



Circular
Action
Alliance®

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Welcome



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Legal Disclaimer

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Anti-Trust Reminder

Circular Action Alliance is subject to federal, state, and international antitrust/ competition laws and has a policy of strict compliance with these laws, without exception.

These antitrust laws prohibit competitors from engaging in actions that could result in an unreasonable restraint of trade.

Consequently, competitors must avoid discussing certain topics when they are together, meeting virtually, or at any other time:

- Prices, fees, rates, profit margins, discounts, promotions, rebates, or other terms or conditions of sale;
- Pricing strategies, methods, trends, plans, or timing of price changes;
- Salaries, costs, and other factors that affect pricing; the hiring or recruitment of other members' employees;
- Allocation of markets or customers or division of territories;
- Topics that may lead participants to not deal with or to boycott a particular supplier, customer, or third party;
- Reductions of output; bid-rigging;
- Or any other anti-competitive topics or actions.

Failure to comply with these anti-trust laws will not be accepted.

CAA intro

The U.S. PRO – Circular Action Alliance

- Circular Action Alliance (CAA) is a 501(c)(3) nonprofit PRO dedicated to implementing effective EPR laws for paper and packaging in the U.S.
- CAA was founded by companies from the food, beverage, consumer goods, and retail industries.
- CAA has been approved to be the single PRO in California, Colorado, Maryland, Minnesota, Oregon, and Washington.





The Role of the PRO

A **Producer Responsibility Organization (PRO)** is a producer-led nonprofit organization that manages and improves the system for collecting and recovering materials after use. We facilitate compliance with Extended Producer Responsibility (EPR) laws, leading to positive environmental outcomes for communities.



PRO & State Regulator Roles and Responsibilities

The State Regulator	The PRO (CAA)
Responsible for compliance enforcement related to a state's EPR law	Develops a program plan for managing covered products
Appoints a PRO to develop a program plan for managing covered products	Provides compliance tools to producers (registration, reporting, and payment portals)
Provides interpretation of the law and regulations as applicable	Uses producer fees/dues to implement program investments as detailed in the program plan
Approved the PRO's program plan and oversees the execution	Operates the program on a day-to-day basis including administration and program performance management

EPR Across U.S. States

	Covered Materials	Sectors	Full or Partial Recycling System Funding?
CALIFORNIA	<ul style="list-style-type: none"> • Packaging • Plastic foodservice ware 	<ul style="list-style-type: none"> • Consumer Packaging • B2B 	<ul style="list-style-type: none"> • Partial (new or incremental)
OREGON	<ul style="list-style-type: none"> • Packaging • Printing and writing paper • Foodservice ware 	<ul style="list-style-type: none"> • Consumer Packaging • B2B 	<ul style="list-style-type: none"> • Partial (capital for collection; MRF payments and operation of PRO depot network)
COLORADO	<ul style="list-style-type: none"> • Packaging • Paper products • Foodservice ware 	<ul style="list-style-type: none"> • Consumer Packaging • Limited B2B* 	<ul style="list-style-type: none"> • Full (100% of the net cost of recycling services)
MINNESOTA	<ul style="list-style-type: none"> • Packaging • Paper products • Foodservice ware 	<ul style="list-style-type: none"> • Consumer Packaging • Limited B2B** 	<ul style="list-style-type: none"> • Partial (but increasing)
MARYLAND	<ul style="list-style-type: none"> • Packaging • Paper products • Foodservice ware 	<ul style="list-style-type: none"> • Consumer packaging • Limited B2B** 	<ul style="list-style-type: none"> • Partial (but increasing)
MAINE	<ul style="list-style-type: none"> • Packaging • Some foodservice ware 	<ul style="list-style-type: none"> • Consumer Packaging • Limited B2B** 	<ul style="list-style-type: none"> • Full
WASHINGTON	<ul style="list-style-type: none"> • Packaging • Paper products • Some foodservice ware 	<ul style="list-style-type: none"> • Consumer packaging • Limited B2B** 	<ul style="list-style-type: none"> • Partial (but increasing)

*Program expansion outlined in Section 14.1 of the Colorado Program Plan

**May include small businesses, public spaces, schools, childcare centers, non-profit, and government-operated buildings.

