SAMPLE

ORBITLEX

OBX-BP-SAMPLE
The Orbitlex Method

OPERATIONAL PACKAGING EPR COMPLIANCE

DELIVERABLE · STAGE **02 / 04**

EPR Compliance Blueprint

Obligation, readiness, and recommended path

01 STATUS CHECK
02 **BLUEPRINT**
03 DATA AUDIT
04 MANAGED

PREPARED FOR

Pine and Table Co.

PREPARED BY	DATE	BASED ON INFORMATION PROVIDED AS OF
Orbitlex	November 3, 2026	October 27, 2026

SAMPLE — fictional company and data. Not legal advice.

AT A GLANCE

6 states	Not ready	Elevated	Data Audit + Managed
OBLIGATED	REPORTING READINESS	TIMING PRESSURE	RECOMMENDED NEXT STEP

SECTION 01

Executive summary

Pine and Table Co. is an obligated producer under US packaging EPR in six states — California, Oregon, Colorado, Washington, Minnesota and Maryland. Maine's program has not launched yet. The company has not registered in any of them, so some obligations are already past due. Its packaging data is partial: the SKU list is reliable, but component materials and weights are missing for a large share of products. Recommended path: a Packaging Data Audit now, then Managed EPR Compliance, which includes one past-due cycle of Backfill.

Key determination snapshot

ITEM	FINDING
Producer status	Obligated in 6 states (CA, OR, CO, WA, MN, MD); Maine — monitor, program not launched
Obligating entity	Pine and Table Co., as brand owner
Data-quality verdict	Partial
Reporting readiness	Not ready
Timing pressure	Elevated — past-due obligations in several states
Recommended next step	Packaging Data Audit (51—100 SKU tier), then Managed EPR Compliance

Priority actions

PRIORITY	ACTION	TIMING	WHY IT MATTERS
Immediate	Register with CAA and in each obligated state	Now	Several registration and reporting obligations are already past due
High	Complete the Packaging Data Audit	Start within 2 weeks	Component materials and weights are missing for ~45% of SKUs
High	Close past-due reporting periods (Backfill)	After the Data Audit	Reports for past periods need the same packaging data
Medium	Set up a supplier-data workflow	Q1 2027	Keeps next year's reports from starting over

SECTION 02

Compliance readiness scorecard

AREA	STATUS	OPERATIONAL RISK
Producer determination	Established	Low
Packaging data completeness	Partial	Medium
Registration readiness	Incomplete	High
Reporting readiness	Not ready	High
Supplier documentation	Fragmented	Medium
Audit defensibility	Not established	High

SECTION 03

Operational complexity indicators

INDICATOR	OBSERVATION	OPERATIONAL IMPLICATION
Active SKUs (US)	~80	Moderate classification volume
Packaging formats	Glass jars, metal and plastic caps, labels, paperboard cartons, corrugated cases, mailers	Multi-material classification
Suppliers involved	11	Supplier coordination needed
Multi-component packaging	Present	Component-level effort
Imported packaging components	Present (caps and labels)	Traceability effort
Sales channels	Own website + grocery retail	Shipping packaging in scope for online orders

SECTION 04

Obligation determination

Pine and Table Co. owns its brands and sets the packaging specifications; its co-packers do not own or license the brand. In each obligated state the obligation therefore lands on Pine and Table Co. as brand owner. Each state reaches this through its own rule: California PRC §42041(w); Oregon ORS 459A.866(1)(a) with OAR 340-090-0860(1)(a) (a person that directs the manufacturing, including setting packaging specifications); Colorado 6 CCR 1007-2 Part 1 §18.2.2(A)(1) (brand owner first in the order of obligation); Washington E2SSB 5284 §102(29)(a)(i)(C); Minnesota Minn. Stat. 115A.1441 subd. 26(a)(1)(iii); Maryland Envir. §9-2501.

For online orders shipped from its own warehouse, Pine and Table Co. is also the producer of the shipping packaging in Oregon, Colorado, Minnesota and Maryland, where that packaging falls on the person that packages the item for shipment (Oregon: packages and ships; Colorado: packages or ships).

