



REUSE IN BEAUTY & PERSONAL CARE

INVESTMENTS AND POLICIES TO DRIVE
CONSUMER-PACKAGED-GOODS
REUSE IN CALIFORNIA

Prepared By:



CPSC
California Product
Stewardship Council™

Sponsored By:



Napa Recycling
& WASTE SERVICES

1. INTRODUCTION & BACKGROUND

California is advancing Extended Producer Responsibility (EPR) for product and material management. Recent policies, including **SB 212** (Pharmaceutical and Sharps Waste Stewardship Program) and **SB 707** (Responsible Textile Recovery Act of 2024), sponsored by the California Product Stewardship Council (CPSC) and **SB 54** (Plastic Pollution Prevention and Packaging Producer Responsibility Act of 2022), supported by CPSC, are leading this transition. These ambitious laws incentivize producers to design products and packaging for reuse, repair, and recycling by tying eco-modulation fees to material circularity. This model links financial incentives to better product design and reduces waste management costs for local governments. These policies build on California's existing EPR and Product Stewardship programs for items such as paint, mattresses, and carpet.

Achieving full circularity requires prioritizing source reduction and reuse within the waste management hierarchy. The City of Napa currently supports reuse infrastructure with outreach events and ordinances, such as mandatory construction and demolition debris recycling, and a proposed ordinance on reusable foodware requirements. Napa County already passed a reusable foodware ordinance. Reusable packaging is a feasible next step for the Napa Valley.

Moreover, a fully circular economy presents a significant economic opportunity. According to CalRecycle's estimates (CalRecycle's Zero Waste Plan, 2026), a full circular economy in California could:

- Add \$411 billion in annual GDP growth
- Create over half a million new jobs
- Avoid \$11 billion in health and environmental costs

Although EPR policies, such as SB 54, assign financial responsibility to producers to fund the program, the success of reuse programs often relies on local implementation. Local ordinances create the necessary enabling infrastructure that allows EPR programs to evolve from recycling-centric systems into comprehensive, community-focused networks that prioritize reuse. **This report provides updates on consumer packaging reuse opportunities.**

Supported by the City of Napa and Napa Recycling, this report from the California Product Stewardship Council (CPSC) explores practical ways for local governments to engage in regional reuse initiatives. Inspired by the structure of EPR programs, it also suggests **policies to position retailers at the core of large-scale reuse systems.** These strategies can be applied broadly. However, the report highlights the beauty and personal care sector. This sector is well suited to advance circularity due to its high industry activity and interest. Both factors are important for the success of product stewardship efforts.

CPSC's findings confirm that the infrastructure for a circular economy in Napa and the San Francisco Bay Area is a present reality, ready for action and investment. Our recommendations include acting as a convener and catalyst for seed funding. CPSC aims to

unite diverse industry stakeholders to drive the expansion of sustainable reuse and prefill infrastructure in the beauty and personal care sectors.

2. REUSE ACROSS PROGRAMS

California’s Extended Producer Responsibility Programs Champion Reuse!

