

Responsible Textile Recovery Act

Textile Stewardship Informal Regulatory Concepts Workshop

Department of Resources Recycling
and Recovery (CalRecycle)

September 29, 2026



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Agenda

Introduction and Background

Allyson Williams, Environmental Program Manager, Product Stewardship Branch

Part I: Responsible End Markets, Reuse, and Repair

Alexander Edwards, Environmental Scientist, Product Stewardship Branch

Part II: Convenient Collection System

Brett Johnson, Environmental Scientist, Product Stewardship Branch

Part III: Producer Identification and Exemptions

Rob Hammerstad, Supervisor, Product Stewardship Compliance Branch

Public Feedback Regarding Workshop Content

Closing Remarks

Discussion Document

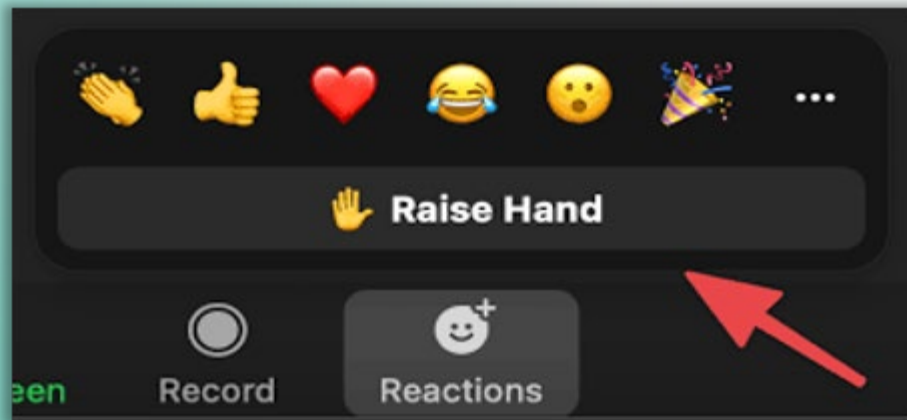
- **Part I:** Responsible End Markets, Reuse, and Repair
- **Part II:** Convenient Collection System
- **Part III:** Producer Identification and Exemptions

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 **October 13, 2026**, via:
 - CalRecycle's public comment portal: [Responsible Textile Recovery Act Informal Rulemaking Comment Period](#)
 - Email: Regulations@CalRecycle.ca.gov with subject line "September 2026 Textile Stewardship Informal Regulatory Concepts Workshop"



Part I: Responsible End Markets, Reuse, and Repair

Alexander Edwards

Department of
Resources Recycling
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Product Stewardship
Branch



Part I: Responsible End Markets, Reuse, and Repair

Topic 1: Criteria for Responsible End Markets

Topic 2: Intermediate Supply Chain Entities

Topic 3: Ultimate Disposition

Topic 4: Reuse and Repair



Topic 1: Criteria for Responsible End Markets

Statutory Background

The Act:

- Defines “recycle” and “recycling.”
- Defines “responsible end market” (REM) and requires environmentally beneficial recycling and recovery practices that minimize risks to public and worker health and safety.
- Does not specify the criteria, documentation, or verification steps needed to determine whether an entity qualifies as a REM.
- Does not describe how REMs should be distinguished from other entities.

See PRC sections: [42984.3\(x\)](#), [42041\(ad\)](#), [42984.3\(v\)](#), and [42041\(aa\)\(3\)](#)

Topic 1: Criteria for Responsible End Markets (REMs)

Regulatory Concept

CalRecycle is considering regulations to define how REMs are identified and verified, including:

1. Compliance with all local, state, federal, and international laws.
2. Benefits to the environment.
3. Minimizing risks to public health and worker health and safety.
4. Transparent material tracking and reporting, including chain-of-custody documentation.
5. Verification and auditability.
6. Performance expectations (e.g., minimum yield).
7. Roles and relationships among intermediate supply-chain entities, REMs, and ultimate disposition.

Topic 1: Criteria for Responsible End Markets – Compliance

Regulatory Concept

CalRecycle is considering regulations that specify how REMs demonstrate adherence to compliance standards, including demonstrating:

1. That they hold valid permits, licenses, and clearances to conduct relevant activities.
2. That all operations and activities conducted are consistent with local, sub-national, national, and international laws.
3. Compliance upon request by the PRO or CalRecycle through specific record keeping requirements.

Topic 1: Criteria for Responsible End Markets – Benefits to the Environment and Minimizing Risks to Public Health and Worker Safety

Regulatory Concept

CalRecycle is considering regulations that specify how REMs demonstrate benefits to the environment, such as:

1. Minimizing discharges of emissions and effluents from covered product handling processes.
2. Reducing environmental contamination (e.g., microfibers, microplastics, PFAS).
3. Documenting compliance with environmental, health, and safety requirements in the PRO's plans and annual reports.
4. Describing occupational mitigation efforts in the PRO's plans and annual reports.

Topic 1: Criteria for Responsible End Markets – Transparency Regulatory Concept

CalRecycle is considering regulations specifying how REMs demonstrate transparency, which may include:

1. Maintaining chain-of-custody records documenting the movement of collected covered products for at least five years.
2. Documenting all complaints, violations, penalties, or other forms of enforcement.
3. Maintaining records of all permits, licenses, and clearances.
4. Providing records to the PRO upon request.
5. Disclosing accepted covered products and any incompatible materials.
6. Consenting to audits conducted by the PRO.

Topic 1: Criteria for Responsible End Markets – Verification and Audits

Regulatory Concept

CalRecycle is considering regulations specifying how to conduct audits of REMs, which may include:

1. Annual compliance audits by the PRO.
2. Annual verification that responsible end markets meet all criteria.
3. Inclusion of audit findings in PRO annual reports.
4. Requiring the PRO to cease use of any end market that fails to meet specified criteria.



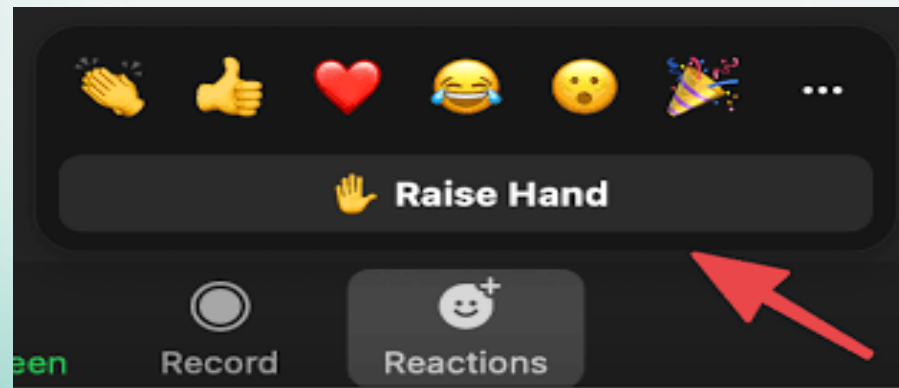
Topic 1: Criteria for Responsible End Markets – Performance Expectations Regulatory Concept

CalRecycle is considering regulations establishing REM performance requirements, such as requiring REMs to:

1. Return covered products to the marketplace for use through recycling.
2. Convert covered products into other usable products or feedstock.
3. Demonstrate that diverted materials are not disposed.
4. Distinguish between intermediate processing and ultimate disposition.
5. Report quantities recycled consistently, including process yield rates.
6. Meet minimum performance expectations, informed by statewide needs assessment data.

