

EPR Quick Reference Guide

A practical playbook for
navigating U.S. packaging
regulations — when you
wear more than one hat

Welcome to the EPR Quick Guide for Multi-Role Leads

We know your team probably knows packaging inside and out. But with the introduction of Extended Producer Responsibility (EPR) legislation across the United States, new reporting and compliance rules are adding complexity—especially in states rolling out their own frameworks with different definitions, timelines, and reporting thresholds.

This guide is designed for people like you: operations, procurement, finance, or sustainability leaders who wear multiple hats and are now being asked to oversee packaging compliance—often without clear internal ownership or fully defined requirements.

Our goal is to make it easier to:

- Understand what's coming (and what's already here)
- Triage your organization's risk and responsibilities
- Equip your team with the questions and tools to move forward holds

This isn't a compliance tool. **It's a conversation starter**, built to help you benchmark your readiness, engage your team, and avoid costly surprises.

Let's get started.



I wasn't even aware we had reporting obligations in Oregon until a supplier flagged it.



- Ops Lead
\$70M CPG brand

How EPR Compares to Other Regulations You Already Know

If you’re managing packaging, procurement, or compliance in a midsize organization, you’re probably already tracking multiple regulations.

Depending on your industry or subsector, it’s not uncommon for companies to be subject to compliance under:

- EPA requirements
- PCR content reporting
- OSHA safety standards
- Country-of-Origin labeling rules
- Sustainability disclosures for public companies

Why It Matters

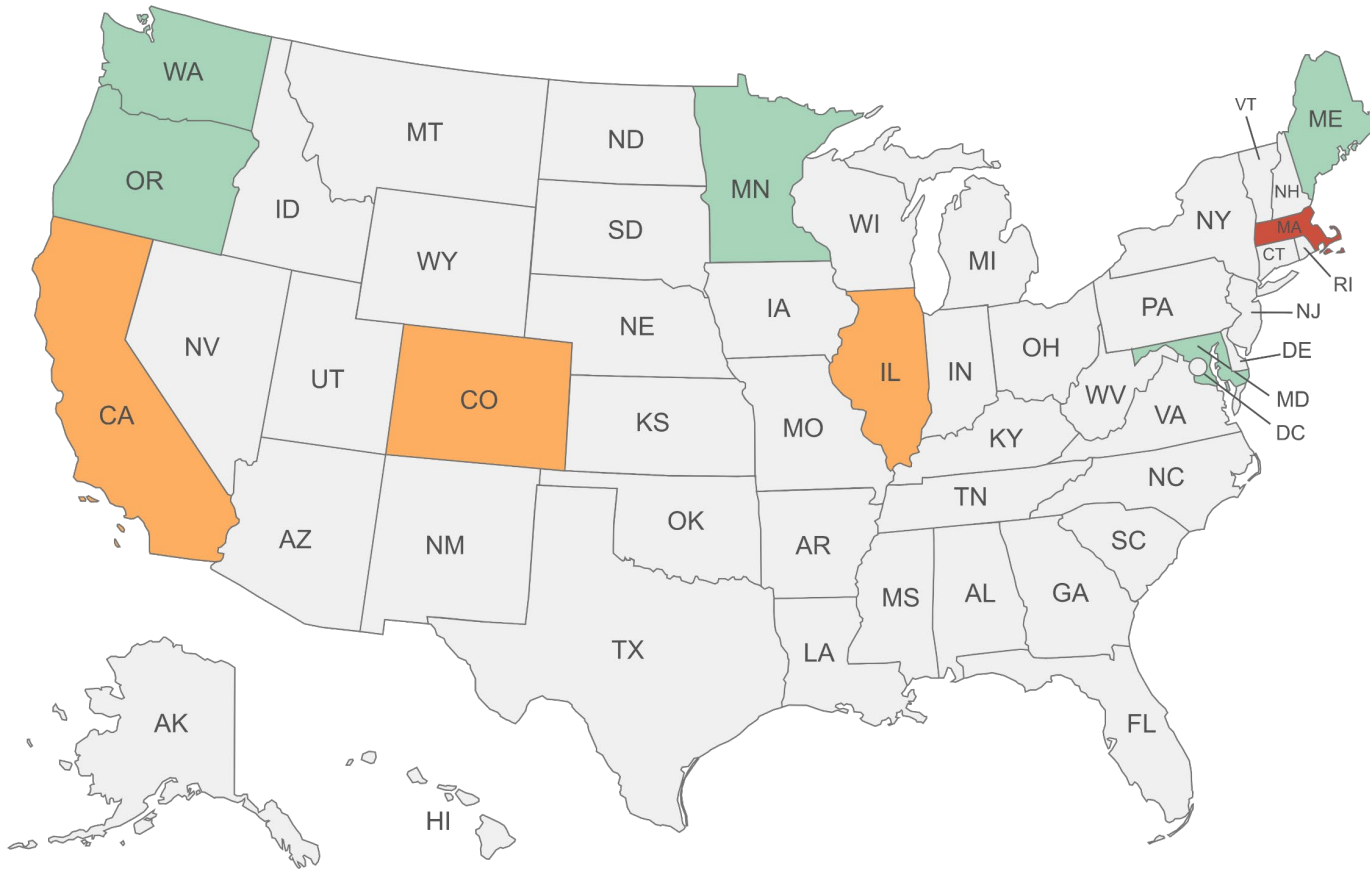
EPR isn’t just about compliance. It’s about new financial obligations, upstream packaging data, and responsibility falling on teams that haven’t historically owned this domain. And because there’s no national registry, it’s up to you to stay ahead of shifting state-by-state mandates.

