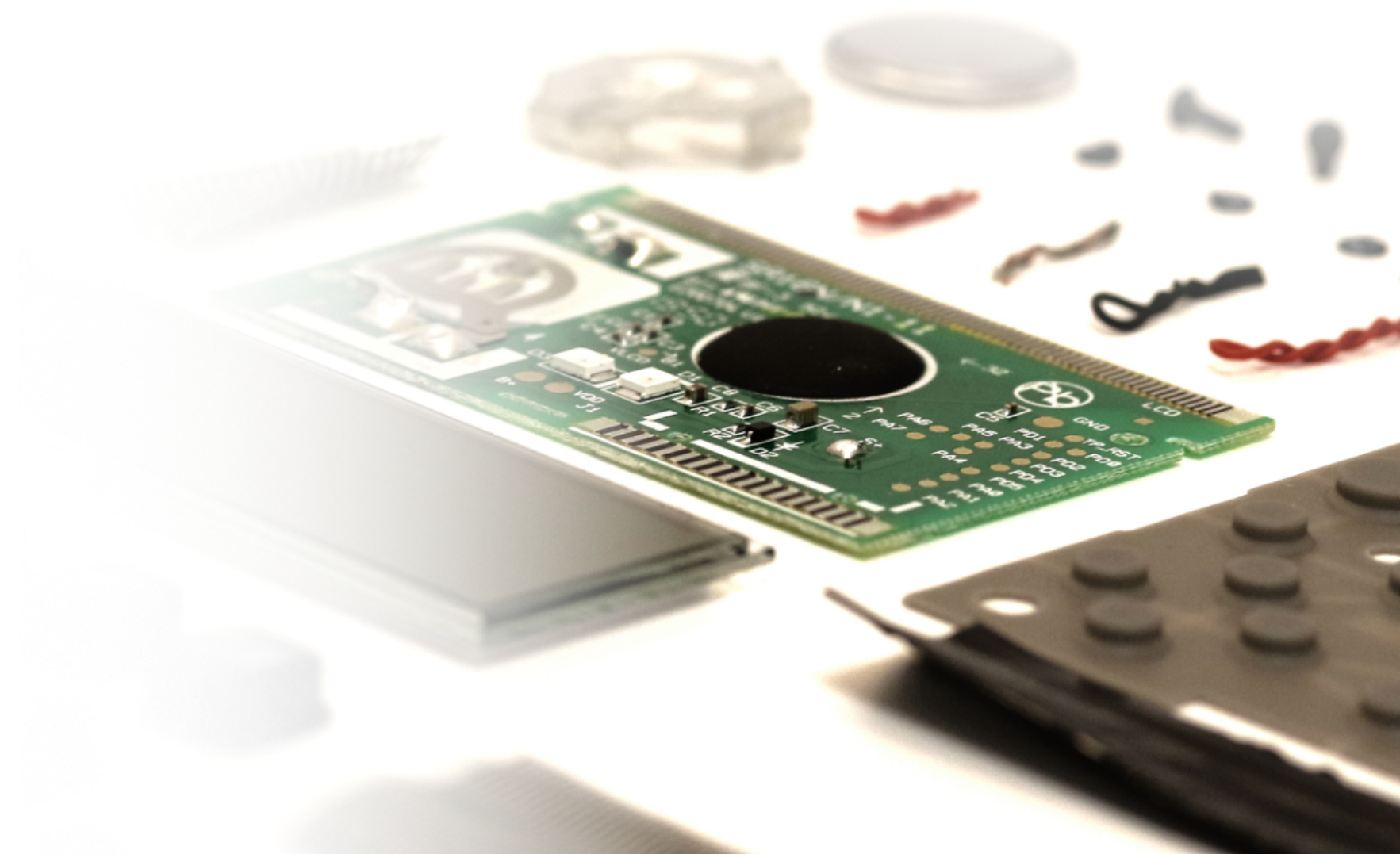


Are You Concerned about SB54?

