Your packaging now carries a recurring cost.

Extended producer responsibility moves the cost of collecting and recycling packaging from city waste budgets onto the companies that put it on the market.

Seven U.S. states have enacted these laws. Oregon and Colorado are invoicing producers today. California's first fees are due in August 2026, with full fees from the January 1, 2027 program start. More states introduce bills every session.

HOW IT WORKS EACH YEAR

Register through a producer organization, not the state ›

Report what you supplied, by material and weight ›

Get invoiced on that report ›

Pay and keep the data behind the filing

It runs again on the year you just finished, so the cost recurs every year.

WHO PAYS

In almost every case the responsible company is the brand owner, not the supplier who manufactured the packaging and not the distributor who shipped it. A clause in a supplier contract does not move the obligation.

WHAT DRIVES THE COST

Fees are charged per metric ton and vary by material, so the same product in a different format can cost several times more. Format choice is the largest lever you have on the bill.

SOME COMPANIES ARE OUT OF SCOPE

Every operating state exempts the smallest producers through a tonnage or revenue floor, though not automatically. At least one aggregates across affiliates, so a small subsidiary can still be in scope.

HURDLES AND DECISIONS TO EXPECT

1. Which legal entities register
2. Who owns this internally
3. Whether to ask suppliers for data now or later
4. Whether packaging changes are worth making
5. Whether to do the first filing in-house

Most of these need a budget owner or a legal sign-off.

If you already know you are obligated, registering with Circular Action Alliance is the first step. It runs the programs in the operating states. If you are not sure, settle that first. Late registration and late reporting are named violations in every operating state.

WHERE THE CURRENT NUMBERS ARE

- **Price your own packaging** epratlas.com/fee-calculator
- **Deadlines and fee schedules by state** epratlas.com/epr-laws-by-state
- **If this just landed on your desk** epratlas.com/prepare-for-epr

Questions on your own portfolio: Dave Hartter, info@hartteradvisory.com, linkedin.com/in/davehartter