

EPR Law Summaries by State

State	California	Colorado	Maine	Minnesota	Oregon
Status	Published draft regulations Selected Circular Action Alliance (CAA) as the PRO.	Enacted implementing regulations. Selected CAA as the PRO.	Released draft rules for enacting the EPR program. Not selected a PRO yet.	Implementing regulations yet to be drafted. Not selected a PRO yet.	Enacted implementing regulations. CAA is the selected PRO.
Obligated Entity <i>(For packaging generally. The obligated entity may differ for food service ware and paper products, and may also vary depending on the method of distribution – whether through physical retail stores or e-commerce.)</i>	Priority order will be: 1. California-based manufacturer (if also the brand owner) of the product 2. California-based brand owner or licensee of the brand or trademark 3. The company that distributes or sells the product in California.	Priority order will be: 1. Manufacturer of the manufacturer-branded/unbranded product 2. Brand owner or licensee of the brand or trademark 3. The importer of record.	Priority order will be: 1. Brand owner 2. Company that imports the product into the state.	Priority order will be: 1. Manufacturer of the manufacturer branded/unbranded product 2. Licensee of the brand or trademark 3. Brand owner of the brand or trademark 4. The importer of record. 5. The first company to distribute or sell the product in the state.	Priority order will be: 1. Manufacturer of the manufacturer branded/unbranded product 2. Brand owner or licensee of the brand or trademark 3. The importer of record.
Registration	The draft regulations would require registration by July 1, 2025. CAA is currently accepting registrations.	Producers had to register with CAA by October 1, 2024 .	No registration deadline at this time.	CAA proposed deadline of July 1, 2025.	Pre-registration required by March 31, 2025. CAA is currently accepting registrations.
Reporting	CAA proposed deadlines – August 31, 2025 – Submit report on the amount of plastic covered material sold in CA from Jan-June 2025. January 31, 2026 – Submit report on source reductions of covered material from Jan-Dec 2025.	July 31, 2025 – CAA proposed deadline to submit covered material information sold from Jan-June 2025.	No reporting deadline at this time. Annual reporting deadlines will be decided by the selected PRO.	No reporting deadline at this time. While the law does not explicitly require producers to report data to the PRO, we expect this requirement to manifest in the stewardship plan.	CAA proposed deadlines: March 31, 2025 – Report the type and weight of covered materials sold in the state for the prior year. May 31, 2026 – Report data for the period from Jan – Dec 2025 May 31, 2027 – Report data for the period from Jan – Dec 2026
Packaging Design Specifications	Source reduction targets: January 1, 2027 – 10% reduction in plastic covered materials sold with at least 2% of reusable or refillable packaging. January 1, 2030 – 20% reduction in plastic covered materials sold with at least 4% of reusable or refillable packaging. January 1, 2032 – 25% reduction by weight and 25% reduction in plastic covered materials sold.	CAA's Program plan may include postconsumer recycled content rate targets.	The payment schedule may be impacted by the use of recycled content in and increased recyclability of packaging material.	January 1, 2032 – Ensure that covered materials introduced in the state are reusable.	Postconsumer recycled content used in covered products may impact the annual fee.
Producer Exemptions <i>(Additional exemptions for certain producers, such as specific food service establishments, and packaging for products such as prescription drugs, infant formula, products sold on farms, may also apply).</i>	Producers, retailers, or wholesalers that had gross sales of less than \$1 million in the state will be exempt from the requirements, except to ensure that all covered materials are recyclable or compostable by January 1, 2032.	Producers with less than \$5 million in realized gross total revenue or less than 1 ton of covered materials sold or distributed within or into the state during the prior calendar year.	Producers whose annual gross revenue is less than \$2 million, or who distribute less than 1 ton of packaging in the state annually.	Producers that generate less than \$2 million in global gross revenue, or which distributed less than 1 ton of packaging into the state, during the most recent fiscal year.	Producers that have a gross revenue of less than \$5 million or sold less than one metric ton of covered products in the state for the organization's most recent fiscal year.