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March 2026

AT THE FEDERAL LEVEL...

There are no significant federal updates impacting foodservice packaging in the United States and Canada this month.

AT THE STATE/PROVINCIAL LEVEL...

FPI's report of bills that may impact foodservice packaging is available [here](#) in PDF and includes bills as of March 27, 2026.

Below are some highlights of recent and upcoming legislative and regulatory activity.

CALIFORNIA: On March 19, 2026, CalRecycle submitted the proposed permanent regulations implementing the SB 54 *Plastic Pollution Prevention and Packaging Producer Responsibility Act* to the Office of Administrative Law (OAL). The OAL has 30 business days from the date of submission to determine whether to approve the regulations. As part of the rulemaking package, CalRecycle requested an effective date of May 1, 2026, rather than the standard practice of setting the effective date at the beginning of the next calendar quarter. Additional information on SB 54 rulemaking and supporting documents are posted [here](#).

The SB 54 Packaging Producer Responsibility Advisory Board met on March 20, 2026, with an agenda largely focused on a review and discussion of the SB 54 Statewide Needs Assessment, as well as updates from CalRecycle and Circular Action Alliance (CAA). Full agenda and meeting documents are available [here](#). The next Advisory Board meeting is scheduled for April 17, 2026. Registration is available [here](#) under “Upcoming Advisory Board Meetings” and the meeting agenda will be posted there once available.

On March 26, 2026, the California Environmental Protection Agency (CalEPA), the California Natural Resources Agency and the Strategic Growth Council hosted an informational webinar on the SB 54 Plastic Pollution Mitigation Fund (PPMF). During the webinar, the agencies provided an overview of the PPMF, discussed implementation considerations and outlined opportunities for public engagement to inform its development. More information can be reviewed on CalEPA’s PPMF webpage [here](#).

Per this [public notice](#), CalRecycle is hosting an SB 54 Needs Assessment Public Information Session on Source Reduction, Reuse and Refill and Consumer Education and Access on April 6, 2026. The session will include presentations from staff on a number of the needs assessment reports including [Current State of Source Reduction, An Analysis of Actions and Investments Needed to Achieve Source Reduction](#) and selected portions of the [Consumer Education and Access](#) report as it relates to reuse and refill. Details for participating are available as part of the notice [here](#). A second information needs assessment workshop is scheduled for April 14, 2026, with additional details to be made available in the near future.

On the legislative front, [AB 2253](#) has now been referred to the Committee on Natural Resources and is scheduled for a hearing April 6, 2026. The proposal would expand existing requirements for substantiating recycled content claims from plastic food container products to all products. The bill would require manufacturers and suppliers making recycled content claims to maintain documentation demonstrating compliance with the Federal Trade Commission's Guides for the Use of Environmental Marketing Claims. It would also require recycled content claims to be based on actual physical recycled content, prohibit the use of certain accounting methods and define "postconsumer" recycled content.

Next, [SB 1180](#) which would clarify how funds collected under the SB 54 Plastic Pollution Mitigation Fund are allocated, is scheduled for a hearing on April 8, 2026, in the Senate Environmental Quality Committee.

Also during the month of March, language for several spot bills relating to foodservice packaging was posted. In particular, [AB 1812](#) and [SB 1031](#) relating to compostable products now have published language.

[AB 1812](#) would change California's requirements for labeling products as "compostable" or "home compostable." The bill would limit use of these terms to products that meet a state-approved compostability standard or hold OK compost HOME certification, prohibit qualified claims such as "compostable except in California," and beginning January 1, 2027, prohibit the use of these terms on any product made wholly or partially of plastic (as defined). The bill will be heard in the Committee on Natural Resources on April 6, 2026.

On the other hand, [SB 1031](#) would require compostable products to be labeled in a manner that clearly distinguishes them from non-compostable products, including specific size, color, and placement requirements for the term "compostable." The bill would also direct the Office of Environmental Health Hazard Assessment to study the potential health effects of degraded compostable plastics and related additives.

COLORADO: Colorado [SB26-146](#), introduced March 24, 2026, would require customer opt-in before single-use food serviceware may be provided by food

establishments or third-party delivery services. The bill would take effect January 1, 2027, and is scheduled for a hearing in the Senate Health and Human Services Committee on April 16, 2026.

The Colorado Department of Public Health and Environment is preparing its annual, inflation-based update to the revenue threshold used to determine small-business exemptions under the state's producer responsibility program. The department is holding a virtual stakeholder meeting on April 6, 2026, to review the draft rule language and receive stakeholder input. Interested parties may [register](#) to join via zoom.

Separately, on March 19, 2026, the Legislative Committee on Legal Services reviewed a [memorandum](#) from the Office of Legislative Legal Services addressing recent regulatory amendments related to the EPR Advisory Board's authority to conduct hearings on eco-modulation rates. The committee did not take action to repeal the rule following a tied vote and members noted the issue may be revisited through future legislative action.

