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Introduction to EPR for Paper & Packaging Laws in the U.S.

October 26, 2026
USCM-MWMA
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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 antitrust laws will not be accepted.

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Compliance is a shared responsibility.
Please raise any questions or concerns real-time.

Agenda

1. Welcome
2. EPR Overview
3. CAA Overview
4. EPR Across the States
5. State Updates
6. Stay Engaged
7. Questions

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What is EPR? What is a PRO?

- Extended Producer Responsibility (EPR) is a policy approach that **shifts financial and sometimes operational responsibility** for the recycling/end-of-life management of a product to the companies that produce the material.

- EPR laws for paper and packaging **require producers (i.e., generally brand owner of the product in the U.S., may include retailers or first importers) to either partially or fully fund** the collection, sortation and processing of the paper, packaging and packaging-like items that they supply into these states.

- Since producers are made responsible for the costs to manage their product/packaging at end-of-life, EPR fees typically **incentivize design choices** that improve recyclability, minimize waste, and improve environmental outcomes.

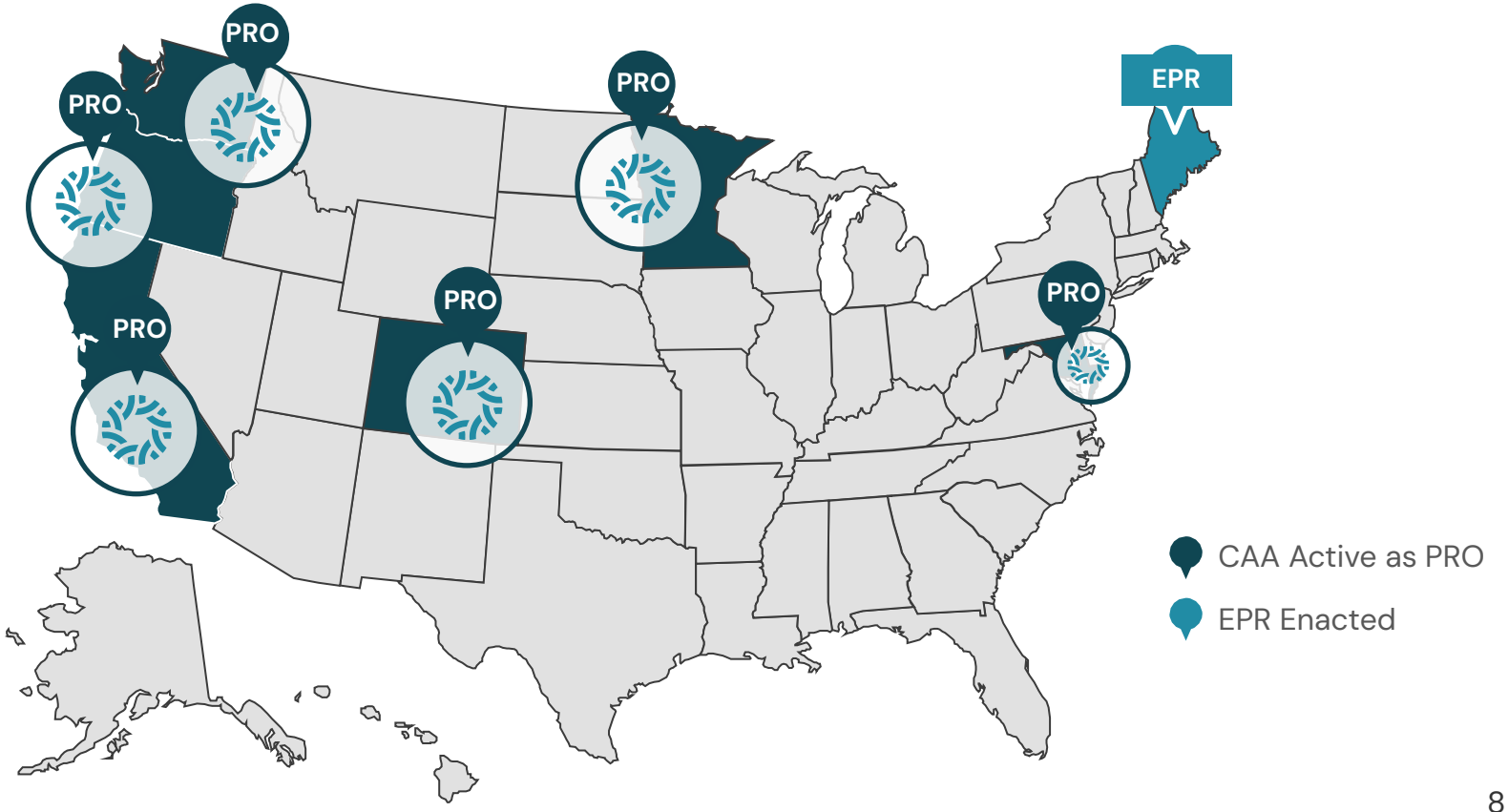
What is EPR? What is a PRO? (Cont.)

