

July 31, 2025

CalRecycle Textile Stewardship Team  
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Sacramento, CA 95812-4025

**SUBJECT: Public Comment on SB 707 Implementation and Regulatory Development**

Dear CalRecycle Textile Stewardship Team,

On behalf of the California Product Stewardship Council (CPSC), sponsors of SB 707, we would like to thank Senator Newman and his staff for their leadership, our Board and staff, and the diligent members of our Statewide Textile Act Taskforce (STRAT). We would like to also thank the hundreds of endorsers and engaged stakeholders who helped make this landmark legislation possible, making SB 707 the first Extended Producer Responsibility (EPR) law for textiles in the nation. And first in California to pass with 158 endorsements and zero opposition on record. CPSC works on all EPR laws/programs in California, and the textile industry really showed up in their engagement and advocacy during the legislative process.

CPSC acknowledges the outstanding commitment of Director Heller and Deputy Director McIntyre, who have participated in numerous stakeholder engagement opportunities, including the Goodwill Sustainability Summit, Circularity in Denver, the EPR Summit in Chicago, and countless meetings with industry leaders and community partners. These efforts demonstrate the Department's proactive approach to collaboration, which is a reflection of the success to come as we move into the implementation of SB 707.

**Key Achievements in SB 707**

We applaud several provisions of SB 707 that establish a strong foundation for circularity. These provisions, if effectively implemented, can serve as a model for national and global EPR programs.

- Prioritization of reuse and repair
- Public health protection
- Incentives for natural fiber production
- Global transparency and accountability
- Funding for research and market development
- Evidence-based performance metrics
- Funding for cost-barriers, like transportation and pre-processing
- Diversity in PRO governance
- Equitable and accessible participation
- Strong enforcement mechanisms.

## Regulatory Priorities and Areas Requiring Clarification.

As the regulatory process moves forward, we respectfully urge CalRecycle to consider the following critical points that were set to be addressed in either regulations or the PRO Plan:

### 1. Definitions and Scope

- **Repair:** Research by UCSB scholar Roland Geyer emphasizes that extending product lifetimes through repair and reuse significantly reduces the demand for new primary production, which in turn lowers associated GHG emissions ([Zink & Geyer, 2017](#)). Repair offers strong environmental benefits as compared to recycling, while promoting job creation and innovation in design. The environmental case for repair remains compelling, especially when paired with circular business models and education programs. Supporting repair aligns with California's climate goals and creates pathways for green workforce development.
- **Recycling:** Recycling should include mechanical and chemical processes that meet California's intent for public health protection and reduction of hazardous waste generation. Caution must be taken with certain mechanical recycling methods (e.g., exposure to bleach, mercerization chemicals, and other surface treatments). Recycling should mean reducing textiles to yarn or fiber form, whereas maintaining the material as fabric aligns more with repair and reuse
- **Reuse:** SB 707 defines reuse as a "sale to consumer for intended use" which excludes B2B transactions and was intended to track reuse from the program through resale to an end-user. It doesn't, however, intend to monitor individual products through their entire lifecycle. The scope of "reuse" must be clearly defined for setting fees and reporting requirements. We strongly support incentives for better labeling, but we do not recommend mandating Digital Product Passports (DPP).
- **Donations and Rentals:** While SB 707 clarifies that rental is not a "sale", further guidance is needed on whether donated textiles or rental services trigger any compliance obligations or reporting requirements.
- **Returns and Interstate Movement:** Clarify how returned products or goods brought into the state for resale or redistribution will be classified under "covered products". This will be a key provision to address overproduction since many brands bring more products into the state that sell to consumers.

- **PPE for Textile Articles:** Define whether certain categories of medical textiles (e.g., surgical gowns, drapes, etc.) fall under “covered products” or exempted like PPE apparel. Intent was to exempt both PPE Apparel and Textiles.

## 2. Eco-Modulated Fee Structure

- We want CalRecycle to provide clarity on the methodology for calculating eco-modulated fees and credit for existing programs should require data-sharing and alignment with waste reduction hierarchy.
- Lower fees should incentivize:
  - Products made in California, supporting local jobs and reducing transportation emissions.
  - Natural fibers sourced locally, which promote soil health for our farmers and carbon sequestration, consistent with regenerative agriculture principles ([Fibershed, 2024](#))
  - Durable products and other strategies that extend consumer use and product lifecycle.
- Ensure the fee structure ties directly to measurable outcomes, such as reduced environmental impacts and increased material recovery.