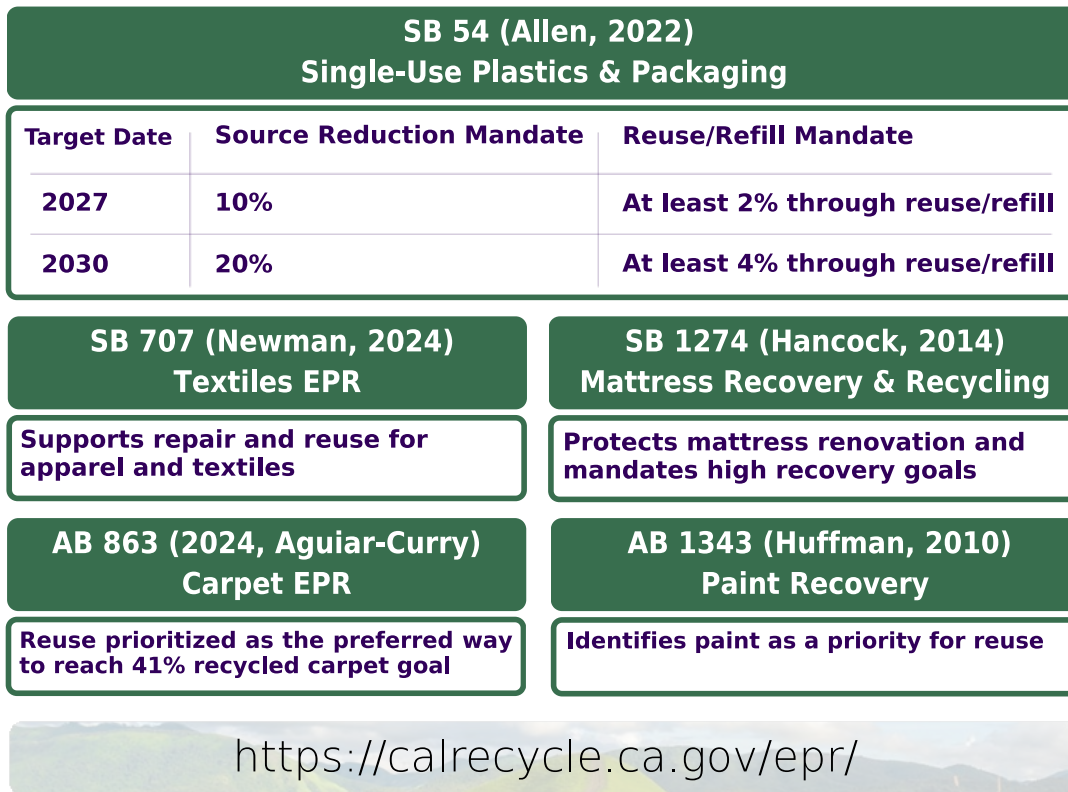


Figure 1. Direct references to reuse in Californian EPR and Product Stewardship legislation.

California’s circular economy is evolving, with reuse becoming more common across various EPR programs. These programs were developed separately; however, they are interconnected. CPSC highlights that there is ample opportunity to harmonize packaging requirements and return logistics for reuse across EPR programs, since many producers offer products that fall under more than one mandate and some products fall under multiple EPR laws. Working actively on aligning these systems will be important as reuse expands (Upstream, 2021).

In the context of Napa, CA, strategically aligning new reuse initiatives with similar sustainability initiatives such as the Single-Use Carryout Bag Reduction Ordinance (Napa Municipal Code 5.65) and the Reusable Foodware and Waste Reduction Ordinance (Napa County Code 5.80) helps businesses and consumers adapt more easily. Coordinating systems across foodware, packaging, and retail supports consistency and easier compliance for businesses.

3. METHODOLOGY & RESEARCH

This report provides guidance for immediate municipal action and supports future stakeholder engagement and project growth. The analysis highlights policy options and practical lessons that can be adapted and refined for local needs. To connect policy with on-the-ground reuse in retail practice, CPSC used a mixed-methods approach which included expert interviews, literature review, and coalition engagement, all to identify strategies for expanding **Consumer-Packaged-Goods (CPG)** reuse in California.



Figure 2. CPSC’s key accomplishments during this phase of the study

3.1 INTERVIEWS

To better understand the challenges facing retail reuse, CPSC interviewed a combined 9 reuse operators, contractors, and policy experts working directly in the field. Insights from these discussions helped clarify key barriers and informed recommendations for building effective retail reuse systems.

Key Takeaways:

❖ **Retailer-Inclusive Policy Environments**

Interviews with reuse providers highlighted the need for policy guidance aimed at retailer shelving allocation for reuse. With policy incentives, retailers can support brands in meeting SB 54 mandates. Though SB 54 does not explicitly include retailers, they can often be included under producer, as many retailers also produce products. Municipal action can provide retailers and brands with the policy alignment needed for these entities to collaborate towards reuse infrastructure.

❖ **Beauty and Personal Care as a Strategic Sector**

The beauty and personal care sector presents a strong opportunity for advancing reuse. Engagement with the California Retailers Association's Beauty Working Group and the US Plastics Pact highlighted a strong interest in closed-loop solutions among major players like Sephora, Ulta, and L'Occitane. This momentum increasingly intersects California's textile EPR framework under SB 707, as future integrated take-back programs can address both packaging and textile-based merchandise.