- A **Producer Responsibility Organization (PRO)** is a producer-led, nonprofit organization that that provides producers with compliance services to help them meet their obligations under EPR laws.

- Generally, a PRO is **responsible for developing a program plan** for managing covered products. That plan is reviewed by a state-appointed advisory board and approved by the state regulatory agency. The program plan outlines program operation and the collection and management of producer fees.

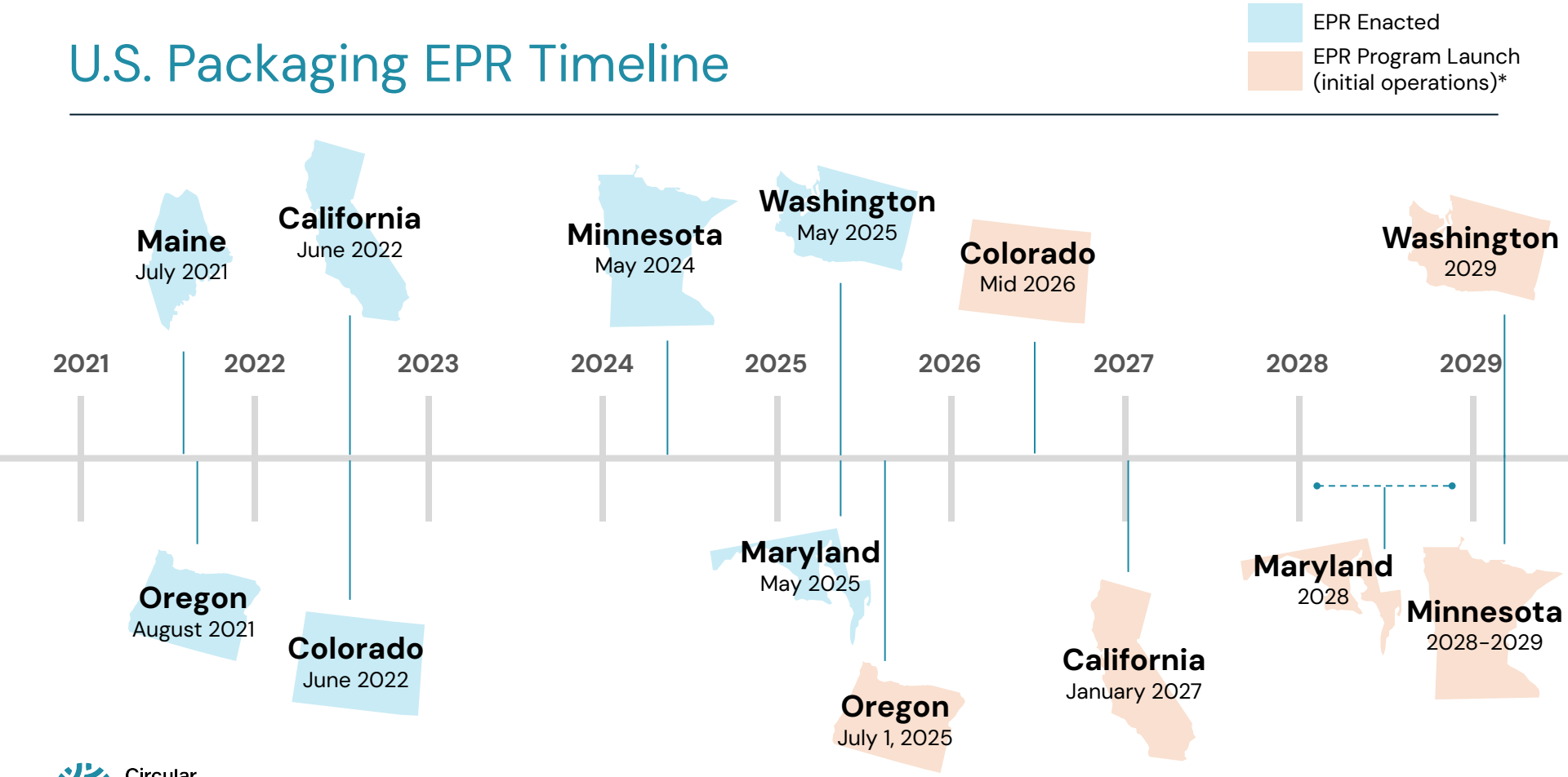
A **Producer Responsibility Organization (PRO)** is a state-appointed, producer-led nonprofit that implements Extended Producer Responsibility (EPR) laws. Working under state oversight, PROs coordinate the collection and recovery of covered materials, help producers meet their obligations and drive improvements in recycling and materials management systems to deliver positive environmental outcomes for communities.

