting documents
- General requests and expectations



# Application Process

- (1) Visit the [PRO Application webpage](#)
- (2) Review the Solicitation Letter
- (3) Prepare Application Components:
  - Application Form ([Download](#))
  - Supporting Documents
- (4) Email completed PRO Application to:  
[Textiles@CalRecycle.ca.gov](mailto:Textiles@CalRecycle.ca.gov)



# Application Form and Questions

[Application Form](#) (Microsoft Word Document)

Form Components:

- Contact information
- Five (5) general questions about the organization
- Four (4) questions specific to financial information about the organization
- Supporting documents

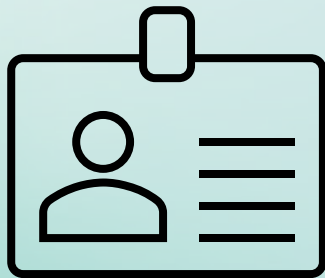




# Contact Information

## Organization

- Organization Name
- Employer ID Number
- Phone Number
- Physical Address
- Website



## Contact Person

- Contact Person Name
- Title
- Phone Number
- Physical Address
- Email Address



# General Questions

1. Provide a summary of the organization and a description of how the organization is qualified to serve as the PRO.
2. Explain why this organization is interested in serving as the PRO.

*Responses to these questions provide information on fundamental aspects of the organization.*

# General Questions (cont.)

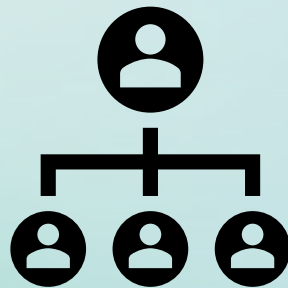
3. List the members and titles of the organization's governing board along with the following information:
  - Term lengths for each member and information on whether a board member is eligible for reappointment.
  - List of the producer(s) that each member represents.
  - Description of how the governing board represents the diversity of covered products in the market.
  - List of covered products placed in the market by these entities. Please provide a detailed and specific list of products. Covered products are defined in PRC sections 42984.3(a),(i), and (ae).

*Responses to this question relate to criteria specified in PRC section 42984.4.*

# General Questions (cont.)

4. List any ex officio members and titles of the organization's governing board, if applicable, and the following information:

- Term lengths for each member and information on whether an ex officio member is eligible for reappointment.
- Describe how the members are involved in the collection, sorting, repair, reuse, recycling, or management of covered products.



*Responses to this question relate to criteria specified in PRC section 42984.4.*



# General Questions (cont.)

5. Describe how your organization can most effectively implement this chapter including, but not limited to, responding to the following:
- Describe the organization's experience implementing textile or apparel collection, reuse, or recycling programs.
  - Describe the organization's experience establishing and/or operating PROs/stewardship organizations.
  - Disclose any entities or organizations that the PRO has conducted business with or has any financial or contractual affiliation with.

*Responses to this question relate to an applicant's ability to effectively implement the chapter.*

# General Questions (cont.)

5. Describe how your organization can most effectively implement this chapter including, but not limited to, responding to the following:
- Provide a list of the producers, including the brands of covered products they produce, who are currently members of or are affiliated with this organization.
  - Provide any other information to demonstrate that the organization can effectively implement the requirements of the law and is relevant to the organizations' qualifications to be the producer responsibility organization.

*Responses to this question relate to an applicant's ability to effectively implement the chapter.*

# Financial Questions

PRC section 42984.4(a)(2)(B) requires the PRO to demonstrate that it has adequate financial responsibility and financial controls in place to ensure proper management of funds. Responses to the following questions will assist CalRecycle's evaluation of these requirements.

1. Describe the types of audits conducted and their associated audit schedule.
2. Describe what fraud prevention measures the organization has implemented.

*Responses to these questions relate to evaluating financial responsibility criteria.*

# Financial Questions (cont.)

3. Pursuant to PRC section 42984.10(b)(4), the PRO shall maintain reserve funds sufficient to operate the plan for no less than six months. How will the organization meet this requirement? What policies regarding reserve funding will the organization implement?



