

Textile Stewardship Informal Regulatory Concepts Workshop

Textile Stewardship Regulations

August 13, 2026

**Department of Resources Recycling and Recovery
Product Stewardship Branch; Product Stewardship
Compliance Branch; Legal Affairs Office**

**Topics Covered:
Definitions, Online Marketplaces, and PRO
Submittals**

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Overview and Purpose of the Workshop

The Department of Resources Recycling and Recovery (CalRecycle) has scheduled a workshop on August 13, 2026, from 10:00 AM to 3:00 PM, in the Byron Sher Auditorium, located on the 2nd Floor at 1001 I Street, Sacramento, CA 95814. The purpose of the workshop is to consult with the public, the regulated community, and other interested parties to solicit feedback on regulation concepts related to some of the requirements outlined in California's Responsible Textile Recovery Act of 2024 (Act) ([Public Resource Code \(PRC\) Sections 42984-42984.27](#)) as enacted by Senate Bill (SB) 707 ([Newman, Chapter 864, Statutes of 2024](#)).

This workshop covers the department's proposed concepts for consideration related to definitions, online marketplaces, and producer responsibility organization (PRO) submittals. Other topics will be addressed in subsequent workshops.

This workshop is split into three parts:

- **Part I** will discuss definitions and supporting topics.
- **Part II** will discuss online marketplaces and supporting topics.
- **Part III** will discuss PRO submittals and supporting topics.

The purpose of this document is to provide interested parties, in advance of the workshop, with an outline of the information that will be presented at the workshop and provide guidance on the type of feedback the department plans to solicit. All specific requests for feedback are included in gray textboxes, but the department welcomes and will consider any feedback interested parties wish to provide.

The department is accepting comments on the proposed regulatory concepts for consideration outlined in this discussion document through August 27, 2026. See the section titled "Process for Submitting Written Feedback" at the end of this document for more information about how to submit comments.

Further information on past and future informal regulatory workshops will be posted on [CalRecycle's Textile Stewardship Website](#).

Part I: Definitions

In Part I, the department will provide an overview of the proposed regulatory concepts and potential language to define terms used in the Act and regulations.

Topic 1: Covered Products

Statute Section: PRC section [42984.3](#)

1. Fabric

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.

Regulatory Concept

The term “fabric” is included in the definition of “textile article,” which is a covered product. Because interpretations of what constitute fabric can vary, the department proposes clarifying this term to ensure the public, the regulated community, and other interested parties have a consistent understanding of what qualifies as fabric when the department verifies compliance with the Act.

The department is considering defining the term “fabric” to clarify which textile articles may constitute covered products under the Act. The department is evaluating whether a definition should identify:

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

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.

2. Yarn

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.

Regulatory Concept

The term yarn is included in the definition of “textile article,” which is a covered product. Because interpretations of what constitute yarn can vary, the department proposes clarifying this term to ensure the public, the regulated community, and other interested

parties have a consistent understanding of what qualifies as yarn when the department verifies compliance with the Act.

The department is considering defining the term “yarn” to clarify which textile materials may constitute covered products under the Act. The department is evaluating whether a definition should identify:

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.

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.

3. Fiber

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.

PRC section [42984.17\(g\)\(2\)](#): The amount [of covered products] described in paragraph (1) shall be broken down by **fiber** type category and Harmonized Tariff Schedule of the United States (HTS) number.

PRC section [42984.17\(h\)](#): The total weight of covered products, respectively, that were collected, broken down by **fiber** type categories.

Regulatory Concept

The term “fiber” is included in the definition of “textile article” and is also referenced throughout the Act, including reporting requirements related to fiber type categories. Because interpretations of what constitutes fiber can vary, the department proposes clarifying this term to ensure the public, the regulated community, and other interested parties have a consistent understanding of what qualifies as fiber when the department verifies compliance with the Act.

The department is considering defining the term “fiber” to clarify which materials may constitute covered products under the Act. The department is evaluating whether a definition should identify:

1. The physical characteristics of fiber.
2. The functional role of fiber in textile manufacturing.

3. The distinction between fiber, yarn, and fabric.

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.

4. Footwear

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.

Regulatory Concept

The term “footwear” is included within the definition of “apparel,” which is a covered product under the Act. Because footwear can include a broad range of products with varying materials, functions, and intended uses, the department is considering whether clarification of this term would assist the public, the regulated community, and other interested parties in determining which footwear products constitute covered products under the Act.