Packaging EPR in the US



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U.S. Packaging EPR Timeline



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*Timelines reflect anticipated launch of initial program operations. Implementation is phased and subject to state rulemaking and regulatory approvals.

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- 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, foodservice and retail industries.
- CAA has been approved to be the single PRO in California, Colorado, Maryland, Minnesota Oregon and Washington.



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CAA's Mission

CAA's mission is to help producers comply with EPR laws, deliver harmonized, best-in-class services and work with governments, businesses and communities to reduce waste and recycle more.

CAA will:

- ✔ Meet state-specific regulatory requirements;
- ✔ Leverage existing recycling systems and infrastructure; and
- ✔ Advance the circularity of covered materials through collaboration with local governments, service providers and recycling system interest holders.



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EPR Across U.S. States



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Paper and Packaging EPR Across U.S. States

	Covered Materials	Sectors	Full or Partial Recycling System Funding?
CALIFORNIA	• Packaging • Plastic foodservice ware	• Consumer Packaging • Industrial, Commercial and Institutional (IC&I)	• Partial (new or incremental)
COLORADO	• Packaging • Paper products • Foodservice ware	• Consumer Packaging • Limited IC&I*	• Full (100% of the net cost of recycling services)
MAINE* **	• Packaging • Some foodservice ware	• Consumer Packaging • Limited IC&I**	• Full
MARYLAND	• Packaging • Paper products • Foodservice ware	• Consumer packaging • Limited IC&I**	• Partial (but increasing)
MINNESOTA	• Packaging • Paper products • Foodservice ware	• Consumer Packaging • Limited IC&I**	• Partial (but increasing)
OREGON	• Packaging • Printing and writing paper • Foodservice ware	• Consumer Packaging • IC&I*	• Partial (capital for collection; MRF payments and operation of PRO depot network)
WASHINGTON	• Packaging • Paper products • Foodservice ware	• Consumer packaging • Limited IC&I**	• Partial (but increasing)

*Potentially subject to change. **May include small businesses, public spaces, schools, childcare centers, non-profit, and government-operated buildings. ***CAA not active as PRO/SO.

EPR Obligations for Producers Across CAA Program States

	California	Colorado	Maryland	Minnesota	Oregon	Washington
Join approved PRO + collect data	☒	☒	☒	☒	☒	☒
Report data to PRO	☒	☒	☒	☒	☒	☒
Pay fees/dues based on data	☒	☒	☒	☒	☒	☒
Source reduce plastic (incl. SR plan)	☒	NA			NA	
Ensure materials are recyclable or compostable	☒	NA	☒	☒	NA	☒

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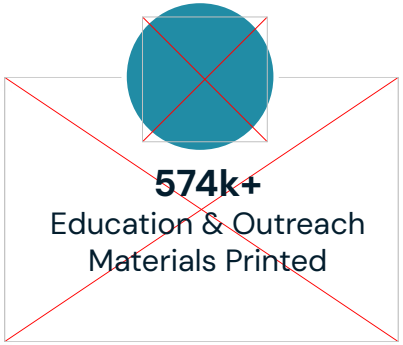
Oregon Implementation Progress