❖ **The "CPG vs. Foodservice" Divide**

CPG reuse systems are distinct from reuse of food service packaging. CPG reuse requires coordination across a broader regional network that includes brands, sorting facilities, and industrial washing operations. This is supported by research as well (PR3, 2024)

❖ **Closed-Loop Systems**

Closed-loop systems are circular models where products are collected, sanitized, and redistributed within a controlled environment. This structure is ideal for advancing reuse because its defined nature makes high-fidelity tracking and monitoring highly achievable. In a hotel setting, reusable personal care items can be distributed and recovered on-site for refilling, allowing brands to precisely measure rotation rates and material durability. Ultimately, these closed loops make the return process more accessible for guests and more successful for businesses.

❖ **Regional Coordination**

Expanding reuse initiatives depends on regional coordination and reliable funding. Interviews indicate that while individual pilots are promising, long-term progress relies on connecting with established networks in larger regions, such as San Francisco and the East Bay, to share infrastructure and logistics. **Towards this, CPSC can support grant writing and securing State funding, as well as regional coordination.**

3.2 CASE STUDIES

Case studies demonstrate that reuse systems can successfully evolve from straightforward, practical initiatives into coordinated networks supported by policy. Local models like Castro Valley Sanitation prove that integrating low-cost infrastructure, such as utilizing existing hauler routes, and fostering collaborative knowledge-sharing are essential for shifting public behavior. Global leaders like TerraCycle’s Loop further illustrate that **when major brands are engaged within a supportive policy environment, large-scale reuse becomes achievable and profitable**. Successful implementation also relies on community-level engagement and adaptive management. In New Zealand, FillGood, through diverse local stakeholder partnership and investment, established a citywide event-based reuse service with high return rates and major public support.



TerraCycle's Loop platform

- Scalable reuse system partnering with major brands & retailers across France & Japan
- Policy lessons for municipal reuse under EPR
- Producer-funded reusable packaging integration with markets



Castro Valley Sanitation District's Curbside Reuse Program

- Local program aligned with Napa's service context
- Flexible use of franchise/hauler agreements
- Example of embedding reuse into municipal operations



The U.S. Plastics Pact Initiative

- National multi-stakeholder initiative driving packaging circularity & reuse
- Illustrates coordinated strategies for scaling reuse innovation under EPR
- Policy resources for state and local government reducing plastic waste



Fill Good & City to Sea [Mini Case Studies]

- Fill Good: Citywide reuse system for events; adaptive local logistics
- City to Sea: Supermarket reuse pilot similar to Loop
- Both show community-scale pilots

Figure 3. An overview of key components of the case studies CPSC compiled during this study

3.3 THE PATH TO SCALE: CONSUMER-PACKAGED-GOODS (CPG) PREFILL SYSTEMS

Advancing California’s circular economy and meeting the reuse goals set by SB 54 (Allen, 2022) will require integrating reuse into retail settings. One approach is to implement closed-loop, **Consumer-Packaged-Goods (CPG)** prefill systems, where brands own their own packaging, and retailers support sales and logistics.



Figure 4. An example of a consumer purchasing reusable CPG goods through

A CPG prefill system is designed to maintain the convenience of current shopping practices while reducing waste. In this model:

- **The Packaging:** Containers are intended to be durable assets, not single-use items. They are typically made from metals or glass that withstand repeated use over many cycles, and are highly recyclable in case they need to be discarded.
- **The Cycle:** Producers fill containers at their facilities and ship to retailers. Consumers purchase these products as they would single-use items.
- **The Return:** After use, containers are returned to the store, mailed back, or placed in specialized curbside collection. Return incentivization can happen through the addition of a refundable deposit, a lost item fee, a trade-back system, or in some cases simply voluntary behavior by eco-conscious consumers.
- **Wash & Refill:** Containers are then sent to a washing facility and returned to retailers for refilling, creating a closed-loop system.

National-scale models like Loop’s program operating across France (Waste360, 2025) prove profitable reuse is achievable through retailer-focused legislation (Appendix 2), Napa is already building significant momentum. This circular approach is currently active locally, proving the foundation exists, yet these efforts require a push to reach the next level. Successes include The Good Pantry’s deposit-based system for Straus Family Creamery bottles and Silver Oak Winery’s collaboration with Revino. Similarly, Juniper Station in Napa provides refill and reuse options for CPG goods. By using standardized, refillable glass molds to slash waste, these leaders demonstrate that Napa is ready for a systemic, citywide expansion.