The department is considering defining the term “footwear” to clarify which footwear products are included within the scope of apparel under the Act. The department is evaluating whether a definition should identify:

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.

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.

5. Undergarments

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.

Regulatory Concept

The term “undergarments” is included within the definition of “apparel,” which is a covered product under the Act. Because undergarments may include a broad range of products with varying functions, styles and methods of wear, the department is considering whether clarification of this term would assist the public, the regulated community, and other interested parties in determining which products constitute covered products under the Act.

The department is considering defining the term “undergarments” to clarify which products are included within the scope of apparel under the Act. The department is evaluating whether a definition should identify:

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

6. Swimwear

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.

Regulatory Concept

The term “swimwear” is included within the definition of “apparel,” which is a covered product under the Act. Because swimwear may include a broad range of products designed for swimming, bathing, or other water-related activities, the department is considering whether clarification of this term would assist the public, the regulated community, and other interested parties in determining which products constitute covered products under the Act.

The department is considering defining the term “swimwear” to clarify which products are included within the scope of apparel under the Act. The department is evaluating whether a definition should identify:

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.

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.

7. Knitted and Woven Accessories

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.

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.

Regulatory Concept

The term “knitted and woven accessories” is included within the definitions of both “apparel” and “textile article,” which are covered products under the Act. Because the

phrase may encompass a broad range of products not otherwise specifically identified in statute, the department is considering whether clarification of this term would assist the public, the regulated community, and other interested parties in determining which products constitute covered products under the Act.

The department is considering defining the term “knitted and woven accessories” to clarify which products are included within the scope of apparel and textile articles under the Act. The department is evaluating whether a definition should identify:

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

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.

8. Personal Protective Equipment (PPE)

Statutory Background

PRC section [42984.3\(a\)\(2\)](#): “Apparel” does not include any of the following:

PRC section [42984.3\(a\)\(2\)\(A\)](#): **Personal protective equipment** or clothing items for use by the United States military.

PRC section [42984.3\(a\)\(2\)\(B\)](#): **Personal protective equipment** worn to protect the wearer from health or environmental hazards.

Regulatory Concept

Personal protective equipment (PPE) is excluded from the definition of “apparel” under the Act. Because interpretations of what constitutes PPE may vary across industries, products, and uses, the department is considering whether clarification of this term would assist producers and consumers in distinguishing excluded PPE products from covered products under the Act.

The department is considering defining 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 that must be associated with covered products identified as 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.

9. Fabric Window Coverings

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.

PRC section [42984.3\(i\)\(2\)\(D\)](#): [“Covered product” does not include the following:] 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.

Regulatory Concept

Fabric window coverings are included within the definition of “textile article,” which is a covered product under the act. However, the act excludes certain automated, motorized, battery-operated, or manually operated window coverings. Because window coverings may include both covered and excluded products with varying materials, operational systems, and functions, the department is considering whether clarification of this term would assist the regulated community in determining which products constitute covered products under the Act.

The department is considering defining the term “window covering” to clarify which products are included within the scope of textile article under the Act and which products are excluded.

The department is evaluating whether a definition should identify:

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

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).

Request for Feedback on Covered Product Definitions

- 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

Statute Sections: PRC sections [42984.3](#) and [42984.10](#)

1. Permanent Collection Site

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:

PRC section [42984.10\(d\)\(1\)](#): 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:

PRC section [42984.10\(d\)\(2\)](#): Provides for a reasonable geographic spread of **permanent collection sites** and an explanation for the geographic spread.

Regulatory Concept

The Act requires PROs to provide for a free and convenient dropoff or collection system for covered products that includes permanent collection sites. Because the Act does not further define what constitutes a permanent collection site, the department is considering whether clarification of this term would assist PROs, producers, authorized collectors, and other regulated entities in implementing collection system requirements under the Act.

The department is considering defining the term “permanent collection site” to clarify minimum operational expectations for permanent collection sites established under the Act. The department is evaluating whether a definition should identify:

1. The physical 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.

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.

2. Temporary Collection Site

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:

Regulatory Concept

The Act authorizes PROs to utilize temporary collection sites as part of a free and convenient collection system for covered products. Because the Act does not further define what constitutes a temporary collection site, the department is considering

whether clarification of this term would assist PROs, producers, authorized collectors, and other regulated entities in implementing collection system requirements under the Act.