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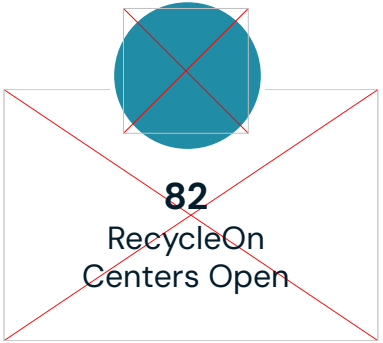
Oregon EPR By the Numbers: Highlights as of 10/21/2026









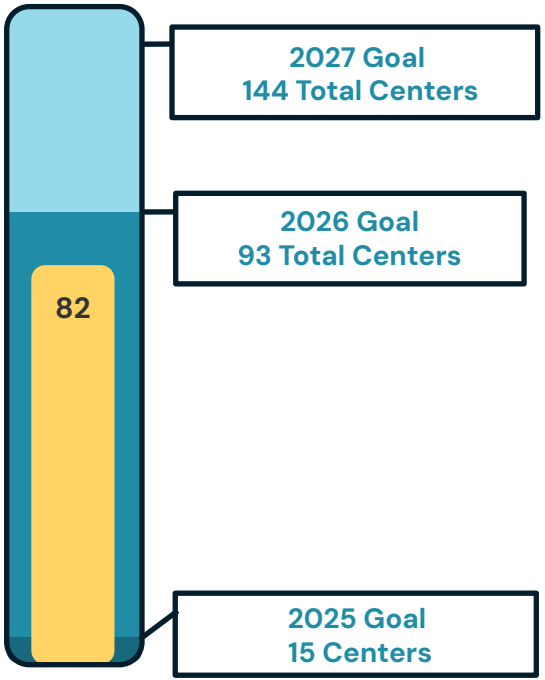




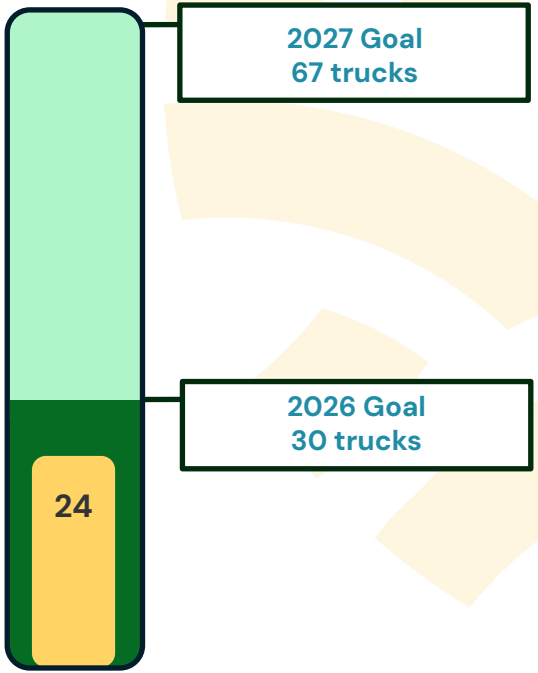
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System Expansion Tracking: October 2026

