

Recycling Policy Update

October 28, 2025



The Recycling Partnership

Building a Better Recycling System

We're a purpose-driven organization committed to building a better recycling system that delivers economic and environmental benefits for communities and the industry.

Who We Are ♦

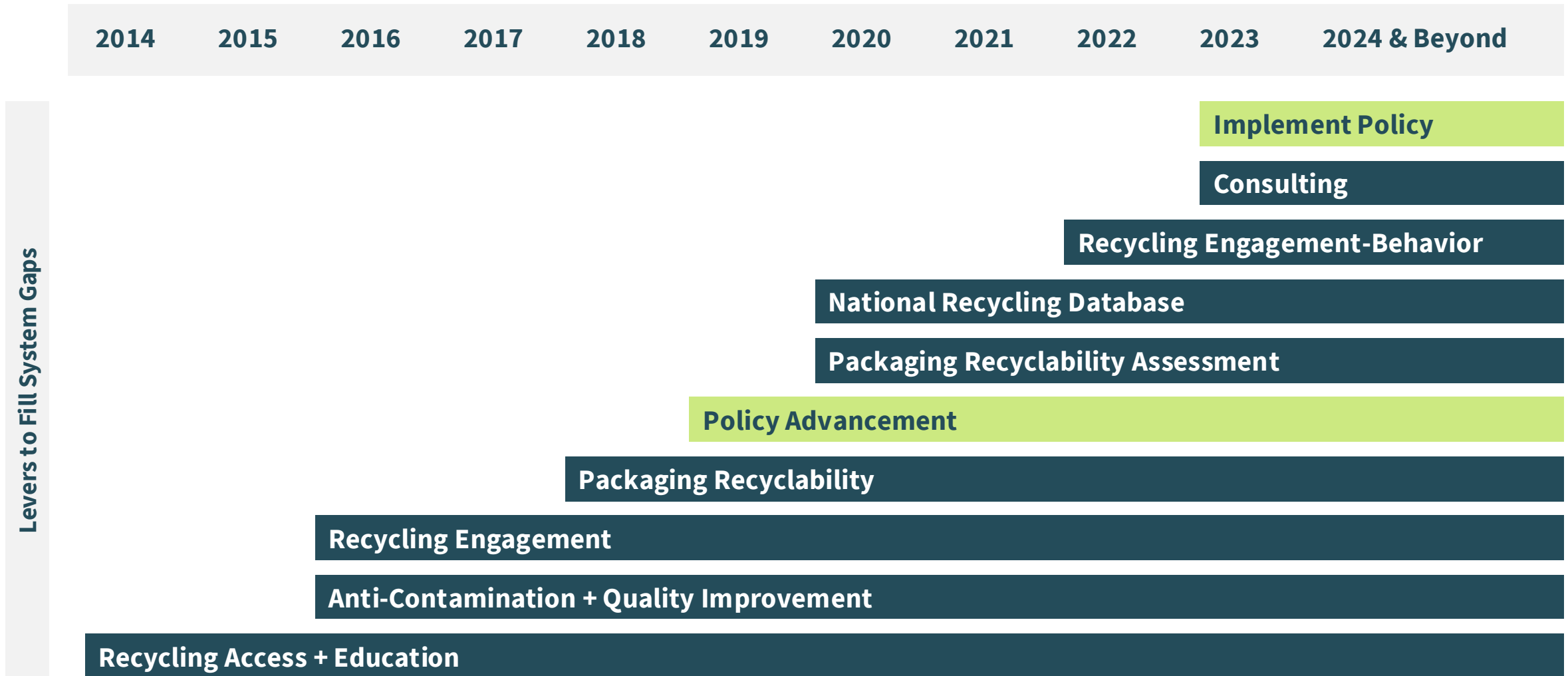
Our mission is to build a better recycling system – one that delivers the economic and environmental benefits our communities and the hundreds of thousands of people who work throughout the recycling industry deserve. We leverage our best-in-class people, operations and data to drive impactful decisions and outcomes.



**The Recycling
Partnership**

Building a Better Recycling System

A Decade of Experience Building Toward an Effective Recycling System



The Recycling Partnership

Building a Better Recycling System

Policy Team

The Recycling Partnership's Team supports policy across the country in three main ways:

- State policy advocacy;
- Federal policy advocacy; and
- State policy implementation.

State Policy Advocacy and Implementation

What does The Partnership advocate for?

The Partnership takes a holistic view at the policy landscape, evaluating what programs or policies can most benefit the system.

Our current book of work focuses on advocacy around certain policies:

- Extended producer responsibility, at both the state and federal levels;
- Research on policies supporting recycled content demand;
- Recycling infrastructure investment tax credit; and
- National infrastructure and accessibility programs.

While these are the policies we currently focus on, we are continually evaluating the landscape and learning from other thought leaders and partners about where we can best play a role in growing the recycling system.