Regulation Type	Applies to...	Federal or State?	Central Registry?	Key Challenge
EPR for packaging	Brand owners/producers	State-by-state	None (no national registry)	Fragmented definitions & reporting
EPA Regulations	Waste, emissions, chemicals	Federal/State Mix	EPA-managed databases	Technical documentation & audits
OSHA Hazard Communication	Workplace safety & labeling	Federal/State Mix	Employer records	Labeling, training & documentation
PCR Content Reporting	Supply chain & sourcing	State level	Patchwork by agency	Supplier transparency
Country of Origin Labeling	Imported products	Federal (USDA, CBP)	Trade documentation	Accuracy & trade compliance
SEC Sustainability Disclosures	Public companies	Federal (SEC)	EDGAR or internal ESG	Public-facing risk & audit trail

Unlike the many of the reporting requirements that companies are subject to, there **is no national packaging registry in the U.S.**

Each EPR rule is created and managed at **the state level**, with different reporting definitions, timelines, and covered materials.





- Enactive and Active
- Enactive, Pending Implementation
- Introduced or Under Review

The U.S. EPR Landscape:

What's happening, where, and when

Unlike in other jurisdictions—such as the EU or Canada—where packaging EPR is governed locally, mature systems have reached a level of harmonization.

This decentralized structure means there's no single rulebook or timeline to follow. Each state defines its own scope, covered materials, reporting cadence, and enforcement model.

Given the emerging nature of EPR in the United States, it is currently a **state-by-state approach with no central framework or governance.**

The result? A fragmented and fast-evolving patchwork of obligations that affect everything from packaging design to financial forecasting.

Why It Matters:

With **10+ states** already active or in motion, compliance isn't just a legal risk—it's a planning and budget challenge. Staying ahead of this map means fewer surprises and better supply chain conversations.

WATCH FOR "HIDDEN COMPLEXITY"

Some states include secondary packaging, tertiary packaging, business to business / industrial packaging, or threshold exemptions that differ from other state rules.

What Counts as “Packaging”?

You Might Be Surprised

One of the biggest risks in EPR compliance isn't what you know — **it's what you didn't know counts.**

Each U.S. state defines packaging differently. While most start with a similar base, things like containers and boxes — many go further, including components you may not think of as packaging at all.