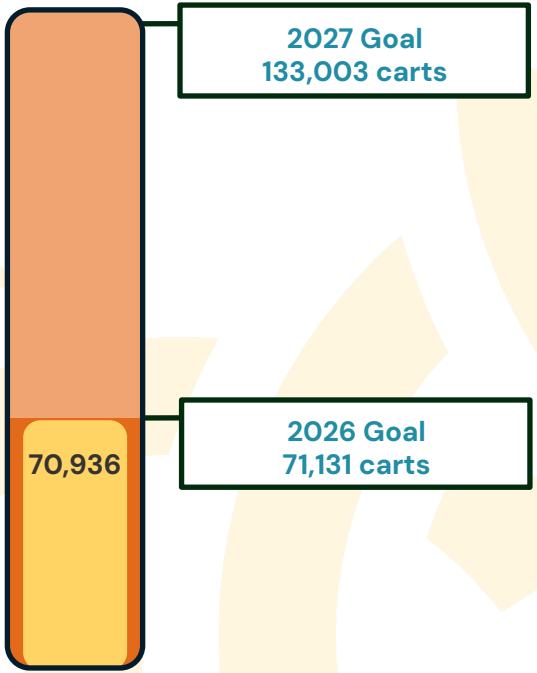
RecycleOn Centers Opened



Recycling Trucks Ordered

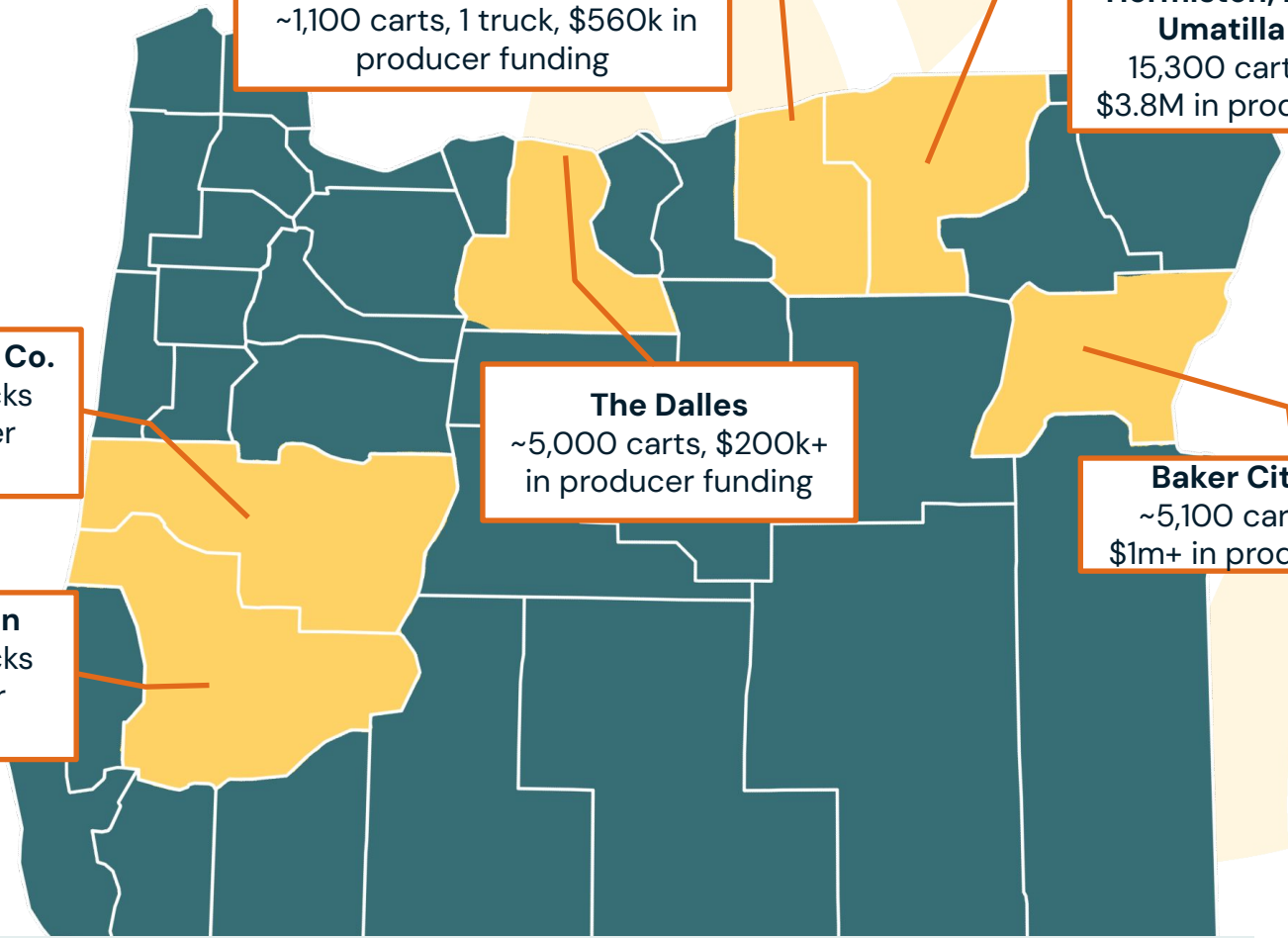


Recycling Carts Ordered



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Oregon System Expansion



Boardman
~1,100 carts, 1 truck, $560k in producer funding

Hermiston, Pendleton & Umatilla City/Co.
15,300 carts, 6 trucks, $3.8M in producer funding

Cottage Grove, Lane Co.
~6,300 carts, 3 trucks
~$1.39m in producer funding

The Dalles
~5,000 carts, $200k+ in producer funding

Baker City/County
~5,100 carts, 2 trucks
$1m+ in producer funding

Roseburg & Winston
~12,000 carts, 3 trucks
~$2.5m in producer funding

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Presented on 9/16/2026. The information presented was current as of the presentation date and is subject to change.