Well you should be. And there is a lot more

Presented by:
Bruce Calder
VP Consulting

May 20, 2026

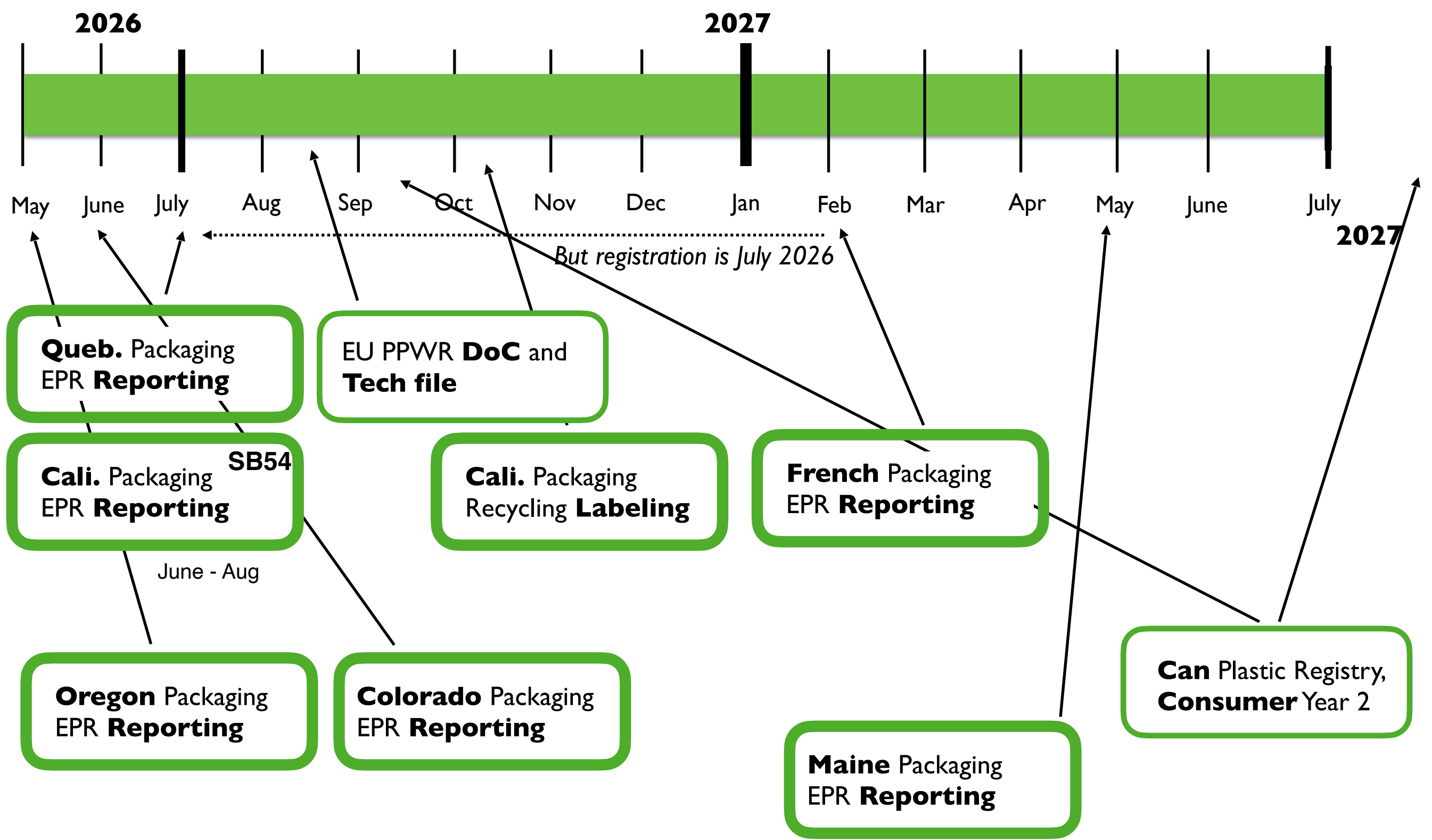


Why this webinar?

- **There are a lot of requirements for packaging coming very fast**
- **EU PPWR got all the attention** ...and fear
 - But most of its major requirements are years away
- **The reporting and fees for packaging is a lot sooner in a lot of other places**
 - But no ones seems to know about them
 - And then people want to know why they did not know before
- **So - here you go**

Packaging Deadlines

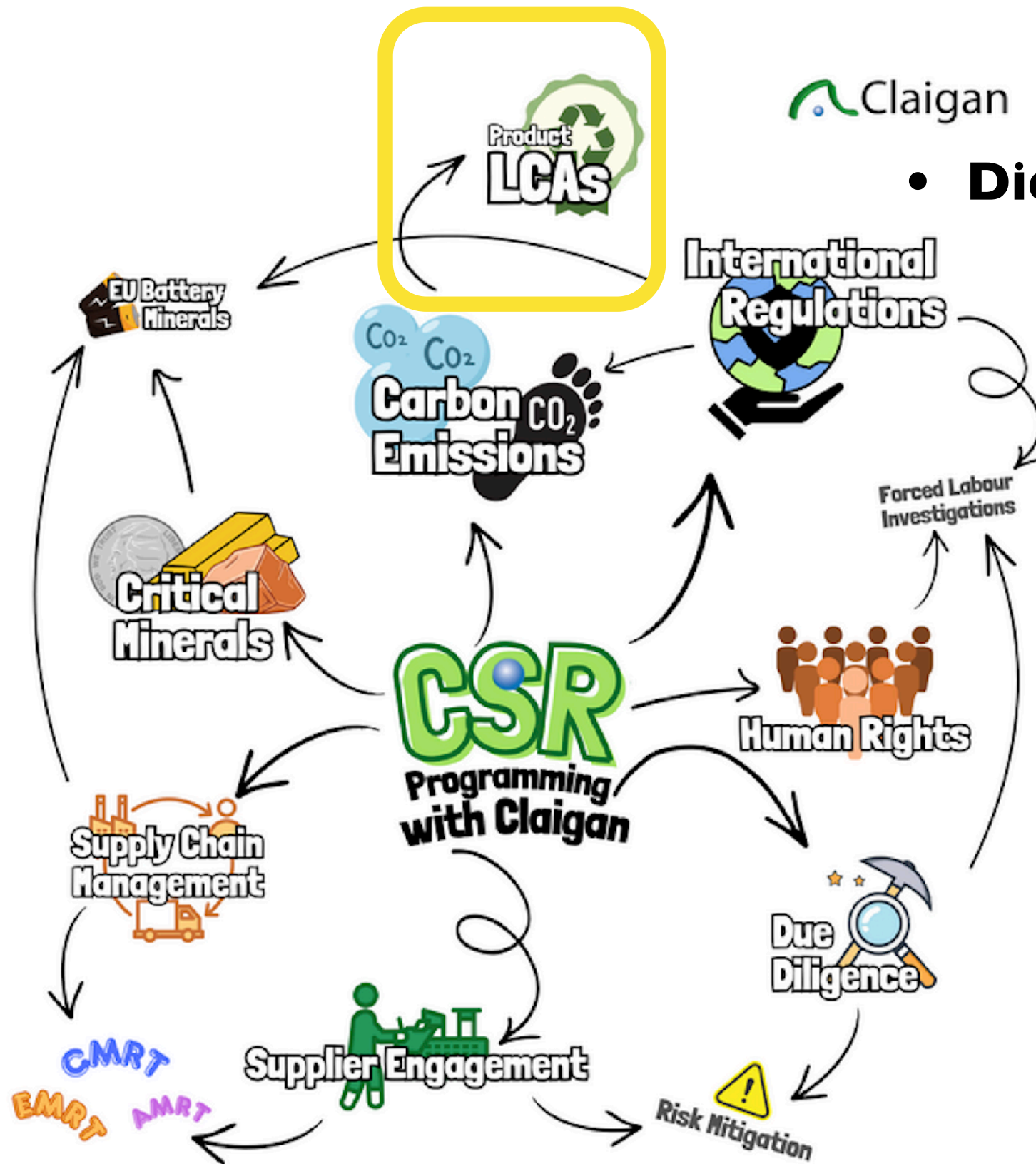
Oversimplified



So....

- This may be a little....
 - **WTF** ...and fear
 - Ok. More bewilderment
 - And - why didn't I know about all this before?
 - Or - Denial. This cannot be all true
- Now the long story....

Interlude



• Did you know that Claigan does

- LCAs
- EPDs

And they are superb :-)

+ scope 1 and 2 reporting?