2026 EPR Producer Report Planning

Producer Reports Submitted to CAA in 2026 (Expected)

Program	2026 Report Date	Data Year	Type of 2026 Report	Program Period Covered by the Report
Oregon	May 31, 2026	CY 2025	Annual Supply Report	2027 Program
Colorado	May 31, 2026	CY 2025	Annual Supply Report	2027 Program
California	TBD (Within 30 days of regs)	CY 2023	Baseline Producer Report	Source Reduction
	TBD (No later than Aug 1)	N/A	Individual Source Reduction Plan	Source Reduction
	May 31, 2026	CY 2025	Annual Supply Report	2027 Program (& Early Fees)
	May 31, 2026	CY 2025	Annual Source Reduction Report	Source Reduction
Minnesota	May 31, 2026	CY 2025	Simplified Supply Report	Pre-Program
Maryland	May 31, 2026	CY 2025	Simplified Supply Report	Pre-Program
Washington	May 31, 2026	CY 2025	Simplified Supply Report	Pre-Program
Maine	TBD – Q3 2026	CY 2025	Start-up Report (e.g. total supply weight only)	Pre-Program (& Start-up Fees)



CAA selected as PRO



PRO/SO not yet selected

FSW by state

Oregon

Oregon – Scope of Covered FSW

OAR 340-090-0840

- (1)(b) **Service Packaging** is packaging that is filled at the point of sale for the purpose of transferring goods to a consumer.
- (1)(e) **Food Serviceware** is used to contain or consume food that is ready to eat. Food serviceware is sold empty or unused to a retailer, a dine-in food establishment or a take-out food establishment, regardless of whether the item is used to prepackage food for resale, is filled on site for food ordered by a customer or is resold as is.

Oregon – Producer Obligation FSW/Service Packaging

- **Service Packaging** – OAR 340-090-0860(4) For service packaging sold or provided to a consumer at a physical retail location in this state, the producer of the service packaging is **the person that first sells** the packaging in or into this state.
- **Food Serviceware** – ORS 459A.866(3) The producer of food serviceware is **the person that first sells** the food serviceware in or into this state.

Oregon – Directing the Manufacturing

- Note: Directing the manufacturing is only relevant to product packaging obligation not the actual food serviceware.
- **Producer Definitions** – OAR 340-090-0860(1)(a) A person that manufactures a packaged item **includes a person that directs the manufacturing** of the item, including setting specifications for an item's packaging. Purchasing or ordering an item for retail sale in the normal course of business is not directing manufacturing.

Oregon – Product Packaging Obligation

Product Packaging Scenarios – Where directing the manufacturing may affect obligation.

ORS 459A.866(1):

- (a) Items sold in packaging at a physical retail location in this state
- (b) Items sold or distributed in packaging in or into this state via remote sale or distribution:

OAR 340-090-0860:

- (2) Storage item, as defined at OAR 340-090-0840(1)(a), sold at a physical retail location in this state
- (3) Shipping or moving items, as defined at OAR 340-090-0840(1)(c), sold at a physical retail location

Oregon – Directing the Manufacturing

- The language “direct the manufacture” refers to the party that provides instruction through a form of a negotiated supplier agreement that sets specifications for their packaging which at a minimum covers basic **quality control over its brand** and typically includes **additional direction** regarding a product or package.
- Brand owners exert influence over their contract manufacturers by specifying certain requirements which **might include**:
 - Maintenance of certain facility environmental, safety and quality standards.
 - The imposition of timelines for production and a requirement to use certain shipping processes.
 - Requirement to notify the brand owner of any manufacturing failures and/or system maintenance interruptions.
- The nature of the above-noted control over the production and distribution of product and packaging requirements clearly demonstrates direction on the part of the brand owner.

2026 Updates

- **New CMCs for 2026**
 - Other paper Packaging – Molded Pulp Food Serviceware
 - Plastic – Small Format – PE and PP caps and lids, HDPE package handles
- **Plastic bag ban**
 - SB 551 becomes effective 1/1/27

Colorado

Colorado – Scope of Covered FSW

6 CCR 1007-2, Part 1, Section 18.1.6

- **Unfilled food and beverage packaging material** – Means a product that is not used as packaging when supplied to or purchased by consumers individually or in bulk but are then used by consumers at a later point for the express purpose of facilitating food or beverage consumption.
- **Service packaging** – Means material that is added at the point of sale by retail, food service, or other service entities to facilitate the delivery or consumption of products, which includes but is not limited to all bags, boxes, cups, plates, containers and other items for the direct or indirect containment of products.

