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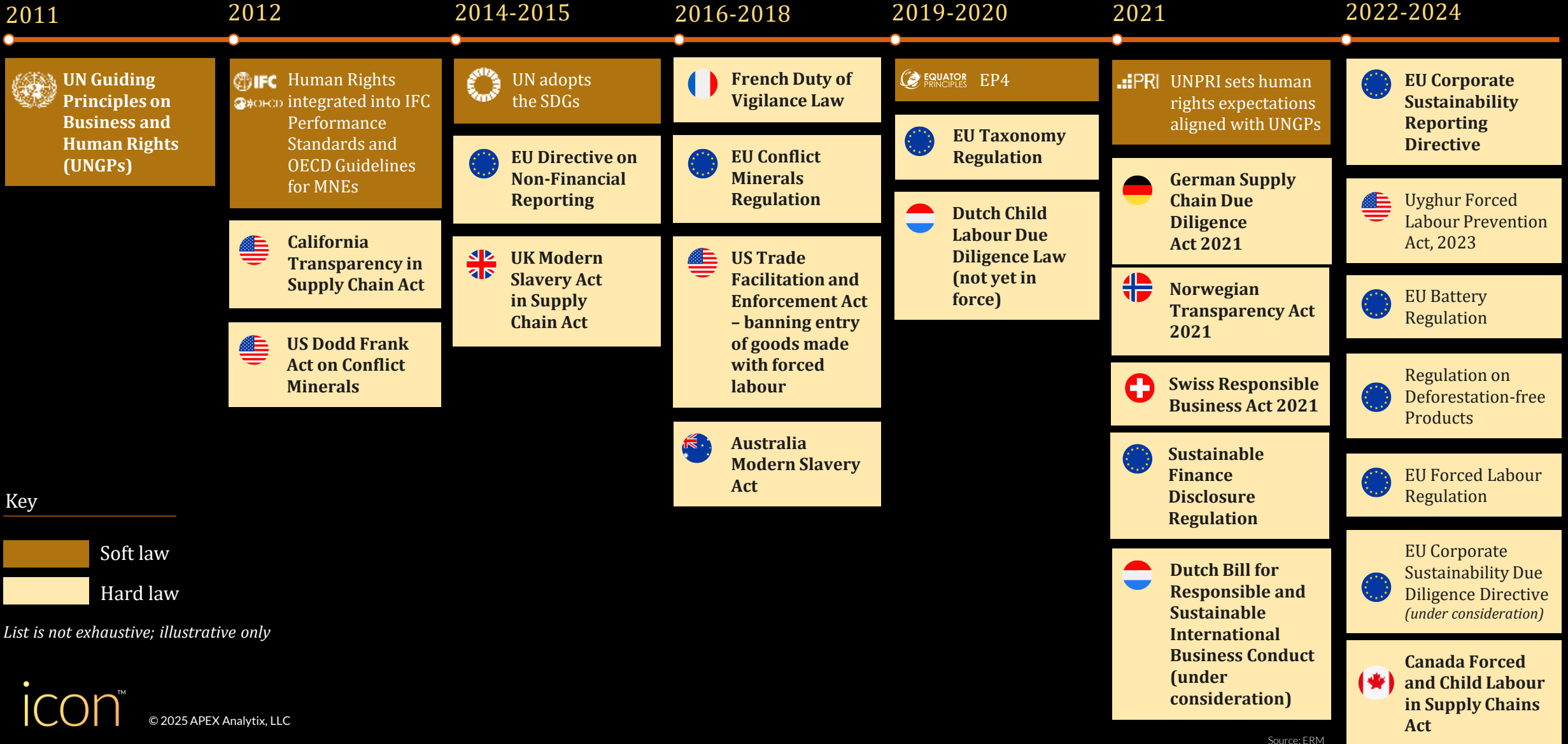
Navigating Key Regulations for Global Enterprises

Ed Struzik, CPIM

March 17, 2025 1:15PM

EU Sustainability Regulation Compliance

A steady increase in stakeholder scrutiny, market expectations and regulation has created significant momentum



Key

- Soft law
- Hard law

List is not exhaustive; illustrative only

EU Sustainability Regulation Compliance

How do you navigate all this?



