



June 2, 2025

Claire Derksen

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

Department of Resources Recycling and Recovery, Regulations Unit

1001 "I" St., MS-24B, Sacramento, CA 95814

Submitted online via Public Comment Form

Dear Director Heller:

LPMA powered by Interchange 360 is submitting the following comments in response to proposed rulemaking for SB 54 Plastic Pollution Prevention and Packaging Producer Responsibility Act:

About LPMA powered by Interchange 360

LPMA powered by Interchange 360 was founded in June 2024 in response to EPR laws by BP Lubricants USA, Inc. (Castrol), Chevron U.S.A. Inc., ExxonMobil Oil Corporation, Pennzoil-Quaker State d/b/a SOPUS Products (Shell) and VGP Holdings LLC (Valvoline). We serve the petroleum and automotive sector by providing members with support in complying with state EPR laws and by returning material to its members and suppliers for the creation of new products. LPMA powered by Interchange 360 is currently developing program plans in California, Colorado, Oregon, and Vermont, with plans to be active in every state that implements an EPR law for its covered materials.

The Importance of Separate Program Options for Petroleum and Automotive Products

Everywhere that there is a successful EPR program for packaging, there is a separate collection and material management system for petroleum and automotive packaging. This is necessary to avoid contamination in the curbside recycling stream, while still allowing for these materials to be successfully recycled. In British Columbia, Canada, for example, the Interchange program operates an independent collection system from the common system. The BC program has approximately 7,000 collection points, including 300 public return collection facilities (e.g., local government and private depots retailers, and service stations) through which it collects approximately 95% of the targeted containers sold in B.C.

Examples of products that would be included in such a system include motor oils, engine lubricants or additives, anti-freeze, transmission/brake/gear oils, or other automotive, mechanical, and motor liquids. Typical packaging formats include rigid plastic or HDPE, bag-in-box, pails (e.g., 5-gallon buckets), metal, multi-layer tubes or bottles, aerosols, or other container designed for single-use.

Additional Pathways Needed for Hard to Recycle Materials

The packaging, sustainability, and recycling industries are in a constant state of innovation. However, the current rules do not provide sufficient flexibility for specialized industries with materials that have proven recycling pathways, but do not fit well into the curbside commingled system, such as petroleum and automotive products. We recommend that CalRecycle provide language in the regulations that provides producers in these industries a clear path to set up or continue operations that have demonstrated success in comparable jurisdictions. Furthermore, in cases such as petroleum and automotive products, a separate PRO may be the best way to collect and manage a targeted list of products.

LPMA powered by Interchange 360 seeks an alternative pathway for the management of packaging for oil-based lubricants, grease, antifreeze, engine additives, and other fluids typically used in transportation and mechanical applications and have demonstrated success with such programs. It is our intent, on behalf of our members, to establish an independent program allowing for compliance of producer obligations under SB 54 and the successful collection and recycling of their material.

LPMA powered by Interchange 360 is pleased for the opportunity to provide these comments and look forward to working with CalRecycle on ensuring a high recycling rate for petroleum and automotive products in the state. Please contact LPMA Director of Membership Services Mark Carpenter at mcarpenter@interchange360.com or (703) 629-1320 to arrange a meeting to discuss further details.

Sincerely,



David Lawes, CEO