Questions and Comments

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Topic 1: Criteria for Responsible End Markets

Request for Feedback (1 of 2)

1. What criteria should entities meet to be designated as a REM?
2. How should REMs demonstrate that their recycling or recovery processes “benefit the environment” and what evidence should PROs be required to obtain?
3. What documentation or operational practices should REMs provide to demonstrate minimization of risks to public health and worker health and safety?
4. How should REMs document and verify that recycling processes exclude prohibited activities such as combustion, incineration, energy generation, and other forms of disposal?
5. What level of transparency, such as chain-of-custody, disclosure of incompatible materials, or reporting of violations, is needed for the PRO or CalRecycle to verify REM compliance?

Topic 1: Criteria for Responsible End Markets

Request for Feedback (2 of 2)

6. What oversight or audit methodology would provide sufficient assurance that REMs meet designated criteria?
7. What performance-based criteria (e.g., yield rates, material recovery targets) are appropriate for determining whether a REM is effectively returning materials to productive use?
8. How can the PRO ensure that international end markets adhere to REM criteria?
9. What additional criteria should CalRecycle consider to ensure that recycling, material recovery, and contaminant disposal are conducted in ways that both benefit the environment and minimize risks to public health and worker health and safety?

Topic 2: “Intermediate Supply Chain Entities”

Statutory Background

The Act:

- Requires PROs to track and report covered materials from collection through ultimate disposition.
- Does not clearly distinguish intermediate supply chain entities from facilities responsible for ultimate disposition.
- Allows facilities to perform multiple functions (sorting, preprocessing, aggregation, partial conversion).

See PRC sections: [42984.10\(f\)](#), [42984.17\(j\)](#), [42984.17\(n\)](#), and [42984.17\(r\)](#)

Topic 2: “Intermediate Supply Chain Entities”

Regulatory Concept

CalRecycle is considering regulations defining “intermediate supply chain entities,” including:

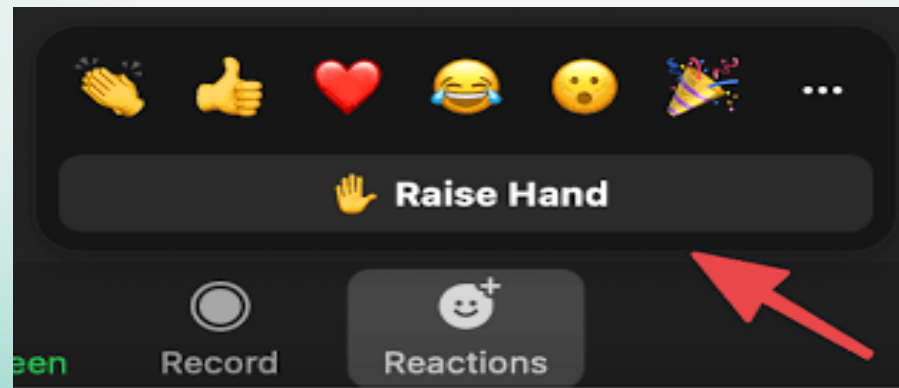
1. Clarifying that facilities or operations (other than collectors and end markets) that receive or process covered product materials are considered an intermediate supply chain entity.
2. Specifying that facilities are intermediate supply chain entities, not end markets, for materials they send off-site for additional processing or disposal.
3. Recognizing that facilities may function as an intermediate supply chain entity for some materials and as an end market or ultimate disposition for materials they fully process.

Topic 2: “Intermediate Supply Chain Entities” Proposed Definition

“Intermediate supply chain entity” means any facility or operation, excluding the person or entity serving as an end market, that receives materials from covered products after they have been collected. A facility or operation owned by the person that collected the covered products is also considered an intermediate supply chain entity if it conducts processing or if it receives the materials after any processing of the covered products has occurred. A facility or operation is an intermediate supply chain entity, not a person or entity serving as an end market, with respect to covered products or material from covered products that it transfers off-site for further processing or disposal, regardless of whether it is a person or entity serving as an end market with respect to other materials. ”

Questions and Comments

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Topic 2: “Intermediate Supply Chain Entities”

Request for Feedback

1. What criteria should be used to clearly distinguish intermediate supply chain entities from persons or entities serving as end markets and other facilities responsible for ultimate disposition of covered products?
2. How should regulations account for facilities that serve dual roles, functioning as intermediate supply chain entities for materials they transfer off-site, while acting as end markets or ultimate disposition for materials they fully process?
3. What reporting requirements are necessary to ensure accurate tracking of material flows through intermediate supply chain entities, including weights, processing steps, and downstream destinations?

Topic 3: Ultimate Disposition

Statutory Background

The Act:

- Emphasizes accountability for the ultimate disposition of covered products and requires PROs to demonstrate how these products are managed.
- Does not define or distinguish the different types of disposition.

See PRC sections: [42984.10\(f\)\(1\)\(B\)\(v\)](#), [42984.17\(l\)](#), and [42984.17\(r\)](#)



Topic 3: Ultimate Disposition

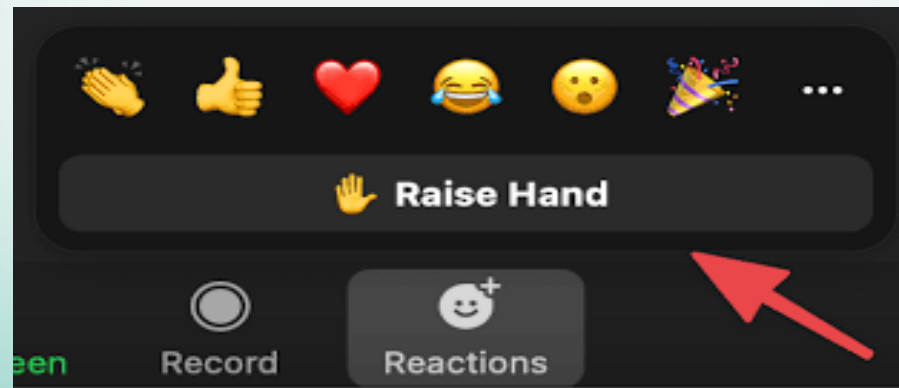
Regulatory Concept

CalRecycle is considering regulations defining “ultimate disposition” and clarifying how PROs account for them, including:

1. Defining “ultimate disposition,” encompassing all final destinations and conversion pathways.
2. Establishing criteria for qualifying as an ultimate disposition, including conversion into usable products, feedstock, usable component materials, or other end point for covered products.
3. Distinguishing ultimate disposition from intermediate supply chain entities.
4. Establishing reporting requirements, including covered product weights, conversion outcomes, and other metrics related to ultimate disposition type.
5. Identifying standards for transparent reporting of all disposition pathways.