The department is considering defining the term “temporary collection site” to clarify the operational characteristics of temporary collection opportunities established under the Act. The department is evaluating whether a definition should identify:

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

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.

3. Reasonable Geographic Spread

Statutory Background

PRC section [42984.10\(d\)\(2\)](#): Provides for a **reasonable geographic spread** of permanent collection sites and an explanation for the geographic spread.

Regulatory Concept

The Act requires PROs to provide a reasonable geographic spread of permanent collection sites as part of a free and convenient collection system for covered products. Because the Act does not further define what constitutes a “reasonable geographic spread,” the department is considering whether clarification of this term would assist PROs, producers, authorized collectors, and other regulated entities in implementing collection system requirements under the Act.

The department is considering defining the term “reasonable geographic spread” to clarify expectations for the placement and accessibility of permanent collection sites established under the Act. The department is evaluating whether a definition should identify:

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

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 subdivision (d)(1) of Section 42984.10 of the Public Resources Code.

Request for Feedback on Collection Related Terms

- 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 (e.g., driving-distance, distance, population density) 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

Statute Sections: PRC section [42984.3](#)

1. 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:

(A) The producer concerned.

(B) Those entities in which the producer is concerned, directly or indirectly, as follows:

(i) Owns more than one-half the capital or business assets.

(ii) Has the power to exercise more than one-half the voting rights.

(iii) Has the power to appoint more than one-half the members of the supervisory board, the administrative board, or bodies legally representing the undertakings.

(iv) Has the right to manage the entities’ affairs.

(C) Those entities that have in the producer concerned the rights or powers listed in subparagraph (B).

(D) Those entities in which an entity referred to in subparagraph (C) has the rights or powers listed in subparagraph (B).

(E) Those entities in which two or more entities as referred to in subparagraphs (A) to (D), inclusive, jointly have the rights or powers listed in subparagraph (B).

Regulatory Concept

The Act excludes certain sellers from the definition of “producer” based on annual aggregate global turnover. Because the Act does not further specify how annual aggregate global turnover should be interpreted or calculated, the department is considering whether clarification of this term would assist producers, PROs, sellers, and other regulated entities in determining compliance obligations and eligibility for statutory exemptions under the Act.

The department is considering defining the term “annual aggregate global turnover” to clarify how seller revenue should be evaluated when determining whether an entity qualifies for statutory exemptions from the definition of producer under the Act.

The department is evaluating whether a definition should identify:

1. The scope of revenue included in the calculation.
2. How turnover should be evaluated across related entities, subsidiaries, franchises, or affiliated business structures.

The department is also considering whether annual aggregate global turnover should be evaluated using the preceding calendar year or another reporting period consistent with annual reporting requirements established under the Act.

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.

2. 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:

(A) The producer concerned.

(B) Those entities in which the producer is concerned, directly or indirectly, as follows:

(i) Owns more than one-half the capital or business assets.

(ii) Has the power to exercise more than one-half the voting rights.

(iii) Has the power to appoint more than one-half the members of the supervisory board, the administrative board, or bodies legally representing the undertakings.

(iv) Has the right to manage the entities' affairs.

(C) Those entities that have in the producer concerned the rights or powers listed in subparagraph (B).

(D) Those entities in which an entity referred to in subparagraph (C) has the rights or powers listed in subparagraph (B).

(E) Those entities in which two or more entities as referred to in subparagraphs (A) to (D), inclusive, jointly have the rights or powers listed in subparagraph (B).

Regulatory Concept

The Act excludes certain sellers from the definition of “producer” based on annual aggregate global turnover. The department is considering establishing and defining the term “small seller” to assist producers, PROs, sellers, and other entities in determining which sellers are not considered producers under the Act.

The department is evaluating whether regulations should identify:

1. The criteria for qualifying as a small seller.

Proposed Definition

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

Request for Feedback on Producer Related Terms

- 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 by the Department to demonstrate which entities sell less than one million dollars in covered products?

Part II: Online Marketplaces

In Part II, the department provides an overview of proposed regulatory concepts intended to clarify statutory requirements applicable to online marketplaces under the Act.

Topic 1: Annual Notification Deadline for Online Marketplaces

Statute Sections: PRC sections [42984.2](#) and [42984.27](#)

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](#).

