



Introduction to EPR for Paper & Packaging Laws in the U.S.

March 2025

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- Topics that may lead participants to not deal with or to boycott a particular supplier, customer, or third party;
- Reductions of output; bid-rigging;
- Or any other anti-competitive topics or actions.

Failure to comply with these antitrust laws will not be accepted.

Agenda

1. Welcome
2. EPR Overview
3. CAA Overview
4. EPR Across the States
5. Colorado Update

What is Extended Producer Responsibility (EPR)?

Extended Producer Responsibility (EPR) is a policy approach that **shifts financial and sometimes operational responsibility** for the recycling/end-of-life management of a product to the companies that produce the material.

EPR laws for paper and **packaging require producers (i.e., generally brand owner of the product in the U.S., may include retailers or first importers) to either partially or fully fund** the collection, sortation and processing of the paper, packaging and packaging-like items that they supply into these states.

Since producers are made responsible for the costs to manage their product/packaging at end-of-life, EPR fees typically **incentivize design choices** that improve recyclability, minimize waste, and improve environmental outcomes.



What is a Producer Responsibility Organization (PRO)?

A **Producer Responsibility Organization (PRO)** is a producer-led, nonprofit organization that provides producers with compliance services to help them meet their obligations under EPR laws.

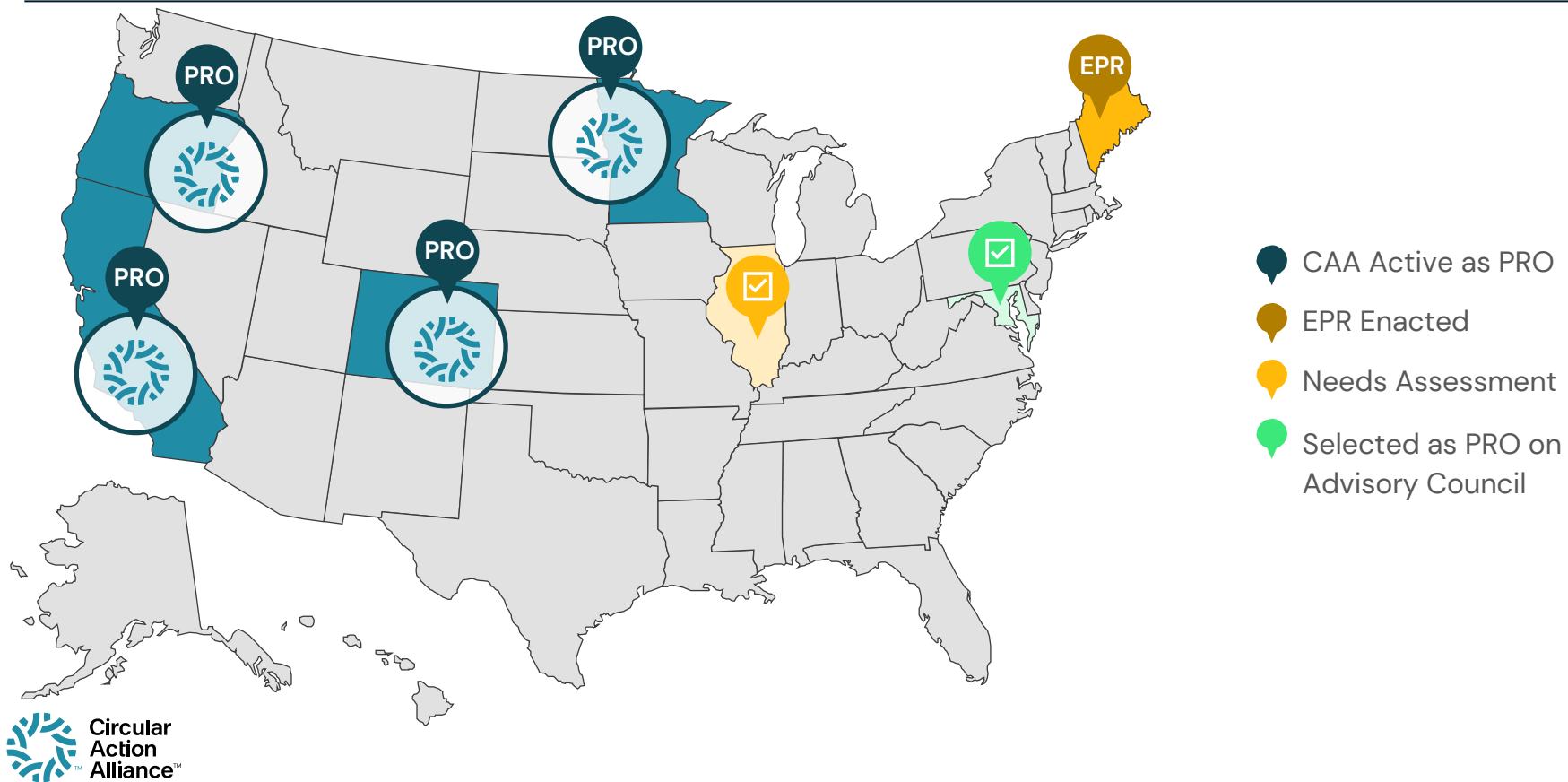
Generally, a PRO is **responsible for developing a program plan** for managing covered products. That plan is reviewed by a state-appointed advisory board and approved by the state regulatory agency. The program plan outlines program operation and the collection and management of producer fees.

The U.S. PRO – Circular Action Alliance

- Circular Action Alliance (CAA) is a 501(c)(3) nonprofit PRO dedicated to implementing effective EPR laws for paper and packaging in the U.S.
- CAA was founded by 20 companies from the food, beverage, consumer goods, and retail industries.



Packaging EPR in the US



CAA's Mission

Help producers comply with EPR laws, deliver harmonized, best-in-class services and work with governments, businesses and communities to reduce waste and recycle more.



EPR Across U.S. States

EPR Obligations for Producers Across States

| | California | Colorado | Oregon | Maine | Minnesota |
|---|------------|----------|--------|-------|-----------|
| Join approved PRO + collect data | ✓ | ✓ | ✓ | ✓ | ✓ |
| Report data to a PRO | ✓ | ✓ | ✓ | ✓ | ✓ |
| Pay fees/dues based on data | ✓ | ✓ | ✓ | ✓ | ✓ |
| POTENTIAL redesign of materials/delivery models | ✓ | ✓ | ✓ | ✓ | ✓ |
| Source reduce plastic (including source reduction plan) | ✓ | NA | NA | ✓ * | NA |
| Ensure materials are recyclable or compostable | ✓ | NA | NA | NA | ✓ |

* In draft rule

State Updates



CO

- On February 3, 2025, CAA submitted its initial Plan Proposal to Colorado's Producer Responsibility Advisory Board.
- The Board will now review the Plan and provide feedback to CAA, ahead of Plan submission to the Colorado Department of Public Health and Environment.
- Program starts January 1, 2026, at the earliest.



CA

- On March 7, 2025, Governor Newsom directed CalRecycle to redraft the regulations for SB 54.
- CAA is dedicated to building and implementing a strong operating plan for SB 54 and is continuing to work with interested parties to ensure a successful program that delivers on the intent of SB 54.