Deeper Dive into EPR for Packaging and Paper Products (PPP)

Common Features of EPR for PPP



Created by legislation
establishing rules
and targets

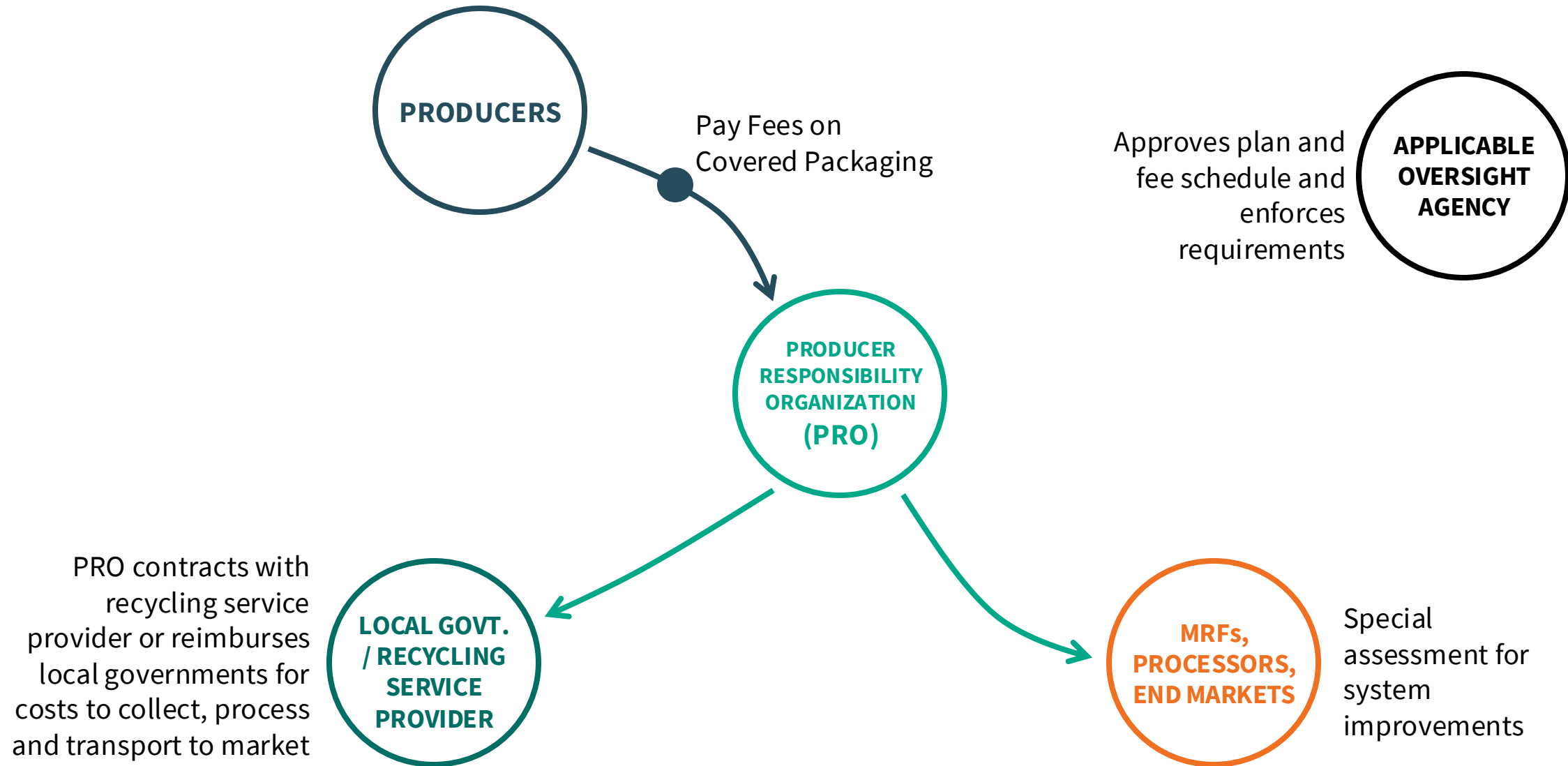


Managed by one or
more Producer
Responsibility
Organizations (PRO)