Know

- What pertains to you?
- When do I need to be ready?
- What is the MOST restrictive?



Scan

- What is coming next?
- What are you doing to get ready?
- Are your suppliers ready?

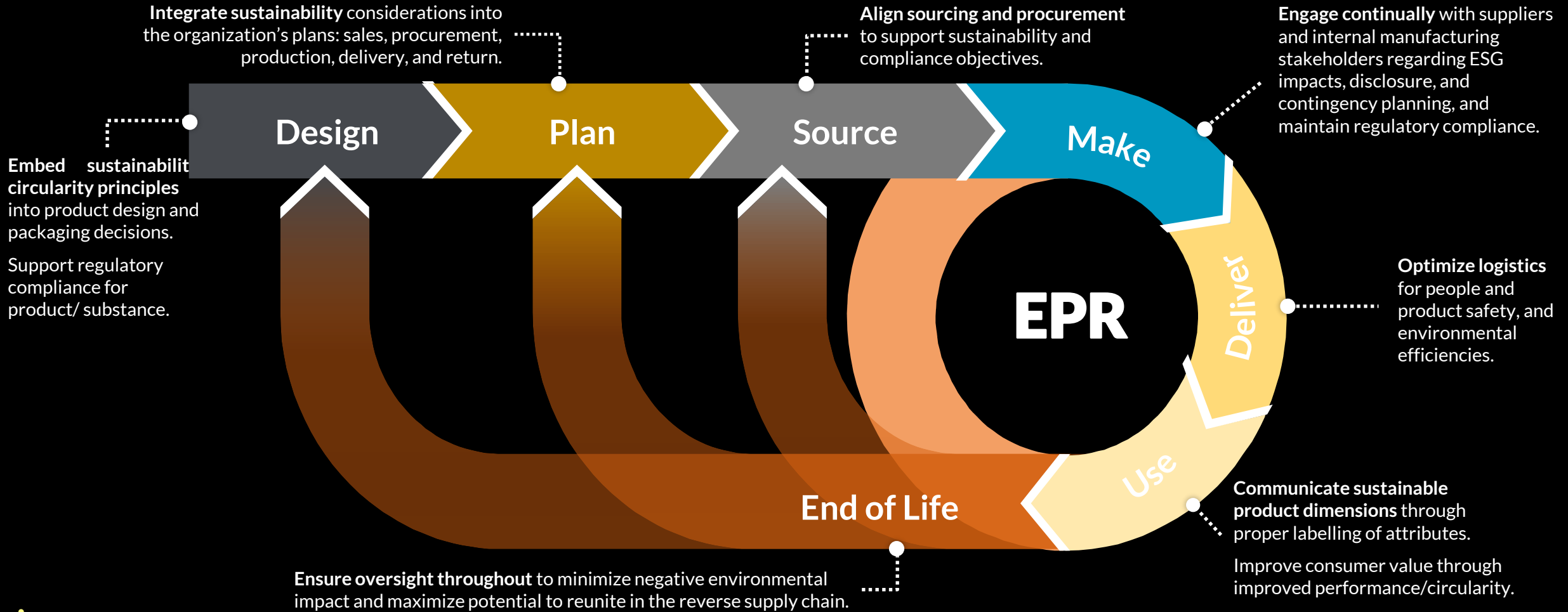


Comply

- Do what is required.
- Be on time.
- Get help - consultants, tools, experts.
- There ARE real penalties.

Extended Producer Responsibility (EPR)

Here is a Circular Value Chain

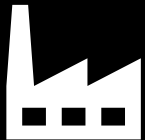


Extended Producer Responsibility (EPR)

Discover how businesses can effectively manage product life cycles and meet EPR requirements to minimize environmental impact

- What is EPR
 - EPR is an environmental policy approach that makes **producers responsible** for the entire **lifecycle** of the products they place on the market, including **product design, importing, selling, take-back, and final disposal**.
 - The goal is to incentivize producers to consider the environmental **impacts** of their products at every stage, including **designing** for better recyclability and **reducing waste** and resource consumption.

- Who must comply?
 - **PRODUCERS:** A producer is defined as the entity that first markets a product subject to EPR in a country.