State Updates (Cont.)



- On November 22, 2024, the Environmental Quality Commission adopted rules to clarify and implement the Plastic Pollution and Recycling Modernization Act.
- On February 21, 2025, the Oregon Department of Environmental Quality approved CAA's Oregon program plan.
- Program starts July 1, 2025.



- The Board of Environmental Protection finalized rules for Maine's EPR for packaging law on December 5, 2024.
- Maine is not expected to select a Stewardship Organization until Spring 2026.
- Start-up fees due to SO in September 2026, first packaging materials fees due in September 2027.

State Updates (Cont.)



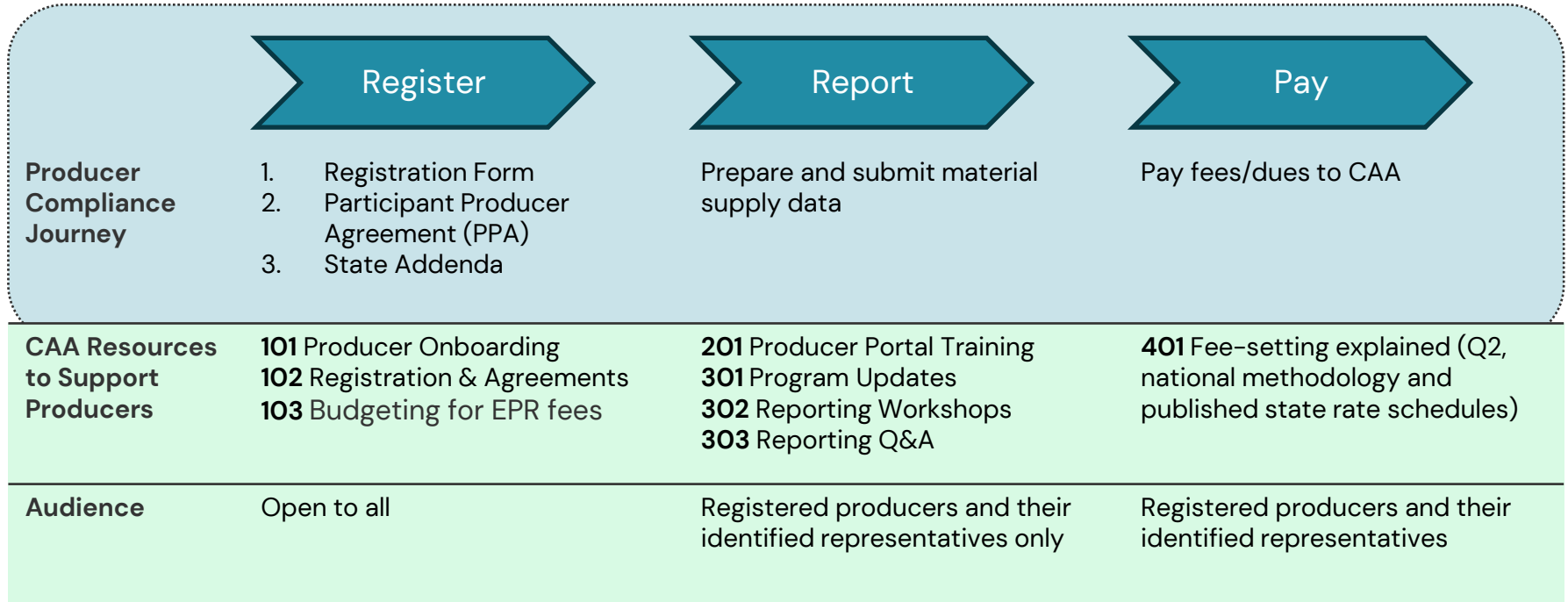
- On February 18, 2025, the Minnesota Pollution Control Agency confirmed CAA's registration to implement the state's EPR program.
- Producers must be a member of a PRO that is registered with MPCA by July 1, 2025.



- CAA serves as the single PRO on Maryland's Producer Responsibility Advisory Council.
- On February 21, 2025, Maryland Department of the Environment published the statewide needs assessment.
- On March 3, 2025, the Advisory Council submitted its Packaging EPR policy recommendations to the state legislature.

Producer Registration & Preparedness

CAA is conducting several Producer Events per week in March to support readiness and on-time reporting



Stay Engaged

Producer Resource Center

- Producer resources page with FAQs, Producer Working Group information and other updates.

Monthly Newsletter

- The latest updates for each state and new resources.

Producer Onboarding Sessions

- *101 Producer Onboarding*
- *102 Registration & Agreements*
- *103 Budgeting for EPR Fees*
- Sign up for producer events on [our website](#).

Producer questions?

Email producer.support@circularaction.org

Scan the QR code or click the link to complete CAA's [covered producer registration form](#).

This is the first step in the producer registration process



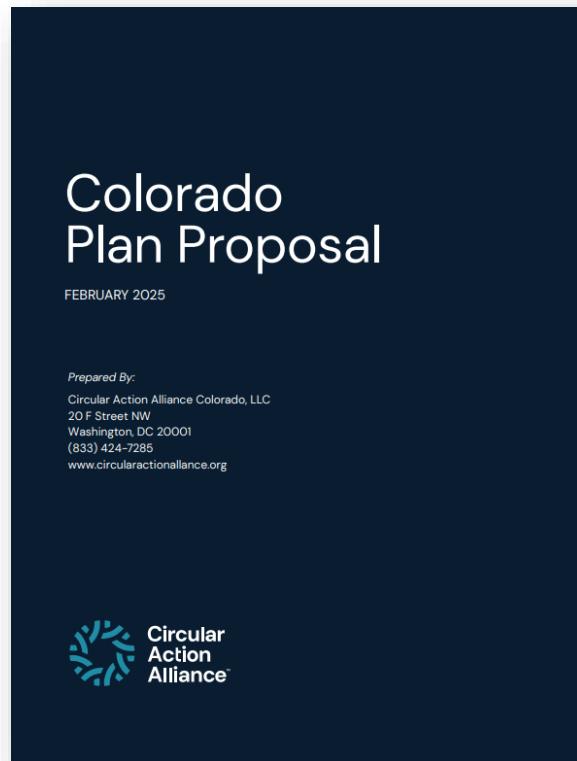
Colorado EPR

Colorado Plan Proposal

Plan submitted to Colorado Department of Public Health and Environment on 2/3/2025

Plan is being reviewed for compliance by the CO EPR Advisory Board

<https://cdphe.colorado.gov/hm/epr-program>



Program Plan Proposal Chapters

- Program Plan Goals
- About Circular Action Alliance
- Consultation and Informing the Program Plan
- Recycling Services Approach
- Service Provider Reimbursement
- Material Strategy
- Education and Outreach
- Compostable Packaging
- Contamination Reduction
- Reuse and Refill
- Postconsumer Recycled Content
- Responsible End Markets
- System Expansion
- Program Budget and Dues
- Eco-modulation Approach
- CAA Colorado Management & Compliance

Collection and Recycling Rate Targets

| Material | Baseline (2022) Collection Rate % | Baseline (2022) Recycling Rate % | Medium (2030) Collection Rate % | Medium (2030) Recycling Rate % | Medium (2035) Collection Rate % | Medium (2035) Recycling Rate % |
|-------------------|--------------------------------------|-------------------------------------|------------------------------------|-----------------------------------|------------------------------------|-----------------------------------|
| Paper | 24 | 22 | 43 | 40 | 61 | 58 |
| Cardboard | 49 | 45 | 66 | 62 | 78 | 74 |
| Glass | 40 | 30 | 56 | 50 | 67 | 61 |
| Metals | 40 | 37 | 59 | 55 | 77 | 73 |
| Rigid Plastics | 16 | 14 | 26 | 24 | 44 | 42 |
| Flexible Plastics | <1 | <1 | 2.5 | 2.5 | 3.5 | 3.5 |
| Total | 29 | 25 | 44 | 41 | 59 | 55 |

Covered Materials

Covered Materials. Materials that are included in the EPR Program as stipulated in the Producer Responsibility Act. Includes packaging material and paper products, except as specified in section 703(13)(b) of the Act.