Regulatory Concept

The department is considering establishing reporting requirements for online marketplaces identifying third-party sellers meeting reporting thresholds under the Act. The department is evaluating specifying an appropriate annual submission date for online marketplaces.

Topic 2: Notification Process

Statute Sections: PRC section [42984.27](#)

Statutory Background

PRC section [42984.27\(a\)\(1\)](#): **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.

Regulatory Concept

The department is considering establishing requirements for how online marketplaces must notify the department and the PRO of third-party sellers meeting statutory reporting thresholds under the Act. The department is evaluating whether notifications should be submitted electronically, consistent with approaches used in other EPR programs, and whether a single standardized electronic form or reporting portal could satisfy the requirements of both the department and the PRO.

Topic 3: Notification Requirements

Statute Sections: PRC section [42984.27](#)

Statutory Background

PRC section [42984.27\(a\)\(1\)](#): 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.

Regulatory Concept

The department is considering establishing the specific information online marketplaces must provide for when notifying the department and the PRO of third-party sellers meeting statutory reporting thresholds. The department is evaluating whether the required information should be submitted electronically in a standardized format and include, at minimum: business name, DBA (if applicable), contact information, physical address, mailing address, relevant brand information categorized by covered product type, sales for the preceding calendar year, and any other information necessary to accurately identify third-party sellers under the Act.

Topic 4: Amount of Sales

Statute Sections: PRC section [42984.27](#)

Statutory Background

PRC section [42984.27\(a\)\(2\)](#): 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.

Regulatory Concept

The department is considering specifying how online marketplaces must calculate and report the amount of sales for third-party sellers meeting statutory thresholds. The department is evaluating whether the amount of sales should be reported as a single total representing all covered product transactions, or whether sales should be reported by covered product category, with individual category amounts summed to determine the total.

Topic 5: Third-Party Seller Information

Statute Sections: PRC section [42984.27](#)

Statutory Background

PRC section [42984.27\(b\)](#): **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.

Regulatory Concept

The department is considering establishing requirements regarding how online marketplaces provide compliance information to third-party sellers regarding obligations under the Act.

The department is evaluating whether regulations should identify:

1. Methods for providing compliance information to sellers.
2. Timing and frequency of seller notifications.
3. Recordkeeping requirements associated with seller outreach.

Request for Feedback on Online Marketplace

- 1) What should be the due date for online marketplace annual notifications?
- 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 sellers with information on the law?

Part III: PRO Submittals

In Part III, the department provides an overview of proposed regulatory concepts to clarify the PRO submittal requirements under the Act.

The Act requires the PRO to submit producer and brand lists, needs assessments, stewardship plans, annual reports, and related documents to the department. While the Act establishes some submittal requirements, the form, manner, timing, and supporting procedural requirements for those submittals are generally left to the department to determine through regulation.

In the sections that follow, each regulatory topic is presented using a consistent structure to assist the public, the regulated community, and other interested parties in understanding the proposed concepts and regulatory direction under consideration. Each topic includes relevant statutory background, a description of the regulatory concept, and rationale supporting the proposed approach.

Topic 1: Electronic Submissions and Accessibility

Statute Sections: PRC sections [42984.5](#), [42984.8](#), [42984.15](#), and [42984.17](#)

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:

- (a) The PRO's costs, according to the cost categories established in the plan, and revenues.

- (b) A summary of any anticipated changes to allocations in cost categories for the next calendar year.
- (c) Any changes to the distribution of a participating producer's costs.
- (d) The amounts of the eco-modulated fees based on the criteria established pursuant to subdivision (b) of Section 42984.14 and the PRO's evaluation of the effectiveness of the eco-modulated fees.
- (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.
- (f) A list of the PRO's collection sites, by name, location, and type.
- (g) (1) The amount of covered products sold in or into the state by the producers covered by the PRO's plan.
 - (2) The amount described in paragraph (1) shall be broken down by fiber type category and Harmonized Tariff Schedule of the United States (HTS) number.
- (h) The total weight of covered products, respectively, that were collected, broken down by fiber type categories.
- (i) The total weight of covered products, by category, that were collected and deemed reusable by each respective authorized collector and authorized sorter.
- (j) A list of each authorized sorter, authorized repair business, and covered product recycling facility used by the PRO, including both of the following:
 - (1) Name and location.
 - (2) Total weight of covered products handled by each location.
- (k) The total weight and number of covered products sold in or into the state attributed to a producer, who is a registered participant of the PRO's plan, which are collected in the state and reused or recycled by the PRO, including a description of the methodology and information used to determine and calculate these values.
- (l) A complete accounting of the ultimate disposition of all covered products collected by the PRO, including the total weight of covered products that were repaired and recycled.
- (m) Metrics and a description of the progress toward attaining the performance standards included in the plan.