Questions and Comments

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Topic 3: Ultimate Disposition

Request for Feedback

1. How should “ultimate disposition” be defined to capture all final destinations of covered products while maintaining clarity between repair, reuse, recycling, and disposal?
2. What criteria should be used to distinguish an ultimate disposition from an intermediate supply chain entity, particularly in cases where materials undergo multiple stages of processing before reaching their end point?
3. What reporting (e.g., weights, conversion outcomes, environmental impacts) is necessary for PROs to demonstrate accountability for the ultimate disposition of covered products?
4. What regulatory standards or verification mechanisms are needed to support accurate tracking of where materials ultimately end up, especially when covered products undergo processing by multiple facilities?

Topic 4: Reuse and Repair – Recycle and Reuse

Statutory Background

The Act:

- Defines "recycle" and "recycling" in a manner that includes covered products "reused" into products.
- Defines "reuse" as the resale of a collected covered product to a consumer for its original intended use with or without repair.



See PRC sections: [42984.3\(v\)](#) and [42984.3\(z\)](#)

Topic 4: Reuse and Repair – Recycle and Reuse Regulatory Concept

CalRecycle is considering regulations to clarify the term “reuse,” which may include:

1. Distinguishing reuse of covered products from recycling into reused products.
2. Establishing separate reporting requirements for each form of reuse.
3. Identifying criteria to help PROs determine whether a reused product originated from recycling or direct resale pathways.

Topic 4: Reuse and Repair – “Resale”

Statutory Background

The Act:

- Requires resale to a consumer to be considered "reuse."
- Does not distinguish commercial resale from informal private transactions.

See PRC section: [42984.3\(z\)](#)



Topic 4: Reuse and Repair – “Resale” Regulatory Concept

CalRecycle is considering regulations defining “resale,” which may include:

1. Clarifying that “resale” refers to commercial sales conducted through registered business entities.
2. Distinguishing commercial resale from informal private sales that fall outside the scope of regulated reuse.
3. Identifying documentation or business registration requirements necessary to demonstrate that a resale activity as reuse.

Topic 4: Reuse and Repair – “Resale” Proposed Definition

“Resale” for the purposes of the Act means the commercial sale of covered products placed on secondhand markets by or through a registered business filed with the California Secretary of State or on secondhand markets that are a business registered with the California Secretary of State. ”



Topic 4: Reuse and Repair – Authorized Repair Business

Statutory Background

The Act:

- Defines “authorized repair business” and requires PROs to report each location’s name, address, and total weight handled.
- Does not specify the operational standards or expectations these businesses must meet.



See PRC sections: [42984.3\(d\)](#) and [42984.17\(j\)](#)

Topic 4: Reuse and Repair – Authorized Repair Business

Regulatory Concept

CalRecycle is considering regulations specifying expectations for “authorized repair businesses,” which may include:

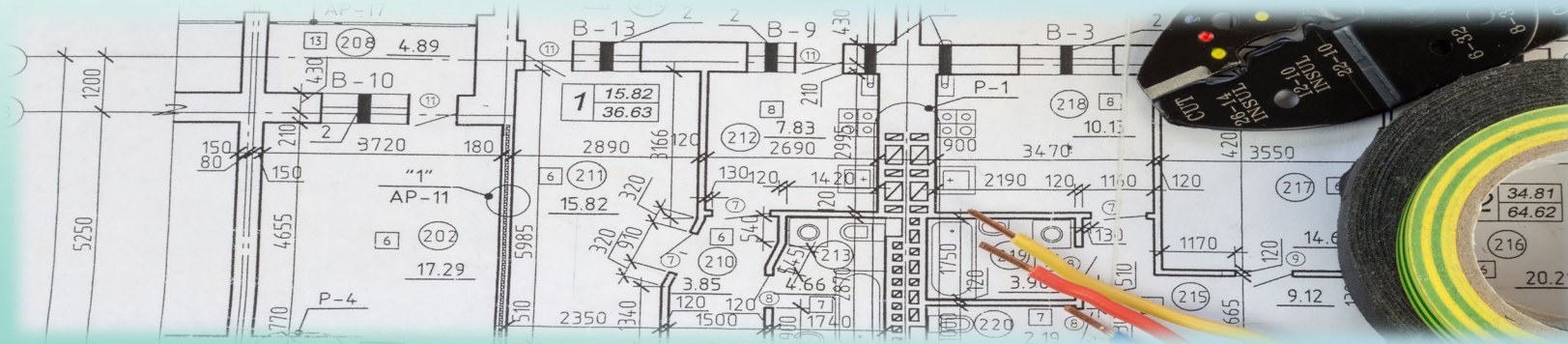
1. Operational criteria, including required repair practices, safety standards, and quality controls.
2. Requiring PROs to identify all applicable rules, conditions, and standards for authorized repair businesses in their plans.
3. Identifying reporting requirements, such as documenting repair methods, repaired covered products, and safety standards.
4. Requiring document maintenance showing resale of repaired covered products and compliance with health, safety, and environmental laws.
5. Requiring PROs to verify performance and compliance of authorized repair businesses through audits, monitoring, or periodic reviews.

Topic 4: Reuse and Repair – “Redesigning and Repurposing”

Statutory Background

The Act:

- Lists “redesigning and repurposing” as a repair activity.
- Does not specify what types of modifications fall under this category or how to distinguish repair from recycling.



See PRC section: [42984.3\(w\)](#)

Topic 4: Reuse and Repair – “Redesigning and Repurposing”

Regulatory Concept

CalRecycle is considering regulations to clarify the phrase “redesigning and repurposing,” which may include:

1. Clarifying that redesigning and repurposing means transforming collected covered products into new products or items, regardless of whether they are prepared for reuse, meaning the resale of a collected covered product to a consumer for its original use with or without repair.
2. Identifying when transformation results in repair versus when it meets the definition of recycling (i.e., final material conversion placed back on the market).
3. Distinguishing redesigning and repurposing from reuse and recycling to support accurate categorization in PRO reporting and oversight.

Topic 4: Reuse and Repair – “Redesigning and Repurposing”

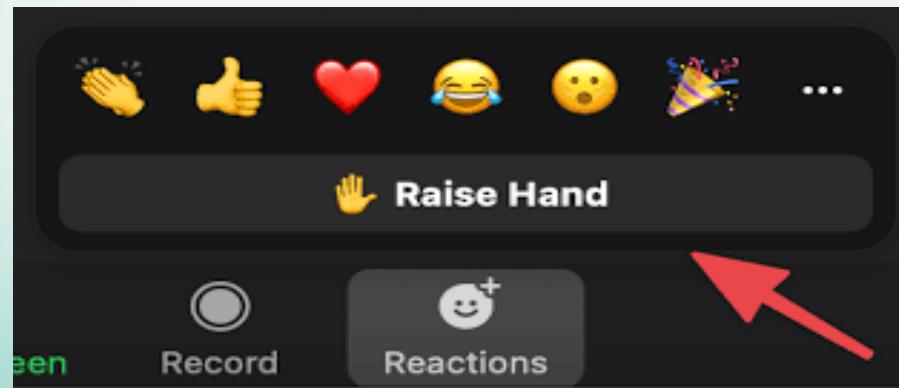
Proposed Definition

“Redesigning and repurposing” means a collected covered product is altered or reconfigured to change its appearance, fit, durability, embellishments, or style, while retaining the original intended use of the covered product.