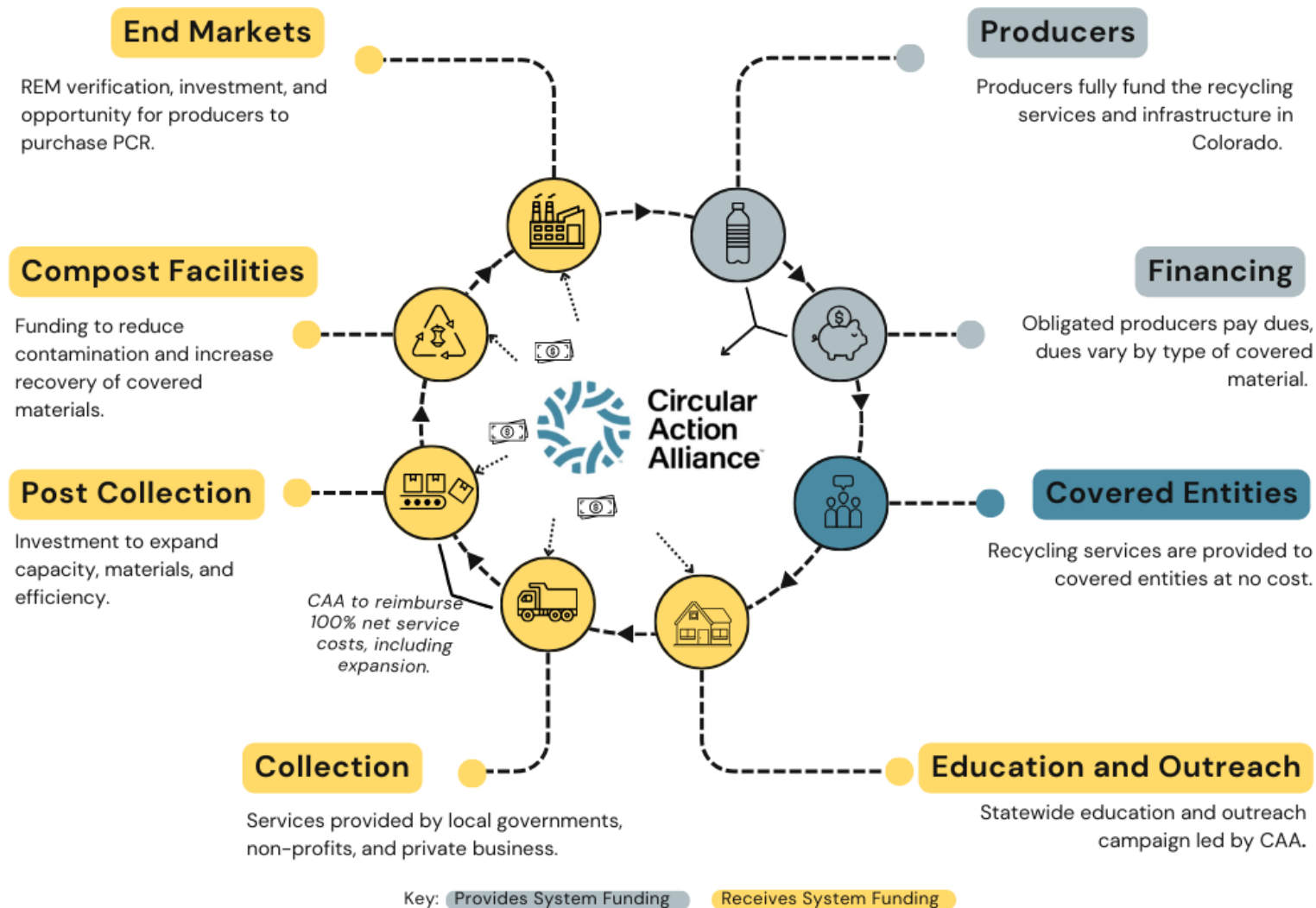


Minimum Recyclable List. The uniform, statewide list of covered materials based on whether the covered material is readily recyclable, including the availability of recycling services, recycling collection and processing infrastructure, and recycling end markets for covered materials.



Additional Materials List. Covered materials not on the Minimum Recyclables List that may be collected in different geographic areas through curbside services, drop-off centers, or other means.