3.4 RETAILER AND PRODUCER COMMITMENTS: STATE GOALS NEED LOCAL ACTION

SB 54 sets out requirements for producers to reach defined reuse and refill targets by 2032. Meeting these goals will require CPG companies to expand their reuse programs and invest in new systems. Retailers play a key role in connecting these efforts with customers, especially as EPR policies place more emphasis on shared accountability throughout the supply chain.



As part of this study, CPSC has invited retailers to participate in a voluntary reuse/refill initiative through a call-to-action facilitated through our relationship with the California Retailers Association (Appendix 6).

CPSC has also joined the U.S. Plastics Pact as an Activator, which allows both organizations to share networks and technical resources. While the U.S. Plastics Pact focuses on national projects, including current work in Maine, CPSC leads efforts in California. Our work here in California helps set an example for national best practices.

CPSC, through this partnership with the City of Napa and Napa Recycling, is working to shape long-term policy under SB 707 and SB 54, focusing on gaps where current state mandates do not fully support retailer reuse platforms. CPSC advocates for local incentives, municipal requirements, and state investment in infrastructure to help move from pilot projects to a broader circular economy across California. Although formal commitments from California institutions are still underway, CPSC is coordinating with retailers to align with CPG reuse efforts.

3.5 WHY BEAUTY AND PERSONAL CARE? A STRATEGIC ENTRY POINT FOR NAPA

After reviewing input from the U.S. Plastics Pact, California retailers Association, and industry stakeholders, CPSC has identified beauty and personal care as a key sector for expanding reuse-in-retail. This market is ideally suited for closed-loop models that advance Napa's circular economy.

- Global brands with a Napa presence already participate in voluntary sustainable packaging initiatives. CPSC has connected with **Pact Collective**, a non-profit uniting beauty leaders like Sephora and Ulta to manage hard-to-recycle packaging and drive regional reuse engagement.
- Napa consumers value high-quality product experiences, so a shift to durable, reusable containers can align with consumer expectations and eco-conscious behavior.
- Smaller packages, even if made from recyclable materials, are often destined for landfills due to inability to sort smaller recyclables, and are thus ideal candidates for prefill
- Many Napa hotels operate as closed systems and offer sponsored beauty and personal care products. **They present an opportunity to pilot a CPG beauty reuse system in Napa.** This could support local tourism and provide educational value for visitors.
- Ulta is a premier beauty and personal care retailer with a branch in Napa, a collection bin, and supporting several brands championing reuse. Also, Juniper Station already exists in Napa. Retailers in Napa are already leading in reusable packaging!



Figure 5: Kérastase Elixir Ultime Refillable
Source: Sephora.com



Figure 6: A sampling of some of today's top refillable beauty offerings
Source: <https://www.cnn.com/cnn-underscored/beauty/best-refillable-beauty-products>

3.6 CLEAN REUSABLE PACKAGING: WASHING AND STERILE REFILL

Cleaning reusable packaging uses many of the same processes as commercial kitchens, but also requires a broader, regional approach to reverse logistics. Washing equipment like spray-type dishwashers and three-compartment sinks is standard, yet reusable packaging systems must also manage collection, packing, and redistribution of containers. These operations may require sealed or tamper-evident bins to ensure hygiene throughout the process (Canadian Standards Association, PR3, RESOLVE, 2025)



Figure 7: Renderings of a large scale reuse-dedicated cleaning facility.
Source: (Canadian Standards Association, PR3, RESOLVE, 2025)

In Napa and the Bay Area, cleaning for reusable CPG packaging can build on existing infrastructure. Wash providers like DishJoy and Sudbusters already support shared-use items. Large commercial kitchens, including those found in Meritage Resort & Spa, Napa State Hospital, Napa Valley United School District's Central Kitchen, and The Meadows of Napa Valley, may have underutilized industrial dishwashing equipment and could serve as valuable partners. Furthermore, established hotels maintain certified on-site sanitizing and washing facilities, providing the rigorous industrial standards necessary to support safe, high-volume reuse systems. Interviews with reuse stakeholders and case studies support the notion that these partners can be included in reuse prefill systems.

3.7 INFRASTRUCTURE AND ENABLING MARKET CONDITIONS

Many essential building blocks for the start of a coordinated CPG reuse system exist. Our stakeholder inventory found local retailers, refilleries, washing partners, and logistics partners, including Napa-based grocers and refill shops. All these potential partners can play a role in supporting a CPG reuse system.