& Forced Labor Risk Assessments
& Critical minerals

Overview - Agenda

- California SB54
- Global requirements
- Deadlines
- Disruptors
- Reporting examples
- California SB 343 (Labeling)
- Q&A



SB54

- **Plastic Pollution Prevention and Packaging Producer Responsibility Act**

- Details by [CalRecycle](#)

- Final version published on May 1 2026

- Guidance is [here](#)

Sort of....



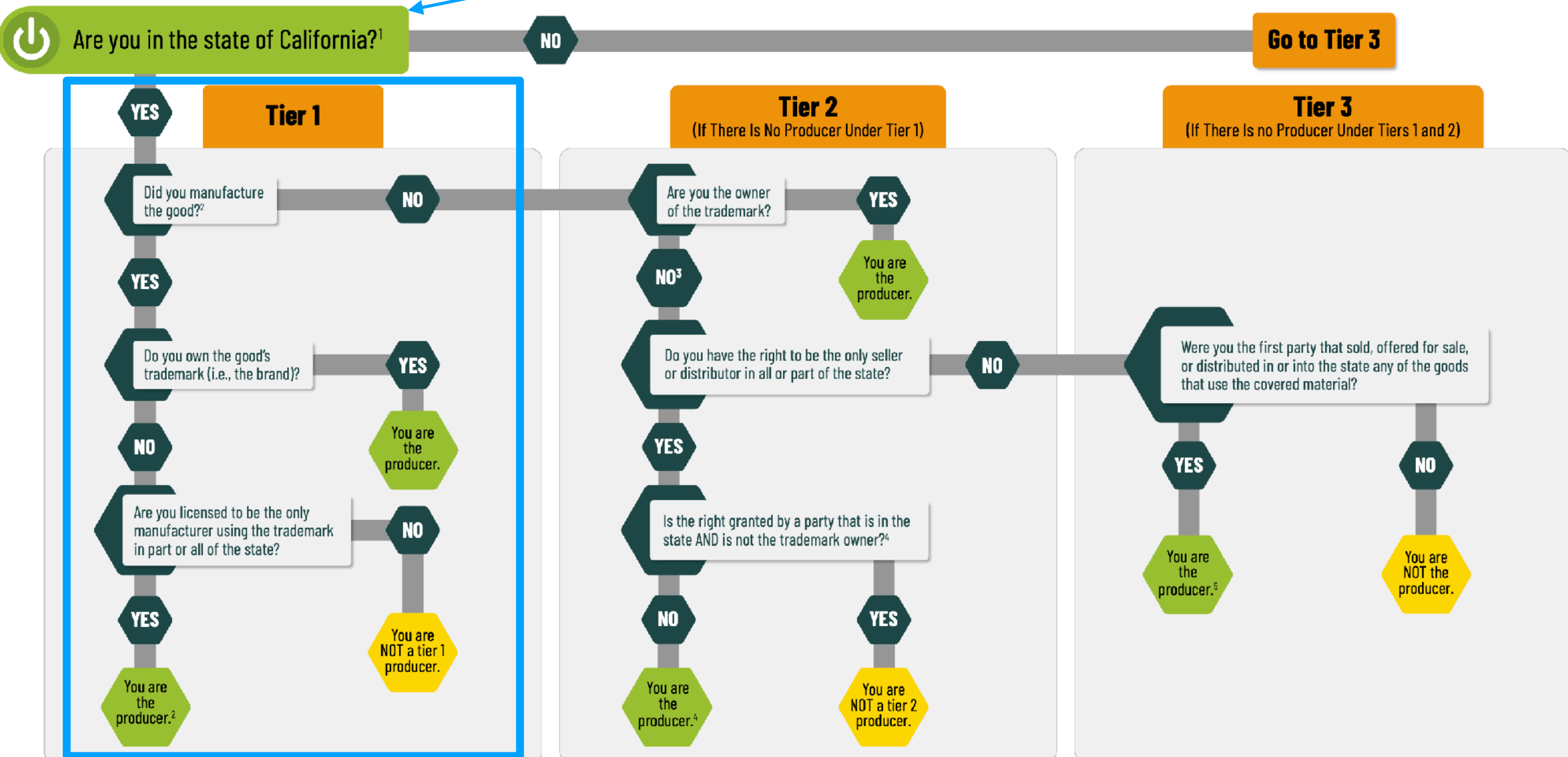
Programs ▾ Recycle ▾ Government ▾ Business ▾

Coming Soon!

Information on various extensions, exemptions, and exclusions allowed under the law. Certain packaging or other materials, producers, and local jurisdictions and recycling service providers may be eligible.

Who is in scope?

Are you under California law (have an entity in the US)?



SB54

Summary

- **Requirements**

- [Register](#) with the PRO (Circular Action Alliance - CAA)
 - By June 1 2026
 - Including providing baseline **2023** packaging data
- Submit plastic Source Reduction Plan to CAA
 - By August 1 2026
- Report 2025 annual packaging data
 - By May 31 2026 (early fees / pre-program)
- Note - a declaration of < 100 ppm Pb, Cd, Hg, and Cr6+ also required

Global Requirements

Oversimplified

- **Consumer products**

- BC
- Alberta
- Saskatchewan
- Manitoba
- Ontario
- Quebec
- New Brunswick
- Nova Scotia
- California★
- Colorado★
- Oregon
- Maine★
- EU

2026/2027

Industrial

2026/2027

Commercial

- Schools
- Hospitals
- Retail

★Medical devices excluded

- France
- UK
- Germany

Packaging EPR

- Questions that affect EPR fees
 - **Material category**
 - **‘Disruptors’**

Recyclability of Packaging *In General*

- **Over simplification for plastics**

1. Does it float?

- (Plastics are float separated)

2. Can the material be read by an FTIR?

- No covering of the plastic and no excessive carbon black colourant

3. Plastic type is recyclable in an industrial scale

- Guidances

- [Plastics](#)
- [Paper](#)

What will get you Higher Packaging EPR Fees - France

- **2X Fees for Disruptors**
 - Carbon black
 - *Enough to block FTIR measurement*
 - Laminate or sleeve of a different plastic
 - Too much filler (calcium carbonate)
 - Rubber coating of coloured paper
 - Silicone coatings
 - Water soluble glues (paper). Water insoluble glues (plastics)
 - MOSH / MOAH Minerals Oils
 - PVC
 - Biodegradable plastics
 - Density > 1 (sinks in water)

