


# Extended Producer Responsibility: Who Owns the Obligation?

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.

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