

What Emerging Brands Should Know About Extended Producer Responsibility (EPR)

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About AMERIPEN

AMERIPEN – the American Institute for Packaging and the Environment – is the only trade association focused exclusively on public policy for the entire U.S. packaging industry to promote the best use, benefits and functions of packaging.

We develop and advocate positions on issues related to packaging and the environment, using sound science and a philosophy of material inclusiveness.

Our membership represents the entire packaging supply chain, including materials suppliers, packaging producers, consumer packaged goods companies, retailers and end-of-life materials managers.

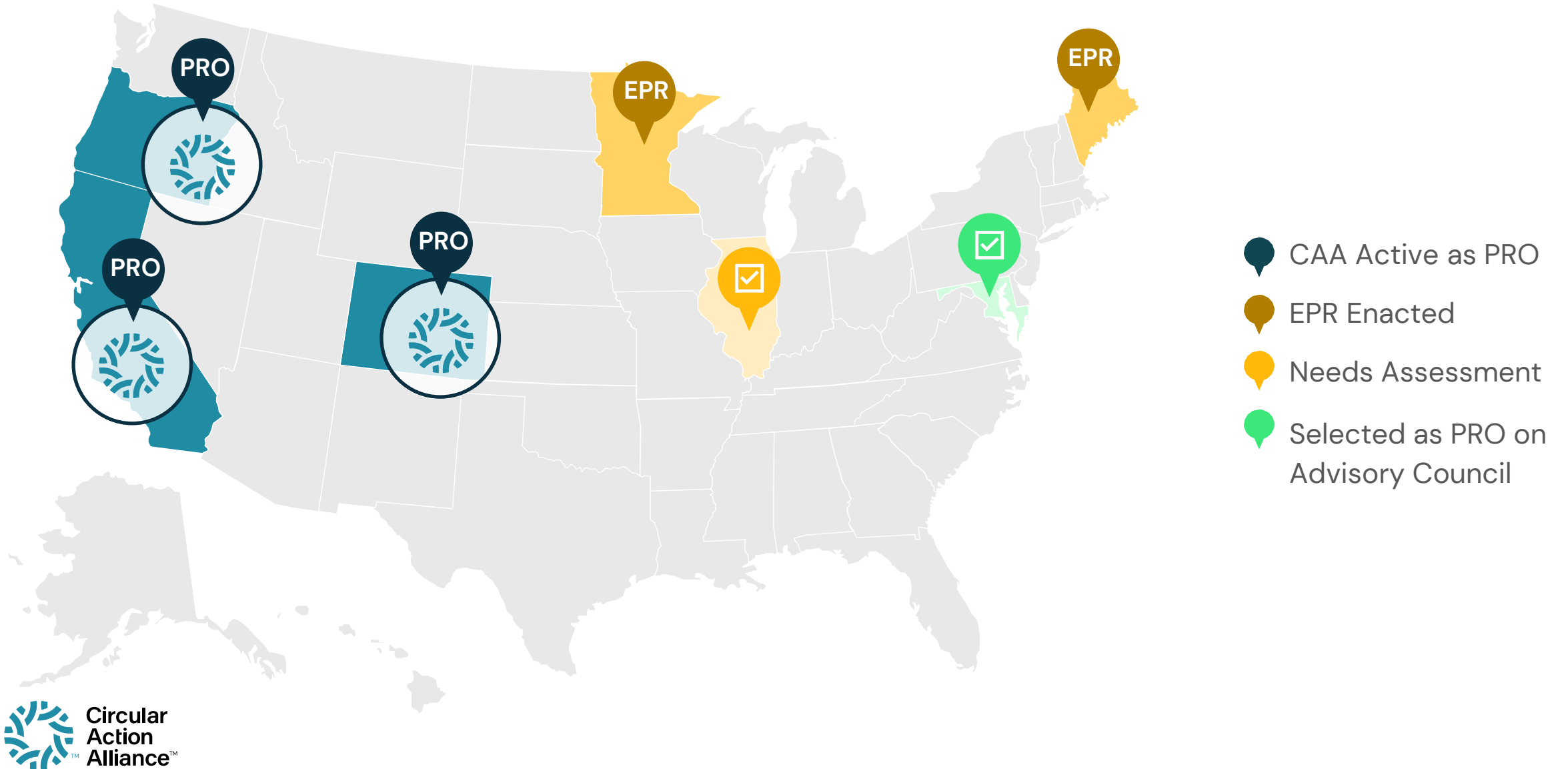
VISION: Packaging is recognized for all its benefits, including preventing waste and driving a circular economy.