Colorado – Producer Obligation

6 CCR 1007–2, Part 1, Section 18.2.2

(D) Producers of [Service Packaging](#)

- (1) The brand owner **directing or performing the manufacturing** of the service packaging;
- (2) The brand or trademark licensee directing or performing the manufacturing of the service packaging;
- (3) Where the producer in (1) or (2) is a business operated wholly or in part as a franchise, the producer is the franchisor, if that franchisor has franchisees that operate in Colorado
- (4) **If there is no identified brand** on the packaging materials and neither (1), (2) nor (3) applies, then **the manufacturer** of the service packaging;
- (5) If (1) through (4) does not apply, then the importer of the service packaging into the United States.
- (6) If (5) does not apply then the distributor who first distributes the service packaging within or into the state.

(A) Producers of [Unfilled Food and Beverage Packaging](#)

- (1) The brand owner of the product **directing or performing the manufacturing** of the packaging material used for the product;
- (2) If (1) does not apply, then the brand or trademark licensee of the product directing the manufacturing of the packaging material used for the product;
- (3) **If there is no identified brand** on the packaging materials and neither (1) nor (2) applies, then **the manufacturer** of the product using covered materials; or
- (4) If (1) through (3) do not apply, then the importer into the United States of the product using covered materials.

Colorado Directing the Manufacturing

- Directing the manufacturing is similarly defined in both OR and CO.
- In CO, directing the manufacturing effects obligation for food serviceware (unfilled fsw and service packaging) and product packaging.
- Reminder: In OR, food serviceware obligation is tied to first seller. Only product packaging hinges on directing the manufacturing.

Colorado – Covered Entities

6 CCR 1007-2, Part 1, Section 18.1.6

- **Covered entity** means the following locations in the state from which covered materials are collected:
 - (a) **all single-family or multi-family residences** in the state; and
 - (b) **non-residential locations identified in the final plan**, including public places; small businesses; schools, as defined in section 22-1-132(2)(c), C.R.S (2024); hospitality locations; and state and local government buildings.

Colorado – Non-Residential Covered Entities

Table 28: Non-Residential Entity Reimbursement Approach

Year	Action	Proposed Reimbursement Approach
2028	Begin implementing reimbursement for schools.	Actual or modeled costs, reimbursement directly to schools.
Prior to 2030	Begin implementing reimbursement for local and state government buildings, and public places.	Reimbursement directly to local government.
2030	Begin implementing reimbursement for hospitality locations and small businesses.	Reimbursement to service provider, potential for need to reimburse directly to the non-residential entity in some cases.



2026 Key Updates

● Minimum PCR Reporting

- Producers are required to report minimum PCR content data at the material class level
- Only PCR content as defined by ISO 14021
- Producers will be required to attest the accuracy of their data
- PCR content being claimed by the Mass Balance Credit Method will require proof of third-party certification

California

California – Scope of Covered FSW

PRC section 42041(e)(1)

- (B) **Plastic single-use food service ware**, including, but not limited to, plastic-coated paper or plastic-coated paperboard, paper or paperboard with plastic intentionally added during the manufacturing process, and multilayer flexible material. For purposes of this subparagraph, “single-use food service ware” includes both of the following:
 - (i) Trays, plates, bowls, clamshells, lids, cups, utensils, stirrers, hinged or lidded containers, and straws.
 - (ii) Wraps or wrappers and bags used in the packaging of food offered for sale or provided to customers by food service establishments

California – Plastic Definition, DTM and De minimis

- The definition of plastic in PRC section 42041(t)2 is considerably broad and includes any synthetic or semisynthetic material chemically synthesized by the polymerization of organic substances that can be shaped into various rigid and flexible forms and includes coatings and adhesives.
- The language "directs/directing the manufacturing" does not appear in California statute or draft regulations.
- De minimis consideration applies only to product packaging. De minimis determinations are made solely by CalRecycle.