Colorado EPR Flow Diagram

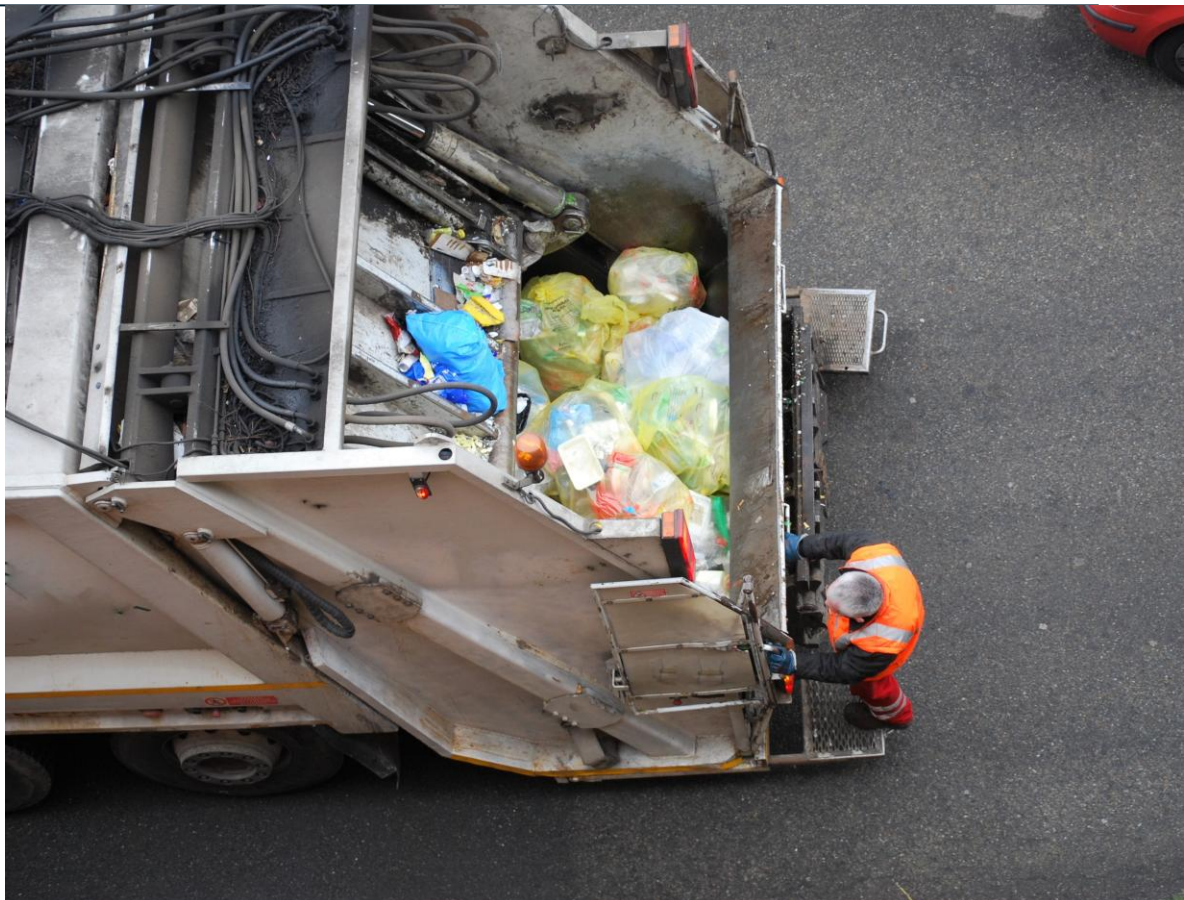
Service Strategy Tools

- Primary Tools

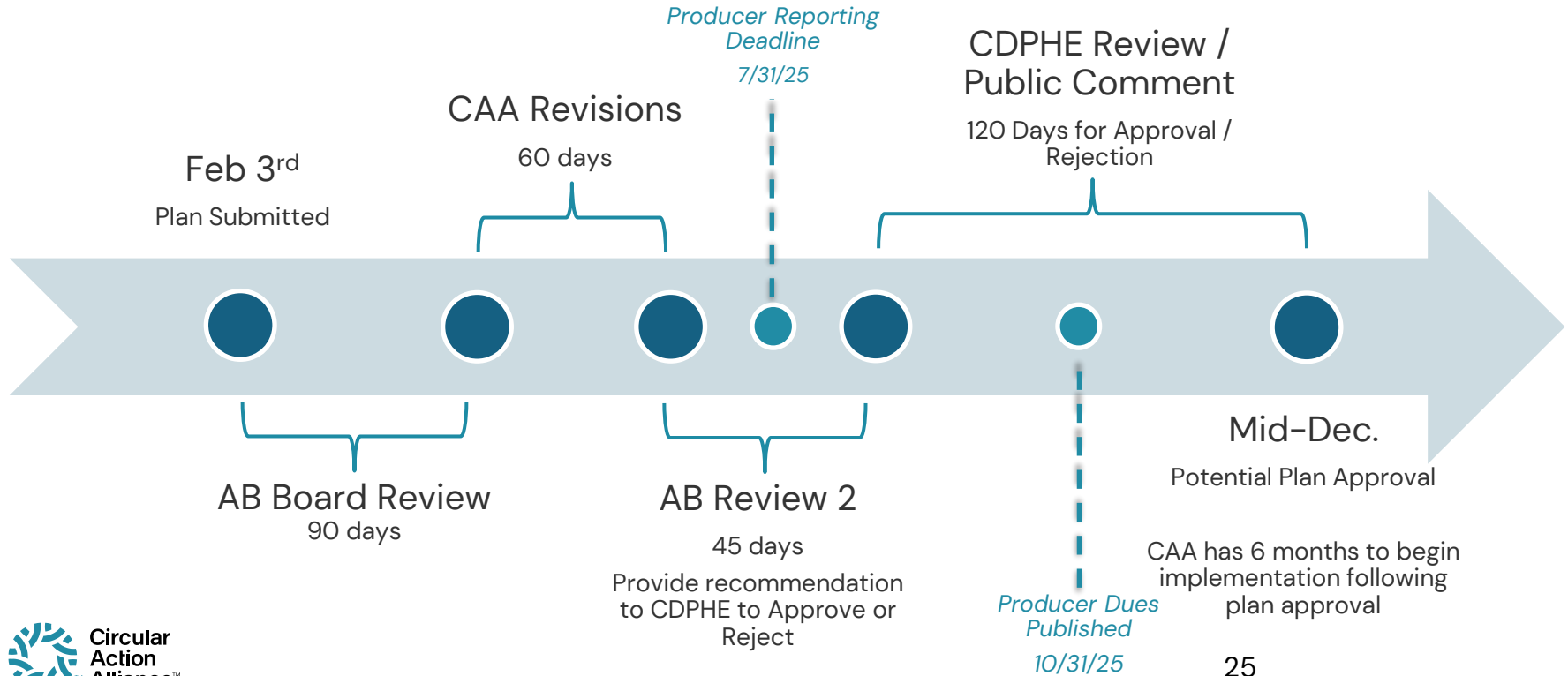
- Service Agreements
- Education and Outreach
- Investment

- Other Tools

- Data tracking, measurement, reporting
- Eco-modulation



CO Program Plan – Review Timeline



Thank You



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Colorado Dues and Material Reporting Categories

Appendix 1

Guiding Principles for Setting Dues

Harmonization

The national due-setting methodology will be used consistently across states, but due rates will vary because of differing state requirements and program costs.

Fairness

Producers must contribute to the costs of the recycling system, including those that use materials that are not recycled.

Material-Specific Costs

Due rates will reflect material-specific management costs in each state using the best available data.

Commodity Revenue

Due rates will reflect state-specific commodity revenues, which will be attributed to the corresponding material categories that earned them.

Eco-modulation

Due setting will account for measurable environmental objectives and state eco-modulation policies. Eco-modulation will be applied after base dues have been calculated.