MISSION: Be the leading voice for the packaging industry, using science to inspire, create and advocate for sustainable solutions for the packaging value chain.



AMERIPEN®

Packaging EPR in the U.S.



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 20 companies from the food, beverage, consumer goods, and retail industries.
- CAA has been approved to be the single PRO in California, Colorado and on the Maryland Advisory Council. CAA is the only PRO to submit an Oregon program plan.



Who is a Producer?

Producer definitions vary from state to state, and sometimes by covered material, but generally the brand owner is responsible, even if another entity is manufacturing the product/packaging.

Sample Producer Definition Hierarchy*:

Brand owner directing or performing manufacturing of the service packaging

Brand or trademark licensee directing or performing manufacturing of service packaging

No identified brand on packaging, then the manufacturer in US

First Importer into the US

Small Business Exemptions

There are exemptions for certain types of companies in each state, in addition to the following **small-business exemptions**

State	De Minimis Threshold
California	<1M in gross revenue or <1 ton of covered material
Colorado	<5.5M in gross revenue (adjusted for inflation)
Maine	<2M in gross revenue or <1 ton of covered material
Minnesota	<2M in gross revenue or <1 ton of covered material
Oregon	<5M in gross revenue or <1 metric ton of covered material

How are Fees Set?

The three main data points are needed to accurately calculate producer fees.

System Costs*

The costs of operating the program including

- Collection, sortation & processing
- Education & outreach materials
- PRO staffing

Number of Producers

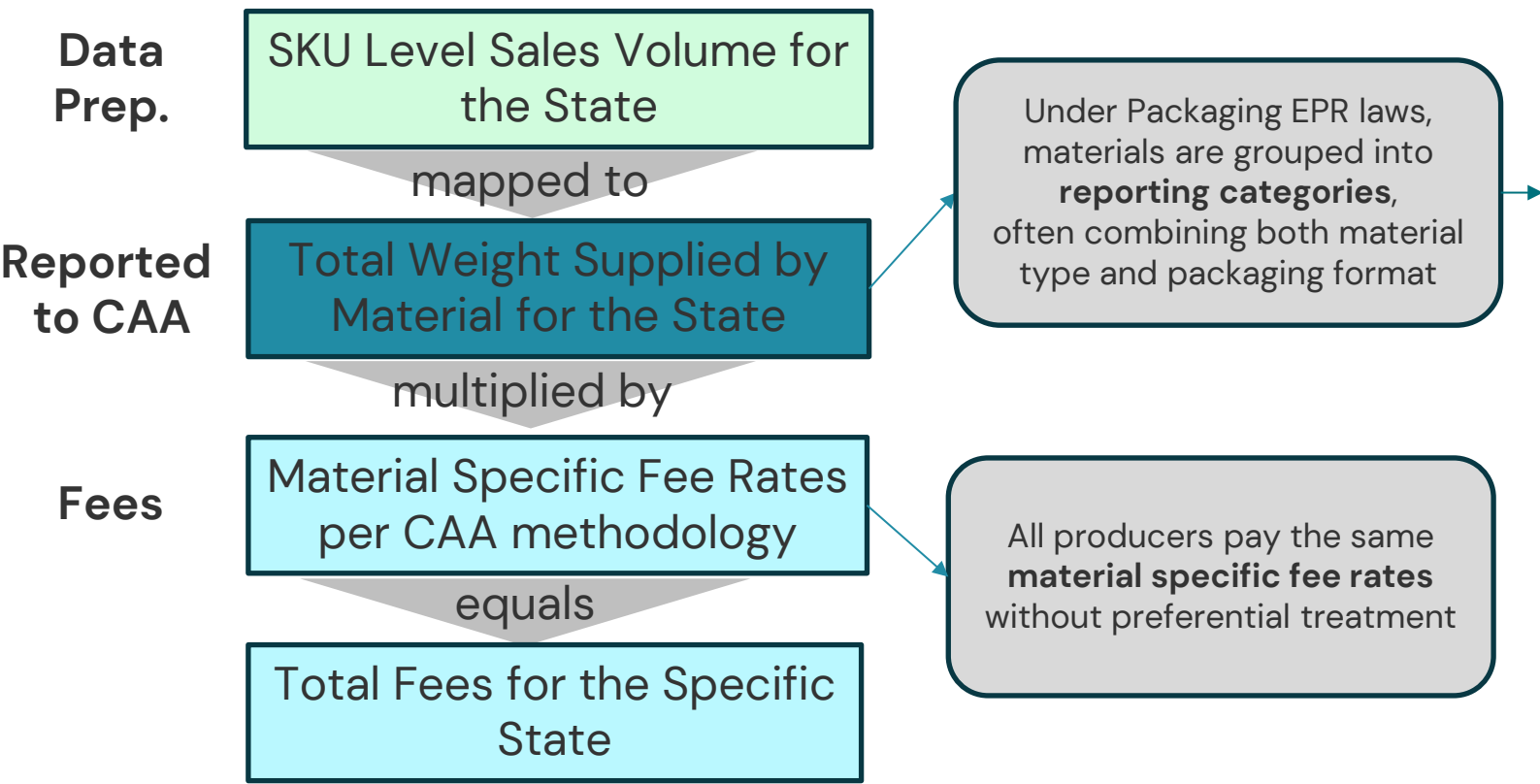
- More than 1,800 producers have already registered with CAA
- CAA is diligently reaching out to producers.
- Robust producer registration reduces free riders in the system.