Producer Obligation

PRC section 42041(w)

- (1) “Producer” means a person **who manufactures a product** that uses covered material **and** who **owns or is the licensee of the brand or trademark** under which the product is used in a commercial enterprise, sold, offered for sale, or distributed in the state.
- (2) If there is no person in the state who is the producer for purposes of paragraph (1), the producer of the covered material **is the owner or, if the owner is not in the state, the exclusive licensee of a brand or trademark** under which the covered product using the covered material is used in a commercial enterprise, sold, offered for sale, or distributed in the state. For purposes of this subdivision, a licensee is a person holding the exclusive right to use a trademark or brand in the state in connection with the manufacture, sale, or distribution of the product packaged in or made from the covered material.
- (3) If there is no person in the state who is the producer for purposes of paragraph (1) or (2), the producer of the covered material **is the person who sells, offers for sale, or distributes the product** that uses the covered material in or into the state.

SB54 Source Reduction Targets – Only Applies to Plastic

SB54 includes a progression of Targets:

	Target year (measured Jan. 1 of each year)		
	2027	2030	2032
Source reduction targets	10%	20%	25%
Reuse, refill (all target years) and elimination (2032 target year only only) ⁵ targets*	2% minimum	4% minimum	10% minimum
Reuse/refill investments	Amount to be determined by PRO, informed by CalRecycle needs assessment		

*Reuse, refill and elimination targets contribute to the overall source reduction targets listed above.

Source Reduction Reports

Baseline Report

Establishes the baseline supply upon which targets are measured. Reports total amount of plastic by weight and number of components supplied to the market in 2023.

Individual Source Reduction Plan

Forecasts Planned Source Reduction (ISRP) Producers forecast their expected source reduction outcomes against California's source reduction targets over the entire program plan.

Annual Source Reduction Report

Data that measures annual source reduction results covering the prior data year. Requires data from Baseline Report and CA Annual Supply Report.

Annual Supply Report

Reports all supply data on the covered materials supplied during the applicable data year (2025).

Emerging States MN, MD, WA & ME

Simplified Reporting MD, MN, & WA

- Reports will be at the Material Class level.
- Producers should only report packaging supplied to a consumer for personal, non-commercial use*.

Simplified Reporting Categories
Printing and Writing Paper
Glass and Ceramics
Metal
Paper/Fiber
Rigid Plastic
Flexible Plastic
Wood and Other Organic Materials
Compostable Materials

*Minnesota's definition of packaging does not explicitly exclude commercial. For this initial reporting phase, CAA is limiting the scope of reporting for packaging to ease administrative burden and align with Maryland and Washington.

Statutory Language on FSW

MN – 325F.075 Subd 1 Definitions:

- (b) "**Food package**" means a container applied to or providing a means to market, protect, handle, deliver, serve, contain, or store a food or beverage. Food package includes:
 - (1) a unit package, an intermediate package, and a shipping container;
 - (2) unsealed receptacles, such as carrying cases, crates, cups, plates, bowls, pails, rigid foil and other trays, wrappers and wrapping films, bags, and tubs; and
 - (3) an individual assembled part of a food package, such as any interior or exterior blocking, bracing, cushioning, weatherproofing, exterior strapping, coatings, closures, inks, and labels.

WA – RCW 70A.208.020(25):

- (a) "Packaging" means a material, substance, or object that is used to protect, contain, transport, **serve, or facilitate delivery of a product** and is sold or supplied with the product to the consumer for personal, noncommercial use.