Full Reporting is Very Complicated

- **For each product**
- **Report**
 - Each packaging component
 - Weight
 - Materials classification
 - Disruptors
 - Every jurisdiction is different

Example Materials Reporting

EU Example

EU Material	(Y/N/X)	Canada
Paper / Cardboard - Standard		Corrugated
Paper / Cardboard - Standard		
Paper / Cardboard - Reinforced		
Liquid Packaging Board - Aseptic		
Liquid Packaging Board - Gable Top		
Steel		
Aluminum		
Clear PET Bottles		
Coloured PET Bottles		
PE Bottles		
PP Bottles		
Rigid - PE		
Rigid - PP		

CAN Example

Canada	(Y/N/X)	California
Corrugated Cardboard		Glass - C
Corrugated Cardboard		
Newspapers		
Newsprint (inserts and circulars)		
Magazines, Catalogues and Directories		
Paper for General Use and Other Paper		
Books		
Gable Top Containers - Beverage		
Gable Top Containers		
Aseptic Containers - Beverage		
Aseptic Containers		
Polycoated/Laminated Paperboard		
Polycoated/ Laminated Paper		

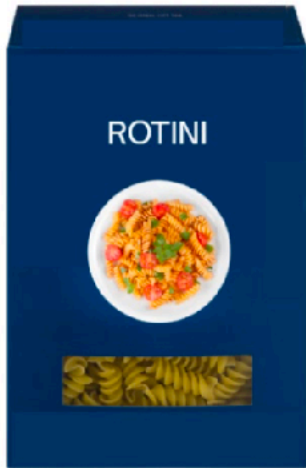
US Example

California	(Y/N/X)	(Y/N/X)	Colorado
Glass - Other Forms w/o plastic component			Corru
Kraft Paper - All Forms w/o plastic component			
Kraft Paper - All Forms w/ plastic component			
Molded Fiber - All Forms w/o plastic component			
Molded Fiber - All Forms w/ plastic component			
Multi-Material Laminate - Aseptic Cartons			
Multi-Material Laminate - Gable-top Cartons			
Multi-Material Laminate - Paperboard with a Plastic			
Multi-Material Laminate - Other Forms w/ plastic co			
OCC - Waxed Cardboard w/o plastic component			
OCC - Waxed Cardboard w/ plastic component			
OCC - Cardboard w/o plastic component			
OCC - Cardboard w/ plastic component			

California Examples

Examples of Categorizing Covered Material

Example 1: Paperboard box with a plastic window



Step 1: Is it covered material? – Yes (move to Step 2) – Paperboard box is being used as single-use packaging for pasta.

Step 2: Identify all detachable components and categorize each individually – Only one component to categorize given that the box has no detachable components (move to Step 3).

Step 3: Do two or more sides of the item measure 2 inches or less? – No, all sides are greater than 2" (move to Step 5)

Step 5a: What is the dominant Material Class? – Paper and Fiber

Step 5b: What is the dominant Material Type? – Paperboard

Step 5c: What is the form? – Paperboard only has one form, "All Forms"

Step 5d: Does the item of covered material have a plastic component? – Yes, the plastic window and plastic adhesive used to seal the box are considered plastic components.

CMC for paperboard box with a plastic window - 25_PF10P (All Forms of Paperboard with a Plastic Component).

That was an easy one...

California Examples

Example 2: Glass bottle with plastic label and dropper.



Step 1: Is it covered material? – Yes (move to Step 2) – Glass bottle and dropper is being used as single-use packaging for serum.

Step 2: Identify all detachable components and categorize each individually – Two detachable components that need to be individually categorized: (1) Glass bottle with plastic label; and (2) Dropper (move to Step 3).

Individually categorizing the glass bottle:

Step 3 (glass bottle): Do two or more sides of the item measure 2 inches or less? – Yes, the diameter of the bottle is less than 2" (i.e., two sides measure less than 2 inches), however, the producer demonstrated that the bottle meets the APR Design Preferred assessment for the design feature of "size sorting potential" (move to Step 5)

Step 5a (glass bottle): What is the dominant Material Class? – Glass

Step 5b (glass bottle): What is the dominant Material Type? – Glass

Step 5c (glass bottle): What is the form? – Bottle and jar

Step 5d (glass bottle): Does the item of covered material have a plastic component? – Yes, the bottle has a plastic label, plastic adhesive adhering the label and a plastic cold end coating, which are considered plastic components.

CMC for glass bottle - 25_G1P (Bottle and Jars of Glass with a Plastic Component).

Individually categorizing the dropper:

Step 3 (dropper): Do two or more sides of the item measure 2" or less? – Yes, the diameter of the dropper cap is less than 2 inches (i.e., two sides measure less than 2 inches) (move to Step 4)

Step 4a (dropper): What is the dominant Material Class? – Plastic (The dropper is made of a glass tube plus plastic cap with bulb. When weighed, the weight of the plastic is greater than the weight of the glass.)

CMC for Dropper - 25_P47P (Plastic - Small - Two or more sides measuring 2 inches or less).

Now do all the packaging for an actual complex product :-)

And California does not included disruptors

Wait until you have to do France

Which is a preview of PPWR in two (2) years

What will get you Higher Packaging EPR Fees - France

- **2X Fees for Disruptors**
 - Carbon black
 - *Enough to block FTIR measurement*
 - Laminate or sleeve of a different plastic
 - Too much filler (calcium carbonate)
 - Rubber coating of coloured paper
 - Silicone coatings
 - Water soluble glues (paper). Water insoluble glues (plastics)
 - MOSH / MOAH Minerals Oils
 - PVC
 - Biodegradable plastics
 - Density > 1 (sinks in water)

Packaging Reporting Affected Companies

- **Consumer products**

- Min. Tonnage
Thresholds*
- BC
 - Alberta
 - Saskatchewan
 - Manitoba
 - Ontario
 - Quebec
 - New Brunswick
 - Nova Scotia
- Min 1t per year*
- California★
 - Colorado★
 - Oregon
 - Maine★
 - EU
- No min t per year*