Napa is already putting these building blocks into practice, positioned ahead of the curve regarding reuse in commercial spaces. Local refilleries, such as The Good Pantry, have successfully adopted deposit models for grocery staples, including reusable milk bottles from Straus Family Creamery. This milk bottle program (which boasts a 70% return rate) demonstrates that consumers are ready for a circular economy. Beyond dairy, the wine industry is also evolving; Silver Oak has partnered with Revino to pilot reusable wine bottles, a venture that can offset the energy cost of production after only three refills. These efforts are further bolstered by the presence of Juniper Station on Main Street and its forthcoming expansion, Junie’s Local, situated across from Oxbow Market. These establishments bring vital access to reusable and refillable consumer goods to the city. Refilleries like these are more than just shops; they are key community partners in a broader CPG reuse system. Their expertise in managing reverse logistics and their established community knowledge should be elevated in any local-scale pilot, as their support is essential to shifting the region away from single-use plastics toward a durable, circular economy.



Figure 8: Select local stakeholders who could become partners in a local reuse pilot or initiative

REUSE REPORT: POLICY UPDATE

Building on the momentum of local success, these efforts can be scaled through regional logistics and institutional support. Dispatch Goods, a nearby Bay Area leader in circular commerce, could serve as a core partner for collection and redistribution. They already manage high-impact reuse systems, including their "DashLoop" pilot with DoorDash, which integrates durable containers directly into the food delivery ecosystem. Furthermore, facilities like the previously mentioned Dishjoy and SudBusters provide services for professional cleaning and sanitization.

To institutionalize this model, local stakeholders like the Napa Chamber of Commerce can be engaged to help build retailer support by emphasizing pro-business benefits, such as reduced packaging costs and increased customer loyalty.

Furthermore, a coordinated CPG reuse effort casts Napa into the spotlight of sustainability, offering a unique value proposition for the local economy. Tourism and downtown partners, including Visit Napa Valley and the Napa Downtown Association, are natural allies who can help spread the word and unlock opportunities to bring reuse into the hospitality and event sectors, making a circular economy a signature element of the Napa experience.

This initial research, together with CPSC's active and growing network of brands and industry partners, provides CPSC with a foundation to continue coordination and technical support, building on efforts to strengthen regional capacity with Napa at the forefront.

Transitioning from research to an operational local network will require outreach, organization, and coalition-building among stakeholders. Through collaboration, CPSC, the City of Napa, and Napa Recycling and Waste Services (NRWS) can help integrate CPG reuse into daily life in Napa. Developing these systems now will support a cleaner waste stream for NRWS to manage, lower ratepayers' fees, and will help advance Napa, and California, toward a fully circular economy.

The City of Napa already has resolutions in place to support Extended Producer Responsibility (EPR) initiatives (Resolution R2009 133), and a Disposal Reduction Policy (Resolution R2023 100) that align the City to expand efforts on reusable packaging.





4. ENGAGEMENT AND POLICY RECOMMENDATIONS



Advancing Packaging Textile Circularity Through Reuse:
A Local and Regional Approach

Policy Recommendations

Engagement Opportunities

<p>REUSE RESOLUTION</p> <p>Utilize the City’s resolutions on EPR and Disposal Reduction to invest in reusable and refillable products in municipal purchasing, and events.</p> 	<p>ENGAGE REGIONAL NETWORKS</p> <p>Support CPSC’s efforts to establish and develop a local network of stakeholders and decision makers looking to bring CPG reuse to the community.</p>
<p>RETAILER REUSE MANDATE</p> <p>Require retailers to dedicate either a minimum percentage or unit count to reusable or refillable CPG options, to support visibility, consumer access, and early market adoption.</p> 	<p>EXPLORE EXISTING OPTIONS</p> <p>Identify pathways to advance reuse, such as Climate Action Plans. Convene relevant departments, retailers, and community partners to coordinate a Napa-based coalition.</p>
<p>ADMINISTER MICROFUNDING</p> <p>Establish a microfunding program through local and state funding sources to support businesses that advance reusable packaging infrastructure.</p> 	<p>FUND A REUSE EVENT</p> <p>Work with CPSC to host a "Napa Reuse Fair" showcases refillable brands. This event would provide a platform for residents to engage with reuse kits and incentivize local retailers to pilot pop-up reuse stations.</p>
<p>NAPA PILOT PARTNERSHIP</p> <p>Launch reusable CPG pilots in controlled settings like hotels and government buildings, leverage curbside networks to expand collection options for consumer CPG, and plug into broader regional efforts.</p> 	<p>HAULER-LED ENGAGEMENT</p> <p>Leverage the hauler’s existing customer communication channels, such as billing inserts, newsletters, and education campaigns. Promote awareness of reusable packaging and waste reduction behaviors.</p>