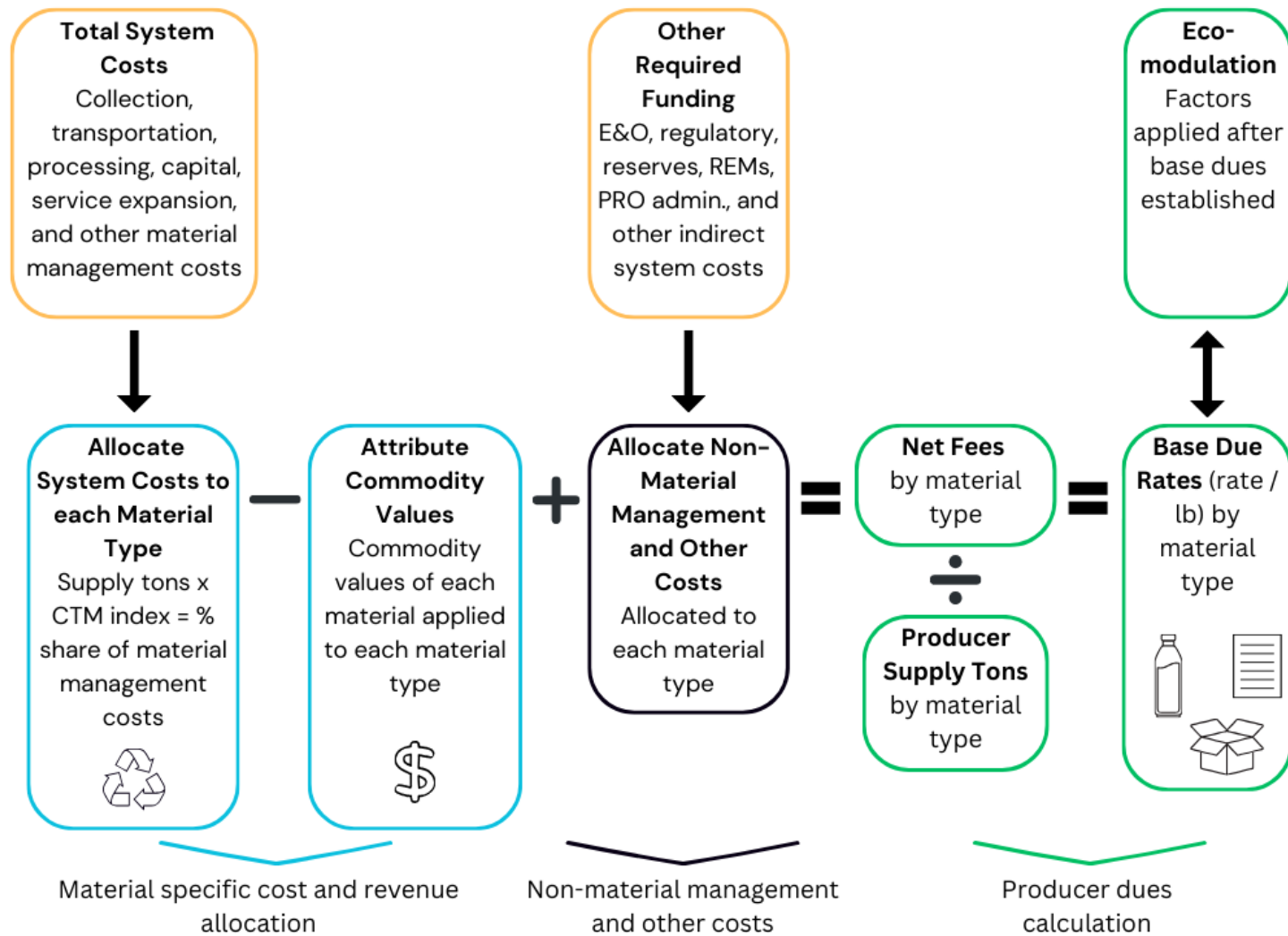
Responsible End Markets

Due setting will factor in the development and maintenance of viable REM with any associated costs attributed to the material category that requires end market development.

Clarity

Due-setting materials and consultations will be prepared and conducted in a manner that clearly communicates to producers the principles, methodologies and approach that CAA is using to determine due rates.

National Due Setting Methodology



Aggregated Dues from CO Program Plan Proposal (Does not include eco-modulation)

| Material Category Aggregation | Covered Material List | Average Dues for Each Scenario | | | Range of Individual Covered Material Category Dues | |
|---|-----------------------|--------------------------------|----------------|---------|--|----------|
| | | Low | Med | High | Min | Max |
| Paper Products | MRL | 2 ¢/lb | 4 ¢/lb | 6 ¢/lb | 2 ¢/lb | 8 ¢/lb |
| Glass | MRL | 2 ¢/lb | 4 ¢/lb | 6 ¢/lb | 2 ¢/lb | 6 ¢/lb |
| Ceramics | NC | 38 ¢/lb | 42 ¢/lb | 46 ¢/lb | 38 ¢/lb | 46 ¢/lb |
| Aluminum Containers | MRL | 4 ¢/lb | 4 ¢/lb | 5 ¢/lb | 4 ¢/lb | 5 ¢/lb |
| Aluminum – Other | AML | 29 ¢/lb | 33 ¢/lb | 38 ¢/lb | 29 ¢/lb | 38 ¢/lb |
| Aluminum – Other | MRL | 10 ¢/lb | 12 ¢/lb | 14 ¢/lb | 10 ¢/lb | 14 ¢/lb |
| Steel Containers | MRL | 5 ¢/lb | 5 ¢/lb | 6 ¢/lb | 5 ¢/lb | 6 ¢/lb |
| Steel/Metal – Other | MRL | 12 ¢/lb | 14 ¢/lb | 16 ¢/lb | 10 ¢/lb | 22 ¢/lb |
| Steel/Metal – Other | AML or NC | 21 ¢/lb | 24 ¢/lb | 27 ¢/lb | 17 ¢/lb | 35 ¢/lb |
| Paper/Fiber | MRL | 7 ¢/lb | 9 ¢/lb | 10 ¢/lb | 7 ¢/lb | 77 ¢/lb |
| Paper/Fiber | AML or NC | 23 ¢/lb | 27 ¢/lb | 31 ¢/lb | 15 ¢/lb | 44 ¢/lb |
| Plastic – Rigid PET | MRL | 15 ¢/lb | 18 ¢/lb | 22 ¢/lb | 15 ¢/lb | 23 ¢/lb |
| Plastic – Rigid PET | AML | 24 ¢/lb | 29 ¢/lb | 33 ¢/lb | 23 ¢/lb | 35 ¢/lb |
| Plastic – Rigid HDPE | MRL | 20 ¢/lb | 23 ¢/lb | 27 ¢/lb | 18 ¢/lb | 58 ¢/lb |
| Plastic – Rigid HDPE | AML | 51 ¢/lb | 58 ¢/lb | 66 ¢/lb | 26 ¢/lb | 121 ¢/lb |
| Plastic – Rigid Other | AML or NC | 66 ¢/lb | 77 ¢/lb | 90 ¢/lb | 33 ¢/lb | 171 ¢/lb |
| Plastic – Rigid PP | MRL | 15 ¢/lb | 18 ¢/lb | 22 ¢/lb | 15 ¢/lb | 26 ¢/lb |
| Plastic – Rigid PP | AML | 26 ¢/lb | 30 ¢/lb | 34 ¢/lb | 26 ¢/lb | 34 ¢/lb |
| Plastic – Flexible | AML or NC | 62 ¢/lb | 73 ¢/lb | 86 ¢/lb | 50 ¢/lb | 115 ¢/lb |
| Plastic – Other | NC | 48 ¢/lb | 55 ¢/lb | 63 ¢/lb | 48 ¢/lb | 63 ¢/lb |
| Wood and Other Organics | NC | 43 ¢/lb | 49 ¢/lb | 55 ¢/lb | 43 ¢/lb | 55 ¢/lb |
| Certified Compostable Packaging and Food Service Ware | NC | 15 ¢/lb | 27 ¢/lb | 40 ¢/lb | 13 ¢/lb | 46 ¢/lb |

Small Producer Exemptions Criteria in Colorado

Producer Exemptions (25-17-713) – p. 47

The following entities are exempt from the producer obligations created by the statute:

- A nonprofit corporation;
- A state or local government;
- A person with **less than \$5.506 million in gross revenue** (global sales (not including on-premise alcohol sales));
- A person that used **less than 1 ton of covered materials** for products sold or distributed in the state (preceding year);
- A builder, construction company or construction contractors;
- A retail food establishment with a physical location licensed by the state or the city of Denver;
- An agricultural employer with less than \$5 million in gross revenue in the state from consumer sales of agricultural products under the brand name of the farmer, egg producer, grower, or individual grower cooperative.