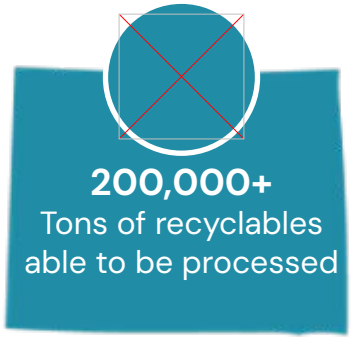
Colorado Implementation Progress

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Colorado EPR By the Numbers: Highlights as of 10/21/2026



400,000+
Households with no-cost access



200,000+
Tons of recyclables able to be processed



3,584
Participant Producers



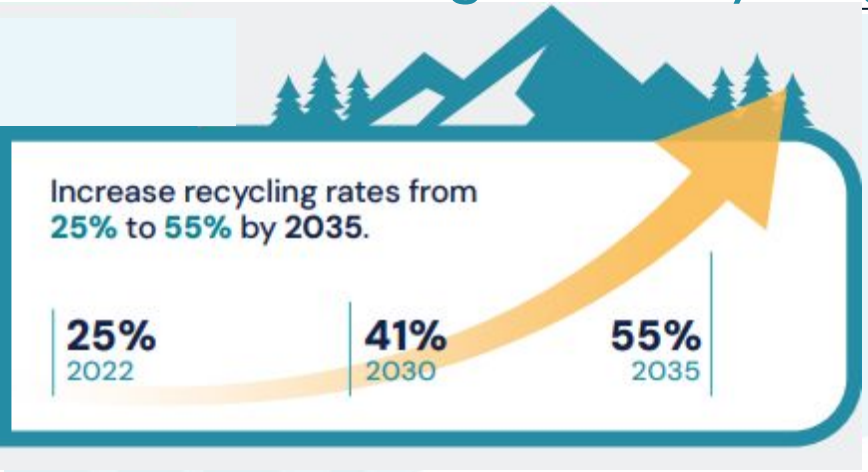
20
Participating Processors



12
Producer funded local government Drop-off sites

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Colorado Program Recycling Rate Goal



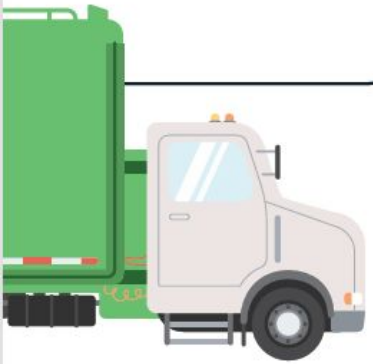
Other Goals Include:
- Statewide access
- Universal recycling list
- PCR targets





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How Does Reimbursement Work in Colorado?



Submit Request

Tell CAA how your community wants to participate.

Qualification

Share details such as recycling services provided, service costs and existing or planned contracts.

Service Agreement

Enter into an agreement with CAA. Funding and reporting begins!

Types of funding available:

Curbside Collection, Drop-off Centers, Transfer Stations, Processing, Education and Outreach.

Reimbursements payments provided through service agreements are the primary mechanism for system investment and expansion in Colorado

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Stay Engaged

Producer Resource Center

- Producer resources page with FAQs, information and other updates.

Monthly Newsletter

- The latest updates for each state and new resources.

Producer Onboarding Sessions

- *101 Producer Onboarding*
- *102 Registration & Agreements*
- *103 Budgeting for EPR Fees*
- Sign up for producer events on our website.

Producer questions?
Email producer.support@circularaction.org

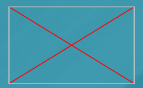
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Scan the QR code or click the link to complete CAA's account registration form.

This is the first step in the producer registration process

Questions?

Thank You



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