



Insights: Alerts

California's Extended Producer Responsibility Law: Reporting Deadline of November 15, 2025

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Like other state-specific Extended Producer Responsibility (EPR) laws (e.g., [Minnesota](#), [Oregon](#)), California's Plastic Pollution Prevention and Packaging Producer Responsibility Act shifts the end-of-life costs of managing, processing, and recycling certain covered materials from taxpayers to the businesses that control the generation or use of these materials.

As other states have done, California appointed the Circular Action Alliance ("CAA") as the "producer responsibility organization" ("PRO") for the state. This appointment of CAA was pursuant to the part of California's EPR law that requires a PRO to administer the state's EPR program, whereby the PRO sets the timeline, requirements, and other compliance obligations and details for covered producers.

One recent deadline for covered producers was to have registered with CAA by September 5, 2025. Another important deadline is for covered producers to report their 2023 data to CAA by **Saturday, November 15, 2025**.

Depending on your position in the supply chain and control over the selection and use of covered materials, the question of whether your company is covered by California's EPR law may not be as straightforward as one would hope. Manufacturers and brand owners are likely to be deemed "producers" under the law such that they must register and report. However, any companies who provide covered materials—largely single-use packaging and plastic food service ware—should confirm their compliance obligations.

Producers who have registered and reported in other states should also be aware that the process in California will entail different strategic considerations on the front-end that can affect a company's obligations down the road. For example, you'll have to decide to self-report or report through the PRO. If your company has a complex structure, you will also need to decide whether to register affiliated entities as separate producers—but if you go that route, be aware that consolidated reporting is not currently available under California's law, so you'll have to file separate reports for each entity. If your company hasn't tracked covered materials on a per-entity basis, filing separate reports may prove a much larger challenge than it initially appears.

Adding to the complexity of complying with California's EPR law and the CAA's requirements pursuant to it, including the November 15 reporting deadline, is that some aspects are still in the process of being revised and clarified. While there is currently no public record of enforcement for failure to comply with the state's EPR regulations, civil penalties for noncompliance are substantial: up to \$50,000 per day per violation. Producers

who fail to register timely may also be banned from selling, offering for sale, importing, or distributing the covered materials in California, which could lead to serious business ramifications.

If you have EPR-related questions—such as whether your business is an Obligated Producer, how to register and report, or any other questions or concerns about environmental laws, regulations, or advertising claims—please feel free to contact [Kilpatrick's Advertising and Marketing team](#).

Related People



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