(n) A description of methods used to collect, transport, repair, and recycle covered products by the PRO, including a description of all of the following:

- (1) How the PRO handled and managed covered products according to the waste hierarchy as defined in Section [40051](#).
- (2) How the PRO maximized reuse and recycling of all covered products.
- (3) How the PRO minimized disposal of all covered products collected by the PRO.
- (4) Results of the PRO's assessment of the efficacy of the collection, sorting, and transportation process.

(o) A description of how the PRO provided incentive payments, grants, and market development investments to support the infrastructure necessary to effectively implement the plan, including how incentive payments, grants, and market development investments prioritized infrastructure closer to the point of generation.

(p) A description of outreach efforts and education, including, but not limited to, the PRO's evaluation of the efficacy of the comprehensive statewide education and outreach program pursuant to subdivision (g) of Section [42984.10](#).

(q) A description of how the PRO coordinated with other PROs and entities pursuant to subdivision (j) of Section [42984.10](#).

(r) A report on activities the PRO has undertaken to prioritize the use of sorting and recycling facilities located closer to the point of generation to minimize transportation emissions and increase accountability for the ultimate disposition of collected covered products.

(s) An analysis of whether the PRO met performance standards established by the PRO pursuant to subdivision (c) of Section [42984.10](#) or by the department pursuant to Section [42984.19](#).

(t) A description of how the PRO addressed the presence of PFAS and other chemicals regulated under Chapter 6.6 (commencing with Section 25249.5) of Division 20 of the Health and Safety Code and Chapter 12.5 (commencing with Section 108945) of, and Chapter 13.5 (commencing with Section 108970) of, Part 3 of Division 104 of the Health and Safety Code, including, but not limited to, the actions taken and investments made to avoid contamination in the recycling process, and the availability of end markets for recycled material that could not be remanufactured into textiles or textile articles in California.

(u) Any other information deemed relevant by the PRO for the department to determine compliance with the approved plan.

(v) Any other information required by regulations adopted pursuant to Section [42984.2](#).

Regulatory Concept

The department is considering establishing standardized electronic submission and accessibility requirements applicable to all documents submitted under the Act. These requirements may include:

1. Establishing procedures for electronic submission of documents.
2. Requiring use of specific department email address(es) or online submission portals and associated submission and receipt processes.
3. Identifying acceptable file formats, document standards, and structural requirements that support consistent review and record management.
4. Requiring adherence to accessibility requirements consistent with applicable laws and standards, including Government Code section 7405 and the Web Content Accessibility Guidelines (WCAG).
5. Establishing the electronic submission date as the official date of receipt.
6. Specifying documents must provide true and correct information under penalty of perjury.

Topic 2: Confidential Proprietary Information

Statute Sections: PRC section [42984.8](#)

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.

Regulatory Concept

The department is considering establishing procedures governing confidentiality claims for documents submitted under the Act. These requirements may include:

1. Processes for designating information submitted to the Department is exempt from disclosure and asserting confidentiality at the time of submission.
2. Requiring the PRO to provide the legal basis for confidentiality claims.
3. Procedures for submitting redacted versions of documents for public release.
4. Specifying that information not designated as exempt from disclosure is deemed subject to mandatory disclosure under the Public Records Act.

Topic 3: Producer and Brand Lists

Statute Sections: PRC sections [42984.5](#) and [42984.17](#)

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 [42984.5\(b\)](#): 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.

Regulatory Concept

The department is considering establishing procedures governing producer and brand list submittals under the Act. Items under evaluation include:

1. Specifying information required in producer and brand lists, such as producer name, associated brands, covered products, producer contact information (e.g., physical and mailing addresses, contact phone number, contact email address), and registration date.
2. Identifying required file format and structure (e.g., spreadsheet with separate columns for specified information).
3. Establishing procedures for submissions and update frequency.
4. Setting recordkeeping expectations to ensure that producers and the PRO maintain accurate and complete information supporting compliance with the Act.
5. Establishing criteria for department rejection of a list.