For mid-sized businesses without a dedicated EPR team, this can mean missed reporting, underdeclared weights, and future fines.

This cheat sheet offers a light-touch view of packaging categories and common oversight areas, especially those often missed by procurement, operations, and generalist leads.

Category	Typical Examples	Overlooked Items
Primary Packaging	Bottles, jars, wrappers, individual units	Tamper seals, pump dispensers, shrink sleeves, adhesives, plastic windows
Secondary Packaging	Multi-packs, boxes holding grouped products	Cardboard inserts, hang tags, branded sleeves
Tertiary Packaging	Outer cartons, bulk shipment containers	Pallet wrap, tape, dunnage, desiccants
E-Commerce Packaging	Mailers, filler, shipping boxes	Return slips, address labels, stickers, QR inserts
Accessory Packaging	In-box promotional material, care guides	Thank-you notes, discount cards, loyalty inserts
Product-Like Packaging	Packaging that stays with the product long-term	Reusable containers, branded jars, refillable dispensers



Tip: Many states expect weights to be declared by packaging type and material (e.g., HDPE bottle vs. PP cap). Knowing what counts and what it's made of is half the battle.



*Our team
didn't count
the shrink
sleeves on our
multipacks —
now we're
retroactively
calculating
weights for two
states.*



– Quote from an anonymized client operations lead, CPG sector

What You Should Be Asking Your Packaging Suppliers

Many producers are surprised to learn how dependent EPR reporting is on their suppliers. If your vendors can't provide accurate material data, or refuse to disclose key weights or recyclability, your compliance risk goes up. With **10+ U.S. states** now introducing Extended Producer Responsibility (EPR) legislation, procurement and operations teams must get ahead of supplier conversations. This cheat sheet includes the starter questions that most teams should be asking now.

Supplier Transparency: What To Ask

CAN YOU PROVIDE WEIGHTS BY MATERIAL TYPE (E.G. HDPE, ALUMINUM, PAPERBOARD)?

Why It Matters:
Reporting requirements are material-specific; poor data = risk of under/over reporting

CAN YOU CONFIRM THE COUNTRY OF ORIGIN FOR YOUR PACKAGING COMPONENTS?

Why It Matters:
May intersect with forced labor regulations and traceability laws beyond EPR

DO YOU KNOW THE RECYCLABILITY CLASSIFICATION OF EACH COMPONENT?

Why It Matters:
Fees are increasingly tied to recyclability; some formats may trigger penalties or disqualification

ARE YOUR INKS, ADHESIVES, OR LABELS COMPLIANT WITH STATE RECYCLABILITY STANDARDS?

Why It Matters:
"Non-obvious" design features like inks and adhesives may trigger non-compliance

DO YOUR MATERIALS CONTAIN PCR (POST-CONSUMER RECYCLED CONTENT)?

Why It Matters:
Some states offer fee reductions or incentives for PCR; tracking requires supplier disclosure

ARE YOU SUPPLYING ANY PACKAGING WE MIGHT NOT BE COUNTING (E.G. INSERTS, LINERS)?

Why It Matters:
Misunderstanding what counts as "packaging" is one of the most common reasons for incomplete filings

Supplier transparency also affects your audit trail. If regulators ask how you calculated your packaging weights and recyclability, your vendor data will be your first line of defense. Even the best-run organizations rely on supplier trust. EPR adds a new layer of due diligence, and documenting vendor responses now can prevent future fines.

Need a formal supplier template with email copy, documentation language, and weight request fields? Request our full Supplier Compliance Toolkit.

Statement	Confidence Level (1–10)	Effort Required by Company (1–10)	Weighted Score (Confidence × Effort)
We know which U.S. states we sell into that have EPR rules or pending laws.			
We've mapped which of our packaging types are obligated in each state.			
We know how to calculate the packaging weights needed for reporting.			
We've identified suppliers who can provide detailed data.			
We know which deadlines apply to us.			
We've reviewed our packaging against each state's design criteria.			
We know who internally owns compliance for each part of the process.			
We know which U.S. states we sell into that have EPR rules or pending laws.			
We've mapped which of our packaging types are obligated in each state.			