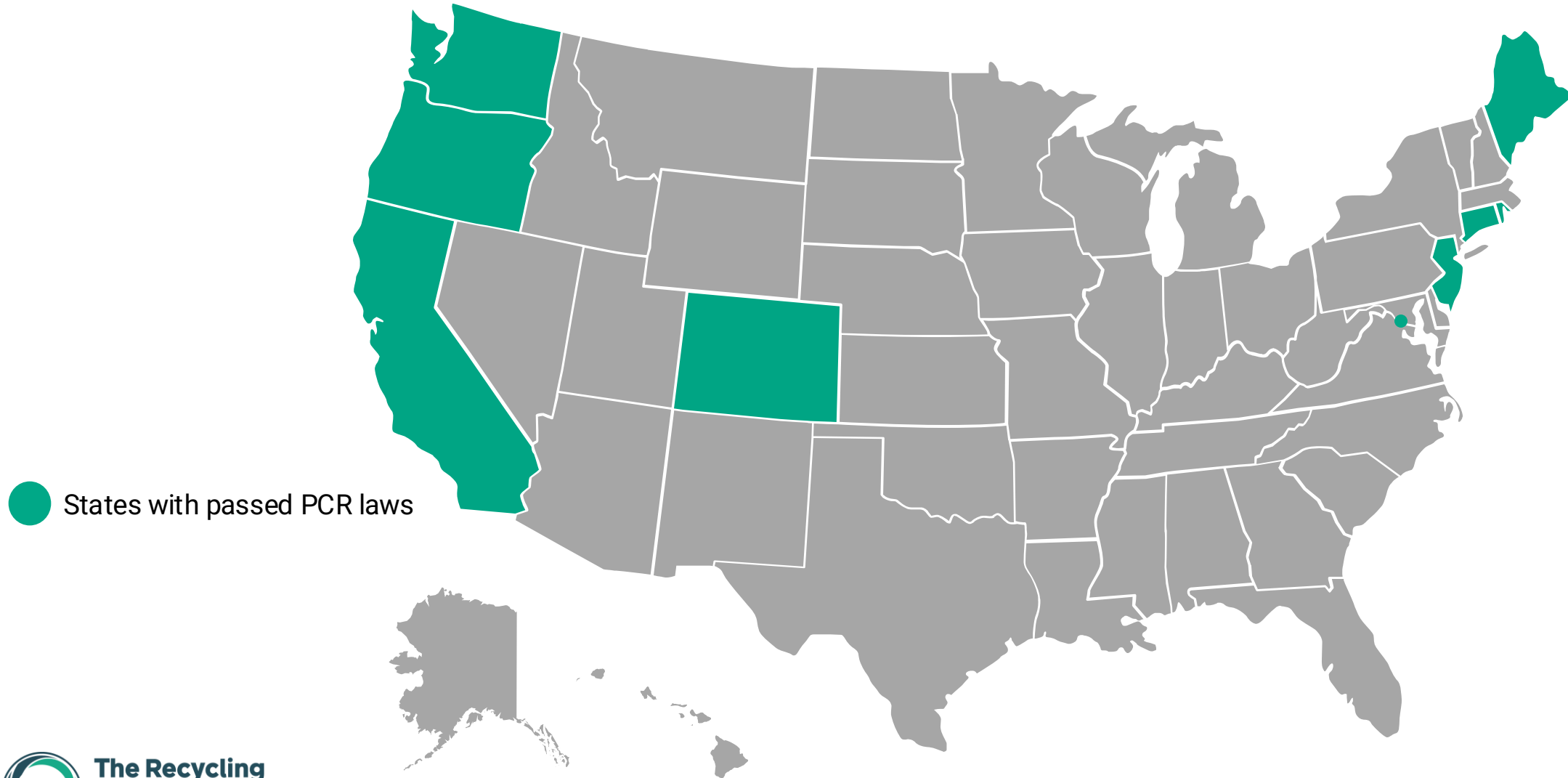
Guided by a Producer
Responsibility
Program Plan

Deeper Dive into EPR for PPP





Mandates for Post Consumer Recycled (PCR) States



How does The Partnership participate after laws are passed?

The Policy Team continues to engage after laws pass:

- Build **relationships with interest holders** to understand the unique landscape and factors influencing the recycling system in each state;
- Track **rulemaking developments** and provide comments;
- Monitor discussion/decisions of **advisory boards and other groups**;
- **Advise the PRO** on program plans, materials strategy, education and outreach, and more;
- Provide **technical assistance** to communities and facilities;
- Share **information and insight** with funders.

What's Happened on the Ground in Oregon Since July 1



- Funding starts to flow to communities and processing sites (first trucks to arrive in summer 2026)
- CAA's first RecycleOn recycling drop-off sites open to collect materials on depot list
- Local governments are mostly collecting the materials on the statewide list of recyclable items
- A portal is live for LGs to access customizable E&O collateral and is available in 12 languages
- Education and outreach materials hit mailboxes, social feeds and beyond
- Residents can look up their recyclable lists by address at RecycleOn.org and choose from 12 languages

Hướng dẫn cho rác tái chế

Cảm ơn quý vị đã tái chế những đồ vật này! Tất cả các vật phẩm phải rửa và khô.



Tuân thủ các hướng dẫn về những vật liệu được phép bỏ vào thùng tái chế sẽ giúp bảo vệ tài nguyên thiên nhiên, giảm thiểu ô nhiễm và tạo ra thêm nhiều cơ hội việc làm.



Scan for: العربية, 简体中文, 繁體中文, हिन्दी, 한국어, Русский, Af-Soomaali, español, Tagalog, українська, tiếng Việt.

Nhựa



Chai và thùng nhựa, xô và chậu cây cứng

Nắp OK nếu vặn chặt. Tất cả các vật phẩm phải có kích thước 2 inch x 2 inch hoặc lớn hơn.

Kim loại



Lon nhôm, thép và phế liệu kim loại

Dưới 10 pound và 18 inch.

Bìa cứng và thùng các tông



Làm phẳng các tông, hộp đóng gói, hộp đựng thực phẩm và đồ uống

Hộp pizza phải rửa, không còn dính thức ăn.

Giấy



Báo, tạp chí, giấy văn phòng, hộp giấy đựng trứng, thư, sách bìa mềm, túi giấy và giấy gói quà phi kim loại

Không



Không rác tái chế trong túi



Không pin



Không thức ăn hoặc chất lỏng
(làm rỗng tất cả các hộp đựng)



Không túi nhựa hoặc loại nhựa co giãn
(đem tới cửa hàng hoặc cơ sở được chỉ định)



Không ống, dây cáp hoặc dây điện

Current EPR Status in Additional States

California

- Continuing to finalize rules
- CAA's program plan is due in mid-2026

Colorado

- Colorado Department of Public Health & Environment (CDPHE) is reviewing CAA's program plan
- Program should go live about 6 months after CDPHE approves the program plan

Maine

- Maine's Department of Environmental Protection is continuing the rulemaking process. They have approved a set of rules and are currently working to approve the Packaging Material Types list.