Preliminary Flat Dues for Low Volume Producers

Low Volume Producers are entities that don't qualify for the exemptions.

The statute requires the PRO to offer an optional flat rate for producers below a certain size to minimize the administrative and reporting costs of those organizations.

Proposed structure:

| Category (Supplied Tons) | Estimated Due Ranges |
|--------------------------|----------------------|
| 1.0 to 2.5 tons | \$600 to \$800 |
| 2.51 to 5 tons | \$1,300 to \$1,800 |
| 5.01 to 7.5 tons | \$2,100 to \$2,900 |
| 7.51 to 10.0 tons | \$2,900 to \$4,000 |

- Flat dues will be published in the fall of 2025 following initial supply data submission.
- As the number of producers that would qualify for flat dues is unknown at this time, fee revenues generated from flat fees will be surplus revenues towards the fee budget.

Appendix – Proposed Reporting Categories CO

| Material Class | Reporting Category | Minimum Recyclables List | Additional Materials List |
|---------------------------|---|--------------------------|---------------------------|
| Paper Products | Newspapers | Y | N |
| | Newsprint (inserts and circulars) | Y | N |
| | Magazines and Catalogues & Directories | Y | N |
| | Paper for General Use | Y | N |
| | Other Printed Materials | Y | N |
| Glass and Ceramics | Glass Bottles and Jars & Other Containers | Y | N |
| | Ceramic – All Forms | N | N |
| Metal | Aluminum Containers | Y | N |
| | Aluminum Foil and Molded Containers | N | Y |
| | Aluminum Aerosol Containers | Y | N |
| | Aluminum – Other Forms | N | Y |
| | Steel Containers | Y | N |
| | Steel Aerosol Containers | Y | N |
| | Steel – Other Forms | N | Y |
| | Metal – Small Format | Y | N |
| | Pressurized Cylinders | N | N |

Appendix – Proposed Reporting Categories CO

| Material Class | Reporting Category | Minimum Recyclables List | Additional Materials List |
|----------------|--|--------------------------|---------------------------|
| Paper/Fiber | Aseptic and Gable-top Cartons | Y | N |
| | Kraft Paper | Y | N |
| | Corrugated Cardboard | Y | N |
| | Waxed Corrugated Cardboard | N | N |
| | Paperboard | Y | N |
| | Polycoated Paperboard | N | Y |
| | Other Paper Laminates | N | Y |
| | Other Paper Packaging – Molded Pulp Food Serviceware | N | Y |
| | Other Paper Packaging | Y | N |
| | Paper – Small Format | N | Y |

Appendix – Proposed Reporting Categories CO

| Material Class | Reporting Category | MRL | AML |
|-----------------|---|-----|-----|
| Plastic – Rigid | PET (#1) – Bottles, Jugs, and Jars (Clear/Natural) | Y | N |
| | PET (#1) – Bottles, Jugs, and Jars (Pigmented/Color) | N | Y |
| | PET (#1) – Other Rigid Containers, Cups, Lids, Plates, Trays, Tubs (Clear/Natural) | Y | N |
| | PET (#1) – Other Rigid Containers, Cups, Lids, Plates, Trays, Tubs (Pigmented/Color) | N | Y |
| | PET (#1) – Other Rigid Items | N | Y |
| | HDPE (#2) – Bottles, Jugs and Jars (Clear/Natural) | Y | N |
| | HDPE (#2) – Bottles, Jugs and Jars (Pigmented/Color) | Y | N |
| | HDPE (#2) - Tubs | Y | N |
| | HDPE (#2) – Pails & Buckets | Y | N |
| | HDPE (#2) – Nursery (plant) pots & trays | N | Y |
| | HDPE (#2) – Squeeze Tubes | N | Y |
| | HDPE (#2) – Other Rigid Items | Y | N |
| | PVC (#3) – Rigid Items | N | N |
| | LDPE (#4) – Bottles, Jugs and Jars | N | N |
| | LDPE (#4) – Other Rigid Items | N | Y |
| | PP (#5) – Bottles, Jugs and Jars | Y | N |
| | PP (#5) – Containers, Cups, Lids, Plates, Trays, Tubs | Y | N |
| | PP (#5) – Nursery (plant) pots & trays | N | Y |
| | PP (#5) – Other Rigid Items | Y | N |
| | PS (#6) – Expanded/Foamed Hinged Containers, Plates, Cups, Tubs, Trays, and Other Foamed Containers | N | N |
| | PS (#6) White Expanded/Foamed Cushioning | N | Y |
| | PS (#6) Colored Expanded/Foamed Cushioning | N | N |
| | PS (#6) Rigid Non-Expanded | N | N |
| | Other/Mixed Rigid Plastic | N | N |

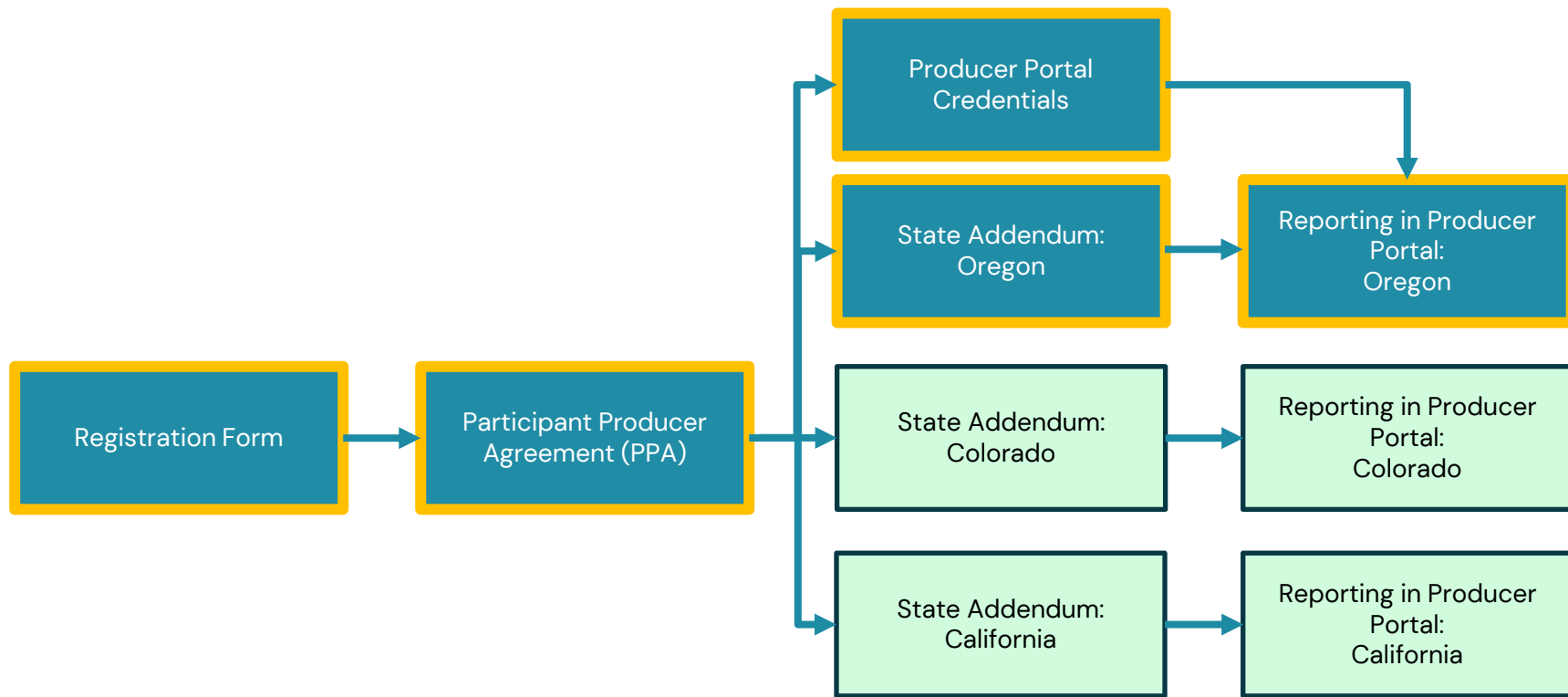
Appendix – Proposed Reporting Categories CO

