



July 31, 2025

California Department of Resources Recycling and Recovery, Product Stewardship Branch

Re: **July 2025 Textile Stewardship Workshop**

On behalf of the California Retailers Association, the American Apparel & Footwear Association and National Retail Federation (the "associations"), thank you for the opportunity to submit comments following the SB 707 Textile Stewardship Informational Workshop held on July 17, 2025.

As stated in our comments on July 17, the associations have signed a Memorandum of Understanding to jointly establish an independent, 501(c)(3) Producer Responsibility Organization dedicated to ensuring that apparel and textiles are diverted from landfill and collected, repaired, reused, and recycled after use in compliance with SB 707. We are dedicated to creating a PRO that will build and execute a plan that reflects California's unique market conditions, waste management challenges, and regulatory landscape.

Leveraging the knowledge and expertise of our thousands of members, the associations will establish an organization that represents the diversity of covered products placed in the market. We are committed to fostering inclusive engagement across the textile value chain and are eager to engage with all producers and interested parties early in this process, and in advance of regulatory requirements and deadlines.

We look forward to the release of the application and, in addition to ensuring we meet the application criteria, we are already preparing to execute the near-term requirements of SB 707, notably the need to deliver a comprehensive, statewide needs assessment by March 1, 2027 and to register producers by July 1, 2026. We are focused on educating producers and will soon be announcing opportunities for all interested parties to learn more about the regulatory requirements and opportunities to participate in the needs assessment process.

The associations appreciate the inclusive process CalRecycle has initiated and look forward to learning more about the PRO application process and keeping all parties apprised of our progress.

Please feel free to reach out to Rachel Michelin, President & CEO, California Retailers Association if you have any questions for need additional information.

Sincerely,

Rachel Michelin, President & CEO, **California Retailers Association**

Steve Lamar, President & CEO, **American Apparel & Footwear Association**

Stephanie Martz, Chief Administrative Office & Legal Counsel, **National Retail Federation**