Maryland

- Maryland's Department of the Environment is currently in the pre-rulemaking phase and drafting content that will then go through a rulemaking review process.

Minnesota

- Minnesota Pollution Control Agency (MPCA) has closed an RFP for 2 needs assessments.
- The preliminary needs assessment is due by 12/31/2025 and the complete needs assessment is due by 12/31/2026 and then every five years.
- MPCA is also conducting advisory board meetings to inform and solicit information from interest holders.

Washington

- Washington's Department of Ecology closed applications for advisory board members and is in the process of selecting membership.
- Ecology offered the draft recycling refund model study for a one-week review. The purpose of this study was to model convenient access to redemption services for a recycling refund (DRS) program. This study was mandated in the EPR legislation.

Federal Policy Advocacy

What are we working on in the 119th Congress?



The CIRCLE Act

(H.R.4466)

Establishes a recycling infrastructure investment tax credit.



RCAA/RIAA/ STEWARDS

(S.351)

Expand recycling infrastructure and access across the U.S.



National EPR

Looks to establish a national EPR framework that works with State programs.



**The Recycling
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Building a Better Recycling System

The Cultivating Investment in Recycling and Circular Local Economies (CIRCLE) Act

The Partnership has led a coalition in support of H.R. 4466, the CIRCLE Act, with bipartisan introduction.

The CIRCLE Act establishes a **30% recycling infrastructure investment tax credit** eligible to private entities as well as nonprofits and local governments.

The CIRCLE Act would:

- Reduce a private entity's tax liability when making qualified investments in infrastructure to recycle paper, metals, glass, aluminum, and other materials. These investments could include machinery, operational equipment, or software;
- Fully develop a residential recycling system that could return over \$11B in new wages & create 200,000 new jobs;
- Advance American manufacturing by ensuring domestic recycled commodities are used as manufacturing inputs;
- Reduce the burden on local governments to bear the cost of operating waste management programs. Local governments and taxpayers could see \$9.4B in savings as fewer materials are sent to landfills or incinerators;
- Support rural and urban communities through expanding infrastructure and a growing ability to provide services in previously unreachable areas.

The CIRCLE Act

The Partnership is leading a coalition of 50+ organizations to coordinate efforts on finding cosponsors for the legislation and showing the benefits of The CIRCLE Act for all parts of the U.S.

If you are interested in joining this coalition or learning more about The CIRCLE Act, please contact Anthony Tusino, atusino@recyclingpartnership.org.

Advanced Drainage Systems, Inc
Alpek Polyester
Altera Polymers
Atlantic Packaging
Amcor
American Beverage Association
Aquatherm
Association of Plastic Recyclers
Ball Corporation
Can Manufacturers Institute
Cirba Solutions
Circular Services
Closed Loop Partners, LLC
Commercial Plastics Recycling, Inc.
Constellium
Core & Main
Cyclic Materials
Dow
ERI
Flexible Packaging Association
Glass Packaging Institute
Global Paint for Charity, Inc.
Indorama Ventures
Infra Pipe Solutions Ltd
Keurig Dr Pepper
LyondellBasell
Mississippi River Cities & Towns Initiative
National Association for PET Container Resources (NAPCOR)
National Stewardship Action Council

National Waste & Recycling Association (NWRA)
New Hope Energy
NEXTLOOP Americas
Niagara Bottling
Novelis
PET Resin Association (PETRA)
Petroflex NA Ltd
Plastic Pipe Institute, Inc
Plastics Industry Association
Primo Brands Corporation
Recology
Recycled Materials Association (ReMA)
River Valley Pipe, LLC
SACO AEI Polymers
Salonvirement
Shorr Packaging
Smart Waste, Inc.
Solid Waste Association of North America (SWANA)
Soucy Techno
Sustainable Food Policy Alliance
Technimark
The Aluminum Association
The Recycling Partnership
Urban Mining Industries, LLC
U.S Chamber of Commerce
U.S. Plastics Pact
Visia
World Wildlife Fund

The CIRCLE Act – What’s Next?

In the House of Representatives, we are working to build a 1-for-1 list of bipartisan cosponsors. We’ve also submitted a request for scoring by JCT.

In the Senate we are working toward bipartisan introduction paired with the relaunch of the Senate Recycling Caucus.

In the stakeholder community we are working to build our list of endorsing organizations to share a variety of perspectives on the positive impacts of investing in recycling systems.

The CIRCLE Act was purpose-built to be “dropped in” to the next legislative package. As Congress considers the next reconciliation package, bipartisan tax package, or omnibus, the stakeholder community is advocating for inclusion of the CIRCLE Act.

The STEWARD Act (S.351)

The STEWARD Act (S.351) is the combination of two bills that almost passed at the end of 2024. Both bipartisan bills were included in the end of year funding package that failed. Both bills were endorsed by more than 75 organizations.

