

Thursday, February 19, 2026

**To:**

CalRecycle  
Textile Stewardship Program Team  
1001 I Street  
Sacramento, CA 95814

**From:**

Board of Directors  
Textile Renewal Alliance  
1121 L Street, Suite 607  
Sacramento, CA 95814

Dear Director Heller and the CalRecycle Textile Stewardship Program Team,

This letter is submitted on behalf of the board of directors of Textile Renewal Alliance (TRA), a prospective Producer Responsibility Organization (PRO) seeking approval to administer California's Extended Producer Responsibility (EPR) law for textiles, the Responsible Textile Recovery Act of 2024. The signatories include the founding associations and producer organizations whose representatives serve as directors of TRA's board and are committed to delivering a compliant, effective, and financially responsible textile stewardship program in California.

For many producers, the decision to participate in TRA has been driven by its strong governance, true nonprofit operating model, and on-the-ground California experience. We are pleased to share that since submitting our application, TRA has received its federal 501(c)(3) determination letter, satisfying the requirement that the PRO must be a nonprofit organization. We have built TRA to meet statutory obligations, with room to evolve over time as we seek to build a novel program that, when operational, will be the largest in the world.

We recognize that the Responsible Textile Recovery Act of 2024 presents an unprecedented opportunity to build and scale programs for responsibly managing a unique set of products. A successful textile management program cannot simply follow existing EPR program templates and must be guided by those with direct experience working within California's regulatory and product stewardship environment. TRA is committed to working collaboratively with CalRecycle, producers, and a diverse set of stakeholders to build on lessons learned and establish a strong, California-focused foundation for textile circularity, while launching innovative textile management systems grounded in data, robust consultation, statutory requirements, and sound financial stewardship.

Our approach recognizes that the entire textile production and management value chain must come together to collect the data and expertise needed to effectively meet the requirements and expectations for California's textile EPR law. We appreciate that TRA's governance structure provides direct oversight by obligated producers, as intended by the law, and that in building a new, nonprofit entity we preserve

our ability to hire staff, select appropriate partners, and procure cost-efficient systems tailored to California’s requirements and specific needs.

Our founding members have prioritized industry alignment and preparation from day one, while simultaneously seeking input and developing mechanisms to engage key stakeholders in the textile value chain. TRA has been clear about its consultative approach to meeting the statutory requirements, which we will carry into our work to inform system design, scope, and costs.

As producers and founding members, we support TRA’s approach of assessing requirements and data before establishing infrastructure plans or other systems that will impact producer fees. This is the primary purpose of the upcoming needs assessment process, which TRA is prepared to begin immediately upon approval.

TRA is also well positioned to register producers quickly and cost efficiently. TRA has the existing relationships and networks to ensure compliance with the earliest requirements of the law. Thanks to the leadership of founding associations, we can reach and register producers by July 1 and have already begun educating producers about their requirements.

We would also like to underscore that TRA is producer funded and has secured sufficient financial resources to support initial program operations. As a result, TRA is prepared to begin execution immediately upon selection and does not anticipate funding-related delays. We know that registering thousands of producers on a tight timeline is a significant effort and we intentionally avoided the additional hurdle of seeking early funding as part of this registration process.

Based on our review of the statute and the obligations it establishes, we believe that TRA is the only applicant that meets the core statutory requirements, including 501(c)(3) status and a governing board made up of producers who are diverse in size and the covered products that they represent. We provide this information to support CalRecycle’s review of the prospective PRO’s organizational readiness and ability to meet the statutory requirements of the Responsible Textile Recovery Act of 2024 and are confident in TRA’s ability to achieve our shared vision of ensuring that products are diverted from landfill for repair, reuse and recycling.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rachel Michelin".

Rachel Michelin  
The California Retailers Association

**Board Representation:**

The California Retailers Association

The American Apparel and Footwear Association

The National Retail Federation

Amazon

ASICS

Eileen Fisher

Everlane

Gap Inc.

Hugo Boss

New Balance

Nike

Patagonia

Regent Apparel

SanMar

Target

Walmart

Zara