

SB 1383 Compliance Evaluations

September 25, 2025



Programs Evaluated

- Short-Lived Climate Pollutants (SLCP) (14 CCR sections 18981.1 through 18998.4)
- Mandatory Commercial Organics Recycling (MORe) (Public Resources Code (PRC) sections 42649.8 through 42649.87)
- Mandatory Commercial Recycling (MCR) (PRC sections 42649 through 42649.7 and 14 CCR sections 18835 through 18839)
- Source Reduction and Recycling Element (SRRE) (PRC section 41000 or PRC section 41300) and Household Hazardous Waste Element (HHWE) (PRC section 41500 or PRC section 41510)

Compliance Evaluation Process

- Commencement letter
- Introduction call with jurisdiction
- Request for Implementation Record
 - Implementation Record access due 10 business days after request is received
- Potential follow-up
- Field visits starting after Implementation Record is received and reviewed
- Findings report will be provided to the jurisdiction, and the jurisdiction will be able to provide feedback
- As needed, Notice of Violations will be sent for issues not resolved
 - “Strategy” development

California Environmental Protection Agency
CalRecycle 
Department of
Resources Recycling and Recovery

Gavin Newsom
California Governor
Yana Garcia
Secretary for Environmental Protection
Zoe Heller
CalRecycle Director

Sent via Certified Mail

[Date]

[SLCP Official Name]
[SLCP Official Title]
[Jurisdiction Name]
[Address]
[City, CA Zip]

Subject: Notification of Compliance Evaluation for the [Jurisdiction Name]'s Waste Diversion Programs

[SLCP Official Name]:

This correspondence serves as notice that the Department of Resources Recycling and Recovery's (CalRecycle) Jurisdiction and Agency Compliance and Enforcement Branch (JACE) will be conducting a compliance evaluation of the [Jurisdiction Name] (Jurisdiction) pursuant to Section 18996.1(c) of Title 14 of the California Code of Regulations (14 CCR). This compliance evaluation will determine if the Jurisdiction is compliant with the following:

- Short-Lived Climate Pollutants (SLCP) (14 CCR sections 18981.1 through 18998.4),
- Mandatory Commercial Organics Recycling (MORe) (Public Resources Code (PRC) sections 42649.8 through 42649.87),
- Mandatory Commercial Recycling (MCR) (PRC sections 42649 through 42649.7 and 14 CCR sections 18835 through 18839), and
- Efforts to implement Source Reduction and Recycling Element (SRRE) (PRC Section 41000 or PRC Section 41300) and Household Hazardous Waste Element (HHWE) (PRC Section 41500 or PRC Section 41510).

A member of JACE will be contacting you shortly with more information about what to expect during the evaluation. After the call, a second letter will be sent with a request for information regarding the Jurisdiction's waste diversion programs, including requesting access to the Jurisdiction's SLCP Implementation Record pursuant to 14 CCR Section

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www.CalRecycle.ca.gov ○ (916) 322-4027

Implementation Record Access Options

- CalRecycle's File Sharing
 - Need to let CalRecycle know so we can send you a link
- Database Platforms
 - Google Drive
 - Paid Service
 - Jurisdiction-Hosted File Sharing – MS SharePoint
- Email
 - Note: CalRecycle can only receive a maximum of 153 MB per email
- In-Person

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[Date]

[SLCP Official Name]
[SLCP Official Title]
[Jurisdiction Name]
[Address]
[City, CA Zip]

Subject: Request for Implementation Record in Support of Compliance with the
[Jurisdiction Name]'s Short-Lived Climate Pollutants Program

[SLCP Official First and Last Name]:

On [Date of Notice of Compliance Evaluation], the Department of Resources Recycling and Recovery's (CalRecycle) Jurisdiction and Agency Compliance and Enforcement Branch (JACE) provided notice that it will be conducting a compliance evaluation of the [Jurisdiction Name]'s (Jurisdiction) Short-Lived Climate Pollutants (SLCP) program (Title 14 of the California Code of Regulations (14 CCR), sections 18981.1 through 18998.4) (Attachment 1). As one of the first steps in the process and pursuant to 14 CCR Section 18995.2(c), CalRecycle requests the Jurisdiction provide access to its SLCP Implementation Record within ten (10) business days from receipt of this letter.