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Figure 9: CPSC’s policy recommendations and highlights of engagement opportunities for Napa, CA

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Sustainable Packaging Coalition. (2024). Framework for scaling reuse: The elements necessary for reusable packaging to succeed. Sustainable Packaging Coalition.

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Upstream (2021). Reuse wins: The environmental, economic, and business case for transitioning from single-use to reusable in food service.

Waste 360. (2025). [Loop with Carrefour, along with a coalition of brands and retailers, has reached commercial scale in France, demonstrating that reuse can work across all packaged goods categories](#)

APPENDIX 2: Case Study on Loop



CPSC
California Product Stewardship Council

Loop (by Terracycle)
CASE STUDY: RETURNABLE PACKAGING
A consumer packaging closed-loop reuse system

SYSTEM AT A GLANCE

Shopper: Purchase, Use, Return
Loop: Refund, Sort, Sanitize
Producer: Receive, Refill, Restock



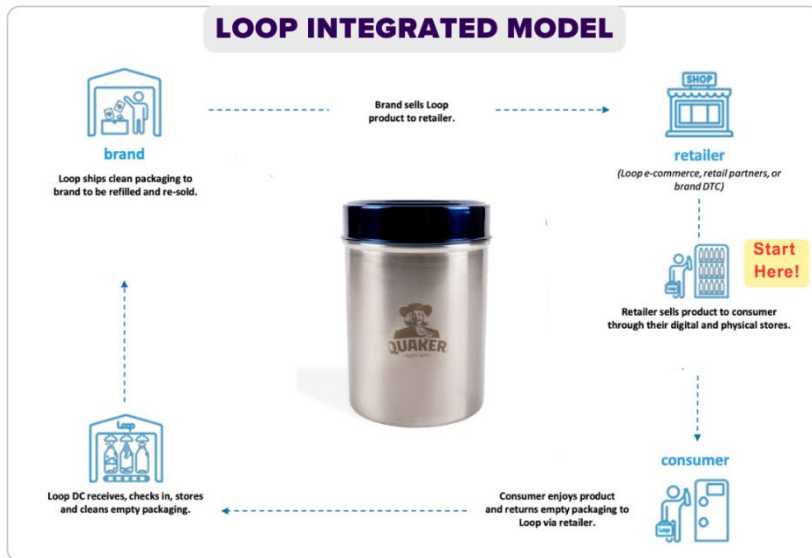
PACKAGING AS AN ASSET

- Durable Packaging
- Withstands 30-1000 Cycles
- Innovative Designs
- Stylish Branding
- Custom or Stock Options
- Producer Wants It Back

KEY MILESTONES

- May 2019 Launch and Early Interest: waitlist of 85,000 consumers
- Return rate of over 80% within 60 days
- Over 98% of containers returned undamaged.
- Life Cycle Assessments: environmental parity after two cycles of reuse.
- December 2020: \$25 million Series A
- June 2025: Achieving Scale and Profitability in France & Japan

LOOP INTEGRATED MODEL



GRADUATED!

ACTIVE

France 800+ Stores
Japan 110+ Stores

PILOT LOCATIONS

INACTIVE

US AUS
UK CA

Strong regulatory support was essential for Loop’s success. These policies encouraged investment in reuse infrastructure, and without them, producers were unlikely to continue beyond the pilot stage.

In these markets, the model faced three primary barriers: logistical complexity from, consumer compliance issues due to limited return incentives, and, most importantly, regulatory gaps.

REGULATORY ENABLERS

France

Anti-Waste Law for a Circular Economy

- *requires 5% of products on retailer shelves to be in reusable packaging by 2023*
- *10% by 2027*

CA PARALLEL: SB54

California

SB 54: Plastic Pollution Prevention and Packaging Producer Responsibility Act

- *2%, by 2027, plastic packaging reduction by shifting to reusable or refillable*
- *4% by 2030*

OTHER SUCCESS FACTORS

- Strategic Brand & Retailer Partnerships
- Centralized Cleaning Infrastructure
- Behavioral Incentives (Deposit-Refund System)
- Media Positioning (2019 World Ec. Forum Launch)



CAN CPG REUSE WORK LOCALLY?