Supply Data

The total amount of covered materials producers sell into a state.

The total amount of materials in each reporting category (e.g. flexible plastic, glass, wood, paper, etc.)

Preparing for Data Reporting and Fees



Sample from Oregon

Material Class	Reporting Category - Revised
Printing and Writing Paper	Newspapers
	Newsprint (inserts and circulars)
	Magazines, Catalogs and Directories
	Paper for General Use
	Other Printed Materials
Glass and Ceramics	Glass Bottles and Jars & Other Containers
	Ceramic - All Forms
Metal	Aluminum Containers
	Aluminum Foil and Molded Containers
	*Aluminum Aerosol Containers
	Aluminum Other Forms
	Steel Containers
	*Steel Aerosol Containers
	Steel - Other Forms
	Metal - Small Format
	*Pressurized cylinders
Paper/Fiber	Aseptic and Gable-top Cartons

Producer Journey to Compliance – Next Steps

Register

- Complete registration form on CAA's website
- Sign Participant Producer Agreement (PPA) – available Nov 11
- Sign PPA State Addenda – available 2025

Report

- Review CAA reporting guidance to prepare data for Oregon in Q4-2024 – available once PPA is signed
- Submit material supply data for Oregon to CAA by March 31, 2025

Pay Fees

- Utilize Sep 2024 Oregon program plan submission for fee estimates and internal budgeting (updated estimates available Dec 6)
- Receive published fees for Oregon in Jun 2025
- Receive invoices and pay fees for Oregon in Jul 2025

Registration with CAA is non-obligating. The sooner producers register and sign an agreement with CAA, the more prepared they will be for reporting.

Producer Guidance & Resources



Ask your questions and get answers from CAA

- [Onboarding Sessions](#) for companies new to their EPR journey
- **[Producer Working Group](#) (PWG) for a more complex deep dive into producer compliance*



Review at your convenience

- [Producer Resource Center](#) for FAQs, action items, etc.
- **Library of past PWG meeting summaries and slide decks*



Get the latest updates

- Sign up for the CAA [newsletter](#)
- Follow CAA on [LinkedIn](#)



Coming Soon:

- **Producer Reporting Guidance – Q4 of 2024*
- **Reporting Q&A Webinars – Nov 19 & Dec 4*

** Available to registered producers only*



**Scan to register with CAA and access
producer resources**