Options for providing CalRecycle access to the Jurisdiction's SLCP Implementation Record include, but are not limited to:

- Uploading to the CalRecycle SharePoint site.
 - Contact your JACE representative if you would like access to CalRecycle's SharePoint site.
- Providing a secure shareable link to the Jurisdiction's electronic document management platform.
- Via email.
- In-person review.

After reviewing the Implementation Record, JACE may request additional information and supporting documentation for the following programs if the information cannot be found within the Jurisdiction's Implementation Record or Electronic Annual Report:

- Mandatory Commercial Organics Recycling (MOR) program (Public Resources Code (PRC) sections 42649.8 through 42649.87)

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Follow-Up After Implementation Record Review

- SRRE, HHWE, MCR, and MORe Information (if cannot be found in Implementation Record or the Electronic Annual Report)
- Field Visit Prep Information (if not already received)

Field Visit

- JACE staff will contact the jurisdiction at least two weeks before the field visit to let them know the dates
- Jurisdiction can shadow JACE staff
- Keep in mind, JACE will only have 1-2 staff in the field (unless training)

Field Visit Expectations

- Expectations for shadowing include, but are not limited to:
 - Not traveling in the same car
 - Not analyzing together (JACE staff are gathering the facts in the field)
 - If jurisdiction staff want to provide assistance to entities encountered in the field, JACE staff will continue on without the jurisdiction staff (JACE is trying to be the most effective and efficient while in the field)
 - JACE staff do not need a guided tour through the jurisdiction

Findings Report

- Draft/preliminary findings report is drafted
- Jurisdiction will receive the report and have three weeks to provide feedback
- If feedback is received, JACE staff will review and may either ask further clarifying questions and/or finalize the findings report
- If needed, a Notice of Violation may be issued



[City of XYZ; XYZ – Unincorporated]
Compliance Evaluation Findings Report
#24-[Reporting Entity ID]

[DATE]

Report Summary

California Code of Regulations, Title 14, Division 7, Chapter 12 - Short-Lived Climate Pollutants

Article 3: Organic Waste Collection Services

Compliant

Noncompliant

Section 18984.1. Three-Container Organic Waste Collection Services

None

Section 18984.2. Two-Container Organic Waste Collection Services

Section 18984.3. Unsegregated Single-Container Collection Services

Section 18984.4. Recordkeeping Requirements for Compliance with Organic Waste Collection Services

Section 18984.5. Container Contamination Minimization

Section 18984.6. Recordkeeping Requirements for Container Contamination Minimization

Section 18984.7. Container Color Requirements

Section 18984.8. Container Label Requirements

Article 10: Jurisdiction Edible Food Recovery Programs, Food Generators, and Food Recovery

14 CCR Section 18991.1. Jurisdiction Edible Food Recovery Program

Finding: Compliant/Noncompliant

[Information on this section]

See Table # below for specific information about the Jurisdiction's edible food recovery program implementation.

Table #

Program Requirements	Compliance	Findings
Educate commercial edible food generators. [18991.1(a)(1)]	Yes/No	
Increase commercial edible food generator access to food recovery organizations and services. [18991.1(a)(2)]	Yes/No	
Monitor commercial edible food generators compliance. [18991.1(a)(3)]	Yes/No	
Increase edible food recovery capacity. [18991.1(a)(4)]	Yes/No	

14 CCR Section 18991.2. Recordkeeping Requirements for Jurisdiction Edible Food Recovery Program

Finding: Compliant/Noncompliant

[Information on this section]

See Table # below for specific documentation required in the Implementation Record.

Table #

Implementation Record Requirements	Received	Notes (as needed)
List of commercial edible food generators in the jurisdiction that have a contract or written agreement with food recovery	Yes/No/N/A	

Preliminary Findings on Compliance Evaluation

- **Struggles:**

- Achieving the recovered organics waste product procurement requirements
- Full implementation in rolling out organic waste recovery programs
- Compliant Implementation Record

- **Successes:**

- Having an edible food collection program
- Providing required education and outreach
- Planning and reporting on capacity

Enforcement Timeline



“Strategy” Development

LAMD will offer to work on a “strategy” with the jurisdiction:

1. Address “low-hanging” violations that could be corrected within 90 days
2. Have tangible tasks that could “keep the ball rolling” towards compliance for a violation(s) that could take longer than 90 or 180 days to correct



**STAY
ENGAGED**



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<https://www.calrecycle.ca.gov/organics/slcp>



jace@calrecycle.ca.gov