

U.S. Extended Producer Responsibility (EPR) Laws: 2026 Landscape, Timelines & Expectations

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As Extended Producer Responsibility (EPR) regulations for packaging accelerate across the United States, manufacturers, brand owners, and importers are entering the most consequential phase of implementation to date. Seven states now have active EPR laws in place—California, Colorado, Maine, Maryland, Minnesota, Oregon, and Washington—with compliance expectations intensifying through 2026 and major fee-based obligations beginning as early as 2027.



2026 marks the first year in which multiple EPR deadlines align, and states expect producers to demonstrate strong internal data systems, transparent supply-chain documentation, and participation in an approved Producer Responsibility Organization (PRO)—most commonly the Circular Action Alliance (CAA).

This update provides a high-level overview of state laws, upcoming deadlines, program expectations, and official resources to help producers prepare.

STATE-BY-STATE UPDATES & KEY TIMELINES

CALIFORNIA — SB 54 (Plastic Pollution Prevention & Packaging Producer Responsibility Act)
California's sweeping SB 54 program continues its phased implementation:

- May 31, 2026 — Producers must submit material supply data to inform fee calculations.
- January 1, 2027 — PRO fee obligations officially begin.
- 2032 Targets — 100% recyclable/compostable packaging; 65% recycling of single use plastics; 25% reduction against 2023 baseline.

Resource: [California SB 54 regulatory information \(CalRecycle\)](#).

COLORADO — Statewide Recycling Producer Responsibility Program
Colorado is one of the most advanced states in implementation:

- January 1, 2026 — First producer fee payments began.
- May 31, 2026 — Detailed material supply reporting due.

Companies selling into Colorado should already be registered with CAA; ongoing accuracy in reporting will impact fee assessments and future compliance.

Resource: [Colorado Producer Responsibility Program](#)

MAINE — First State to Enact Packaging EPR (2021)
Maine is preparing to launch full program operations:

- May 31, 2026 — Registration and reporting of 2025 packaging data due.
- Late 2026 — Simplified supply report required to establish producer baseline obligations.
- 2027 — First payment obligations begin.

State authorities are selecting a stewardship organization in early 2026, widely expected to be CAA.

Resource: [Maine Stewardship Program for Packaging](#)

OREGON — Recycling Modernization Act (RMA)

Oregon's program is fully active, though now subject to ongoing litigation:

- May 31, 2026 — Deadline for reporting 2025 covered material sales volumes.
- Litigation Update (Feb 2026) -- A federal court issued a preliminary injunction blocking enforcement of Oregon's RMA.

Despite litigation, EPR obligations continue for most producers.

Resource: [Oregon Plastic Pollution and Recycling Modernization Act](#)

WASHINGTON, MARYLAND & MINNESOTA — Newer Programs Entering Implementation

States beyond the original four are now onboarding producers:

- Washington — Registrations open; producers must have a PRO in place by January 1, 2026.
- Maryland — Registration with CAA expected to open Spring 2026.
- Minnesota — Producer registration portal remains open; additional reporting guidance forthcoming.

These states contribute significantly to the expanding national EPR footprint.

Resource: [EPR Legislation Tracker](#)

WHAT PRODUCERS SHOULD EXPECT IN 2026

Alignment of Deadlines Across Multiple States

2026 is the first year when reporting, registration, and invoice cycles become more synchronized, increasing administrative pressure for multi-state producers.

Greater Financial Impact

Fee schedules are becoming clearer and more substantial:

- Oregon producers reported ~\$1.1M in cumulative fees already paid by participating OEMs.
- Plastics carry significantly higher fee rates, incentivizing material reduction and design changes.

Heightened Enforcement Focus

States are issuing invoices, collecting fees, and preparing for potential sales restrictions for noncompliance, particularly in Colorado and Oregon.

Increasing Compliance Complexity

Companies must maintain detailed packaging data—including material type, weight, components, and supply chain sources—and prepare for potential audits.

KEY TAKEAWAYS FOR INDUSTRY

- Multi-state producers must adopt a centralized EPR compliance strategy to manage disparate deadlines and reporting formats.
- Data quality and completeness are now critical, influencing both fee calculations and regulatory risk.
- PRO membership, especially with the Circular Action Alliance, is becoming a requirement across nearly all active states.
- Regulatory momentum indicates continued expansion, with additional states expected to pursue EPR in 2026–2027.