SECTION 05

State applicability matrix

STATE	STATUS	THRESHOLD TEST (EXEMPT IF BELOW EITHER)	PINE AND TABLE	TIMING POSTURE
California — SB 54	Obligated	$1M gross sales into California (PRC §42060(a)(5)(A))	$1.3M into CA	**Active** — registration in CalRecycle's system and with CAA
Oregon	Obligated	$5M gross revenue, or under 1 metric ton into Oregon (ORS 459A.863(32)(c),(d))	$7.4M; >1 t	**Active reporting** — first supply data was due March 31, 2025
Colorado — HB22-1355	Obligated	$5,779,297 gross revenue (from July 1, 2026), or under 1 ton (C.R.S. 25-17-713(1))	$7.4M; >1 t	**Active** — no sales in covered materials without participating, since July 2025
Washington — E2SSB 5284	Obligated	$5M global gross revenue, or under 1 ton into Washington (§102(16))	$7.4M; >1 t	**Past due** — PRO membership required after July 1, 2026
Minnesota	Obligated	$2M global gross revenue, or under 1 ton into Minnesota (115A.1441 subd. 13)	$7.4M; >1 t	**Past due** — PRO membership required after July 1, 2025 (Minn. Stat. 115A.1448 subd. 1(a))
Maryland	Obligated	$2M global gross revenue, or under 1 ton into Maryland (Envir. §9-2501)	$7.4M; >1 t	**Past due** — annual registration from July 1, 2026 (COMAR 26.04.14.07)
Maine	Monitor	$2M total gross revenue, or under 1 ton (38 M.R.S. §2146(2))	—	**Program not launched** (no stewardship organization contracted as of October 2026)

> Thresholds and dates checked against statutes and regulator pages in September—October 2026. Confirm current figures at registration.

SECTION 06

Estimated compliance operating costs

ITEM	PRICE	NOTES
EPR Compliance Blueprint (this document), 51—100 SKUs	**$1,600**	Credited toward Managed
Packaging Data Audit, 51—100 SKUs	**$3,000**	Builds and classifies the packaging inventory
Managed EPR Compliance, 51—100 SKUs	**$16,000 per year (annual billing)**	All active EPR states, no per-state add-on; includes one past-due Backfill cycle (one reporting year across all obligated states)
Backfill beyond the included cycle	**$1,000—$2,500 per state filing**	By state complexity

> Excludes producer fees paid to the producer responsibility organization (PRO) and any government charges. Producer fees, reportable tonnage and eco-modulated outcomes are not calculated in this Blueprint; they require the Packaging Data Audit.

SECTION 07

Findings & data gaps

FINDING	SEVERITY	OPERATIONAL IMPACT
Component material and resin missing for ~45% of SKUs	High	Prevents defensible classification
Cap and label weights not recorded	High	Blocks accurate reporting by category
Shipping cartons and mailers not linked to SKUs	Medium	Online-order packaging under-counted
Packaging data spread across ERP export, supplier PDFs and artwork files	Medium	Slows the audit; raises rework
2 overseas cap suppliers have not confirmed resin type	Medium	Timeline risk
No state-level sales history before 2025	High	Past periods may need prorated or reconstructed data (custom-scoped)

SECTION 08

Data-quality verdict

VERDICT

Partial

The ERP export gives a reliable SKU list, but component-level data is incomplete. Recommended route: Packaging Data Audit (51—100 SKU tier) with supplier follow-up.

