



Circular
Action
Alliance

Introduction to Circular Action Alliance (CAA) for PFI

October 17, 2023

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Agenda

1. Background
2. CAA Overview
3. Colorado Needs Assessment
4. Next Steps



Background

The Context

- California, Colorado, Maine and Oregon have passed laws that establish Extended Producer Responsibility (EPR) programs for paper, packaging, and packaging-like items.
- These EPR laws require producers (i.e., brand owners, retailers, restaurants and first importers) to fund and/or administer the collection and processing of the paper and packaging that they supply into these states.
- California, Colorado, Oregon and Maine all require the formation of producer responsibility organizations (PROs), which will manage recycling programs on behalf of obligated producers.
- In May 2023, the Colorado Department of Health & Environment (CDPHE) approved Circular Action Alliance (CAA) to be the one PRO to administer and implement the state's EPR program.
- This legislative session, other states have passed "study bills," or laws that require and establish a process for making recommendations on future EPR legislation (e.g., Maryland, Illinois, New Hampshire). CAA has applied to be the PRO appointed to sit on Maryland's Advisory Council.
- New York passed a needs assessment last legislative session (2022), and the state is contracting with a third party to conduct the study.

What is the Role of the PRO?

What is a PRO?

- Producer Responsibility Organizations (PROs) manage the financial and sometimes operational requirements of an EPR law on behalf of producers.
- PROs are typically required to be non-profit organizations.
- Some laws allow for a single PRO (at least at program outset), while others allow for multiple PROs.

What are the PRO's responsibilities?

- A PRO's primary responsibilities are the development, implementation, and operation of a program plan which is approved by the relevant government agency, and the collection and management of producer fees.
- Operating under an approved program plan, a PRO may manage:
 1. Program operations and management
 2. Stakeholder relations and communication
 3. Data management and reporting
 4. Financing
 5. Legal and regulatory compliance



CAA Overview

Who is Circular Action Alliance?

Circular Action Alliance (CAA) is a nonprofit, tax-exempt 501(c)(3) established to support the successful implementation of EPR laws for paper and packaging.

CAA was officially incorporated in December 2022 and 18 companies from the food, beverage, consumer goods, and retail industries serve as Founding Members.



