Extended Producer Responsibility: Who Owns the Obligation?

Nov 02, 2026

Categories:

Publications
Quick Legal Hits

Authors:

Ryan M. Gallagher
Thierry R. Montoya

Extended producer responsibility (EPR) requirements are expanding nationwide, but the answer to "who owns the obligation?" can vary by state and product. Manufacturers and brand owners should identify which entity may be treated as the producer, map where products are sold, and confirm when registration, reporting, and fee obligations begin.

Drawing on a Manufacturing Week 2026 session presented by FBT Gibbons' Thierry Montoya and Ryan Gallagher, the Quick Legal Hits video below provides a primer on evolving EPR laws, with a particular focus on California's battery stewardship regime.

Related Coverage

2026 FBT Gibbons LLP. All rights reserved. ADVERTISING MATERIAL.

FBT Gibbons

- California's New Battery Law Ends Your Weight-Based Exemption
- California's Battery Stewardship Rule Is Product Governance, Not a Recycling Program
- California's Textile EPR Program Is Active: Key Compliance Deadlines and What Producers Should Do Now

Manufacturing Industry

With experience in every necessary area — banking, litigation, intellectual property, construction, labor and employment, environmental, real estate, government relations, and more — FBT Gibbons works with manufacturers to develop an integrated, strategic approach to legal services.

Learn More

© 2026 FBT Gibbons LLP. May be considered attorney advertising in some jurisdictions.

2026 FBT Gibbons LLP. All rights reserved. ADVERTISING MATERIAL.

FBT Gibbons