



February 13, 2026

Comments on SB 54 Plastic Pollution Prevention and Packaging Producer Responsibility Act Permanent Regulations

On behalf of the Glass Packaging Institute (GPI), I offer the following comments on SB 54 Plastic Pollution Prevention and Packaging Producer Responsibility Act Regulations.

GPI is the North American trade association for the glass container manufacturers, glass recyclers and suppliers to the industry. Our member companies produce domestic US food and beverage glass containers purchased in grocery stores and retail outlets. GPI's members include glass container manufacturers and glass recycling facilities across the country, including California.

GPI has also started a coalition to address intentionally small format packaging that often ends up in the "glass commodity stream" from primary material recovery and recycling facilities. The coalition plans to increase infrastructure, improve recyclability, and prevent potential fees and bans.

The most pressing issues to address were the Article 2 explanations of covered material categories and categorical exclusions, and we support the direction that these amendments are taking, and the additional clarity on process that was offered. While more process detail could help, we hope that the Department will take additional opportunities to refine as needed once the program plan and initial data give more information on the CMCs and solicit more public comment on exclusions to ensure that the underlying goals of the law are met and unintended consequences or broad exclusions avoided.

Following up on our comments from June 2025, we offer the following additional comments:

Article 1 – Definitions

On page 2, definitions, “alternative collection”, GPI supports the less specific, broader range of collection modalities that could encompass “not curbside” collection. For the remaining glass containers that are covered under these regulations, they will be a small percentage of the overall stream, and the industry may be able to leverage investments in infrastructure to recover more cleaner streams of glass thru non curbside commingled streams at some point.

On page 6, “Independent Producer” we continue to support the idea that a small group of similarly situated producers could work together to efficiently recover the same material or packaging format under this definition, if needed. This is especially important with the elimination of the provisions allowing the creation of additional PROs.

Article 4 – REMs

On page 75 – GPI supports the definition of end-market for glass being the entity that first produces glass feedstock that meets quality standards necessary to be used in lieu of virgin material. The glass beneficiation plants, and equivalents, produce cullet, which has a positive environmental impact in the making of new glass containers. Cullet not only helps displace raw materials but also requires less energy to melt than the energy required to convert raw materials into glass, lowering energy use, emissions, and carbon footprint.

Article 11 – Local Jurisdiction Exemptions. GPI remains concerned that local jurisdictions and recycling service providers have an adequate bar for process and data supporting their request of exempting themselves from otherwise recyclable CMCs. While needing to allow for special, limited circumstances, the producers with material in the CMC that is the target of the exemption request need adequate opportunity to comment and offer

alternative solutions before jurisdictions can be exempted from accepting certain materials. The impact of cumulative jurisdictions gaining exemption may impact CMCs being able to reach targets and are at risk of fees or material bans.

Sincerely,

A handwritten signature in black ink that reads "Scott DeFife". The signature is written in a cursive, slightly slanted style.

Scott DeFife
President