2026/2027

Industrial

2026/2027

Commercial

- Schools
- Hospitals
- Retail

★ Medical devices excluded

Starting in second half 2026

- France
- UK
- Germany

No min t per year

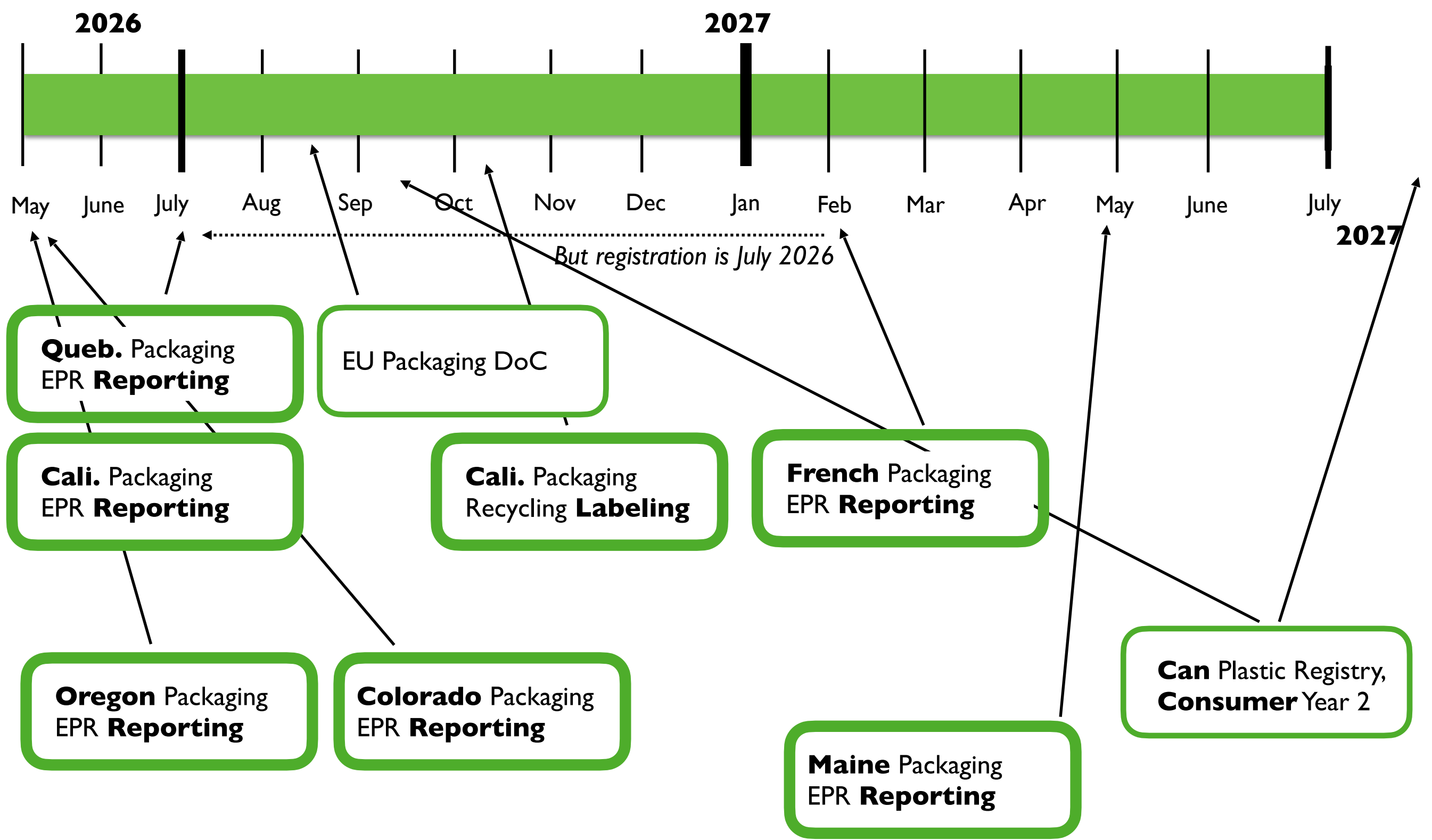
25t per year

No min t per year

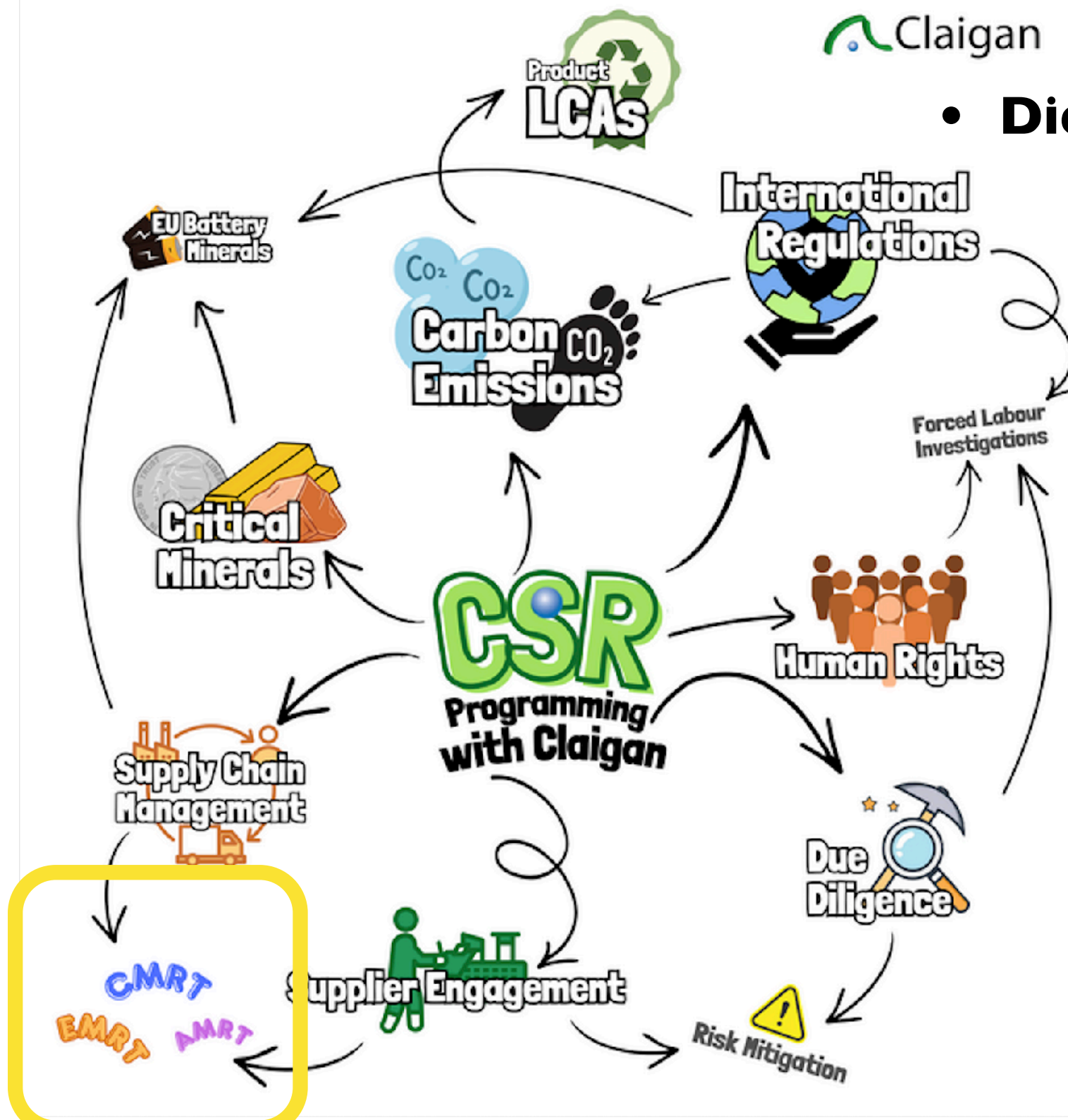
UK started in 2025, but high min threshold