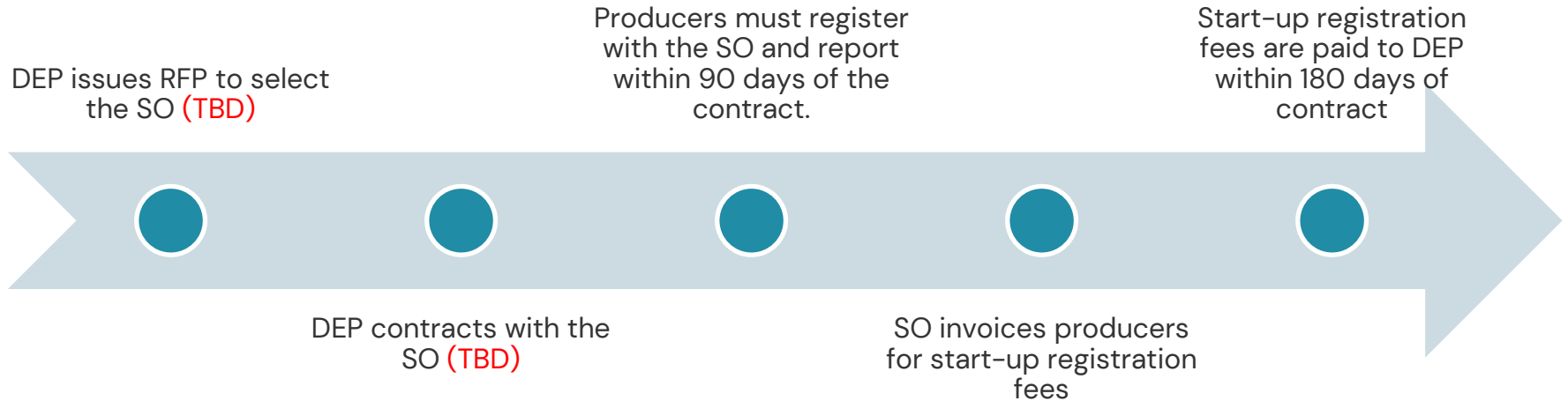
Statutory Language on FSW

MD – Section 9-2501 Definitions:

- (n)(1) “Packaging” means a material, a substance, or an object that is used to protect, contain, transport, serve, or facilitate the delivery of a product that is sold or supplied with the product to the consumer for personal, noncommercial use and that is sold, offered for sale, imported, or distributed in the State.
- (2) “Packaging” includes:
 - (i) Primary, secondary, and tertiary packaging intended for the consumer market;
 - (ii) **Service packaging** designed and intended to be filled at the point of sale, including: 1. Carry-out bags; 2. Bulk goods bags; and 3. Take-out and home delivery **food service packaging**; and
 - (iii) Beverage containers.

Maine

- The Maine timeline is contingent on the selection of the Stewardship Organization.
- As of 4/30/2026 CAA has not been selected as the SO in Maine.



<https://www.maine.gov/dep/waste/recycle/epr.html>

CAA Guidance



Reporting for: XYZ_003, Colorado

The reporting period is active.

[Switch Program](#) ▾

Notifications

[View All](#)

- L Preparing to Report Your Supply Data Revised Guidance Available** 04/14/2026
This guidance offers producers a comprehensive overview of the information and data required for reporting to CAA. Producers must submit both qualitative and quantitative data related to their business or organization and the packaging and paper products supplied to the market in the relevant data year associated with the annual producer report. Recent updates include state-specific sections and new content related to Eco-Modulation incentives and Minimum PCR Content reporting in Colorado.
Revised guidance can be found in the "Guidance and Tools" article.
- L The Producer Portal open March 31, 2026 for California, Colorado, Oregon and Minnesota reporting** 03/31/2026
The Producer Portal will open as early as March 31, 2026 for the following activities:
 - Annual and simplified supply reporting
 - Annual supply reporting (CY 2025 data) opens March 31, 2026 for California, Colorado, and Oregon.
 - Simplified supply reporting opens March 31, 2026 for Minnesota.
- L California Individual Source Reduction Plan Producer Guidance & Workbook Available Now** 03/05/2026
The California Individual Source Reduction Plan Guidance and Workbook are now available. Producers can navigate to the "Guidance and Tools" article under the Useful Links section of the home page to download a copy of the guidance and workbook.

Statements & Activity

[View All](#)[California](#)[Colorado](#)[Oregon](#)

You logged into the system

04/21/2026

Useful Links

[Guidance and Tools](#)[Now Available: 2025 Producer Adjustment Request Form for Oregon Reporting](#)[CAA's Vendor Information](#)

All 40+ guidance documents and tools are posted here

21/2026

20/2026

17/2026

16/2026

Useful Links

[Guidance and Tools](#)



[Now Available: 2025 Producer Adjustment Request Form for Oregon Reporting](#)

[CAA's Vendor Information](#)

[2025 Oregon Producer Fee Schedule](#)

[Complete California Registration with CAA by September 5, 2025 \(Additional Information is Required\)](#)

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FAQ

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