A community approach:

- using regional producers minimizes transport logistics
- convenient return via existing hauler networks
- local reuse providers can support implementation
- integration into municipal zero-waste planning



Contact CPSC to learn more about curbside reuse, policy recommendations, and ways your jurisdiction can get involved in the broader reuse movement



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APPENDIX 3: Case Study on CV San



ABOUT THE PROGRAM

The Castro Valley Sanitary District (CVSan) Bulky & Reuse Pick-Up program provides residents with an annual on-call service to divert bulky items from landfill. Prioritizing reuse and refurbishment, the program also features reuse maps, community swap events, and educational resources to help residents and businesses adopt more sustainable practices.

COVERED PRODUCTS

- Household Furniture and Mattresses*
- Electronics* and Appliances
- Textiles* and Housewares
- Bicycles
- Books and Scrap Metal
- Automotive Tires: up to four

* covered or partially covered under current California EPR programs



CONVENIENT COLLECTION DRIVES REUSE

Integrating reuse into existing waste infrastructure through curbside collection reduces the barriers to reuse participation. This approach supports higher participation rates and helps normalize sustainable practices at the community level.



WHAT HAPPENS TO ITEMS COLLECTED FOR REUSE?

Items are temporarily staged and inspected for reusability. Suitable items are transported to partners that include thrift stores, nonprofits, and “Bad Business Model Bikes”



REUSE SUCCESS!

CPSC’s 2024 Textile Waste Audit at CV San uncovered 11,750 lbs of textiles collected in one week of the program with 87% deemed sellable & 13% deemed repurposable!



BEYOND PICKUP PROGRAMS CV SAN ACTIVELY PROMOTES A CULTURE OF REUSE

LEARNINGS FROM CV APPLICABLE ACROSS JURISDICTIONS

- Create “Reuse Maps” to help residents locate local reuse businesses
- Promote guides like CV San’s “Life Changes Waste Reduction” guide
- Promote online groups like Buy Nothing and host swap events
- Partners with repair/reuse organizations
- Help businesses transition from disposable to reusable foodware
- Advise residents on best practices for selling items online/flea markets
- Promote and support of bulk refill stations and reusable containers



CVSan uses bulky item contractual provisions to prioritize reuse and refurbishment!

A FORMAL ZERO-WASTE PLAN

CV San’s reuse strategy is part of a comprehensive Zero Waste Strategic Plan which aims for 90% or more diversion from landfills and the highest-impact strategies first.

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APPENDIX 4: Case Study on U.S. Plastics Pact



CONVENING STAKEHOLDERS TO TACKLE PLASTICS NATIONALLY

The U.S. Plastics Pact (USPP) brings together businesses, not-for-profit organizations, and government agencies to work together toward a circular economy for plastics, as outlined by the Ellen MacArthur Foundation’s New Plastics Economy Initiative.

WHAT IS THE U.S. PLASTICS PACT?

The USPP is a membership body consists of 130+ member organizations across the entire plastics value chain

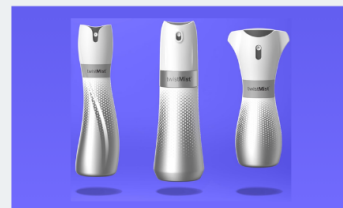


**REUSE CATALYST PROGRAM
& SUSTAINABLE PACKAGING AWARDS**

Activators are eligible for awards and incentive programs toward packaging solutions and pilot program

Examples of past winners include:

- twistMist™ : refillable/reusable aerosol bottles
- Reuse Solutions: reusable packaging for clothing retailers
- CLUBZERØ: Reuse for food/beverage brands



twistMist™

PACT RETAIL ACCESSORIES WINS 2023 SUSTAINABLE PACKAGING AWARDS

- Solving the single-use shipping box
- The USPP supports innovations through it's sustainable packaging awards
- Pact group is in the activator network, among other award winners



