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California Plastic Pollution Prevention and Packaging Producer Responsibility Act (SB 54) Data Reporting Requirements

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This guidance is for producers that choose to participate in a Producer Responsibility Organization and not register as an independent producer. Circular Action Alliance (CAA) is currently the only identified California Producer Responsibility Organization (PRO). On May 1 the SB 54 regulation became effective and therefore producers have until June 1, 2026 to register with Circular Action Alliance (CAA) and submit supply data for 2023 and 2025¹. The CAA registration portal can be found [here](#). All section references footnoted in this document align to the January 29, 2026 version of the [draft regulation](#).

Registration & Preliminary Data Submission Requirements

- Producers must register by June 1, 2026.²
- Producers must submit supply data for the 2023 calendar year when applying to become a participant in the PRO.³ This includes the following “supply data”, by covered material category:
 - Total weight of material sold, distributed, or imported in/into the state
 - Total number of plastic components sold, distributed, or imported
- Producers must also submit annual supply and source reduction reports for the 2025 calendar year by May 31, 2026.

CAA’s guidance document for data reporting and a preparation workbook is [available here](#).

¹ Those complying individually and not through CAA must register with CalRecycle and apply to be an independent producer by June 1, 2026. Those qualifying for a small producer exemption must register with CalRecycle and apply for the exemption by June 1, 2026.

² § 18980.5

³ § 18980.5(d)

Qualitative Data Submission Requirements

Following submission of the preliminary supply data in the reporting portal, CAA will request that producers provide qualitative data about their company or organization. This includes:

- List of brands for all covered materials submitted in the supply report
- List of corporate affiliates, including Tax ID/EIN, affiliate legal name, and a declaration of affiliate inclusion in the supply report
- Disclosure of all methodologies used to prepare supply data, which may include:
 - An explanation of data sources and reporting methodologies used to calculate supply volumes, packaging weights, and total reported quantities
 - An explanation of assumptions or adjustments that were applied in reporting
 - Details of internal processes or tools used to ensure data accuracy and compliance with CAA's reporting requirements

CAA may request additional calculations or information to confirm data reasonability.

Fees

On May 1, CAA published an [illustrative fee schedule](#) to help producers and other stakeholders understand how program costs are translated into fee rates across covered material categories (CMCs) using CAA's fee-setting methodology.

Ongoing Reporting Obligations

Submit Annual Data

For all covered material where the reporting entity was the producer, PROs must collect data for the previous calendar year, on an annual basis⁴. CAA will request previous year's data be submitted annually by May 31.

Notify the PRO or Department of Changes

- Participant producers must ensure contact information with the Department remains current and accurate.⁵
- Participant producers must notify the PRO of any reportable activities they report directly to the Department⁶

⁴ § 18980.10.2 (b)

⁵ § 18980.10 (a)(3)

⁶ § 18980.10.1(b)

- If a participant producer's activities have changed such that it is no longer subject to the reporting requirements, it must notify the PRO within 30 days of the change.⁷

Reporting Requirements for Producers Claiming Certain Exemptions

In circumstances where producers may apply for an exemption from certain requirements of this rule, producers will be asked in the CAA registration portal to check a box to indicate the exemptions that will be requested of CalRecycle, including information about the specific covered material proposed to be exempted. For the exemption requests listed in this section CAA is guiding producers to report covered material based on the assumption that no exemptions are in effect at the time of reporting. These may include:

Exemptions for Specific Materials with Demonstrated Recycling Rates

Producers meeting this requirement may request an exemption from CalRecycle, or the PRO may submit the application on the producer's behalf.⁸ Once approved, producers must maintain complete, up-to-date data regarding collection and recycling for purposes of demonstrating that the packaging or food service ware items meet the requirements. Exemption requests must be made every 1-2 years, depending on the date the request is submitted.⁹

Exemptions for Materials with Unique Challenges

This exemption applies to covered materials or packaging components that present unique challenges in complying with the rule requirements because it cannot be recycled, composted, or source reduced.¹⁰ This exemption request to CalRecycle must be made by the PRO on behalf of a producer or group of producers.¹¹

Exemptions for Materials that Pertain to Health & Safety

This exemption applies to covered materials or packaging components for which health and safety concerns prevent compliance with requirements of the statute.¹² This exemption request to CalRecycle must be made by the PRO on behalf of a producer or group of producers.

⁷ § 18980.10 (b)(2)(A)

⁸ § 18980.2.3 (b), (d)

⁹ § 18980.2.3 (f)

¹⁰ § 18980.2.4 (c)(4)(A)

¹¹ § 18980.2.4 (a)

¹² § 18980.2.4 (c)(4)(C)

Exemptions for Materials that are Unsafe to Recycle

This exemption applies to covered materials or packaging components that cannot comply with requirements of the statute because it is unsafe to recycle.¹³ This exemption request to CalRecycle must be made by the PRO on behalf of a producer or group of producers.

Small Producer Exemption

Eligible small producers must register with and submit an electronic application to CalRecycle to request this exemption. In the CAA registration portal, there are prompts to follow if the producer indicates that they intend to apply to request a small producer exemption. When making the request to CalRecycle applicants must include records showing that gross sales in the state in the most recent calendar year were less than one million dollars (\$1,000,000).¹⁴

Source Reduction Reporting

Producers of covered material are required to set goals and report on both the weight of plastic covered material and the number of plastic components to measure source reduction progress. More information can be found on how to calculate this reporting [here](#). CAA plans to provide guidance to producers on requirements for source reduction reporting and on the preparation of Individual Source Reduction Plans.

Further Compliance Guidance

For guidance on how this regulation may affect your business and to explore strategies for compliance, please reach out to our team.

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¹³ § 18980.2.4 (c)(4)(D)

¹⁴ § 18980.5.2