



Date 22, 2023  
Department of Resources Recycling and Recovery  
1001 I St  
Sacramento CA 95812

**Subject: Support Letter for Circular Action Alliance's Application to be the Producer Responsibility Organization Pursuant to Senate Bill 54 (Allen)**

Dear Director Wagoner,

The California Chamber of Commerce, local chambers of commerce and these undersigned state and national organizations, representing diverse businesses large and small from across California, strongly support the application of the Circular Action Alliance (CAA) to be California's first Producer Responsibility Organization (PRO) for Senate Bill 54 (Allen). CAA's ability to facilitate an extended producer responsibility (EPR) program is unmatched as the only not-for-profit formed specifically to meet the requirements of U.S. EPR programs, including SB 54, supported by a team of experts with direct experience establishing PROs and developing packaging EPR program plans. CAA was the first PRO selected in the United States to manage Colorado's EPR program for paper and packaging. They also were selected for Maryland's State Producer Responsibility Advisory Council. Additionally, CAA is the only organization conducting extensive and meaningful outreach to the diversity of stakeholders across the vast California marketplace, including non-governmental organizations, businesses large and small, and local and state government.

#### **Senate Bill 54: Moving California to Circularity**

On June 30, 2022, California Governor Gavin Newsom signed SB 54 into law, requiring all single-use packaging be 100% recyclable or compostable and that all single-use plastic packaging and some plastic products be source reduced by 25% and recycled at rates no less than 65%. SB 54 effectively mandates a paradigm shift for packaging and recycling, compelling companies to make design and packaging choices that prioritize waste reduction and to ensure that single-use items are recycled and remain in a circular economy. SB 54 is one of the world's most aggressive single-use packaging EPR programs. CAA's experience is vital for a tailored approach necessary to help producers comply with all the mandates of SB 54.

#### **CAA's Experience Fundamental for a Successful California EPR Program**

SB 54 was passed and signed into state law containing some of the most aggressive EPR mandates in the world and under unprecedented compliance time frames. Expediency and competency to immediately begin implementation are necessary for the incoming PRO so that all producers can meet statutory deadlines. CAA's selection in Maryland and Colorado, as well as their work to become the PRO and prepare program plans in other EPR states, speaks to the organization's ability to leverage their experience in a way that is responsive to local context and to engage meaningfully with a range of stakeholders. By operating across states, CAA can leverage knowledge and data gathered from other programs to achieve better recycling, higher efficiency at scale and more cost savings with cross-state harmonization, which ultimately reflects in lower costs to California consumers and a better EPR program in California.

#### **Fostering Change: Uniting Producers for Inclusive Representation and Sustainable Practices in California**

As producers continue the journey to circularity through compliance with SB 54, experienced representation matters. Producers will need to work together under common leadership to ensure compliance and establish a successful program plan in California. A PRO with experience in plan development, including registering producers, gathering the necessary data, partnering with local governments and the hauling industry to support and innovate recycling systems, and providing best-in-class compliance services to producers, is essential for the program's success. CAA is the clear choice as their due diligence - conducting proactive outreach with businesses, NGOs, haulers and local and state government, to name a few - reflects strongly on the organization and its ability to lead a diverse set of stakeholders.

The coalition strongly supports the Circular Action Alliance to be selected as California's first PRO pursuant to Senate Bill 54. CAA has clearly demonstrated their capacity and vision to meet the monumental task before them and we are confident in the organization's ability to help producers meet the compliance obligations of SB 54 and further propel California towards a circular economy.

Respectfully,



Adam J Regele  
Vice President of Advocacy and Strategic Partnerships  
California Chamber of Commerce

*On behalf of the following organizations:*

Agricultural Council of California  
AMERIPEN  
American Chemistry Council  
Anaheim Chamber of Commerce  
Asian Food Trade Association  
Auto Care Association  
Brentwood Chamber of Commerce  
California Apple Commission  
California Asian Chamber of Commerce  
California Blueberry Commission  
California Building Industry Association  
California Business Properties Association  
California Fresh Fruit Association  
California Grocers Association  
California Hispanic Chamber of Commerce  
California Hotel and Lodging Association  
California League of Food Producers  
California Manufacturers and Technology Association  
California Metals Coalition  
California Restaurant Association  
California Retailers Association  
Carlsbad Chamber of Commerce  
CAWA – Representing the Automotive Parts Industry  
Chino Valley Chamber of Commerce  
Cirtus Heights Chamber of Commerce  
Consumer Brands Association  
Council For Responsible Nutrition  
Dairy Institute of California  
Flexible Packaging Association  
Fontana Chamber of Commerce  
Gateway Chambers Alliance  
Greater High Desert Chamber of Commerce  
Huntington Beach Chamber of Commerce  
Imperial Valley Regional Chamber of Commerce  
Independent Beauty Association  
Industrial Environmental Association

International Bottled Water Association  
International Dairy Foods Association  
La Verne Chamber of Commerce  
Lake Elsinore Chamber of Commerce  
Lodi Chamber of Commerce  
Lompoc Valley Chamber of Commerce  
Long Beach Area Chamber of Commerce  
Mammoth Lakes Chamber of Commerce  
Mission Viejo Chamber of Commerce  
Morgan Hill Chamber of Commerce  
National Confectioners Association  
Newport Beach Chamber of Commerce  
North San Diego Business Chamber of Commerce  
Norwalk Chamber of Commerce  
Oceanside Chamber of Commerce  
Palm Desert Area Chamber of Commerce  
Pet Food Institute  
Personal Care Products Council  
Plastic Recycling Corporation of California  
Plastics Industry Association  
Pleasant Hill Chamber of Commerce  
PRINTING United Alliance  
Ridgecrest Chamber of Commerce  
Sacramento Metro Chamber of Commerce  
Santa Barbara South Coast Chamber of Commerce  
Santa Maria Valley Chamber of Commerce  
Simi Valley Chamber of Commerce  
Stockton Chamber of Commerce  
The Toy Association  
Tulare Chamber of Commerce  
West Ventura County Business Alliance  
Western Agricultural Processors Association  
Western Growers Association  
Western Plastics Association  
Wine Institute  
Yorba Linda Chamber of Commerce