USPP POLICY RECOMENDATIONS



- **Reuse Mandates and Enablers:** Legislation to require reuse in closed-loop environments
- **Tax Exemptions and Subsidies:** Financial incentives, such as sales tax exemptions for qualified reuse system operators
- **Government Procurement Standards:** Public agencies can use their purchasing power to require reusables in government procurement

SUMMARY OF THE US PLASTICS PACT'S SUCCESSES

- Decreased problematic materials from 14% to 8%.
 - Increased reusable/recyclable/compostable pkg to 47.7%
 - Grew PCR & responsible biobased use from 7% to 9.4%.
 - Grew to 130 Activators
- Published:
- **The PCR Toolkit Problematic**
 - **Unnecessary Materials List**
 - **Reuse Policy Guidance**
 - **Design for Circularity Playbooks**
- Established:
- Reuse Catalyst program
 - Sustainable Packaging Awards
- Supported:
- The Recycling Partnership's Pathway to Circularity
 - Closed Loop Partners' Composting Consortium.

Contact CPSC to learn more about curbside reuse, policy recommendations, and ways your jurisdiction can get involved in the broader reuse movement

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APPENDIX 5: Supplementary (Mini) Case Studies



In 2020, the Wellington Regional Stadium Trust (WRST) with City Council developed a city-wide reuse system for food and drink consumption at major city events. The core model provides shared, dedicated washing infrastructure along with a logistics service. FillGood operates as a brand across events, simplifying user behavior and building public identity. Fillgood tapped into underutilized washing capacity in hospitality and commercial facilities. Organizational & funding partners included the Wellington City Council, Venues Wellington, Reuse Aotearoa, Sustainability Trust, and more.

City: Wellington, New Zealand
Population: 520,971

Key Successes in August 2025:

- 235,047 single-use items prevented
- 340 events, festivals, and venues
- 983,662 attendees
- 15 regular casual staff

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City to Sea partnered with retailer Marks & Spencer (M&S), household brand Ecover, and reuse start-up Reposit to test a scalable supermarket reuse model. The pilot introduced a “buy anywhere, return anywhere” deposit-return system for household and beauty products. Customers purchase items in durable, returnable packaging and pay a deposit. Empty packaging can be returned to any participating drop-off location, regardless where purchased.

City: Bristol, UK
Population: 494,400

Key Takeaways

- Early collaboration and producer engagement accelerates reuse adoption at scale
- Convenience-focused design (“buy anywhere, return anywhere”) reduces participation barriers
- Mainstream retail settings are viable environments for reusable packaging systems

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APPENDIX 6: Retailer Outreach Letter



Invitation to Beauty & Personal Care Retailers:

California Reuse in Retail Initiative: Program Design Phase

The California Product Stewardship Council (CPSC) is collaborating with the [U.S. Plastics Pact](#), [Upstream](#), [WRAP](#), and municipalities in California on early program design of the [Reuse in Retail Initiative \(RRI\)](#).

This collaborative, pre-competitive effort invests in scalable reusable packaging systems in select product categories, potentially including on-shelf personal care and beauty products dependent upon brand participation.

With California moving toward long-term packaging systems under the Plastic Pollution Prevention and Packaging Producer Responsibility Act (SB 54 Allen), brands and retailers are mapping reuse pathways that fit their product lines and in-store operations. RRI offers companies a coordinated space to shape these emerging systems together.

Partners in the current Scoping Phase through the end of 2025 include Ahold Delhaize USA, Unilever, Kraft Heinz, Henkel, L'Occitane, and Pact Collective, among others. Local government facilitators include San Francisco and Los Angeles. Aside from their formal partnerships with Upstream and WRAP, the U.S. Plastics Pact is also working with CPSC, Perpetual, PR3, and the Reusable Packaging Association.

Retailers will play a vital role in the upcoming Program Design Phase starting in 2026!

Participating companies will come together to design the following aspects of this reusable packaging system:

- Reverse logistics
- Packaging design
- Consumer experience

Designing a practical, consumer-friendly reuse model for beauty and personal care requires close cooperation with retailers, brands, municipalities, and operational partners.

Retailers are invited to participate in the design phase to shape efficient return and collection pathways, influence innovative packaging, collaborate with leading brands and municipalities, and position themselves advantageously for California's long-term reuse and EPR initiatives. Join now to stay ahead in the market for reusable consumer packaged goods!

Learn more with the [FAQ](#) and by reaching out to Annika Furr at afurr@usplasticspact.org