The Colorado Producer Responsibility Advisory Board is scheduled to meet on April 8, 2026, with registration and past meeting materials available [here](#).

CONNECTICUT: Introduced on March 5, 2026, [HB 5524](#) addresses a range of issues within the state's materials management system. With respect to plastics, it would prohibit most foam polystyrene foodservice ware and restrict the distribution of single-use utensils, napkins, straws and condiment packets unless requested by the customer. The bill would also prohibit the distribution of straws containing PFAS. HB 5524 was referred to the Joint Environment Committee, which held a public hearing on March 13, 2026, and reported the bill with amendments on March 18, 2026.

HAWAII: On March 16, 2026, the Hawaii Legislature introduced four resolutions ([HR 195](#), [SR 128](#), [HCR 205](#) and [SCR 136](#)) requesting that the Department of Health review environmental labeling claims for recyclability, biodegradability and compostability. The measures would examine whether labeling practices, including use of the chasing-arrows symbol, align with Hawaii's recycling and composting infrastructure and assess contamination risks associated with

unclear labeling. The Department would be asked to submit its findings to the legislature prior to the 2027 regular session. All four measures are still under committee consideration.

ILLINOIS: The Illinois Statewide Recycling Needs Assessment Advisory Council met on March 9, 2026. The meeting included an update from the Illinois EPA and a presentation and discussion with the Association of Plastics Recyclers concerning their EPR perspectives. The next meeting of the advisory council is scheduled for April 13, 2026. Details and supporting documents for past and future meetings are available [here](#).

MAINE: The Maine Department of Environmental Protection (DEP) has expressed its intent to issue a Request for Proposals for a Stewardship Organization that will be contracted to manage the administration of the state's packaging stewardship program.

Further, the Department indicated that they are developing producer guidance covering compliance topics such as producer identification, packaging material categories, start-up registration, annual reporting and estimation methods. This guidance is expected to be published in the summer.

Additional details on DEP activities and resources will be provided in forthcoming newsletters. All newsletters released by the Department to date are available on the [Stewardship Program for Packaging website](#).

MARYLAND: The [Maryland EPR Advisory Council](#) met on March 3, 2026, with the agenda primarily focused on reuse and refill. Next, the council met on March 17, 2026, to discuss compostable covered materials. Previous meeting videos and slides may be accessed [here](#).

The next meeting of the Maryland EPR Advisory Council is scheduled for April 21, 2026, with details for joining available [here](#).

MINNESOTA: The [Minnesota Packaging EPR Advisory Board](#) met on March 18, 2026. The meeting included updates from both the Minnesota Pollution Control Agency and CAA, followed by an overview of reuse and waste reduction. The full

meeting packet may be accessed [here](#). The advisory council is scheduled to meet again on April 15, 2026, with more information [here](#).

Also in Minnesota, [SF 4208](#) was introduced on March 9, 2026, and would prohibit ortho-phthalates in food packaging. The proposal has been referred to the Commerce and Consumer Protection Committee.

NEW JERSEY: the New Jersey Department of Environmental Protection (NJDEP) has granted a one-year extension of the foam polystyrene products ban exemption for trays used for raw or butchered meat and fish, including poultry, as well as foods prepackaged by manufacturers in foam polystyrene food service packaging. This action extends the exemption beyond its current expiration of May 4, 2026, through May 4, 2027, marking the third year NJDEP has approved an extension. The extension notice is scheduled to be published in the New Jersey Register on April 20, 2026, but was effective as of March 12, 2026.

OREGON: In March, the [Oregon Recycling System Advisory Council \(ORSAC\)](#) and its subcommittees held several meetings as detailed below.

The ORSAC Responsible End Markets Subcommittee met on March 3 and March 11, 2026, to review CAA's second draft responsible end markets program plan amendment. Links to meeting slides and supporting documents are available [here](#) under "Past Meetings".

A meeting of the full ORSAC was held on March 18, 2026, to discuss DEQ's Covered Product Leakage Study, potential updates to recycling material acceptance lists, recommendations related to CAA's second draft responsible end markets program plan amendment and updates to Specifically Identified Material designations. Links to meeting slides and supporting documents will be posted [here](#) under "Past Meetings", once available. The full ORSAC is scheduled to meet again on May 20, 2026, with the link to join the meeting [here](#), under "Upcoming Meetings".

Next, the Rulemaking Advisory Committee for Oregon's third rulemaking took place on March 30, 2026. Topics for the meeting included draft rule proposals and discussions related to responsible end markets, covered product exemptions and

lifecycle evaluation rules. The full meeting agenda and link to access meeting documents are available [here](#) under “Meeting schedule”. The next meeting of this group is scheduled for May 27, 2026, with details to follow.

