



EPR Group Consulting

strategic planning for EPR compliance



Partner with a Team of Experts

We are a multi-disciplinary consulting firm providing strategic advice about the EPR packaging, paper, and food service waste programs on a nationwide basis –including, California, Oregon, Colorado, Minnesota, and Maine.

We are recognized experts in our fields with decades of experience. We hold law degrees and graduate degrees in chemistry, supply chain economics, and environmental engineering – supported by experienced analysts with degrees in environmental policy.

Our Clients

Our clients are leaders in their industries – from agribusiness to manufacturers of packaging to consumer packaged goods, including the food and beverage industry, and brand leaders in packaged foods, confectionaries, dietary supplements, and home accessories.

Services

We can evaluate your responsibility under these programs, identify strategic objectives, trouble-shoot, discuss challenges and solutions, and help you chart a plan for achieving your objectives – whether that means rethinking your packaging options, taking measures to minimize fees under the program, or engaging with regulators at a program level.

Evaluate Producer Status

The programs are complicated. In some cases, it's not clear who and what is being regulated. You may be a producer in one state but not in another state. You may be a producer for some of the packaging associated with your products in one state but a distributor may be responsible for other packaging in the same state.

We start with a questionnaire to evaluate whether you are a producer. We designed this questionnaire only after hundreds of hours reviewing and monitoring the applicable requirements, engaging with stakeholder associations, and attending agency workshops and advisory board meetings. In most cases, it should take you no more than ten minutes to complete it.

Based on your questionnaire responses, we explore threshold issues with you such as could your company or some of its covered materials qualify for an exemption or exclusion under the state programs? Should you consider applying for a more general exemption, such as special exemptions for covered materials under California's program? What are the risks of registering or not registering with the PRO? When should you join the producer responsibility organization ("PRO")? What corporate entity should register with the PRO on your behalf?

Identify Strategic Objectives

Each company will have different objectives depending on a variety of factors and company objectives may shift over time. Some companies may already have a set of strategic objectives in mind, others may prefer to develop these objectives organically as the programs mature or as they gather more information.

One obvious focus for strategic planning is preparing for the first substantive regulatory requirement that must be met – the collection and reporting of sales data. Where there is the option of reporting the data directly to the state regulatory agency rather than to the PRO, companies may want to evaluate their preferred approach for reporting.

Topics for long-term strategic planning include plans for source reduction, meeting recycling rates, and approaches to minimizing base fees (depending on covered material usage) and eco-modulated fees (fees assessed to incentivize environmentally positive outcomes).

Trouble Shoot

We can help you trouble shoot factors that may impact your company's ability to comply with program requirements or meet your company's strategic objectives.

For example, does your company's software provide the required packaging data for reporting? Can your company access sales data and information from its subsidiaries as may be required by the PRO? Does your company have concerns about sharing trade secrets with the PRO? Would it facilitate compliance to better understand the meaning of an unclear statutory or regulatory or PRO requirement? Does your company have concerns about being at a competitive disadvantage because your competition is not required to comply with the EPR programs or has not joined a PRO?

We can help you flesh out these issues and discuss potential solutions and approaches – some of which may warrant engagement with regulatory or legislative bodies or with the PRO or with legal counsel.

Create a Plan for Compliance

We can help you create a plan for compliance and identify the resources you will need to implement the plan. Some companies will need to engage with different departments within their own company and some will need to identify outside experts to implement their program. For example, engagement with services that offer software designed to collect data from suppliers, engagement with companies that certify PCR content, consultation with business attorneys to evaluate trade secret protections.

For companies looking for policy support, we have extensive experience with the federal and state rule-making process, and can help you develop an approach for raising concerns at the program level.

Our Team

Catherine W. Johnson, CEO and Principal



Catherine has over 30 years of experience as an environmental attorney, representing a wide range of businesses, including Fortune 50, Fortune 500, and S&P 500 manufacturing companies in a variety of permitting and compliance matters. She was also lead attorney in both a Superfund case and a Proposition 65 case which are each considered bellweather cases in their fields, and have been the subject of articles in legal journals and the national media. Catherine served as a partner with one of California's leading law firms before founding the environmental boutique law firm, Environmental General Counsel PC (EGC) and EPR Group Consulting. Through EGC, she is an active member of the National Stewardship Action Association's (NSAC) SB 54 Working Group Committee. As a consultant to the U.S. EPA, Catherine supported the rule making process for federal solid waste regulations by drafting preambles to the regulations and assisting in the review and response to public comments. Catherine graduated from Smith College and the University of Virginia School of Law.

Jim D. Werner, Senior Policy Advisor



Jim Werner is an environmental engineer with more than 40 years of technical and policy experience, including heading environmental programs at both the state and federal level. Most recently, Jim managed the Environmental Policy Section of the U.S. Congressional Research Service, advising members of the U.S. Congress on a wide range of issues including climate change and waste management. Jim previously served as Director of Delaware's Air and Waste Management Division and as Missouri's Director of Air and Land Management, where, at both agencies, he led successful legislative and administrative initiatives to reduce and recycle wastes. From 1993-2001, Jim served as Director of Environmental Management Policy at the U.S. Department of Energy. Jim also worked for several years in private consulting for corporate and government clients. Jim graduated from the University of Delaware and earned a Masters Degree in Environmental Engineering from Johns Hopkins University.

Dr. Heidi Schweizer, Senior Economist



Heidi is a supply chain economist. Her commodities research focuses on production, supply chain management, and transportation. She is the author of numerous academic articles in her field in leading academic journals. She was formerly an Assistant Professor at North Carolina State University where she was a member of the Agricultural and Resource Economics Department. She holds a Masters of Science in Applied Economics from Montana State University and a PhD in Economics from the University of California, Davis.

Dr. Julia Thrower, Senior Scientist



Julia has over 12 years of experience as an environmental attorney and holds a graduate degree in biochemistry. Julia previously served as an attorney in the United States Department of Justice (DOJ), Natural Resources Division, for over nine years, where she was awarded DOJ's highest award, the Special Achievement Award. At EPR Group, she tracks EPR packaging developments across the country with a special focus on recycling and compostability definitions in each state. Julia graduated from Berkeley Law School (formerly Boalt Hall) and holds a PhD in biochemistry from Johns Hopkins University. She was also a post-doctoral fellow in the Chemistry Department at the University of California, Berkeley.

Emma Roos-Collins, Senior Policy Analyst



Emma tracks and analyzes developments in the EPR laws and manages the development of EPR research materials and presentations, with a special emphasis on California's source reduction requirements and labeling requirements. Emma participates in NSAC's SB 54 Implementation Working Group's Committee and is EPR Group's liaison with Product Stewardship Institute. Emma graduated with highest distinction (summa cum laude) with a Bachelor of Science in Environmental Economics and Policy from the University of California, Berkeley.

Adrien Thein-Sandler, Senior Policy Analyst



Adrien was previously a planning consultant for an environmental consulting firm, where he conducted statutory and regulatory research, environmental policy analysis, and submitted public comments for emerging regulatory issues. He tracks and analyzes EPR laws in California, Oregon, and Colorado for EPR Group Consulting with a special emphasis in producer responsibility evaluations. Adrien was the recipient of several academic and athletic awards as an undergraduate, including the John Harvard Scholar award given to students who rank in the top 5% of their academic class. He graduated with a Bachelor of Arts in Environmental Science and Policy from Harvard University.

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