Questions and Comments

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Topic 4: Reuse and Repair

Request for Feedback (1 of 2)

1. What criteria should be used to distinguish reuse that occurs as an outcome of recycling from direct resale of collected covered products, and what indicators best demonstrate which pathway was used?
2. What types of documentation (e.g., product descriptions, secondary-market listings, sales records, processing records) should be required to verify reuse activities?
3. What characteristics or indicators best demonstrate that a product is being resold for its original intended use, and in which product categories might determining original intended use be most challenging?
4. What criteria should be used to differentiate resale of collected covered products by established businesses (which qualifies as reuse) from informal person-to-person transactions?
5. What documentation requirements or verification practices should entities meet to demonstrate compliance with reuse requirements?

Topic 4: Reuse and Repair

Request for Feedback (2 of 2)

6. What operational, safety, or quality-control standards should authorized repair businesses be required to meet, and what documentation should they maintain to demonstrate compliance with applicable laws?
7. What additional reporting elements beyond name, location, and weight handled would help the PRO and CalRecycle evaluate repair activities, including repair methods, worker-safety protections, and the ultimate disposition of repaired products?
8. What criteria should be used to distinguish repair that involves redesigning and repurposing from recycling and reuse?
9. What are the typical resale markets for repaired covered products?
10. Is the meaning of “original intended use” clear? If not, how should the term be further clarified in regulations?

Part II: Convenient Collection System



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

Brett Johnson

Part II: Convenient Collection System

Topic 1: Convenience

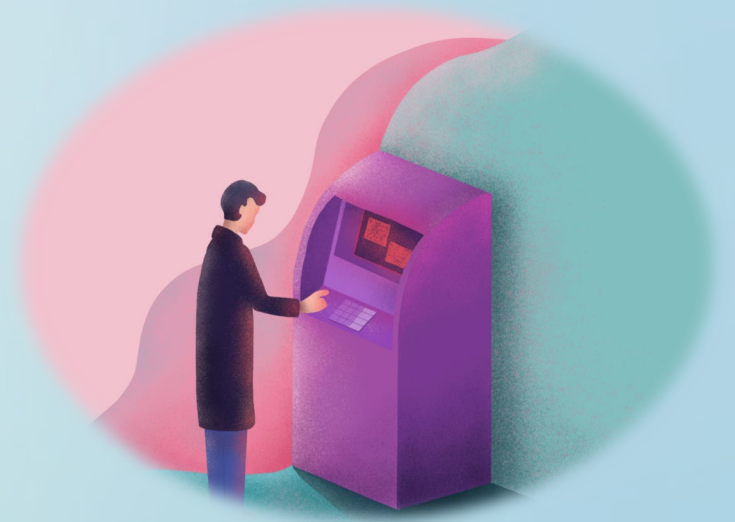


Topic 1: Convenience

Statutory Background

The Act requires:

- PROs to meet minimum convenience standards through a free and convenient collection system.
- Permanent collection but does not specify how temporary sites or mail-back options contribute to convenience.



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

Topic 1: Convenience – Minimum Expectations

Regulatory Concept

CalRecycle is considering regulations clarifying convenience standards, which may include specifying:

1. The minimum convenience standard in counties with 100,000 or fewer residents may be met through a combination of collection locations, which may include temporary sites that collectively provide convenience comparable to the specified minimum number of permanent collection sites.
2. Temporary collection sites, mail-back, and direct pick-up may supplement convenience once minimum standards are met.
3. Collection bins may count as a permanent site if they are operated by an authorized collector and meet minimum operational criteria.
4. PRO expectations when it does not meet minimum convenience standards within a county.

Topic 1: Convenience – Signage

Statutory Background

The Act:

- Requires PROs to provide a plan for collection-site signage.
- Does not specify that collection sites must display signage.
- Does not identify what information must be included on signage.



See PRC section: [42984.10\(e\)\(2\)](#)

Topic 1: Convenience – Signage

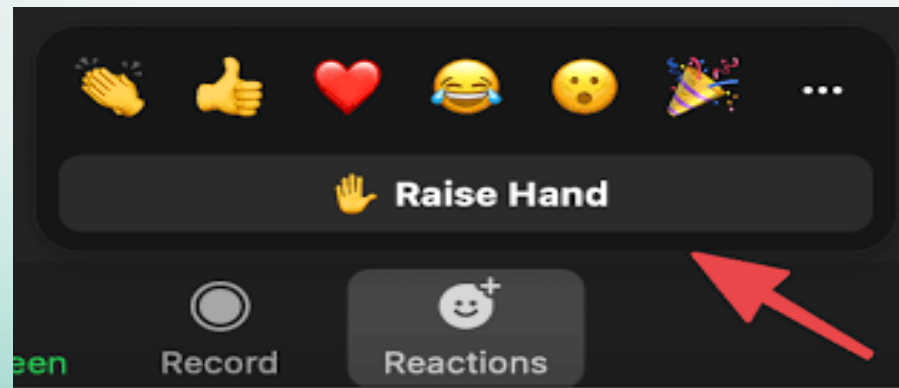
Regulatory Concept

CalRecycle is considering regulations establishing signage requirements for collection sites, which may include:

1. Obligating authorized collectors to display PRO-provided signage at collection sites.
2. Identifying minimum information: service provider name, contact details, hours of operation, and use instructions.
3. Requiring signage to be prominently displayed, clearly visible, and placed in appropriate locations at each site.

Questions and Comments

- To make a comment in-person, please line up at the podium.
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Topic 1: Convenience

Request for Feedback (1 of 2)

1. What criteria should CalRecycle use to determine whether the PRO sufficiently meets minimum convenience standards?
2. Should temporary collection sites and mail-back options count toward convenience only after permanent site minimums are met, and what conditions should apply when they are used as supplemental options?
3. What documentation, verification, or monitoring mechanisms are necessary to ensure PROs consistently apply convenience standards and accurately report steps taken to meet minimum collection requirements in each county?
4. What operational criteria should CalRecycle use to determine whether a collection site qualifies as a permanent location, including minimum operating hours, weeks of operation, and acceptance of all covered products?