1. The Recycling and Composting Accountability Act (S.1194/H.R.4040 – 118th)

- a. This legislation would commission EPA to take an inventory of existing recycling and composting infrastructure, prepare a report of best practices to reduce contamination and increase participation, and share the report with Congress.
- b. *Now H.R.4109 in the 119th Congress.*

2. The Recycling Infrastructure Accessibility Act (S.1189/H.R.6159 – 118th)

- a. This legislation would create an EPA grant program to provide transfer stations to communities/areas of the country that are too far from existing recycling markets.
- b. *Now H.R.2145 in the 119th Congress.*

The Senate version of STEWARD passed out of the Environment and Public Works Committee in January 2025.

Both bills were re-introduced in the House. The legislation must be combined and passed in the House Energy and Commerce Committee.

The Recycling Partnership is committed to advancing the STEWARD Act. We are encouraging the House Energy and Commerce Committee to markup H.R.2145 and H.R.4109 to become the STEWARD Act and pass the full House.

National Extended Producer Responsibility

The Recycling Partnership is exploring conversations related to National EPR in Congress.

TRP advocates for a national EPR framework that builds on our learnings from state-level advocacy and implementation, provides consistency across the nation in definitions and targets, and sets out to meet the National Recycling Goal.

In March 2024, the Senate Environment and Public Works Committee held a hearing on EPR. You can read our letter for the record [here](#).

Get in Touch:

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🌐 recyclingpartnership.org



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Appendix



**The Recycling
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Building a Better Recycling System

State	California	Colorado	Maine	Maryland	Minnesota	Oregon	Washington
Scope of Materials	All packaging & plastic foodware	Printed paper & packaging	All packaging	Packaging and paper products	Packaging and paper products	Printed paper & packaging and plastic foodware	Packaging and paper products
Cost Coverage Scope	Improvements	100%	Full	Reimbursement for covered services – up to 90% by 2030	Reimbursement for covered services – up to 90% by 2031	Improvements (est. 28% when fully implemented)	Reimbursement for covered services – up to 90% by 2032
Multiple PROs	Yes (after 8 years)	No* – Independent Producer Plan allowed	No	Yes, after 7/1/2033	Yes, after first stewardship plan ends (5 years)	Yes (10% market share requirement)	Yes, after first program plan expires (5 years)
Recycling Rate Requirements	65% for plastics	25% by 2022, 41% by 2030, 55% by 2035 for paper & packaging	Set by DEP	Set by MDE – Informed by Needs Assessment	Set by MPCA – Informed by Needs Assessment	25% by 2028, 50% by 2040, 70% by 2050 for plastics	Set by Ecology – Informed by Needs Assessment
Recycled Content Mandates	No (set in other statute)	Set w/ PRO Plan	Set by DEP	Set w/ PRO Plan – Informed by Needs Assessment	Set w/ PRO Plan – Informed by Needs Assessment	No (eco-modulation factor)	Set by the Department – Informed by Needs Assessment



State	California	Colorado	Maine	Maryland	Minnesota	Oregon	Washington
Education and Outreach	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Exemptions for Bottle Bill Material	Yes	Yes, if future bottle bill is passed	Yes	Yes, if future bottle bill is passed	Yes, if future bottle bill is passed	Yes	Yes, if future bottle bill is passed
Responsible End Market Requirement	Yes	Yes	No*	Yes	Yes	Yes	Yes
Encompass Composting	Yes	Yes	No	Yes	Yes	Includes compostability study	Yes
Source Reduction Requirements	25% reduction by 1/1/2032	Eco-modulation factor	Eco-modulation factor	Set w/ program plan	Statewide requirement + performance targets set w/ program plan	Eco-modulation factor	Statewide plastic source reduced requirement + performance targets set w/ program plan
Selected PRO	CAA	CAA	TBD	CAA	CAA	CAA	TBD
Anticipated Program Implementation	2027	2026	2027	2029	2029	Program is live as of 7/1/2025	2030