Instructions For Use

Step1

Rate each statement on two scales:
Confidence (1 = unsure, 10 = total confidence), then
Effort Required (1 = easy, 10 = heavy lift)

Step2

Multiply the two numbers to get a score out of 100

Step3

- Sort the statements from highest to lowest score to determine which ones:
- Are high stakes and need immediate action
 - Can be tackled later or delegated
 - Should be monitored but not urgent

Focus Your Efforts:
Prioritization Matrix for Action

In small and mid-sized companies, teams juggle multiple roles and limited time. Even if you're aware of EPR requirements, knowing where to focus first can be tough.

This tool helps you prioritize based on confidence and effort required, so you can take action where it matters most.

Use this matrix to sort issues by urgency, internal certainty, and lift required — then tackle the high-impact, low-confidence items first.

Why This Matters:

EPR compliance isn't a one-and-done task. It's ongoing, multi-stakeholder, and state-by-state. By focusing on **high-risk, high-effort areas** where you lack confidence, you reduce the chances of last-minute scrambles, reporting errors, or missed filings.

Looking Ahead

What U.S. Teams Can Expect Based On Global EPR Trends

While it may feel like the U.S. landscape is already complex, we're still in the early stages of what's likely to become a more robust, standardized EPR environment.

In Europe and Canada, we've seen clear patterns emerge in how policies mature, and many U.S. states are already pulling from those blueprints.

By learning from other jurisdictions, your team can plan beyond today's filing deadlines and build systems that are ready for tomorrow.

What's Likely Coming Next (Based On European And Canadian Trends)

Emerging Signals in the U.S.		What's Happened in Europe & Canada		What This Means For You
Multiple states introducing EPR independently	→	National-level harmonization has followed initial fragmentation	→	Expect future efforts toward standardized reporting across U.S. states (though we're not there yet)
Voluntary eco-modulation conversations beginning	→	Fee structures tied to recyclability and material choices are now standard	→	Packaging design will likely impact your costs directly
Reporting thresholds still debated	→	Clear de minimis thresholds have been established by material, market, and company size	→	Don't assume you'll always be exempt. Small producers can be pulled in as rules evolve.
Lack of enforcement in some U.S. states	→	Enforcement bodies now routinely issues fines, warnings, and audits	→	Expect increased regulatory follow-up as systems mature
Confusion about what qualifies as packaging	→	Expanded definitions include tertiary, transport, and promotional packaging	→	You'll likely need better supplier data and internal tracking systems over time

What
Experts
Expect



You don't want to architect your internal systems for today's version of compliance. You want to future-proof your processes for where the policy is going.



