



May 6, 2026

Honorable Buffy Wicks  
Chair, Committee on Appropriations  
California State Assembly  
1021 O Street, Suite 8220  
Sacramento, CA 95814

**RE: SUPPORT AB 2549 (Zbur) – CALIFORNIA RETAILERS ASSOCIATION SPONSORED BILL**

Dear Chairwoman Wicks:

On behalf of the California Retailers Association (CRA), I am writing to express our strong support for AB 2549. CRA is sponsoring this measure to provide critical fixes to California's Battery Embedded Product (CBEP) Program, which expanded the Electronic Waste Recycling Act of 2003 to include products with batteries that cannot be easily removed with common household tools. CBEP, created by the passage of SB 1215 (Newman-2022), began implementation January 1, 2026. Leading up to that program start date and throughout the rulemaking process, CRA worked with CalRecycle and our retail members to identify several areas needed for statutory improvement to ensure the product stewardship program works for California in achieving the state's environmental sustainability goals while also keeping products affordable.

AB 2549 makes important, practical improvements to California's CBEP program by streamlining the notification and reporting process for manufacturers, retailers, and CalRecycle. Current implementation of the program has created unnecessary compliance burdens and liability exposure for retailers, while increasing costs for products that fall within the program's scope. AB 2549 addresses these issues by requiring Universal Product Codes in manufacturer notices, standardizing notice templates and file formats, and clarifying CalRecycle's role as the single source of truth for product scope.

These changes will help ensure the program functions as intended while reducing confusion in the marketplace and avoiding unintended costs for consumers and businesses. We also support the bill's provisions to provide delayed enforcement for discount stores, which will help smaller and lower-margin retailers comply without disrupting operations. And CRA supports the exemption of thrift stores from CBEP as thrift

stores cannot know where exactly products come from and how they are made as they serve as second, third and even fourth-hand sellers of products.

For these reasons, the California Retailers Association respectfully requests your support for moving AB 2549 forward through the legislative process. Thank you for your leadership on this important issue and for your continued work to improve the implementation of California's environmental programs.

Respectfully,

A handwritten signature in black ink, appearing to read "Sarah Pollo Moo", with a long horizontal flourish extending to the right.

Sarah Pollo Moo  
Vice President, Operations and Sustainability Compliance  
California Retailers Association

Cc: Assemblymember Rick Chavez Zbur  
Nikita Koraddi, Principal Consultant  
Members of the Assembly Appropriations Committee