

March 18, 2026

Brian Phillips
Executive Director
1005 12th Street Lower 1
Sacramento, CA 95814

Re: CalRecycle's Completeness Review of Circular CRV Association's Revised Q4 2025 Quarterly Report

Dear Mr. Phillips,

The Department of Resources Recycling and Recovery (CalRecycle) received Circular CRV Association's revised Quarterly Report for the fourth quarter of 2025 (Quarterly Report) on February 23, 2026, covering the period from October 1, 2025, through December 31, 2025. CalRecycle is required to notify Circular CRV Association if the revised Quarterly Report is incomplete and identify the missing information within 30 days of receipt (by March 25, 2026) pursuant to Title 14 of the California Code of Regulations (14 CCR) section 2381(d)(2).

Staff reviewed the revised Quarterly Report for completeness pursuant to the requirements in 14 CCR section 2381 and found the revised Quarterly Report incomplete. The following requirements were found to be incomplete, and the missing information is identified below.

Pursuant to 14 CCR section 2381(b)(1)(A)-(B), the Quarterly Report must include the total number of empty beverage containers redeemed and the amount of refund value payments made to consumers. Both the total number of empty beverage containers and refund value paid must be reported by material type and collection method, broken down by redemption site for each calendar month. Circular CRV Association did not report the required redemption data for all redemption sites operating during the reporting period. The redemption sites that Circular CRV Association previously informed CalRecycle were operational during the reporting period but were not included in the quarterly report are listed below.

- Ralph's Grocery (260 S La Brea Ave, Los Angeles, CA 90036)
- Ralph's Grocery (7257 W Sunset Blvd, West Hollywood, CA 90046)
- Ralph's Grocery (1930 N Lakewood Blvd, Long Beach, CA 90815)
- Food 4 Less (3210 E Anaheim St, Long Beach, CA 90804)

- Ralph's Grocery (6290 E Pacific Coast Hwy, Long Beach, CA 90803)

However, the sites above may not be an exhaustive list of those missing from the quarterly report. Staff notes that 14 CCR section 2381(b)(1)(A)-(B) does not specify the fully operational status of redemption sites. If Circular CRV Association began operations at redemption sites prior to notifying CalRecycle, this activity must be reported in the redemption component of the Quarterly Report.

Additionally, 14 CCR section 2381(c)(3) requires the Quarterly Report to include the total number of beverage containers cumulatively sold by dealer members into each unserved convenience zone in which any of the dealer members operate. The revised Quarterly Report does not include the total number of beverages sold by all dealer members that were in convenience zones with operational redemption sites during the quarterly reporting period. The Quarterly Report must include this data for the following dealer members:

- Ralph's Grocery (260 S La Brea Ave, Los Angeles, CA 90036)
- Trader Joe's (263 S La Brea Ave, Los Angeles, CA 90036)
- Whole Foods (6350 W 3rd St, Los Angeles, CA 90036)
- Ralph's Grocery (7257 W Sunset Blvd, West Hollywood, CA 90046)
- Whole Foods (7871 Santa Monica Blvd, West Hollywood, CA 90046)
- Ralph's Grocery (1233 N La Brea Ave, West Hollywood, CA 90038)
- Trader Joe's (7310 Santa Monica Blvd, West Hollywood, CA 90046)
- Ralph's Grocery (1930 N Lakewood Blvd, Long Beach, CA 90815)
- Food 4 Less (3210 E Anaheim St, Long Beach, CA 90804)
- Ralph's Grocery (2930 E 4th St, Long Beach, CA 90814)
- Ralph's Grocery (6290 E Pacific Coast Hwy, Long Beach, CA 90803)
- Whole Foods (6400 E Pacific Coast Hwy, Long Beach, CA 90803)

Circular CRV Association must also ensure that the inclusion of the missing dealer data is reflected in the capacity and redemption rate performance standard calculations in the Quarterly Report pursuant to 14 CCR section 2381(c)(4).

Pursuant to 14 CCR section 2381(c)(4), the Quarterly Report must include a description of how the dealer cooperative achieved each performance standard identified in its stewardship plan. However, the measurement methodology described in the "Explanation" column of the Performance Standard Analysis table (page 21) does not reflect the same methodology described in Circular CRV Association's approved stewardship plan. The estimated total quarterly capacity is identified on the Capacity and Redemption Analysis table (page 19) as 2,195,776 units. This quarterly capacity estimate is inconsistent with the quarterly capacity estimate established by the stewardship plan. Please ensure that the capacity calculations and the methodologies described in the Quarterly Report and approved Stewardship Plan are consistent. Any

changes to performance standards require prior approval by CalRecycle pursuant to 14 CCR section 2378(c).

Further, Circular CRV Association provided conflicting information in the description of how the dealer cooperative achieved each performance standard identified in its stewardship plan pursuant to 14 CCR section 2381(c)(4). Specifically, the description of how the geographic spread performance standard was met used inconsistent language stating: “In Quarter 4, 2025, there were [four] Fully Operational Dealer Cooperative sites” (page 21) while the title page of the revised Quarterly Report identifies two fully operational redemption sites (page 1). Please ensure that the description of geographic spread on page 21 accurately reflects the number of redemption sites redeeming beverage containers during the reporting period. In addition, the description of the geographic spread (measurement column) in the Performance Standard Analysis table (page 21) is unclear. Please clarify the distance standard by which geographic spread will be measured and ensure it is consistent with the geographic spread measurement description identified in the stewardship plan.

Lastly, staff note that the Redemption Reporting tables (pages 5 and 6) include potentially inaccurate information. For example, the Whole Foods in Pasadena does not host a redemption site, so it is unclear why this dealer is included in this table identifying redemption amounts. Also, while redemption sites may operate on a dealer’s premises, the redemption sites themselves do not sell beverage containers, so it is not clear why sales information is provided for some redemption sites (e.g., the Foothill Unity Center in Monrovia is not a dealer). It is also unclear why the Foothill Unity Center redemption site in Monrovia did not redeem any containers or if it was operational during the reporting period (CalRecycle was noticed that the site was fully operational on January 12, 2026). Please update the tables to ensure that all applicable redemption sites and associated information in the Quarterly Report’s tables are accurate.

Pursuant to 14 CCR section 2381(d)(3), Circular CRV Association must submit the missing information to CalRecycle within 30 days of this notice date.

Questions regarding this letter may be directed to DealerCoops@CalRecycle.ca.gov.

Sincerely,

Signed by: Michelle Martin

Deputy Director, Division of Circular Economy
CalRecycle