— Jason Berquist,
Vice President, Recycle Me

What Good Looks Like

One Decision at a Time

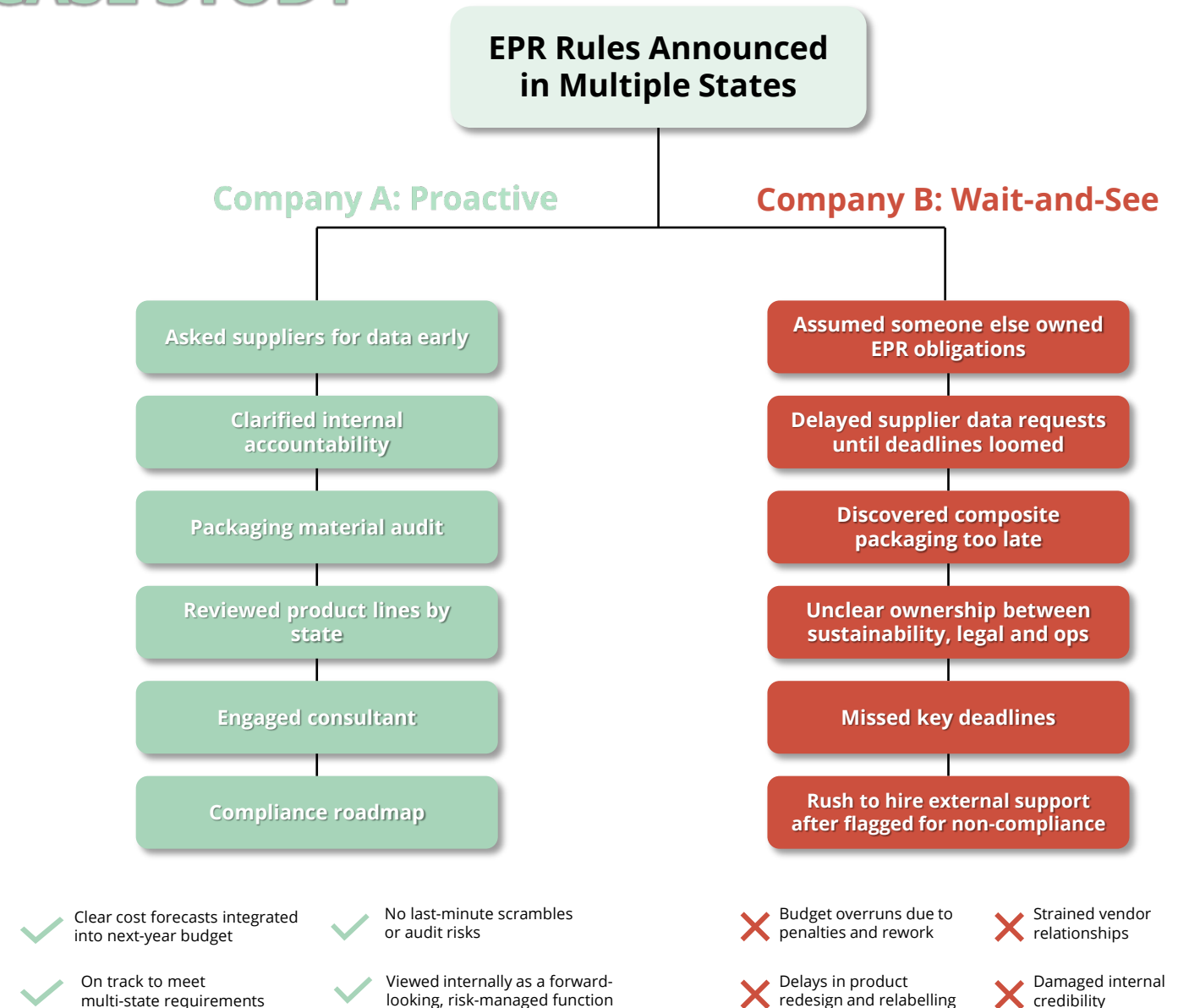
When it comes to EPR compliance, there's no one-size-fits-all playbook, but the patterns are clear.

Companies that get ahead of state-level packaging requirements typically do three things well:

- Assign ownership early
- Engage suppliers with clarity
- Prepare to report before they're forced to

This **fictional case study** shows how two nearly identical companies took different paths — with dramatically different results.

Fictional CASE STUDY



Feeling Overwhelmed?

We've Got You

If you've made it this far, chances are you're juggling EPR alongside a dozen other priorities. **You're not alone.**

From packaging data collection to cross-functional coordination, we know this work can feel like threading a needle with one hand tied behind your back, especially when you wear multiple hats.

That's where we come in

Recycle Me supports teams across North America in navigating packaging EPR and related compliance. Whether you need a second set of eyes on your packaging matrix, help wrangling supplier data, or support preparing internal budget justifications, our team is here.

DISCOVERY MEETING

Book a **free discovery call** with one of our experts.

Book a **30-minute**
EPR Strategy Session

No **pressure**. No **cost**.

Just practical, tactical advice **tailored** to your reality.

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across the **globe**

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