Topic 1: Convenience

Request for Feedback (2 of 2)

5. What minimum signage content requirements are needed to ensure consistency, readability, accessibility, and clear consumer instruction across all statewide collection site?
6. What standards should CalRecycle consider in meeting the collection systems for small counties pursuant to PRC section 42984.10(d)?
7. How could non-permanent collection sites, such as temporary sites, pickup services, collection events, or mail-back programs, collectively or individually count toward meeting a small county's minimum collection location requirement?

Part III: Producer Identification and Exemptions

Rob Hammerstad

Department of
Resources Recycling
and Recovery

Product Stewardship
Compliance Branch



Part III: Producer Identification and Exemptions

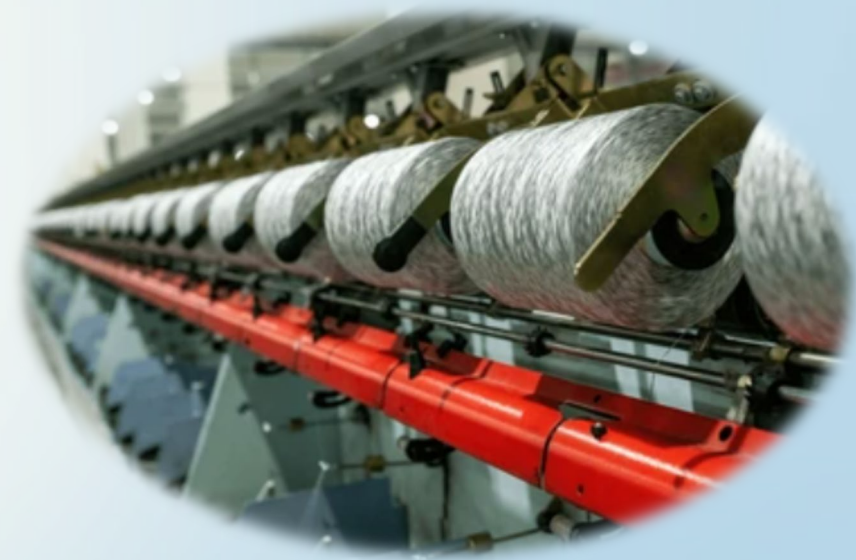
Section 1: Producer Identification

Topic 1: Identification and Registration Process

Topic 2: “In or into the State”

Topic 3: Duty Assumption

Topic 4: Small Seller Exemption Process



Part III: Producer Identification and Exemptions

Section 2: Product Exclusion

Topic 1: “Secondhand Covered Product”

Topic 2: Personal Protective Equipment Exclusion Process

Section 3: Additional Lists

Topic 1: List Types

Topic 2: Process to add a list entry

Section 1: Producer Identification

Topic 1: Identification and Registration Process

Statutory Background

The Act:

- Establishes criteria for a tiered hierarchy to determine who is the producer of a covered product as follows:
 - **Manufacturer** that owns or licenses the brand; if none in the state, then;
 - **Brand owner** in the state or, if the owner is out-of-state, the **exclusive licensee** in the state; if none, then;
 - **Importer**; if none, then;
 - **Distributor, retailer, or wholesaler** selling the product in or into California.
- Requires producers to register with the PRO and comply with its procedures and requirements.



See *PRC* sections: [42984.3\(s\)\(1\)-\(4\)](#), [42984.4\(b\)](#)

Section 1: Producer Identification

Topic 1: Identification and Registration Process

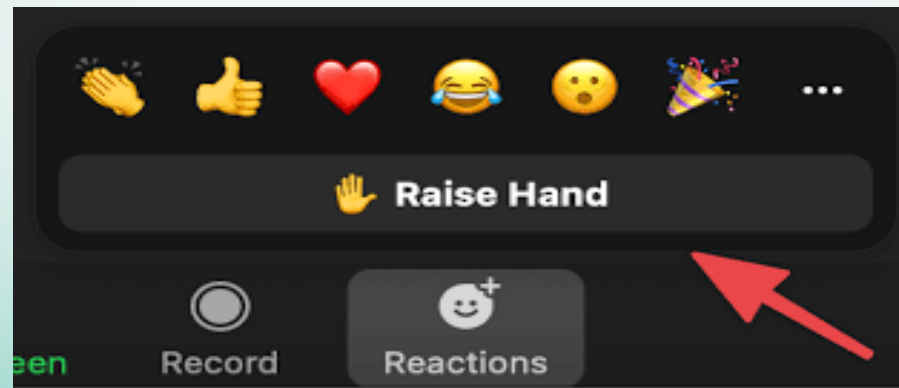
Regulatory Concept

CalRecycle is considering regulations specifying that the PRO shall be responsible for a process to map a regulated entity within the producer hierarchy, which may include:

1. A registration portal, required forms, documentation, the registration process, and assignment of a producer registration number.
2. Collection and storage of records on brand ownership and licensing, importer-of record, and distributor and retailer details.
3. Maintenance of current inventory of producer registrations.
4. Submission of the registration inventory to CalRecycle at a defined interval.
5. Management of registration updates, including annual updates and those required within 30 days of changes to producer status.

Questions and Comments

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Section 1: Producer Identification

Topic 1: Identification and Registration Process

Request for Feedback

1. What challenges might be anticipated with the registration process or portal?
2. What documentation would best allow for identification of a business as a brand owner, licensee, manufacturer, distributor, importer, and/or wholesaler of covered products?

Section 1: Producer Identification

Topic 2: “In or into the State”

Statutory Background

The Act:

- Is enforceable against entities that operate within the state of California. To this end, the phrases “in or into the state” and “in the state” are present throughout.
- Does not provide a methodology to determine if an entity is considered in the state.



See PRC sections: [42984.3\(s\)\(1\)](#), [42984.3\(s\)\(5\)](#)

Section 1: Producer Identification

Topic 2: “In or into the State”

Regulatory Concept

CalRecycle is considering regulations clarifying the meaning of “in or into the state,” which may include:

1. The criteria for determining that a person or entity is subject to the Act as:
 - a) The entity is subject to the jurisdiction of California courts and/or;
 - b) The entity has voluntarily assumed responsibility under the Act.

Section 1: Producer Identification

Topic 3: Duty Assumption

Statutory Background

The Act:

- Allows for the transfer of duties and responsibilities from one person who manufactures, distributes, imports, offers for sale, or sells a covered product to another.
- Does not provide specifics or requirements regarding the process to facilitate transfer of duties and responsibilities.



See PRC sections: [42984.3\(r\)](#), [40170](#), [42984.3\(s\)\(6\)](#), [42984.4\(b\)](#)

Section 1: Producer Identification

Topic 3: Duty Assumption

Regulatory Concept (1 of 3)

CalRecycle is considering regulations specifying how a person or entity may assume the duties and liabilities of a producer, which may specify that:

1. The PRO shall include in its producer responsibility plan a standardized duty assumption agreement form to be used between a producer and a person assuming some or all of the obligations of the producer under PRC section 42984.3(s)(6).
2. Entities involved in a duty assumption agreement shall register with the PRO and be in compliance with the Act prior to entering into the agreement.