Packaging Deadlines

Oversimplified



Second Interlude :-)



• Did you know that Claigan does

- Conflict minerals
- EMRTs and AMRTs?

Second Interlude - Continued



EU Packaging and Packaging Waste Regulation (PPWR)

Technical file for PPWR

(EU Packaging and Packaging Waste Regulation (PPWR) (Regulation (EU) 2025/40)

Date:

[Date Technical File Complete]

Standard(s):

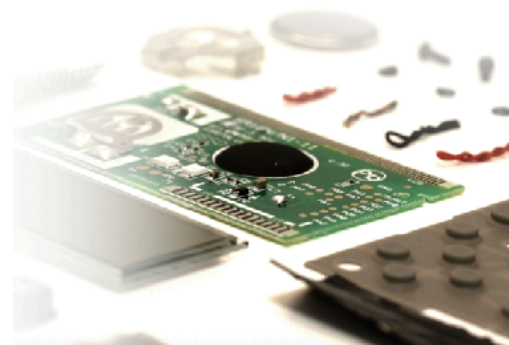
CEN - CR 13695-1

Product:

Packaging for products (and their replacement parts) listed in Annex I

Scope of Technical File

- EU Packaging and Packaging Waste Regulation (PPWR) (Regulation (EU) 2025/40)
 - Article 5 - Requirements for substances in packaging
 - Paragraph 4 - Limits on Pb, Hg, Cd, and Cr6+
 - ANNEX VII - Conformity assessment procedure
 - Module A - Internal production control - Technical Documentation



Summary of Technical File Document

#	Requirement	Source	Description	Complete	Document
1	General Description of packaging	Annex VII 2(a) Annex VII 2(b)(c)	Descriptions and material identification of sales, grouped and transport packaging	Yes No	Document reference
2	Supplier specification – details of the requirements communicated to suppliers to regarding packaging materials	Annex VII 2(d)	Details of the requirements communicated to suppliers to regarding packaging materials	Yes	Document
3	Risk Assessment	Annex VII 2	Risk assessment of Pb, Cd, Hg, Cr6+ in packaging		
4	Test Report	Annex VII 2(f), CR 13695-1	Packaging test results according to CR 13695-1		
5	Declaration of Conformity	Annex VII (5), Annex VIII	Declaration of conformity to the PPWR		



EU PPWR - Declaration of Conformity

- Template provided with training

[Company Logo](#)

DECLARATION OF CONFORMITY

Manufacturer: [Company Name](#)
[Address](#)

This declaration of conformity is issued under the sole responsibility of [Company Name](#).

Object of the declaration:

Primary, secondary, and tertiary packaging for the products in Annex I

The object of the declaration described above is in conformity with:

Packaging and Packaging Waste Regulation 2025/40 (PPWR)

Standards used to assess conformity:

- CR 13695-1

[Name](#)

[Signature](#)

[Date and Place of Issue](#)

[\[title of person signing\]](#)

• Did you know that Claigan does

• EU PPWR

• Education

• Technical Files

• Declarations of conformity

The best solution to your 2026
PPWR Requirements

And education for 2027 and
beyond

California SB 343

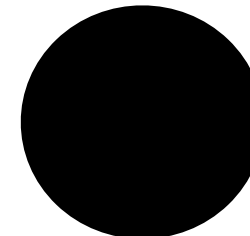
- **Truth in Recycling Legislation**
 - No chasing arrows symbols on packaging unless true in California
- **Who is affected**
 - All products sold in California
 - Consumer, professional, commercial, and industrial
 - ***Except*** medical devices

California SB 343

- **Example**



Or



- **Unless listed as recyclable in California**
- **Spoiler alert**
 - When in doubt, Claigan can help

California SB 343

- **Truth in Recycling Legislation**
 - No chasing arrows symbols on packaging unless true in California
- **Who is affected**
 - All products sold in California
 - Consumer, professional, commercial, and industrial
 - ***Except*** medical devices
- **When?**
 - Products manufactured after October 4 2026

California SB 343

Enforcement

- **Any person in the State of California**
 - Can request your justification for the recycling arrows on any of your products
 - You need justification beyond a supplier's "say-so"
 - And the **brand owner** is **strictly liable** for the claim on the box with their brand on it
- **Prosecution**
 - Very similar to Prop 65
 - Any person can make a claim / lawsuit based on false advertising