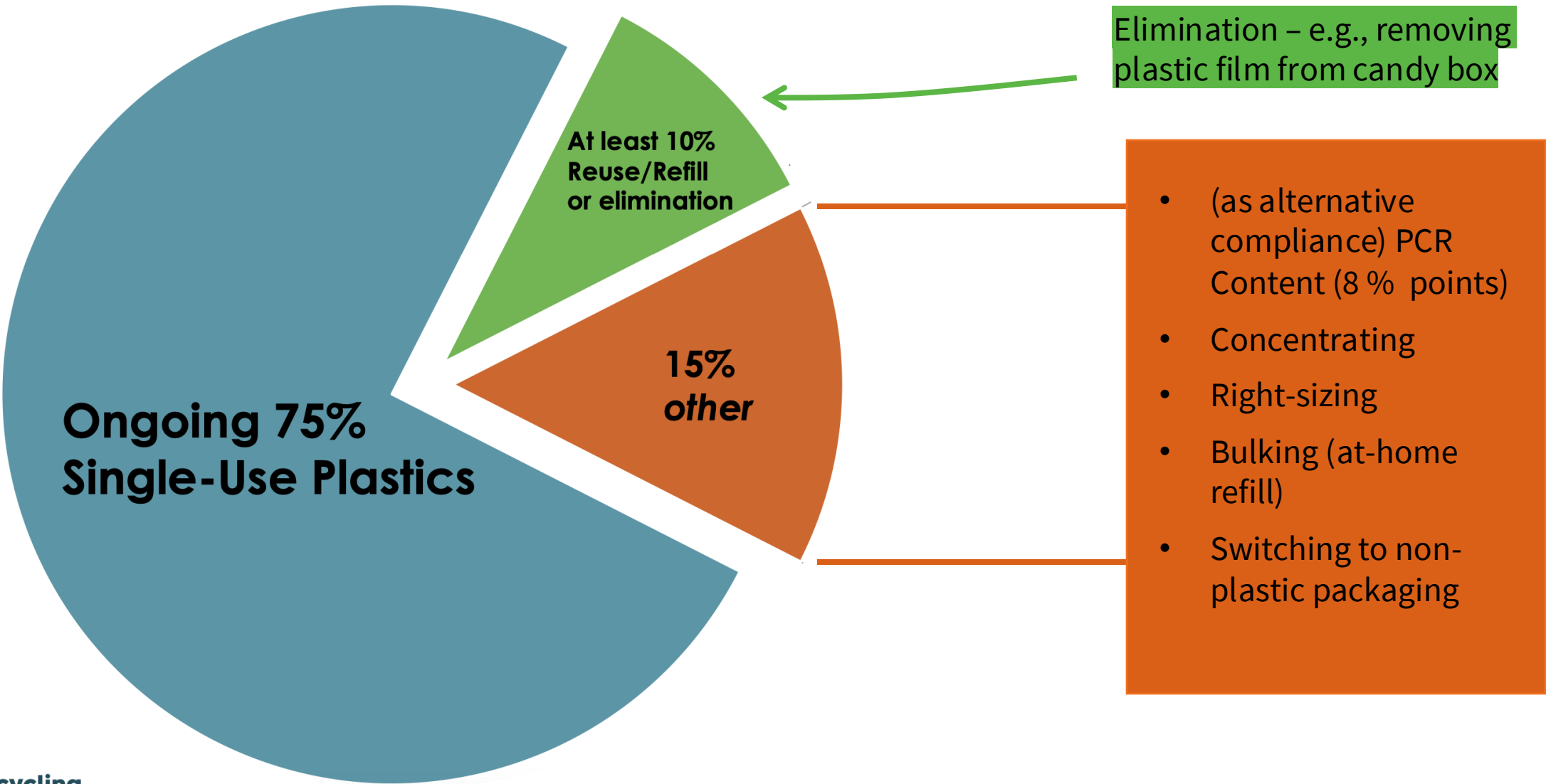
California SB 54 – Plastic Source Reduction

Plastic Source Reduction Mandate by 2032:

- 25% source reduction of plastic covered material by weight and by number of plastic components
 - At least 10% of this source reduction must be achieved by shifting to reusable or refillable packaging (4%) or through eliminating plastic packaging components without replacing it with another material
 - The remaining source reduction (15%) can be accomplished through concentrating, right-sizing, optimization, shifting to bulk or large formats, or shifting from a plastic covered material to a non-plastic covered material.
 - No more than 8% can be accomplished through alternative compliance based on the use of post- consumer plastic recycled content verified by a third party approved by CalRecycle.*



SB 54 Source Reduction Overview



California SB 54 – Plastic Source Reduction

- The 25% Source Reduction goal is aggregated over the entire industry, by the PRO
- Baseline for Source Reduction will be established by CalRecycle based on 2023 data
- All PRO members must submit individual source reduction plans, with data on the amount (by unit count) and weight of plastic covered materials and a plan on how the producer will reduce plastics usage
- Historic source reduction (going back to 2013) can be reported, and the PRO has the discretion of giving credit for that activity



