



Circular
Action
Alliance®

CAA WA Updates

Recycling Reform Act Advisory Council Meeting
June 11, 2026

Agenda

1. Intro
2. Producer Services:
Overview of Producer
Journey
3. Data & Analytics: From
Lists to Producer Fees
4. Draft REM Standard Public
Comment
5. Closing

Overview of the Producer Journey

Jim Velky

Director Account Management
& Segment Lead

CAA's Mission

- CAA's mission is to help producers comply with EPR laws, deliver harmonized, best-in-class services and work with governments, businesses and communities to reduce waste and recycle more.

CAA will:

- Meet state-specific regulatory requirements;
- Leverage existing recycling systems and infrastructure; and
- Advance the circularity of covered materials through collaboration with local governments, service providers and recycling system interest holders.



Demonstrated Growth in Producer Participation Through Multi-Program Engagement and Targeted Education

4,245

Unique Participant
Producers across all
CAA Programs

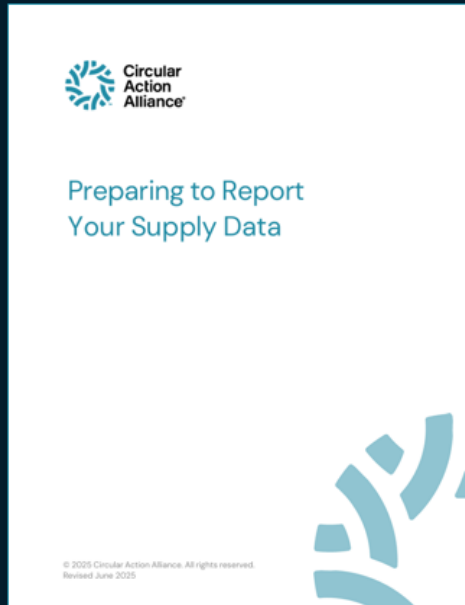
Washington Producers

- March 2026 = 2,324
- June 2026 = 2,675

CAA's Producer Journey



Guidance and education available to support producer reporting



Since 2024, CAA has published more than 45 producer guidance documents to its Producer Portal

This guidance offers producers a comprehensive overview of the information and data required for reporting to CAA.

CAA producer support has managed more than 50K support cases since 2025

How Producers Stay Engaged

- **Registering!**
- **Producer Resource Center**
 - Producer resources page with FAQs, PWG information and other updates
- **Monthly Newsletter**
 - The latest updates for each state & new resources
- **Email us**
 - Email us at Producer.Support@CircularAction.org
- **Attend an Onboarding Sessions**
(See QR Code →)
 - 101 Producer Onboarding
 - 102 Registration & Agreements
 - 103 Budgeting for EPR Fees



If you haven't yet registered, please click this link or scan the QR code below for the [Account Registration Form](#). This is the first step in the producer registration process.



If you'd like to attend other Producer Events, scan the QR code or click the link to See our [producer events page](#).



D&A: From Lists to Producer Fees

Aaron Burman

Vice President of Data & Analytics



**Circular
Action
Alliance®**

Three Core Components of Fee-Setting



Total Program Costs

Each year, CAA determines the costs required to implement the program in each state. These costs vary state-to-state due to the existing system and specific requirements outlined in laws and regulations.



Relative Material Costs

Some materials cost more per ton to manage than others. To reflect this in fee rates, CAA developed indices that represent the relative cost to manage each type.



Producer-reported Supply

Each year, producers report how much material they supply in the state. Reports follow state-specific categories.

The Fee-Setting Process

1

Build the State Budget

CAA creates a program budget for each state based on system costs and the requirements in law and regulation.

2

Create Material Cost Indices

CAA analyzes cost drivers (volume and density of materials, equipment, labor, recovery rates) to estimate relative cost of managing each material.

3

Collect Producer Data & Determine Total Supply

Producers report the amount and type of materials supplied into the state. CAA combines this data to calculate total supply by material category.

