



Maryland EPR (Extended Producer Responsibility for Packaging and Paper Products)

Producer Snapshot & Compliance List

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

Maryland's packaging EPR program is in its early days. CAA is the appointed PRO. The registration portal opened March 31, 2026, and a simplified, voluntary supply report was due May 31, 2026 (now passed), at CAA's request rather than under the statute. No producer fees are active yet, and the full program plan is due July 2028.

PRO	Circular Action Alliance (CAA), appointed PRO
Scope	Packaging, paper products, and foodservice ware.
Agency	Maryland Department of the Environment (MDE)
Funding Model	Partial (but increasing). Producers fund majority of recycling system costs
Current Producer Status	Registration portal opened March 31, 2026. Simplified supply reporting due May 31, 2026 – this is at CAA's request and is not statutory
Program Fees	Not active. First admin fees expected mid-2026 (PRO level, not producer level)
Rulemaking	First round completed in May 2026. MDE anticipates minimum two rounds. By July 1, 2027, MDE must develop a statewide list of covered materials determined recyclable or compostable
Program Plan Due	July 2028

Where Things Stand (Regulatory Status)

- **Registration Portal:** Opened March 31, 2026. Registration must be completed before any report can be submitted.
- **Simplified Reporting Portal:** Targeted to open April 23, 2026. Voluntary simplified Supply Report due May 31, 2026. Report at material class level.
- **Rulemaking:** Phase one of rulemaking began in February 2026, covering covered materials list and definition clarifications. The Secretary of the Environment adopted the regulations on May 5, a Notice of Final Action was published in the Maryland Register on May 15, and the regulations took effect May 25, 2026. MDE anticipates at least two rounds. Additional topics may include sell/distribute/offer ban date, responsible end market evaluation, environmental benefits criteria, worker safety, and program financing.

- **Statewide Materials List:** By July 1, 2027, MDE must develop a statewide list of covered materials determined recyclable or compostable through curbside recycling programs. This list will be pivotal for future fee-setting.
- **Program Plan:** Due July 2028.

2026 Key Operational Milestones

Date	Milestone	Producer Action
End of 2025	MDE first rulemaking package expected	Monitor rule language; participate in comment periods through trade associations
March 31, 2026	Producer Registration Portal opened	Register via CAA Producer Portal. Complete brands listing
April 2026 (target)	Simplified Supply Reporting Portal opens	Prepare CY2025 Maryland supply data at material class level
May 31, 2026	Voluntary Simplified Supply Report DUE	File via Producer Portal. Data supports CAA program planning
July 2026	CAA initial registration with MDE expected	No direct producer action required
July 1, 2027	MDE statewide covered materials list DUE	Review recyclability determinations for portfolio
July 2028	CAA Program Plan DUE to MDE	Plan approval triggers fee schedule and full producer obligations

Key Watchouts for Personal Care Producers

Watchout	
Registration precedes reporting	Unlike some states, Maryland requires completion of registration before a supply report can be filed. Plan for March 31 registration before the May 31 reporting deadline.
Two rulemaking rounds expected	The covered material category list, definition clarifications, and eco-modulation approach will evolve across at least two rulemaking rounds. Expect ongoing changes through 2027.
Statewide materials list is pivotal	MDE's July 1, 2027 statewide list of recyclable/compostable materials will drive future fee tiers and malus exposure. This is the Maryland equivalent of Colorado's MRL.
Not yet a fee-bearing program for producers	Producers will not pay fees in 2026. Admin fees in mid-2026 are PRO-level, not producer-level.
Multi-state coordination matters	CAA uses a common portal across states. Producers should align Maryland data compilation with Minnesota, Washington, and other CAA-PRO states to reduce administrative burden.

Resources

- [MDE producer responsibility page](#)
- [SB 901 bill page](#)
- [SB 901 enrolled bill text](#)
- [MDE draft regulations](#)

- [MDE proposed guidance](#)
- [CAA Maryland producer page](#)

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