



California EPR (SB 54)

Producer Snapshot & Compliance Details

As of July 2026.

This summary is provided for information only and is not compliance or legal advice. Please confirm applicability to your specific products and packaging with counsel and regulators.

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Program Overview

SB 54 is the most far-reaching packaging EPR law in the country, with full implementation beginning January 1, 2027. It pairs producer fees with mandatory statewide targets for source reduction, reuse, and recycling, alongside a separately funded pollution mitigation account.

PRO	Circular Action Alliance (CAA), sole approved PRO
Scope	All single-use packaging and plastic food service ware
Plastic Source Reduction	10% by 2027, 20% by 2030, 25% by 2032, against a 2023 baseline
Reuse/Refill/Elimination	2% by 2027, 4% by 2030, 10% by 2032
Recycling Rates (Plastic)	30% by 2028, 40% by 2030, 65% by 2032 – This is “actual recycling”, not “designed for recyclability” or collection rates.
Recyclable/Compostable	100% of covered material by 2032
Plastic Pollution Fund	\$500 million annually, funded by producers and upstream supply chain such as resin producers. It is separate from program fees

IMPORTANT: Final regulations were approved by the Office of Administrative Law on May 1, 2026, and took effect immediately upon filing with the Secretary of State. Producers must register and report by June 1, 2026. Statutory deadlines and CAA operational deadlines remain in force, so producers should act now.

Where Things Stand (Regulatory Status)

- **Regulations:** passed the Office of Administrative Law on May 1, 2026 and took effect on filing with the Secretary of State. By June 1, 2026, producers had to register with CAA and submit supply data, register with CalRecycle as an independent producer, or register with CalRecycle and seek the small-producer exemption.
- **FDA/USDA exemption:** rests on a three-part test: show no alternative exists, that swapping components won't fix it, and that redesign won't either. Only mandatory federal requirements count; voluntary guidance does not.

- **CAA Program Plan:** the draft reached the SB 54 Advisory Board on June 15, 2026 with a draft fee schedule, draft budget, and final PRO source-reduction baseline. The 60-day comment window shuts August 14, 2026, after which CAA files the final plan with CalRecycle by October 13, 2026. CalRecycle then has 75 days to approve or deny, landing approval near year-end.
- **Plan Approval:** Expected by January 1, 2027.
- **Program Launch:** January 1, 2027.
- **De minimis:** CalRecycle likely won't finalize de minimis determinations before the baseline deadline, so producers must include the weight of every plastic component in baseline data.

2026 Key Operational Milestones

Date	Milestone	Producer Action
March 31, 2026	CAA Producer Portal opened for CY2025 Annual Supply reporting	Portal access verified; data preparation underway
Week of March 31, 2026	California Individual Source Reduction Plan (ISR) opens in Portal	Review new ISR guidance published by CAA
April 23, 2026 (target)	California Annual Source Reduction Report opens	Prepare CY2025 plastic supply and component data
May 31, 2026	CY2025 Annual Supply Report DUE	File via CAA Portal. This drives 2027 fees and Aug. 2026 Early Fees
May 31, 2026	California Annual Source Reduction Report DUE	Report plastic weight and components
June 1, 2026	Producer Registration Deadline (regulatory)	Register and report to CAA, as independent producer, or apply for small producer exemption
June 15, 2026	CAA Program Plan due to SB 54 Advisory Board	Includes draft fee schedule, draft budget, final source reduction baseline
No later than Aug. 1, 2026	Individual Source Reduction Plan (ISR) DUE	Producer-specific plan filed through CAA Portal
August 2026	CAA issues California Early Fee invoices	One installment. Based on CY2025 supply data
October 2026	CA fee/malus schedules published	Final fee rates confirmed for 2027 program year
January 1, 2027	Full SB 54 program launch	Fee payment, compliance obligations fully in effect

Key Watchouts for Personal Care Producers

Watchout	
Component complexity	Personal care packaging is component-heavy (pumps, sprayers, droppers, overcaps, seals, shrink bands). Each plastic component is counted separately. Expect high component-level fee exposure.
No de minimis relief (yet)	All plastic weight must be reported. Small parts like tear strips, tape, and liners all count until CalRecycle issues determinations. CAA has filed the following de minimis exclusions with CalRecycle. None are approved yet: – Polymer cold-end coatings on glass containers – Polymer coatings and liners on metal packaging – Polymer dispersion coatings on paper and fiber substrates – Wax-alternative coatings on corrugated cardboard and equivalents (for example, kraft paper bags without a polycoat lining) – Polymer adhesive on paper labels – Polymer adhesive (water-based and hot-melt) on folding paperboard and corrugated boxes and other paper packaging – Polymer tape and paper tape with polymer adhesives on corrugated boxes – Water-based inks with polymer binders used on packaging – Plastic windows in paper or fiber envelopes, bags, or paperboard boxes – Polymers used as binders, color coatings, or sizing agents incorporated into the paper content of paper packaging – Single-sided (inside-only) polycoated paperboard and corrugated packaging
Small/flexible formats	Sachets, single-use samples, and small flexibles fall into challenging CMCs with higher fee rates and recyclability scrutiny.
Labels and decoration	PS labels, shrink sleeves, and in-mold labels may affect recyclability designation and fee outcomes.
Source reduction targets are plastic-specific	2023 is the locked baseline. Growth in plastic supply after 2023 increases exposure to maluses.

Resources

- [SB 54 legislative text](#)
- [Permanent SB 54 regulations](#)
- [CAA California proposed program plan](#)
- [CAA California program plan \(accessible version, revised June 18, 2026\)](#)
- [Public comment form \(one comment at a time by chapter and page; closes Aug. 14, 2026\)](#)
- [CalRecycle producer screening tool](#)
- [CalRecycle guidance on categorically excluded materials notices](#)
- [CalRecycle guidance for single-use packaging producers](#)

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