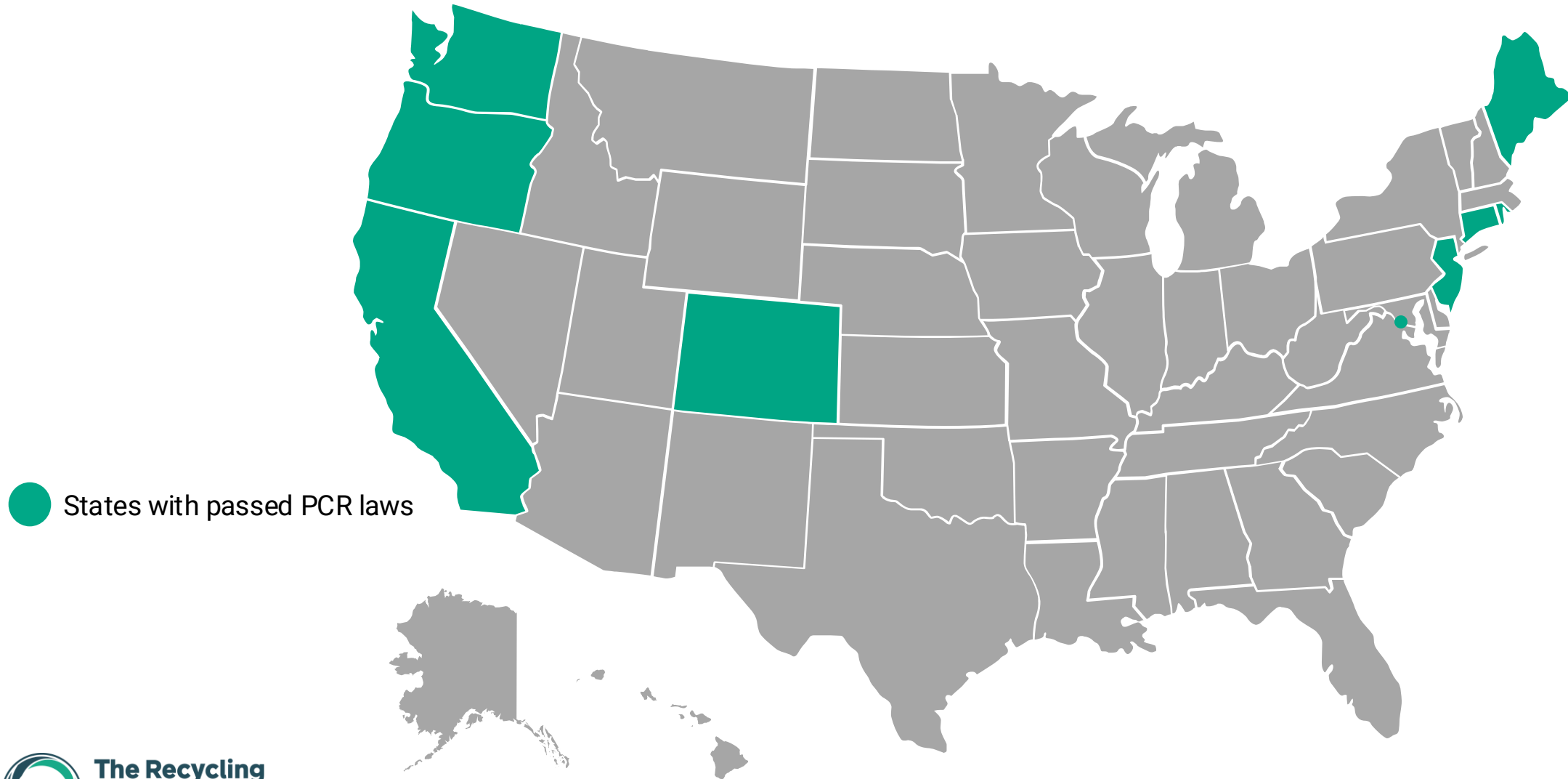
California SB 54 – 100% Recyclable/Compostable/Reusable

Recyclability/Compostability/Reusability by 2032:

- SB 54 requires that by Jan. 1, 2032, all packaging must be recyclable, reusable, or compostable (PRC 42050(b))
- **Recyclability** is defined through SB 343, and requires that:
 - 60%+ of residents in the state have access to recycling,
 - MRFs serving 60%+ of state accept the material,
 - Material is sorted to a defined stream and sent to a responsible end market for recycling,
 - If collected source separated, each category of material must achieve a 75% recycling rate
- Material that is "trending towards compliance" or can demonstrate a hardship may be exempted by CalRecycle, although more specifics are needed
- **Compostability** is defined through AB 1201. Requires that compostables comply with ASTM standards and be an "allowable organic agricultural input" under USDA rules. USDA currently does not consider compostable packaging an allowable organic agricultural input.
 - Implementation of AB 1201 delayed to June 30, 2027 --> ideally provides time for USDA National Organics Standards Board to change their decision in October 2025



Post Consumer Recycled (PCR) States



States with passed laws



State Laws	Covered Products	Start Dates & PCR Rates
<u>CA AB 793</u>	Plastic beverage containers	1/1/22 - 15% 1/1/25 - 25% 1/1/30 - 50%
<u>CA SB 270</u>	Single-use carryout bags ban Plastic reusable grocery bags Paper carryout bag	Pre 1/1/20 - 20% Post 1/1/20 - 40% <8 lbs. capacity – 20% >8lbs. capacity – 40%
<u>CA RPPC Law</u>	Rigid plastic packaging containers	25% PCR Reduce container weight Achieve at least 10% product concentration Use reusable or refillable packaging Meet a 45% recycling rate
<u>CA Recycled Content Trash Bag Program</u>	Plastic trash bags (>0.75 mils thick)	Pre 1/1/98 – 30% Post 1/1/98 – PCR content equal to at least 10% of the weight of the bag. At least 30% of the weight of the material used in all plastic products sold in CA
<u>CA SB 1013</u>	Wine & distilled spirits in a box, bladder, pouch, or similar container	1/1/24 – 15% 1/1/27 – 25% 1/1/32 – 50%
<u>CA §14549</u>	Glass containers manufactured in CA	Container with less than 50% mixed-color cullet – 35% Container with 50% or more mixed-color cullet – 25%



States with passed laws



State Laws	Covered Products	Start Dates & PCR Rates
<u>WA SB 5022</u>	Plastic beverage bottles Plastic wine (187 ml) & dairy milk containers Plastic household cleaning & personal care Plastic trash bags	1/1/23 - 15% 1/1/26 - 25% 1/1/31 - 50% 1/1/28 - 15% 1/1/31 - 25% 1/1/36 - 50% 1/1/25 - 15% 1/1/28 - 25% 1/1/31 - 50% 1/1/23 - 10% 1/1/25 - 15% 1/1/27 - 20%
<u>WA SB 5323</u>	<u>Single-use carryout bags ban</u> Plastic reusable grocery bags Paper carryout bags	1/1/21 - Ban enacted Pre 7/1/22 – 20% Post 7/1/22 - 40% PCR 40% PCR
<u>NJ S 2515</u>	Plastic beverage containers* *Manufacturers who utilize hot fill process shall not exceed 30% PCR. Rigid plastic containers Plastic carryout bags Plastic trash bags Paper carryout bags Glass containers	1/1/24 - 15% with 5% increase every 3 years (up to 50%) 1/1/24 - 10% with 10% increase every 3 years (up to 50%) 1/1/24 - 20% PCR 1/1/27 - 40% PCR 1/1/24 - 5-20% 1/1/27 - 10-40% (varies by bag thickness) 1/1/24 – 40% PCR <8 lbs. capacity – 20% 1/1/24 – 35% PCR
<u>ME LD 1467</u>	Plastic beverage containers	1/1/2026 - 25% PCR 1/1/2031 - 30% PCR
<u>ME LD 1532</u>	Single use carryout bags ban Paper carryout bag	4/22/2020 – Ban enacted >8 lbs. capacity – 20%
<u>CT HB 6664</u>	Plastic beverage containers	7/1/25 – 15% 7/1/28 – 25% 7/1/33 – 50%