YOU WANT TO GET THIS RIGHT

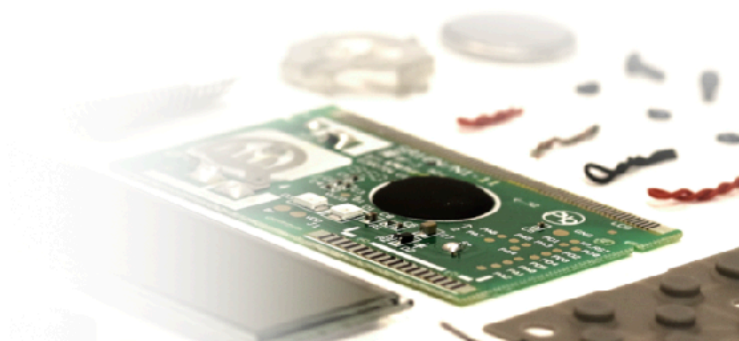
Third Interlude :-)



EPR - Packaging

May 11 2026

Presented by:
Bruce Calder
VP Consulting Services



Material	EU Recyclable (Y/N/X)	Canada	CAN Recyclable (Y/N/X)	California	CA Recyclable (Y/N/Y*)	CA Compostable (Y/N/Y*)	Colorado	CO Recyclable (Y/N/X)	Oregon
Paper / C...		Corrugate...		OCC - Ca...	Y	Y	Corrugate...	Y	Corrugate...

- **Did you know that Claigan does**
 - Packaging EPR
 - Education
 - Materials and reporting
 - Labelling justification
 - Source Reduction Plans

One stop shop for packaging
EPR

Source Reduction Reporting Guidance

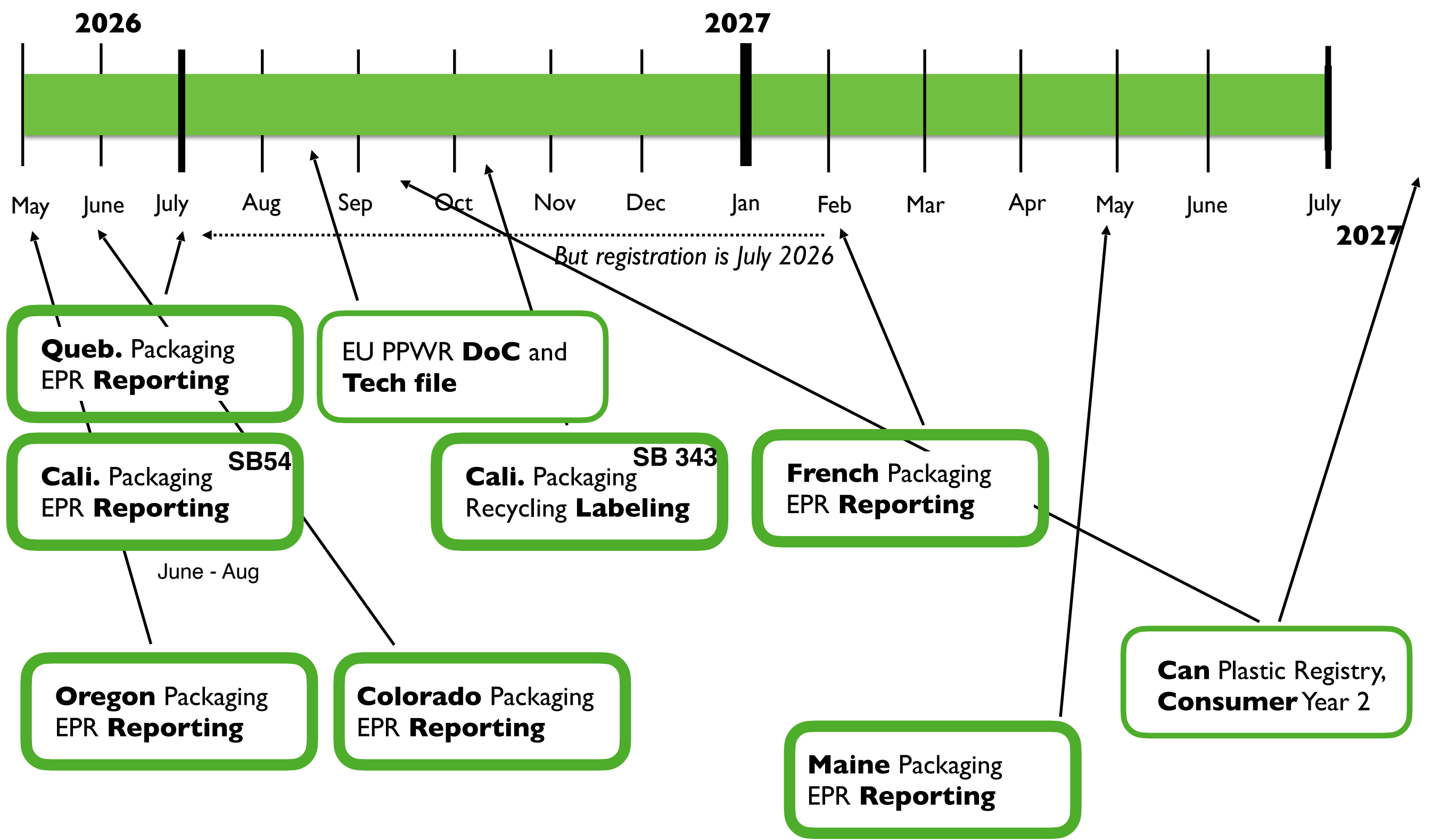
Plastic Pollution Prevention and Packaging Producer Responsibility Act (the Act)
Department of Resources Recycling and Recovery (CalRecycle)
September 2, 2025

Done PPWR with Claigan?