Section 1: Producer Identification

Topic 3: Duty Assumption

Regulatory Concept (2 of 3)

3. A duty assumption agreement must be submitted to the PRO and may include the following:
 - a. Both entities' PRO registration numbers
 - b. All products/brands/SKUs covered
 - c. Effective/termination dates
 - d. Fee/payment responsibility information
 - e. A records access clause
 - f. The specific duties to be assigned and liabilities to be relieved
 - g. The circumstances under which repeated compliance breaches may result in the termination of the agreement.
4. A producer may be required to maintain and provide records to CalRecycle to verify the status of a duty assumption agreement including, but not limited to, the duty assumption agreement, brand owner authorization, a list of all affected brands/SKUs, and other records.

Section 1: Producer Identification

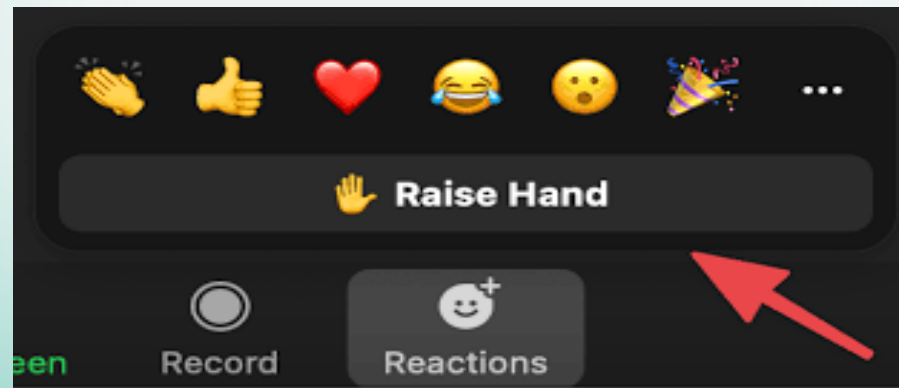
Topic 3: Duty Assumption

Regulatory Concept (3 of 3)

5. The terms under which a duty assumption agreement may be considered null and void may include, but are not limited to, the assuming party ceases to exist, dissolves, is insolvent, or is unresponsive to the PRO or CalRecycle.
6. A producer and its products, brands, or SKUs covered are compliant only after the PRO approves the agreement as compliant and confirms the assuming entity meets its obligations under the Act and with any obligations it is assuming.
7. An assuming entity must be in the state with respect to the Act.
8. A duty assumption agreement shall specify the duties to be assumed and obligations to be relieved.

Questions and Comments

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Section 1: Producer Identification

Topic 3: Duty Assumption

Request for Feedback

1. What additional information should be included in a duty assumption agreement?
2. What restrictions should be placed in a duty assumption agreement?
3. What types of duties should be assumed?
4. How does failure to comply under the agreement affect the publication of compliance lists under PRC section 42984.20(a)?

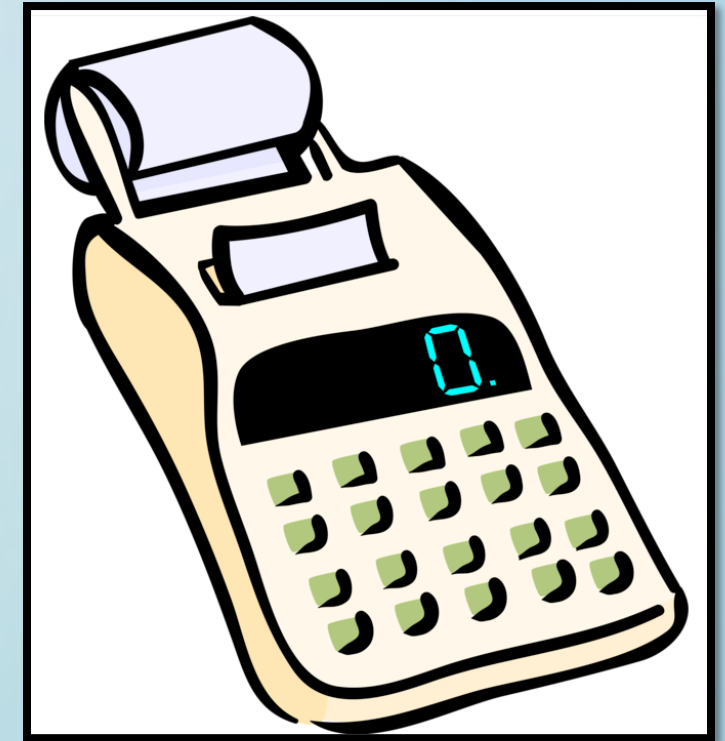
Section 1: Producer Identification

Topic 4: Small Seller Exemption Process

Statutory Background

The Act:

- Allows for exemption of sellers that would otherwise be considered a producer under the Act if their annual aggregate global turnover is under \$1 million.
- Does not provide specifics or requirements regarding the process in which an entity acquires a small seller exemption.



See PRC section: [42984.3\(s\)\(8\)](#)

Section 1: Producer Identification

Topic 4: Small Seller Exemption Process

Regulatory Concept (1 of 2)

CalRecycle is considering regulations to specify the process by which an entity acquires small seller status, which may specify that:

1. The PRO shall include in its plan a framework for a standardized small seller exemption process, including standardized forms.
2. The PRO shall maintain supporting records and provide them to CalRecycle upon request.

Section 1: Producer Identification

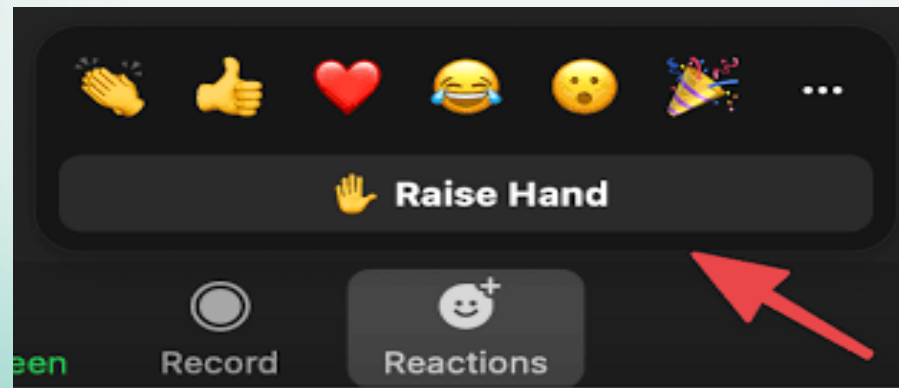
Topic 4: Small Seller Exemption Process

Regulatory Concept (2 of 2)

3. The PRO shall notify CalRecycle of new small seller registrations and supply CalRecycle with the full registration information within a defined timeframe.
4. The process shall require annual renewal by small sellers.
5. The PRO shall notify CalRecycle of any small seller status changes, including, but not limited to, any entity additions or removals within a defined timeframe.

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.



