



March 30, 2026

The Honorable Catherine S. Blakespear
Chair, Senate Environmental Quality Committee
California State Capitol
Sacramento, CA 95814

RE: SB 1180 (Allen) - California Plastic Pollution Mitigation Fund

Position: Oppose unless amended

Dear Senator Blakespear:

On behalf of the undersigned organizations, we respectfully oppose SB 1180 unless amended. The coalition includes stakeholders who participated in the negotiations that led to SB 54, as well as organizations committed to its effective implementation. Together, we are concerned that SB 1180 would stretch the scope of the California Plastic Pollution Mitigation Fund beyond the framework established in the Plastic Pollution Prevention and Packaging Producer Responsibility Act (hereinafter referred to as "SB 54").

The mitigation fund represents a significant funding stream of \$500 million annually, financed through producer payments to address environmental and public health impacts associated with plastic pollution. These payments are on top of what producers will already pay to fund and manage the EPR program. and to ensure those resources are used to monitor and reduce impacts and to restore, recover, and protect the natural environment. That framework is anchored in mitigating impacts, not reshaping markets or production behavior which are already addressed through SB 54's producer responsibility requirements.

SB 54 already requires significant upstream changes through producer obligations, including source reduction requirements, recyclability standards, and other design and system changes intended to reduce plastic waste. Those provisions are designed to address production and use of packaging materials directly. The mitigation fund, by contrast, was broadly structured to address environmental and public health impacts associated with plastic pollution, recognizing the need to continue driving down impacts while advancing more sustainable material choices and systems.

SB 1180 moves away from that structure in several keyways. First, the bill requires expenditures to help create or accelerate a "transformative shift away from plastic production and use." This language moves beyond mitigating impacts and toward influencing manufacturing and

consumption decisions that SB 54 already addresses through its producer responsibility requirements.

Second, SB 1180 requires funded activities to incorporate public education regarding lifecycle impacts of plastics. While targeted outreach tied to mitigation projects may be appropriate, the bill could enable broad public information campaigns and other activities, without clear or measurable environmental outcomes tied to plastic pollution mitigation. SB 54 already requires the PRO to allocate significant funding to education and outreach initiatives. It is unnecessary to establish another stream of funding to accomplish similar objectives when these efforts could be tied together with the existing funding stream to achieve the same goals. In addition, SB 1180 establishes new administrative requirements for grant programs, including technical assistance and other support from state agencies such as CalRecycle. These provisions would increase the share of administrative overhead and could further direct mitigation funding toward program administration and outreach activities rather than on-the-ground environmental mitigation.

Third, the bill would allow mitigation dollars to be used for pollution sources outside SB 54's product management framework, including tires, textiles, and other noncovered streams. Producers who are in scope of SB 54 for their product packaging and food service ware should not be financially responsible for mitigating the impacts of other products outside of SB 54's scope. While these are important issues, these uses would extend funding and focus beyond what industry stakeholders agreed to when negotiating the mitigation fund during SB 54.

Our coalition respectfully requests amendments to maintain a clear nexus between mitigation funding and SB 54-covered materials, clarify that funds remain focused on measurable environmental and public health outcomes directly tied to plastic pollution impacts, ensure grantees demonstrate a nexus to SB 54, and remove provisions that veer away from the original mitigation framework.

Should you have any questions or wish to discuss these concerns further, please do not hesitate to contact cfinarelli@thehcpa.org or nicole@mqadvocacy.com.

Sincerely,

Christopher Finarelli
Senior Director, State Government Relations and Public Policy
Household and Commercial Products Association

Elizabeth Esquivel
California Manufacturers & Technology Assoc

Nicole Quinonez
CalChamber

Erin Raden
Consumer Brands Association

Tim Shestek
American Chemistry Council

Gail Delihant
Western Growers Association

Sarah Pollo Moo
California Retailers Association

Ivy Brittan
Plastics Industry Association

Matthew Singh
Flexible Packaging Association

Carol Patterson
Foodservice Packaging Institute

Cherish Changala
Western Plastics Association