States with passed laws

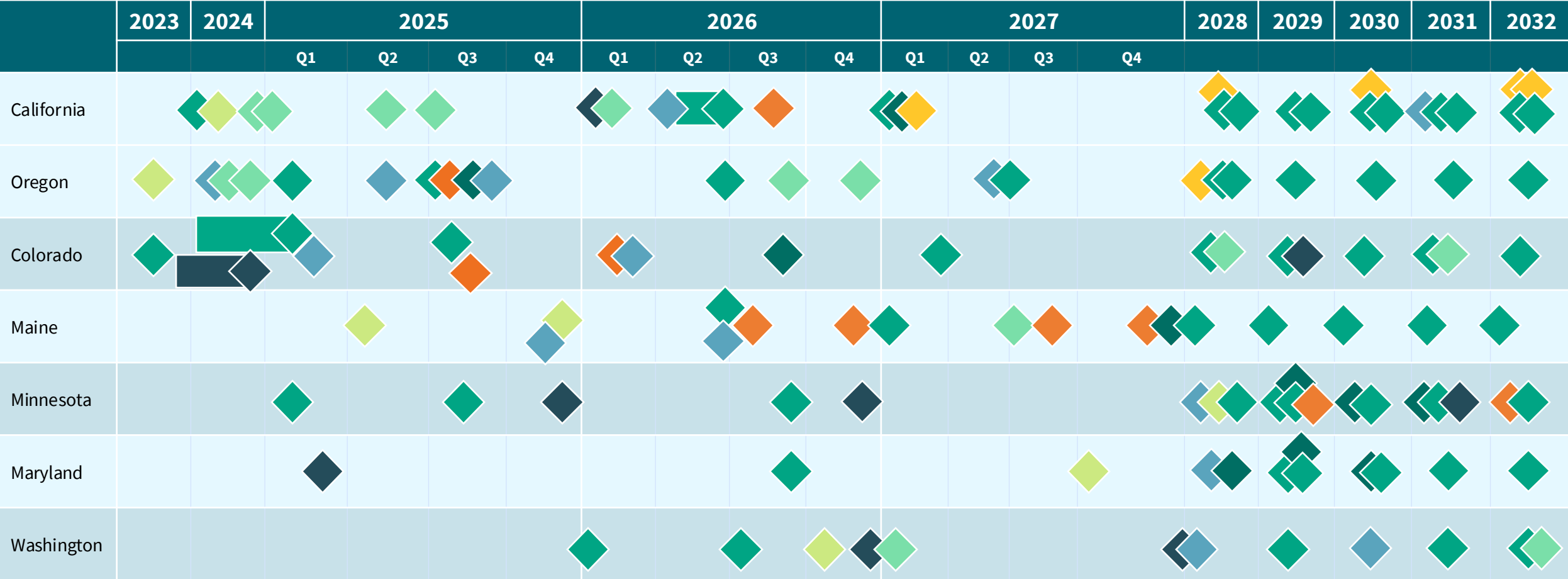


State Laws	Covered Products	Start Dates & PCR Rates
<u>CO HB 21-1162</u>	Single-use plastic carryout bag ban Paper carryout bag	1/1/24 – Ban enacted 1/1/23 – 100%
<u>DCMR 21-1002</u>	Single-use paper carryout bags	5/17/19 – 40% PCR
<u>ORS 459A.655</u>	Any rigid plastic container	1/1/95 – 25%
<u>ORS 459A.550</u>	Glass food, drink, or beverage containers*	1/1/95 – 35% 1/2/08 – 50%
<u>OR HB 2509</u>	Paper checkout bag	40% PCR
<u>RI H 7065</u>	Paper bag	1/1/24 – 40% PCR

*Applies to glass manufactured in Oregon, or within 750 miles** of the border of Oregon.

**Manufacturers over 750 miles of the OR border must comply if they sell more than 1,000 tons of new glass containers to packagers in OR.

Integrated EPR State Timelines



Type of Milestone



PRO is selected / Producers join PRO
/ Producers must be on Program Plan
/ PRO Annual Report



Needs Assessment
(announced, completed)



State Program Plan (Issued by
state, submitted, amended,
revised by PRO)



**Recycling rate/Source
reduction targets**



State Material List (drafted,
finalized)



State-specific studies (e.g.
consumer cost impact)



**Producer fees, reporting &/or
product bans begin**



**Community & MRF
Reimbursements begin**



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