The Clorox Company

L'ORÉAL

Walmart 



PEPSICO



TARGET

THE
Coca-Cola
COMPANY



MARS

FERRERO

niagara
BOTTLING, LLC

amazon 

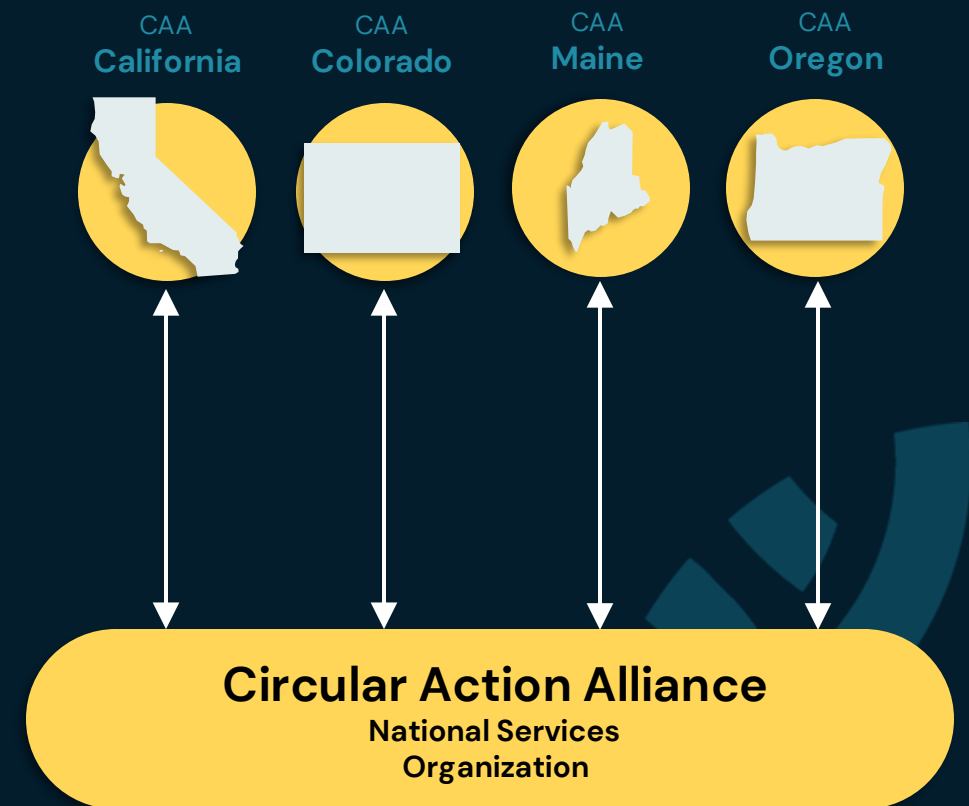
KraftHeinz



scJohnson

PRO Structure & Responsibilities

- CAA is a non-profit PRO with a mission to provide best-in-class compliance services to all producers across multiple states.
- As a national services organization, CAA will support the implementation of state EPR programs through compliance tools and resources, such as reporting portal for producers.
- Our priority is to implement program plans that are responsive to the needs of each state and enhance materials management through system improvements and local operations.



Our Approach

As a non-profit PRO, CAA will provide services and support for producer compliance and work collaboratively with all EPR program stakeholders to create a circular economy for paper and packaging



Support & Represent Producers

Provide all producers with harmonized compliance and reporting services and help them navigate different obligations from state to state.



Improve Recycling System Outcomes

Manage the collection and distribution of funding to improve consumer access to recycling, enhance collection systems, increase recycling rates, and generate high-quality recycled material that can be used over and over in new products and packaging.



Ensure Program Efficiency

Establish transparent and competitive procurement practices for service providers to advance strong EPR program outcomes, while managing system costs.



Educate Consumers

Equip consumers with clear information to raise participation rates, reduce litter and contamination, and increase recycling rate.



Support Innovation

Support and incentivize innovation in packaging design and delivery models to reduce waste, enhance recyclability, and keep materials in circulation.



Collaborate for Impact

Meaningfully engage with all system stakeholders to inform the development of strong, locally relevant program plans.

An aerial photograph of a dense evergreen forest, likely a spruce-fir forest, showing a vast expanse of green trees with some lighter green highlights from sunlight filtering through the canopy.

Colorado Implementation

Colorado EPR Implementation

- Needs Assessment began in August 2023.
- The needs assessment is an in-depth study that will assess Colorado's existing recycling system and identify opportunities for growth and improvement of the system.
- It is meant to provide the roadmap for the approved PRO's program plan and inform the rule-making process.
- The legislation establishes the elements of the needs assessment which include assessments of:
 - Access to Services
 - Recycling Services Costs
 - Demographic Factors & Other Variables
 - Contamination at MRFs & Compost Facilities
 - Non-Residential Service Availability, Gaps & Costs
 - Processing Capacity
 - Opportunities & Costs
 - Minimum Recyclables List
 - Markets
 - Innovative Technologies
 - Reuse & Refill
 - Education
 - Three Scenarios (Impact of Exemptions)
 - Compost Facilities





Next Steps

Next Steps

CO

CAA is working with HDR, CDPHE and the CO Advisory Board to ensure the needs assessment is finalized and delivered to CDPHE by January 30, 2024.

CA

CAA is engaged with informal rulemaking in California. CalRecycle released a PRO application on September 9, and CAA intends to apply. Approval will be finalized in early 2024.

OR

CAA is engaged with rulemaking in Oregon and is developing a program plan ahead of the March 31, 2024, submission deadline. This is a requirement for PRO approval.

ME

CAA will continue to participate in the Maine stakeholder workshops and provide comments to Maine DEP. DEP will release an RFP for a Stewardship Organization (SO) by the fall of 2025.

MD

CAA has applied to be appointed as the PRO in Maryland, and to serve on the Producer Responsibility Advisory Council.

Get Engaged



CAA will continue to host presentations and discussions that will be accessible to all stakeholders and producers, including a Producer Working Group kicking off **November 1, 2023**.



CAA has created a survey to help ensure that companies that know or suspect they will have obligations in EPR states are receiving up to date information and alerts regarding requirements



Scan the QR code to complete CAA's obligated producer survey and receive access to producer working groups, compliance news, regulatory updates, and more.



Why Support CAA?



A Single PRO Offers:

- **Consistent Compliance Services** (i.e., single reporting portal)
- **System Cost Management** (i.e., centralized IT/human resources)
- **Cross-State Harmonization** (i.e., similar material lists, eco-modulation)



California letter of support ensures CAA is selected in the largest market



Scan the QR code to complete CAA's obligated producer survey and receive access to producer working groups, compliance news, regulatory updates, and more.



Thank You



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