| Material Class | Reporting Category | Minimum Recyclables List | Additional Materials List |
|---|--|--------------------------|---------------------------|
| Plastic – Flexible | HDPE (#2) /LDPE (#4) Flexible and Film Items | N | Y |
| | PP (#5) Flexible and Film Items | N | N |
| | Plastic Laminates and Other Flexible Plastic Packaging | N | N |
| Plastic – Other | Plastic – Small Format | N | N |
| | Plastic Packaging – Hazardous or Special Products | N | N |
| Wood and Other Organics | Wood and Other Organics | N | N |
| Certified Compostable Packaging and Food Service Ware | Paper – Certified to ASTM D8410-22 | N | N |
| | Plastic and Polymer Coated Substrates – Certified to ASTM D6868-21 | N | N |
| | Rigid Plastic – Certified to ASTM D6400-23 | N | N |
| | Flexible Plastic – Certified to ASTM D6400-23 | N | N |

Producer Services Updates – March 2025

Appendix 2

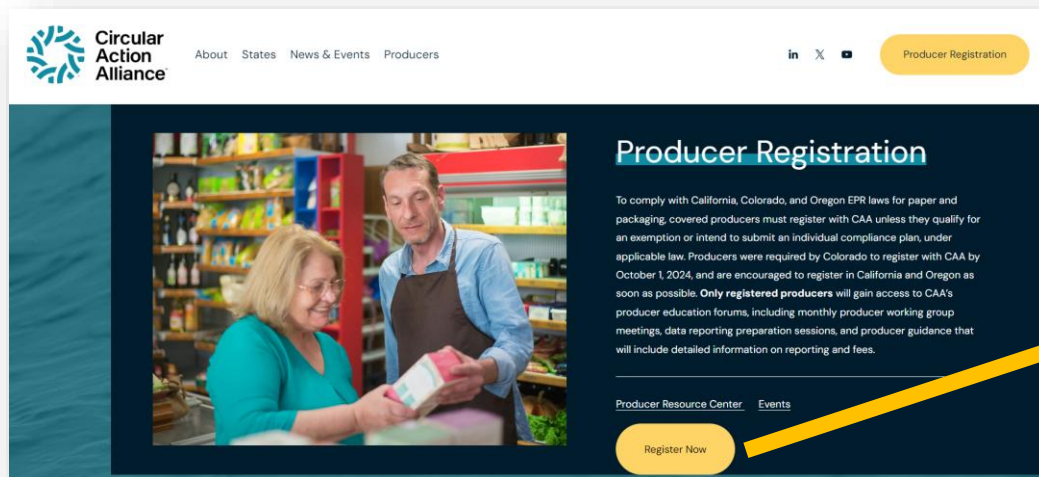
CAA has issued agreements and credentials to the Producer Portal for all active registrations



Registrations prior to Nov 2024 need to be updated for producers to receive the PPA and create an account

CAA's Producer Registration Webpage
circularactionalliance.org/registration

Registration Form



Circular
Action
Alliance™

Circular Action Alliance (CAA) is the Producer Responsibility Organization (PRO) approved to implement Extended Producer Responsibility (EPR) laws for paper, packaging and foodservice ware in California and Colorado, and the only PRO submitting a program plan in Oregon.

Registration Requirement:

- To comply with producer registration requirements in California's, Colorado's and Oregon's EPR laws for paper, packaging and foodservice ware, producers must register with CAA, unless the producer intends to submit an individual compliance plan, under applicable law.
- Any company that expects to be considered a producer under California, Colorado, and/or Oregon's paper, packaging and foodservice ware EPR laws, and which is not otherwise exempt from registration under those laws, must complete this form as part of the producer registration process with CAA.

Producers should register each of their obligated, subsidiary companies individually

Participant Producer Agreement and State Addenda are complementary; both are required to be signed before submitting your report

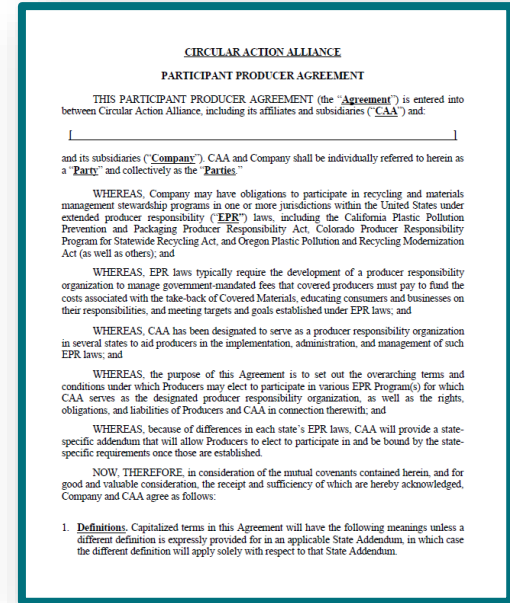
PPA + State Addendum = Full registration with CAA for each state program

Participant Producer Agreement (PPA):

- Formalizes consistent terms & conditions between CAA and participant producers
- Does not obligate producers to pay fees if they are later determined not to be a producer

State addenda:

- Specific State Addenda are ancillary documents developed in conjunction with government-approved Program Plans
- Formalizes the registered producer's financial obligation in each state, and allows for producer reporting to be submitted
- Obligates participant producers to pay fees/dues to CAA within a specific state program



[CAA's Participant Producer Agreement \(PPA\)](#) Click link to view a static copy of the document.