4

Allocate Costs and Revenue by Category

CAA allocates overall system costs to all material categories using supply data and cost indices and distributes commodity revenue only to those categories that generate revenue.

5

Set Fee Rates for Each Category

Fee rates are expressed in cents per pound of packaging material supplied into the market.

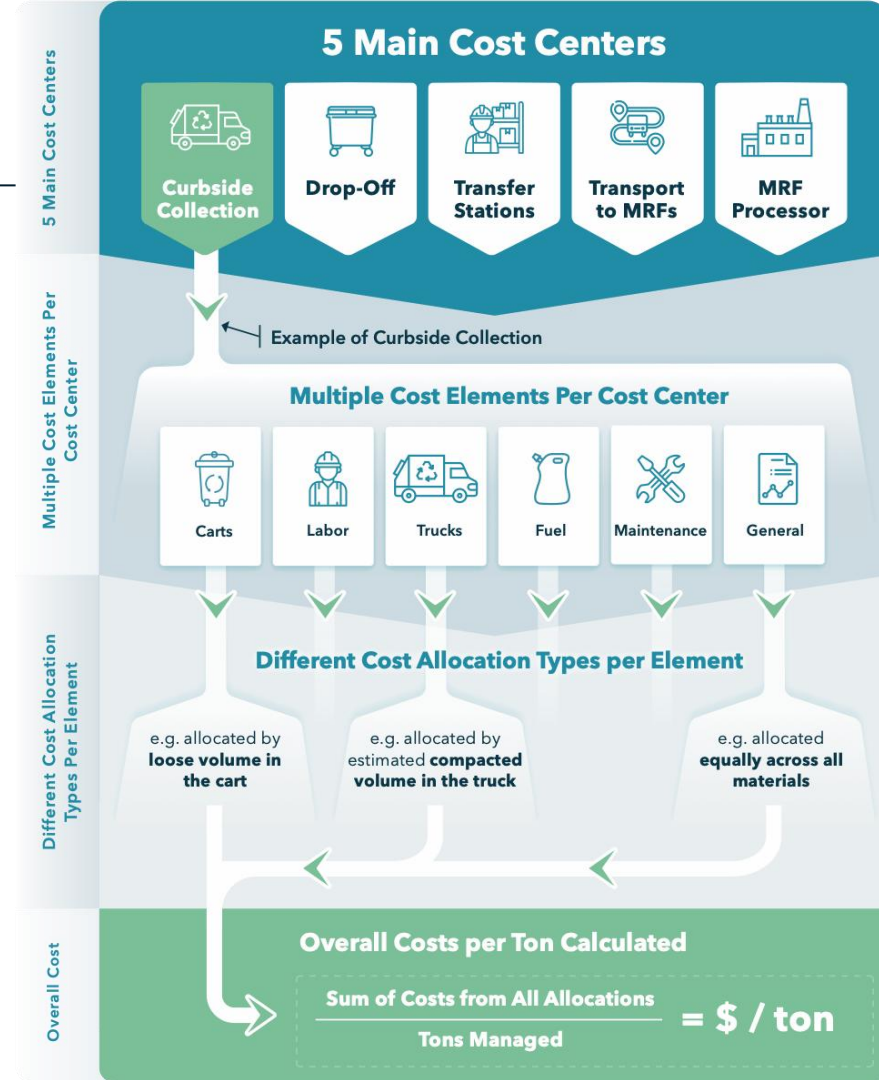
6

Calculate each Producer's Fee

Producer fee = (producer's amount in each category × that category's rate) ± adjustments like bonuses & maluses.