Topic 4: Needs Assessments

Statute Sections: PRC section [42984.6](#)

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.

Regulatory Concept

The department is considering establishing procedures governing needs assessment development and submittals under the Act. Areas under evaluation 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 if the department conditionally approves or disapproves.
4. Establishing procedures and deadlines for updates to the needs assessment no less than every five years.

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

Statute Sections: PRC sections [42984.8](#) and [42984.12](#)

Statutory Background

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 [42984.8\(e\)](#): 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).

Regulatory Concept

The department is considering establishing procedures governing stewardship plan submittals and revisions under the Act. Items under evaluation include:

1. Requiring submittals in Portable Document Format.
2. Requiring PRO to post the submitted plan on its website upon submission to the department.
3. Specifying a process for submitting producer responsibility plans, revised plans, substantial changes to the plan, and five-year plan reviews.
4. Specifying processes for identifying and submitting substantial plan changes to the department for approval.
5. Establishing expectations for department review, resubmittal, and plan changes.

Topic 6: Annual Reports

Statute Sections: PRC sections [42984.10](#), [42984.16](#) and [42984.17](#)

Statutory Background

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:

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.

Regulatory Concept

The department is considering establishing standardized procedures governing annual reporting submittals under the Act. Areas under evaluation include:

1. Establishing a due date for annual report submissions.
2. Requiring submittals in Portable Document Format.
3. Requiring PRO to post on its website upon submission to the department.
4. Establishing for resubmitting annual reports if determined to be noncompliant.
5. Identifying formatting standards that support consistency and clarity across annual reports.
6. Specifying criteria for the department determining if annual reports are compliant or noncompliant.

Topic 7: Notice of Producer Responsibility Plan Implementation Status

Statute Sections: PRC section [42984.9](#)

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](#).

Regulatory Concept

The department is considering establishing requirements related to the PRO demonstrating the producer responsibility plan is fully implemented. Requirements under evaluation include:

1. Submitting to CalRecycle and posting on the PRO website a notice demonstrating whether the PRO achieved or did not achieve full implementation within 12 months of the department's approval of a plan.
2. Providing a certification of the implementation status of the producer responsibility plan with key information (e.g., list of producers, collection sites, service providers, website address).
3. Signing the notice and providing it to CalRecycle in Portal Document Format under penalty of perjury.

Request for Feedback on PRO Submittals

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

Process for Submitting Written Feedback

CalRecycle has developed a process for requesting written feedback from interested parties. While this process is not a specific requirement, CalRecycle requests all written feedback and questions to be submitted using the specified format below, for the purposes of maintaining consistency in the way in which the information is received, and to aid with expedited review and processing. All written feedback may be submitted after the workshop to Regulations@CalRecycle.ca.gov with the subject line: August 2026 Textile Stewardship Informal Regulatory Concepts Workshop or CalRecycle's public comment portal: [Textile Stewardship Informal Regulatory Concepts Workshop Public Comment Period](#). CalRecycle requests all feedback specific to the August 13, 2026, workshop is submitted **no later than August 27, 2026**. Preferred formats include e-mail, .docx, and PDF.

Requested Feedback on Specific Regulation Concepts:

When providing feedback or asking questions on a specific regulation concept, please include (1) the Part Number and Topic Number [i.e., Part 1, Topic 1; Part 1, Topic 2, or Part 1, Topic 3], including the specific title, (2) feedback or questions related to that regulation concept. For example, when providing feedback on Part 1, Topic 1: Covered

Products, the preferred format would be:

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

Specific feedback related to this item...

This process can be repeated for each regulation concept a person wants to address.

All feedback and questions can be included in the same email or document.

Questions or Feedback for Specific Sections of Statute or Regulations:

When providing feedback or asking questions on a specific section in the statute or regulations, please include (1) the full section number, including any subsections associated with it, (2) feedback or questions related to that section. For example:

PRC section 42984.4(a)(1)

Specific feedback or question related to this section...

This process can be repeated for each section a person wants to address. All feedback and questions can be included in the same email or document.

General Questions or Comments:

When asking general questions or providing general comments on topics related to this workshop that do not focus on a specific regulation concept or specific statutory section, please list each question and comment in numerical order:

Question 1: General question on this discussion document

Question 2: General question on this discussion document

Comment 1: General comment on this discussion document