RHODE ISLAND: As introduced in February 2026, [HB 7913](#) and [SB 2639](#) would restrict the provision of plastic straws unless requested or directly taken by the consumer. The House bill has been referred to the House Environment and Natural Resources Committee, while the Senate companion was referred to the Senate Commerce Committee. SB 2639 received a hearing on March 24, 2026, and was retained in committee for further consideration.

TENNESSEE: Legislation to establish a statewide producer responsibility organization for packaging, originally introduced in 2025 as part of the “Tennessee Waste to Jobs Act,” carried over into the 2026 session. The Senate bill ([SB 269](#)) was heard by both the Senate Government Operations Committee and the Energy, Agriculture and Natural Resources Committee on March 11, 2026. Government Operations reported the bill favorably, while Energy, Agriculture and Natural Resources referred it to a subcommittee, essentially pausing further action this session. The House companion ([HB 600](#)) also carried over and was placed on the Agriculture and Natural Resources Subcommittee agenda for March 18, 2026; however, it was removed from the agenda and has not been rescheduled.

WASHINGTON: On March 4, 2026, the Washington Department of Ecology announced that they accepted CAA’s registration as the Producer Responsibility Organization (PRO) for the Recycling Reform Act. More information [here](#).

The first meeting of the [Recycling Reform Act \(RRA\) Advisory Council](#) was held on March 13, 2026, with meeting agenda and documents available here under “Past Meetings”. The meeting included updates from the Department of Ecology regarding the RRA rulemaking process, an overview of the needs assessment and an update from the state’s consultants on the development of recycling lists. The next convening of the advisory council is scheduled for April 29, 2026, with information to join the meeting under “Upcoming Meetings” [here](#).

On March 19, 2026, the Department of Ecology announced that they are starting a rulemaking process for the RRA (Chapter 173-950 WAC) to guide implementation.

The rules will define when a new program plan must be submitted and outline the PRO's responsibility for covering agency implementation, administrative, and enforcement costs. Per the [rulemaking website](#), rulemaking is scheduled to take place until October 2027.

QUEBEC: In March, Quebec's environment ministry issued an [administrative position](#) (French only) adjusting several plastic packaging collection and recycling targets under its EPR regulations, citing compressed timelines and the need to develop additional recycling infrastructure. While the underlying regulation has not been amended, the administrative position reflects how the requirements will be applied and enforced in practice. Collection targets originally set to begin in 2027 have been deferred to 2030, with interim targets for 2027 to 2029 eliminated. The ministry also reduced multiple 2030 collection and recycling targets for plastics, including PET and other rigid plastics, and delayed the start of prescribed collection target increases for all materials to 2035 rather than 2032.

PRODUCER RESPONSIBILITY ORGANIZATION (PRO) UPDATE

Please refer to [CAA's Producer Resource Center](#), [CAA's Producer Policies](#) and [CAA's Upcoming Events webpage](#) to stay informed.

AT THE LOCAL LEVEL...

Approved

MIAMI, FL: The Miami City Commission adopted [Resolution No. 18993](#), which directs the City Manager to implement procurement policies to reduce or eliminate the use of single-use plastics, including polystyrene, in City-run concessions and future City contracts with concessionaires operating on City property. The restrictions become effective by March 3, 2027, and apply to City operations and contracts.

Under Consideration

BEAUFORT, NC: On March 10, 2026, the Beaufort City Council passed the first

reading of proposed amendments to the city's single-use plastics ordinance. Under amended rules, businesses would be prohibited from providing foam polystyrene cups and food trays within city limits. Plastic straws and cutlery could only be provided upon customer request. The ordinance would also restrict the distribution of plastic carryout bags and require retailers to offer reusable bags made of cloth with stitched handles. If approved on second reading, the ordinance would take effect eight months after adoption, contingent on all municipalities in Beaufort County adopting a substantially similar measure. Second reading has not been scheduled.

MIDDLETOWN, PA: The Middletown Township Environmental Advisory Council has recommended that the Township consider an ordinance to reduce or eliminate certain single-use plastics. The proposal would phase out plastic carryout bags, foam polystyrene food containers and plastic single-use foodservice items such as utensils. The recommendation was presented as part of a policy discussion at a recent Board of Supervisors meeting. No ordinance has been introduced to date and the proposal remains under review.


FPI Enacted Legislation and Ordinance/Bylaw Tracker

[FPI's enacted legislation and ordinance/bylaw tracker](#) provides information on known enacted legislation and local mandates relating to foodservice packaging. Any changes from the previous month will be highlighted.

Please note that the contents of this file have been developed for general informational purposes and should not be considered as professional advice, including legal opinion, or as a substitute for seeking professional guidance. Further, this confidential guidance is for FPI members only. Please do not distribute outside of your organization.

Please contact [Carol Patterson](#) with any feedback or questions. Thank you.



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