Section 1: Producer Identification

Topic 4: Small Seller Exemption Process

Request for Feedback

1. What additional information and/or documentation is necessary to verify status as a small seller under the Act?
2. How often should a Small Seller List be updated?

Section 2: Product Exclusion

- “Secondhand Covered Product”
- Personal Protective Equipment Exclusion Process



Section 2: Product Exclusion

Topic 1: “Secondhand Covered Product”

Statutory Background

PRC section 42984.3(aa): “**Secondhand covered product**” means any covered product that has been previously **owned** by a consumer.



Section 2: Product Exclusion

Topic 1: “Secondhand Covered Product”

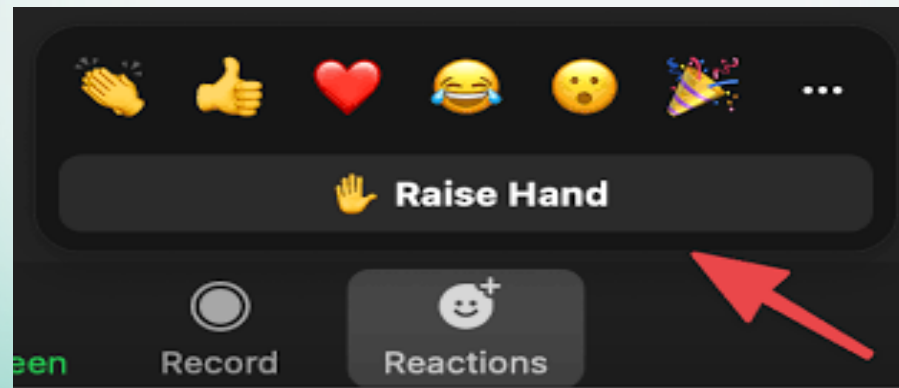
Regulatory Concept

CalRecycle is considering regulations to clarify the definition of secondhand covered product and specify the scope of how secondhand covered products may be acquired, which may specify that:

1. If a covered product moves between entities under common control or significant influence, that transfer alone does not cause the covered product to be considered a secondhand covered product.
2. A covered product shall only be considered a secondhand covered product when it is sold by a secondhand market.

Questions and Comments

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Section 2: Product Exclusion

Topic 1: “Secondhand Covered Product”

Request for Feedback

1. How can an entity provide proof that a covered product was previously owned by a consumer other than itself or its related parties?

Section 2: Product Exclusion

Topic 2: Personal Protective Equipment Exclusion Process

Statutory Background

The Act:

- Excludes personal protective equipment and military clothing.
- Does not provide specifics or requirements regarding the process for an entity to acquire a personal protective equipment product exclusion.



See PRC sections: [42984.3\(a\)\(2\)](#), [42984.3\(a\)\(2\)\(A\)](#), [42984.3\(a\)\(2\)\(B\)](#), [42984.4\(b\)](#)

Section 2: Product Exclusion

Topic 2: Personal Protective Equipment Exclusion Process

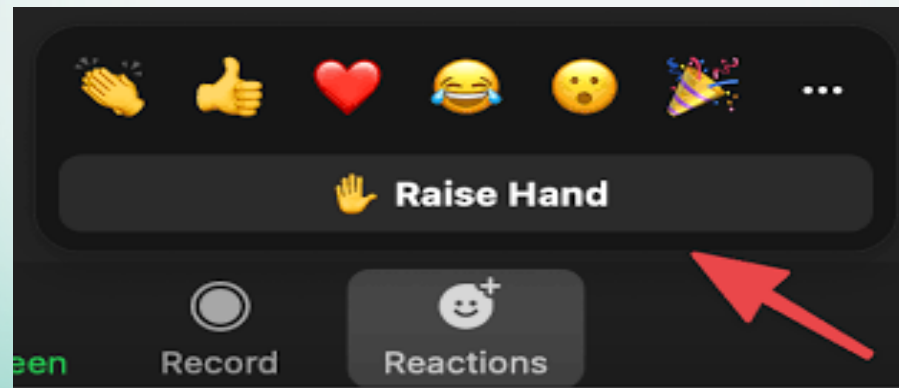
Regulatory Concept

CalRecycle is considering regulations to specify the process by which an entity acquires an exclusion for personal protective equipment, which may specify:

1. That the PRO include in its plan a standardized process by which an entity acquires an exclusion for an item that qualifies as personal protective equipment under the Act.
2. The process shall use standardized forms and store supporting records.
3. The process shall require annual renewal by the entity that holds the exclusion.

Questions and Comments

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Section 2: Product Exclusion

Topic 2: Personal Protective Equipment Exclusion Process

Request for Feedback

1. How often should a Personal Protective Equipment List be updated?
2. Does audience have suggestions for standardized criteria that qualifies something as personal protective equipment?

Section 3: Additional Lists

- List Types
- Process to add a list entry



Section 3: Additional Lists

Topic 1: List Types

Statutory Background

The Act:

- Allows for the exemption of small sellers and exclusion of covered products that meet the criteria for personal protective equipment.
- Does not identify methods to disseminate information regarding these producer exemptions or product exclusions.

See PRC sections: [42984.3\(a\)\(2\)\(A\)](#), [42984.3\(a\)\(2\)\(B\)](#), [42984.3\(s\)\(8\)](#)

Section 3: Additional Lists

Topic 1: List Types

Regulatory Concept

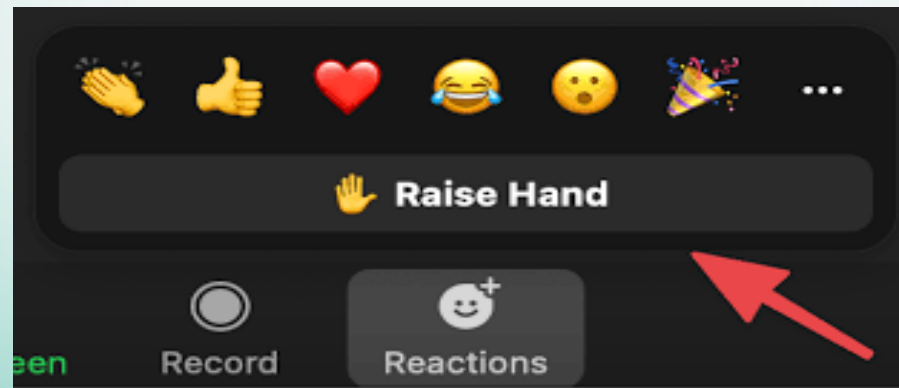
CalRecycle is considering regulations to require the PRO to provide CalRecycle with specified information in lists and publish each list on the PRO website, which may specify requirements for:

1. A Small Seller List.
2. A Personal Protective Equipment List that includes the brand and/or trademark and specific product that is exempt.



Questions and Comments

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Section 3: Additional Lists

Topic 1: List Types

Request for Feedback

1. Are there other statutory areas where requiring a list could enhance clarity?
2. At what frequency should additional list types be updated?
3. What specific information should be included in each additional list?
4. What is the most efficient or transparent mechanism for communicating this information to support compliance and enforcement?
5. What risks might arise from making these lists, and how can those risks be mitigated?