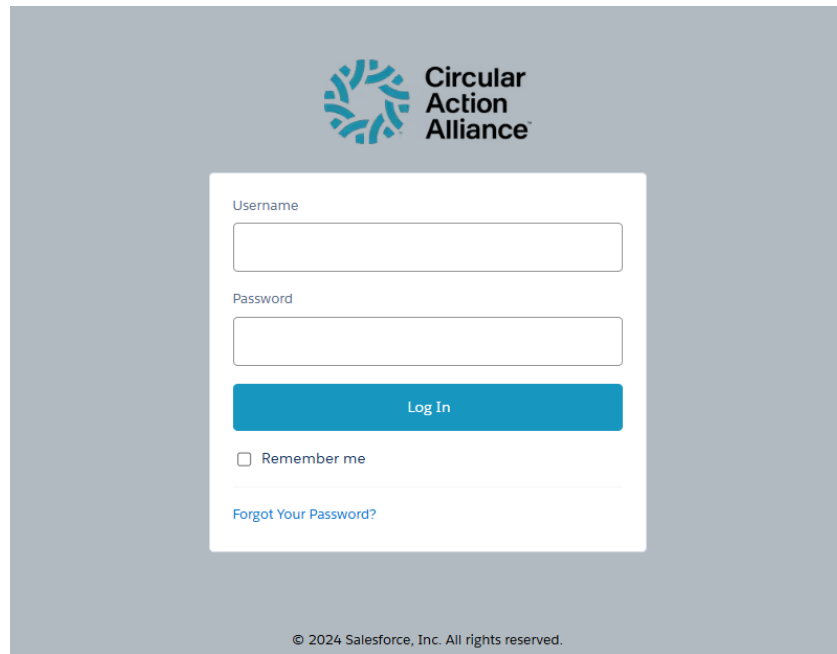
Producers can use CAA's Reporting Guidance to prepare for pending deadlines, once registered

1. Covered Materials & Producer Definitions
2. Preparing to Report your Supply Data
 - Qualitative data (affiliations, producer type, brand list, etc.)
 - Quantitative data (accepted reporting methodologies, how to report covered materials)
3. Material Reporting Categories & Definitions
4. Oregon 2025 Report Preparation Workbook
5. Other Program-Specific Guidance (Eco-modulation, Source Reduction, etc.)

Please contact producer.support@circularaction.org for any specific questions after reviewing the guidance documents.

CAA's Producer Portal has been live since early February and is already accepting producer reports for Oregon 2025

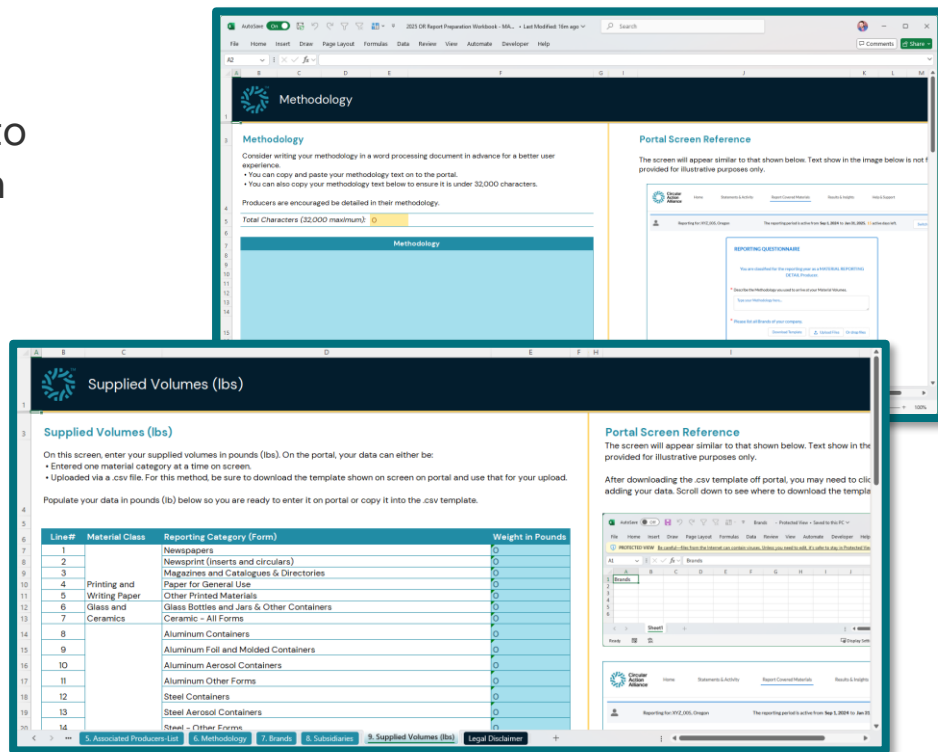
- On launch, producers will be able to use the portal to:
 - Submit Oregon reports
 - Access guidance (including confidential)
 - View account information, including account name and address
 - Create support cases with Producer Services team
 - Request new user, such as 'Reporting Contact'



The screenshot shows the login interface for the Circular Action Alliance. At the top right is the logo, which consists of a circular arrangement of teal arrows pointing clockwise, followed by the text "Circular Action Alliance" in a bold, sans-serif font. Below the logo is a white login box. Inside this box, there are two input fields: the first is labeled "Username" and the second is labeled "Password". Below these fields is a blue button with the text "Log In" in white. Under the button is a checkbox labeled "Remember me". At the bottom of the login box is a link that says "Forgot Your Password?". At the very bottom of the page, below the login box, is the copyright notice: "© 2024 Salesforce, Inc. All rights reserved."

Report Preparation Workbook

- CAA developed an optional Excel-based *Report Preparation Workbook* to help producers gather the information the portal requires
- This helps producers be ready to report before they log in to submit
- It includes a place to list your:
 - Yes / no question answers
 - Methodology
 - Subsidiaries
 - Brands
 - Supplied Material Weights (lbs)



Producer Compliance & Enforcement

- Per ORS 459A.869(8), CAA will establish a searchable registry disclosing all CAA's compliant members and non-compliant members.
- CAA will monitor compliance by conducting periodic audits.
- CAA will first notify a non-compliant producer of any deficiency and provide the producer an opportunity to respond and to cure the delinquency.
- For any program year that a producer is found to be non-compliant because they are not reporting and paying fees accurately or on-time, the producer will retroactively pay all fees during the period of non-compliance, subject to any late charges or liquidated damages.
- In the event that CAA is unable to adequately resolve a non-compliance,
 - CAA will send a notification to DEQ after completing its internal compliance processes, and
 - producers may also be subject to DEQ enforcement fines or penalties.

CAA Producer Registration Rates Remain Strong with recent increases in Oregon

**Total Updated
Registrations:**

2,315
Total

94% Obligated in California

91% Obligated in Colorado

93% Obligated in Oregon

**Participant Producer
Agreements (PPAs)**

1,060

**PPAs signed &
guidance sent**
(covering 80% of registrations)

Oregon 2025 Next Steps – Recap

- **March:** Confirm Portal access, sign OR state addendum, report to CAA by March 31st
- **April & May:** Report validation, CAA vendor setup
- **Early June:** Fee rates announced, Invoices issued to producers
- **July:** Payment due to CAA, program start