



March 6, 2025

The Honorable Gavin Newsom
Governor, State of California
1021 O Street, Suite 9000
Sacramento, CA 95814

RE: Publish SB54 Regulations by March 8th

Dear Governor Newsom,

As the Alliance for Mission-Based Recycling (AMBR), a national coalition of recyclers dedicated to advancing credible and transparent recycling systems, we commend California's leadership in addressing plastic pollution and investing in expanded recycling infrastructure through the enactment of Senate Bill 54. This landmark law, which you signed in 2022, sets critical targets, including requiring all packaging to be recyclable or compostable by 2032, reducing plastic packaging by 25% within a decade, and achieving a 65% recycling rate for single-use plastics in the same timeframe.

A critical component of SB54 is the requirement for expanded polystyrene (EPS) food service ware to meet a 25% recycling rate by January 1, 2025. Failure to achieve this threshold has resulted in a ban on the sale, distribution, or import of EPS foodware in California, effective this year. We are encouraged by CalRecycle's unwavering commitment to applying the first piece of this legalization, and we need to see a continued commitment in this critical moment. Having effective state oversight and checks and balances on the Producer Responsibility Organization (PRO), were critical elements in the negotiations of this bill that cannot be undermined now that regulations are ready for publication.

We are deeply concerned about recent reports suggesting that industry stakeholders are exerting pressure to delay and perhaps revise the implementation of SB 54's regulations. Additionally, industry's calls to revise chemical recycling limitations that are long-standing in the state and using this opportunity to change decades of prohibitions on burning our waste is especially concerning. Such delays could undermine the progress made and hinder California's efforts to combat plastic pollution and the work of other states to implement similar laws.

SB 54 is not just critical for California—it is laying the groundwork for effective Extended Producer Responsibility (EPR) for Packaging and Paper policies nationwide. Across the United States, states are looking to California as a model for reducing packaging waste and holding plastic producers accountable for their packaging design. Four other states are also in the implementation stage, including Colorado, Maine, Minnesota, and Oregon. SB 54's success will prove that EPR bills with strong state oversight can prevent plastic pollution, cut waste, shift costs away from residents, and ensure producers take responsibility for their products. If California falters now, it could embolden further resistance and slow momentum for similar policies in other states. Additionally, leadership from the states is even more important than ever as we already see the new administration rolling back efforts to address plastic pollution and roll back environmental protections.

We urge your administration to:

1. **Ensure Timely Implementation:** Finalize and enforce SB 54's regulations by the March 8, 2025, deadline to keep the law on track and prevent unnecessary delays.
2. **Stand Firm Against Industry Pushback:** Reject attempts to weaken or postpone key provisions, ensuring that corporate interests do not override environmental progress and public interest.
3. **Reaffirm California's Commitment:** Clearly communicate the state's commitment to reducing plastic pollution and holding producers accountable, reinforcing SB 54 as a model for national action.

California has long been a leader in environmental policy. By steadfastly implementing SB 54, the state can continue to set a precedent for others to follow in addressing the global plastic pollution crisis and advancing Extended Producer Responsibility nationwide.

We thank you for your consideration of our comments and your leadership on these issues. Please feel free to contact us with questions or for further information.

Sincerely,

Katie Drews
National Director of AMBR
Co-President, Eureka Recycling, Minneapolis, MN

Bryan Ukena
Founding Member, AMBR
CEO, Recycle Ann Arbor, Ann Arbor, MI

Martin Bourque
Founding Member, AMBR
Executive Director, Ecology Center, Berkeley, CA

Mike Garfield
Founding Member, AMBR
Director, Ecology Center, Ann Arbor, MI

Suzanne Jones
Founding Member, AMBR
Executive Director, Eco-Cycle, Boulder, CO

About AMBR: AMBR envisions a world where keeping natural resources in the ground is prioritized and where we collectively work toward the elimination of waste, toxins, and pollution, and where all products are reused, refilled, recycled, or composted. We support this vision by working to evolve recycling systems to better protect people and the planet, mitigate climate change, and strengthen communities. Learn More:

<https://ambr-recyclers.org/>