*Responses to these questions relate to evaluating financial responsibility criteria.*



# Financial Questions (cont.)

4. Explain any other ways your organization demonstrates that it has adequate financial responsibility and financial controls in place to ensure proper management of funds. For example:
  - Financial policies and procedures that outline guidelines for financial management, including budgeting, spending, procurement, and reporting, ensuring consistency and transparency in financial operations.
  - Qualified and trained staff who possess the necessary skills and knowledge to handle financial matters effectively.

*Responses to these questions relate to evaluating financial responsibility criteria.*

# Financial Questions (cont.)

4. Explain any other ways your organization demonstrates that it has adequate financial responsibility and financial controls in place to ensure proper management of funds. For example:
  - Proper oversight of financial matters through regular review of financial reports and approval of budgets and expenses, ensuring the PRO's financial sustainability.
  - Internal financial controls, such as segregation of duties, multiple approvals for financial transactions, and regular audits or reconciliations, to prevent fraud, errors, and ensure accuracy and integrity of financial data.

*Responses to these questions relate to evaluating financial responsibility criteria.*

# Supporting Documents

CalRecycle requests the following documentation with applications:

- IRS Form 990 (if available)
- IRS 501(c)(3) determination or affirmation letter (if available)
- Organization's Articles of Incorporation of a Nonprofit
- Organization's bylaws
- Organization's organizational chart
- Copies of most recent audits (if available)

*These documents allow CalRecycle to verify the organization's 501(c)(3) status (or progress towards obtaining) and evaluating other fundamental aspects of the organization.*

# Application Form Instructions

Applicants download the [Application Form](#).

Applicants type their responses to the questions in the form.

- No page or character limit to responses.
- Applications should meet accessibility requirements.

Applicant saves the completed application as a PDF and proceeds to submission.



# Submission Process

Once an applicant completes the application form and prepares all documents, the applicant submits the materials via email to [Textiles@CalRecycle.ca.gov](mailto:Textiles@CalRecycle.ca.gov).

The applicant will receive a confirmation email.

Any issues, contact [Textiles@CalRecycle.ca.gov](mailto:Textiles@CalRecycle.ca.gov).

Deadline: January 1, 2026, at 11:59 PM PST.





# Request to Applicants

## Public Record

- All application materials are deemed public records pursuant to the California Public Records Act.
- CalRecycle requests the applicant identify confidential proprietary information with an explanation as to why the information must be withheld from disclosure.

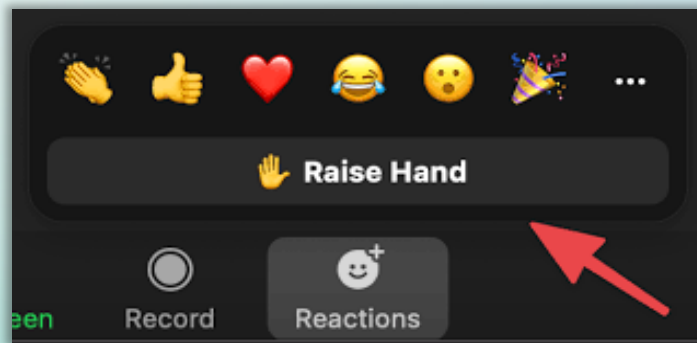
## Public Availability of Applications

- CalRecycle will post the applications online.
- Documents must be made accessible for CalRecycle to post online pursuant to [section 11546.7 of the Government Code](#).
- CalRecycle requests that applicants submit documents that meet [accessibility requirements](#).
- If any documents are unable to be posted online due to accessibility, they will still be available through a Public Records Act Request.

# 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.





## Ways to stay informed



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



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



**Questions about textile stewardship:**  
[Textiles@CalRecycle.ca.gov](mailto:Textiles@CalRecycle.ca.gov)



**Apply to Join CalRecycle's Textile Team**