

March 16, 2026

The Honorable Susan Rubio  
Chair, Senate Governmental Organization Committee  
1021 O Street, Suite 8710  
Sacramento, CA 95814-4900

**Subject: SB 1123 (Wiener): Administrative Procedure Act  
SUPPORT**

Dear Chair Rubio,

On behalf of the Board of the California Product Stewardship Council (CPSC), I write to express our **SUPPORT** for **SB 1123 (Wiener)**, which would require California to include economic and other direct and indirect benefits to consumers in its assessment of pending regulations.

The California Product Stewardship Council (CPSC) was founded in June of 2007 with the mission to shift California's product waste management system from one focused on government-funded and ratepayer financing to one that relies on producer responsibility to reduce public costs and drive improvements in product design. CPSC has played an instrumental role in passing many of California's major EPR programs for HHW, including SB 212 (Jackson, 2018) for medicine and sharps, and most recently AB 2440 (Newman, 2022) for batteries. CPSC wants to ensure Product Stewardship and Extended Producer Responsibility (EPR) programs run well in California, to serve as a model for other states.

SB 1123 (Wiener) will improve the transparency and effectiveness of the administrative procedures to ensure the net benefits to the State are fully captured. From experience in waste impact procedures, CPSC knows direct costs do not tell the full story when capturing the net benefits.

For the reasons stated above, we are proud to support SB 1123 (Wiener).

Sincerely,



Joanne Brasch, PhD  
Director of Advocacy