VERDICT	WHAT IT MEANS	TYPICAL ROUTE
Structured	Component materials and weights are recorded for nearly all SKUs in one system.	Validation within the Data Audit
Partial · this Blueprint	The SKU list is reliable; component-level data is incomplete.	Data Audit with supplier follow-up
Fragmented	Data sits in several sources that do not agree; SKU coverage is uncertain.	Data Audit with consolidation
Reconstruction Required	Packaging data must be rebuilt from samples, artwork or supplier records.	Custom-scoped reconstruction

SECTION 09

Recommended immediate engagement

Packaging Data Audit — 51—100 SKU tier

TARGET START	Within 2 weeks
OBJECTIVE	A reportable packaging inventory for current and past-due periods
SEPARATE SCOPE	Reconstruction of pre-2025 sales data scoped separately if required

SECTION 10

Roadmap

STEP	WHAT IT DOES	STATUS
Free Status Check	Obligation screen	Completed
Blueprint (this document)	Obligation, readiness, deadlines, routing	Completed
Packaging Data Audit	Build and classify the packaging inventory	Recommended
Managed EPR Compliance	Registrations, report preparation, deadlines, PRO correspondence; one past-due Backfill cycle included	Recommended
Backfill Remediation	Prepare overdue reports for past periods	Conditional — beyond the included cycle

> Orbitlex prepares registrations and reports and confirms each deadline in advance; your Authorized Representative or Primary Contact submits them.

SECTION 11

Assumptions, scope limitations & disclaimers

This Blueprint is based on information provided by Pine and Table Co. as of October 27, 2026. Orbitlex has not independently verified sales, revenue or packaging figures supplied by the client.

Producer determinations apply to the brands, channels and states described in this document. A change in brand ownership, manufacturing arrangements, sales channels or states of sale may change the determination.

This Blueprint does not calculate producer fees, reportable tonnage or eco-modulated outcomes. Those require the Packaging Data Audit.

Orbitlex does not guarantee regulatory outcomes. US packaging-EPR rules, fees and timelines are still changing; dates and the responsible PRO are confirmed at registration. This document is an operational work product, not legal advice.

APPENDIX A

Methodology

01	**Intake**	Company profile, brand ownership, manufacturing arrangements, sales channels, revenue and states of sale, as provided by the client.
02	**Producer determination**	Each state's producer hierarchy applied to the client's role for each brand and channel.
03	**Threshold test**	Revenue and tonnage compared with each state's small-producer exemption.
04	**Readiness review**	Packaging data, supplier documentation and registration status reviewed against what reporting requires.
05	**Routing**	Next engagement and timing recommended from the findings above.

APPENDIX B

Status conventions

Status chips mark readiness, risk, workflow and timing. Determinations (Obligated, Monitor, Exempt) and priorities are stated as plain text.

CHIP	VALUES USED IN THIS BLUEPRINT
In place	Established, Low, Completed, Complete
Partial / pending	Partial, Medium, Incomplete, Fragmented
High risk / not ready	High, Not ready, Not established, Active, Active reporting, Past due, Missing
Recommended	Recommended
Monitor / conditional	Conditional, Program not launched

APPENDIX C

Sample SKUs reviewed

SKU	PACKAGING	COMPONENTS	DATA COMPLETENESS
PT-JAM-STR-12	Glass jar + metal cap + paper label + carton	4	Partial — cap weight missing
PT-SAUCE-TOM-16	Glass jar + plastic cap + film label	3	Partial — cap resin unknown
PT-HONEY-SQ-12	PET squeeze bottle + PP cap + label	3	Complete
PT-GIFT-TRIO	Paperboard box with window + 3 jars + insert card	7	Partial — window film weight missing
PT-MAILER-M	Corrugated mailer + paper fill (online orders)	2	Missing — not linked to SKUs

APPENDIX D

Sources & references

CALIFORNIA	SB 54; Public Resources Code §42041(w), §42060(a)(5)(A)
OREGON	ORS 459A.863(32)(c),(d); ORS 459A.866(1)(a); OAR 340-090-0860(1)(a)
COLORADO	HB22-1355; C.R.S. 25-17-713(1); 6 CCR 1007-2 Part 1 §18.2.2(A)(1)
WASHINGTON	E2SSB 5284 §102(16), §102(29)(a)(i)(C)
MINNESOTA	Minn. Stat. 115A.1441 subd. 13, subd. 26(a)(1)(iii); 115A.1448 subd. 1(a)
MARYLAND	Md. Code, Envir. §9-2501; COMAR 26.04.14.07
MAINE	38 M.R.S. §2146(2)
PRO	Circular Action Alliance (CAA), producer responsibility organization