Try overall EPR with Claigan

Packaging Deadlines

Oversimplified



Final Interlude - Claigan Product Updates

- **Ever tested a product with Claigan before?**
 - Yes?
 - We can update its compliance
- **Claigan keeps all the original data for every test**
 - And has process to update previous tested products to today's compliance

Claigan Product Updates

- **Full product update to modern chemicals lists**



Page 1 of 2

Product Compliance Update

Client: Tim's Workshop	Product: Medical Generator (Model TXV610)	Date: May 20, 2026
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Previous Evaluations: CETR-TXV026, CETR-TVX042

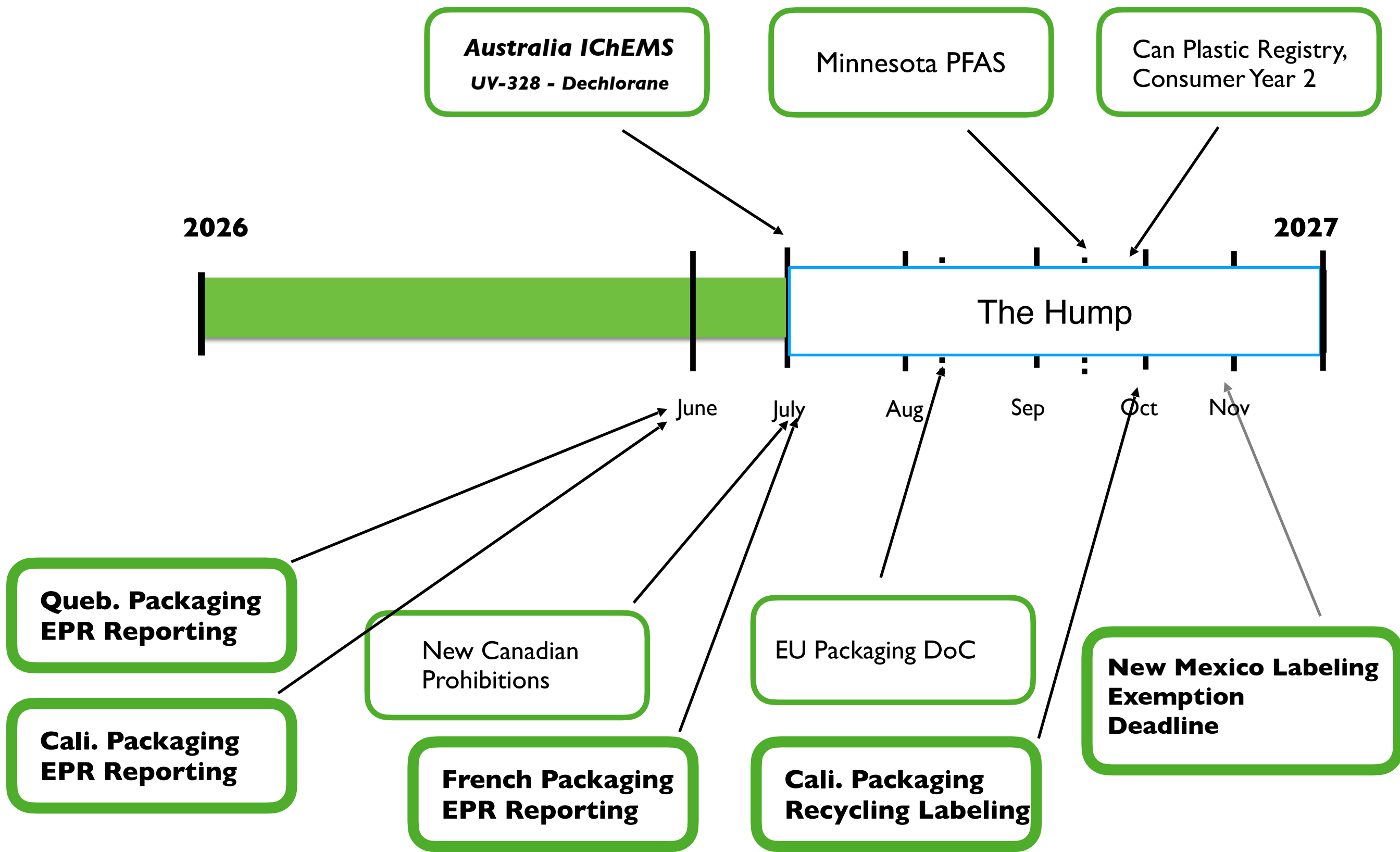
Results of Cumulative Gap Assessment(s):

Updated	Directive/Regulation	Substance Listing	Conclusions	Substances
	RoHS Directive 2011/65/EU (including 2015/863)	-	Compliant	-
X	REACH Regulation 1907/2006, Article 33 (SVHC)	February 2026	Compliant Contingent	TPP
X	REACH Regulation 1907/2006, Article 67 (Restrictions)	September 2024	Compliant	-
X	California Proposition 65 (The Safe Drinking Water and Toxic Enforcement Act, 1986)	December 2025	Compliant	-
X	POP Regulation 2019/1021	May 2025	Compliant	-
	Australian Department of Immigration and Border Protection Notice No. 2016/30, test for asbestos	-	Compliant	-
X	Medical Devices Regulation 2017/745, Section 10.4.1	ATP 24	Compliant	-
	Medical Devices Regulation 2017/745, Section 23.4	-	Compliant Contingent	Ni
	Health Canada File Number 08-111801-312, test for BPA and DEHP	-	Compliant	-
	FDA Title 21 Section 801.437, testing for natural latex rubber	-	Compliant	-
	TPCH Toxics in Packaging Model Legislation (1989)	-	Compliant	-
	EU Packaging Regulation (PPWR) 2025/40	-	Compliant	-

- We update roughly three hundred (300) product updates a year
- Just reach out and we can explain how

Restricted Materials

The “HUMP” in 2026



Claigan Annual FAQ Webinar

- A webinar based completely on **your questions**

Q&A



CALL FOR QUESTIONS

Claigan Annual FAQ Webinar

Submitted questions will be answered as part of webinar

Ottawa, 11 May 2026 - Claigan's next webinar is all about answering **your questions**; so send us your best! Claigan's annuals FAQ webinar will be completely based on submitted questions.

Have a question you want answered by an expert? We want to answer it. The deadline is May 25th, 2026. Submit questions to webinar@claigan.com or on Claigan's website at www.claigan.com/contact-us. Your personal information will be kept confidential. Just your question will be addressed in the webinar. The best twenty (20) questions will be answered in Claigan's live webinar on June 3rd, 2026.

Questions can include anything on the topic of restricted materials or extended producer responsibility (e.g. REACH SVHC, Global POP, EU MDR, Modern Slavery, Critical Minerals, PFAS, etc.). We want to answer a wide variety of questions. They can be general, they can be granular; we want them all!

- Submit your questions to
 - webinar@claigan.com
 - Or
 - [Contact us](#) on webpage
- To have your question (and answer) added to to Claigan's annual webinar