## 3. Data Transparency and Performance Standards.

- We urge CalRecycle to maintain robust requirements for material flows, chemical content, and market development outcomes.
- Establish clear performance benchmarks over time to drive progress toward reuse, repair and recycling goals.
- Transparency provisions should include mandatory feedback loops so PROs can act on findings from their annual reporting. For example:
  - Assessment of collection, sorting, and transportation efficacy.
  - Actions taken and investment made to avoid contamination in the recycling process.
  - Availability of end markets for recycled material that could not be remanufactured into textiles or textile articles in California.

## 4. Online Market Compliance

- We recommend CalRecycle to clearly define online market compliance and protocols, including protocols for non-compliant producers and online sellers.
  - Platforms must maintain annually updated lists of high-volume third-party textile sellers.

- PROs should create simplified digital compliance tools to ensure small and micro sellers participate in the program.
  - CalRecycle should clarify thresholds, enforcement procedures and reporting frequency for both platforms and sellers.
- Stakeholders discussed in depth concerns around international direct-to-consumer sales not being captured in the definition of producers, so additional protective provisions were added to the bill. The enforcement and protection were ultimately under the Federal jurisdiction since these products are subject to trade laws. As of July 30<sup>th</sup>, the Federal government has stopped the "de minimis" exemption that allowed low-value commercial shipments shipped to California without reporting to customs ([Reuters, 2025](#)).

## 5. Chemical Management and Microplastics

We urge CalRecycle to collaborate with the Department of Toxic Substances Control (DTSC) on Safer Consumer Products (SCP) Chemical List referenced in the bill and take note on the following:

- Producers must be held accountable for the disclosure of these chemicals at the point of market entry.
- Hazardous chemicals in textiles such as synthetic dyes, PFAS, plasticizers, and heavy metals pose serious environmental and human health risks through water and soil contamination, dermal and inhalation exposure, and chronic toxic effects, especially for vulnerable populations such as infants and pregnant women (Kant, 2012; Rovira et al., 2025).
- Microplastics from textile production and waste, particularly from synthetic fibers are a major source of environmental pollution posing risks to aquatic ecosystems and food chains ([Ciesielska-Wrobel et al., 2023](#)).
- Textile microfibers, especially from chemical treated fabrics, are a persistent source of non-biodegradable pollution with toxic properties that pose health risks to humans and ecosystems ([Periyasamy, A. P., 2023](#)).
- These materials contribute to greenhouse gas (GHG) emissions during both their production and degradation phases ([Zink & Geyer, 2017](#)).
- For the program to effectively achieve its climate and public health goals, these provisions must be clear and enforceable.

## Conclusion

Since the passage of SB 707, our Statewide Textile Recovery Act Taskforce (STRAT) membership has grown to over 150 stakeholders across eight active working groups reflecting unprecedented participation from producers, recyclers, and community advocates.

In support of implementation efforts, CPSC recently featured in a peer-reviewed article published in the European Society of Medicine (ESMED) journal. The article outlines a comprehensive framework for EPR program design, including the importance of source-separated collection, investment in local reuse and recycling infrastructure, and performance metrics that prioritize durability and repair over end-of-life recycling (Brasch et al., 2025). These findings support the regulatory direction of SB 707 and emphasize the need for clear, enforceable guidelines as the program enters its implementation phase.

CPSC remains committed to serving as a resource for stakeholders looking to get involved in the regulatory process to and invite all stakeholders to [join the STRAT](#), and advance textile circularity in California.

Thank you again for your dedication to this groundbreaking initiative. We look forward to continued collaboration and to the next PRO informational workshop.

Sincerely,

A handwritten signature in black ink, reading "Joanne Brasch". The signature is fluid and cursive, with the first name "Joanne" written in a larger, more prominent script than the last name "Brasch".

Joanne Brasch

Director of Advocacy and Outreach

## References

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