Section 3: Additional Lists

Topic 2: Process to add a list entry

Statutory Background

The Act:

- Requires the PRO to manage and update a list of brands of covered products and provide the list to the department in a form established by the department.
- Does not provide details regarding the process to update the list, the form of the list, or the specific information to be included in the list.



See PRC sections: [42984.3\(a\)\(2\)\(A\)](#), [42984.3\(a\)\(2\)\(B\)](#), [42984.3\(s\)\(8\)](#)

Section 3: Additional Lists

Topic 2: Process to add a list entry

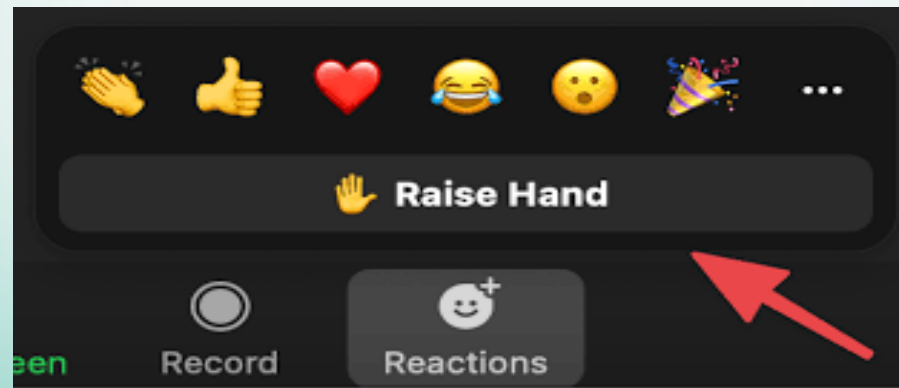
Regulatory Concept

CalRecycle is considering regulations requiring the PRO to maintain additional lists, which may specify:

1. That the PRO shall curate and maintain additional lists, including, but not limited to, a Small Seller List and Personal Protective Equipment List.
2. Standardized fields for each list including, but not limited to, entity name, product name, and effective date.
3. The minimum evidence required to support inclusion (e.g., declarations, standardized hazard certifications).
4. That addition, update, and removal procedures and timelines conform with Part III: PRO Submittals - Topic 3: Producer and Brands Lists from the CalRecycle workshop held on August 13, 2026.

Questions and Comments

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Section 3: Additional Lists

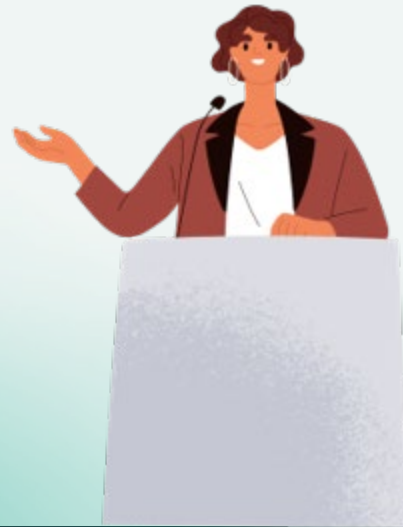
Topic 2: Process to add a list entry

Request for Feedback

1. Are there any other supporting documents or information that should be requested to verify the inclusion of a product or producer to any of the proposed lists?
2. How can duplication be avoided for information already collected through registration, reporting, or audits?
3. Are there situations where publishing these lists could create concerns regarding confidentiality or proprietary information, and how can that be managed?

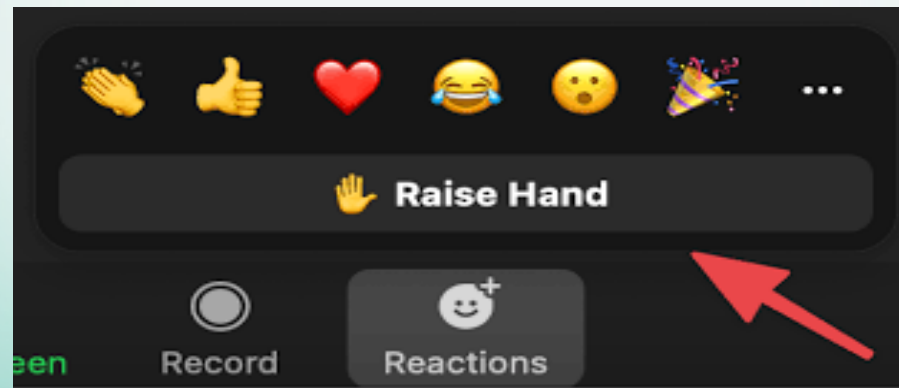
Request for Feedback

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

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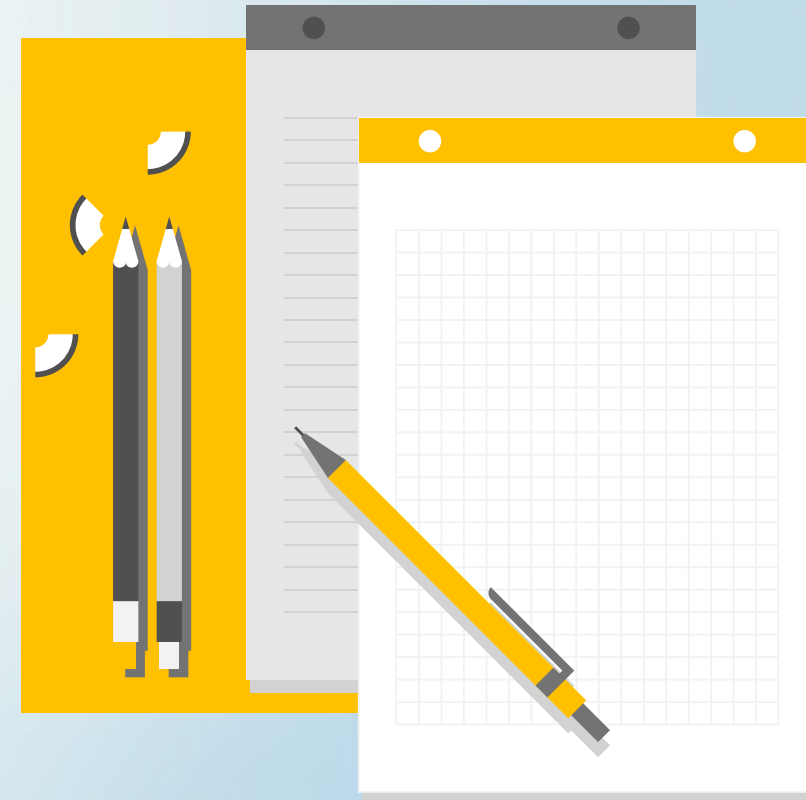


Opportunity for Written Feedback

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 "September 2026 Textile Stewardship Informal Regulatory Concepts Workshop"

Please submit written comments by **October 13, 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>