Cost to Manage (CTM) Model

- Provides cost differentiation between material categories based on their cost to manage in the recycling system
- Materials that are not accepted are treated as contamination and absorb costs of residue management and negative impacts to material value
- Outside of the CTM model, CAA also leverages passive eco-modulation factors to increase fees for unrecyclable packaging and reduce fees for recyclable packaging



Aligning Materials Across States

- Classification is unique in each state
 - OR: USCL, PRO & N/A
 - CO: MRL, AML & N/C
 - CA: Recyclable, Compostable, Both, Neither
 - WA: residential recycling, residential composting, public place, alternative collection
- Classification of materials affects the fee rates
 - Polycoated paperboard varies by over 100% due in large part to classification as not accepted in OR and accepted in CO
 - PET thermoforms vary by over 200% for the same reason
- Category definitions can also have significant effects on individual package fee rates
 - In CA, transparent green PET is included in the pigmented PET category, but in OR & CO, it is included in the PET Clear/Natural category
- **Aligned classification provides producers with clear financial incentive to utilize recyclable packaging**

CAA's draft REMs Standard

Ross Bergman

Responsible End Markets Senior Manager

What is a Responsible (End) Market?

Common definition

A market in which the recycling and recovery of materials or the disposal of contaminants is conducted in a way that benefits the environment and minimizes risks to public health and worker health and safety.

Statutory obligation

PRO must:

- have a process to verify end markets are REMs.
- support service providers in sending materials to REMs.

Usually, service providers have an obligation send materials to REMs

Different requirements

- Variance amongst states in REM definitions, responsible criteria, and reporting requirements
- Requirements are usually more detailed in rules than in statutes

REM requirements exist in almost all EPR states

REM Roles & Responsibilities

Regulator

- Establish REM requirements
- Approve PRO approach through Program Plan
- Monitor and enforce

CAA

- Establish verification process
- Track flow of materials
- Oversee verification against REM requirements

End Markets

- Share information (e.g., documentation, reporting) demonstrating REM compliance
- Undergo audits by a third-party

MRFs, Secondary Processors, Brokers and even landfill operators have a role too > To be covered in upcoming slides

What Is the CAA REM Standard?

- Applies to recycling of paper, packaging, and food serviceware
- For entities downstream of the MRF/depot/collection
- Harmonizes shared state requirements; state-specific appendices for unique rules
- Focused on compliance-level assessment in line with EPR REM requirements
- Applicable to certification of Responsible Market entities worldwide

- What the standard does not cover:
 - Recycled content claims or chain-of-custody
 - MRFs and Collection Operations
 - Composting facilities

REM Standard Structure

Core Pillars

- Legal Compliance
- Labor Health & Safety
- Environmental Soundness
- Transparency
- Assurance of Processing & Disposition

Addenda

- State-Specific Yield

Responsible Market Categories

End Markets and Supply Chain Entities
w/ Processing

Supply Chain Entities – No processing

Supply Chain Entities – No possession

Disposal Entities

Public Comment Period (May 5 – July 7, 2026)

- **Purpose:**

- Improve the draft standard
- Identify unclear or unworkable requirements
- Strengthen verifiability and outcomes
- Ensure the standard works across facility types and materials

Not a referendum on EPR statute or regulations

- **General information:**

- May 5 – July 7, 2026
- All interested parties welcome to comment on draft REM Standard text
- Comments will be reviewed, themed, and dispositioned

[circularactionalliance.org/
rem-standard-public-
comment](https://circularactionalliance.org/rem-standard-public-comment)



Stay Engaged

Producers

- Register with CAA
- Producer questions? Email producer.support@circularaction.org

Support Ecology's Needs Assessment

- Respond to surveys and interviews

Provide CAA Your Input

- Early engagements through listening tours – site visits, facility tours, conversations
- Sign up for CAA news, webinars and events on [our website](#).
- Comment on REM Standard until July 7



Washington State Listening Tour

Let's keep in touch. Invite CAA out to your community or facility.



Thank You



Info@CircularAction.org



CircularActionAlliance.org



Circular Action Alliance



[@CircActAlliance](https://twitter.com/CircActAlliance)



[@CircularActionAlliance](https://www.youtube.com/CircularActionAlliance)