California

EPR Snapshot for Envelope & Mail Producers



Summary

PRO: Circular Action Alliance (CAA)

Status: Rulemaking Active, 2027 Program Start

California's EPR law has the narrowest scope of any enacted state for paper-based communications companies. It targets single-use packaging and single-use plastic food service ware — it is NOT a broad printed paper law. Many communications envelopes and direct mail products may fall outside current covered-material definitions. However, envelopes used as single-use consumer packaging (e.g., e-commerce poly mailers or branded packaging envelopes) may require analysis.

Regulatory and Litigation Notes:

- SB 54's final regulations went into effect May 1, 2026, and producers now face a compressed compliance calendar — registration was due June 1, CAA's program plan submission to CalRecycle was due June 15, and baseline data is due July 1, all ahead of the January 1, 2027 program start.
- The regulatory landscape is now facing multiple simultaneous legal challenges: NRDC and Californians Against Waste have announced plans to sue over the finalized rules; NAW has filed a new federal lawsuit in the Eastern District of California challenging SB 54 on Commerce Clause and First Amendment grounds, naming CalRecycle Director Zoe Heller and the Circular Action Alliance as defendants; and 17 Republican Attorneys General have filed a separate lawsuit challenging the law. Despite this wave of litigation, none of these cases have resulted in an injunction.
- California's program obligations remain fully in effect and producers should continue meeting all current deadlines while monitoring developments closely.

What Is Covered

- Single-use packaging materials sold or distributed in California
- Single-use plastic food service ware

What is NOT covered: General printed paper, direct mail, transactional mail, communications envelopes. California's scope is specifically focused on single-use packaging — the narrowest definition among EPR states.

Practical Takeaways

- Standard communications envelopes, direct mail, and transactional mail are very likely outside California's current scope — but confirm with counsel
- E-commerce mailers, poly mailers, or envelopes used as product packaging should be analyzed under the single-use packaging definition
- Begin monitoring CAA registration requirements ahead of the January 1, 2027 program start if you have any covered products
- Plastic envelope components (like window films on covered packaging mailers) are subject to strict source-reduction mandates. Under SB 54, plastic packaging must hit a 25% source reduction by weight and plastic components must achieve a 65% recycling rate by January 1, 2032.

What to Watch

- CalRecycle's Covered Material Categories List — updates could expand or clarify scope
- CAA registration and reporting timelines as the 2027 launch approaches
- Whether California follows other states in expanding scope to paper products in future legislative sessions

Key Dates

- December 31, 2025 - CalRecycle published updated Covered Material Categories List
- CAA approved as designated PRO for California
- August 2026 - Early-stage administrative program fees were invoiced by CAA to fund the state's initial regulatory onboarding pool
- January 1, 2027 - Full Program Launch. Producers must be fully compliant under CAA to legally distribute covered single-use packaging in California

Key Resources

- CalRecycle EPR Page
- CAA California Page
- CAA Producer Resource Center

Practical briefing only; not legal advice. Consult qualified counsel to determine how EPR obligations apply to your specific products and operations. Last updated October 2026.