Make & sell in country



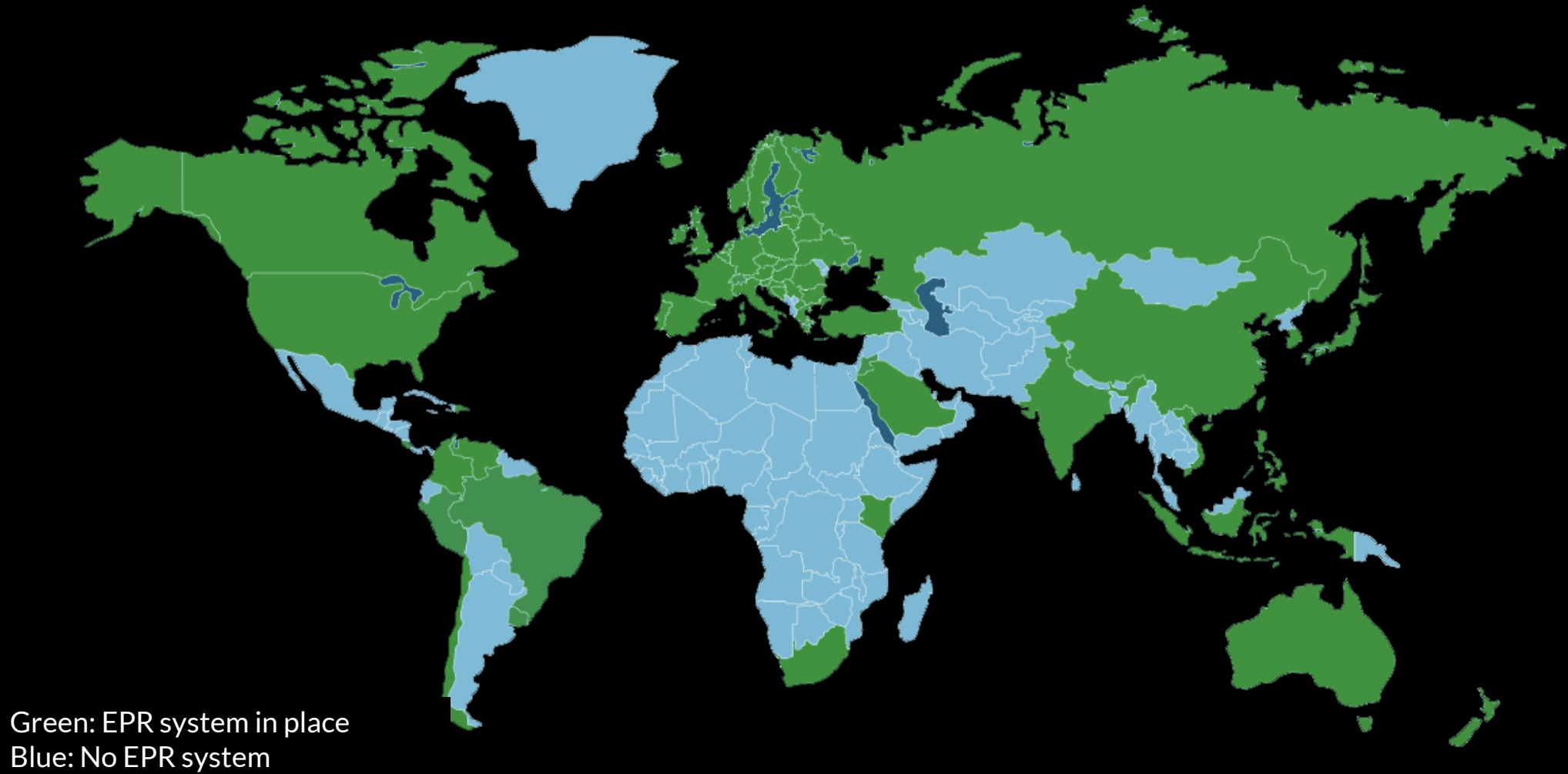
Import into a country you are established



Sell products in a country you are not physically established

- Risks of non-compliance:
 - Fines, income confiscated, product seizure, store fronts shut down.

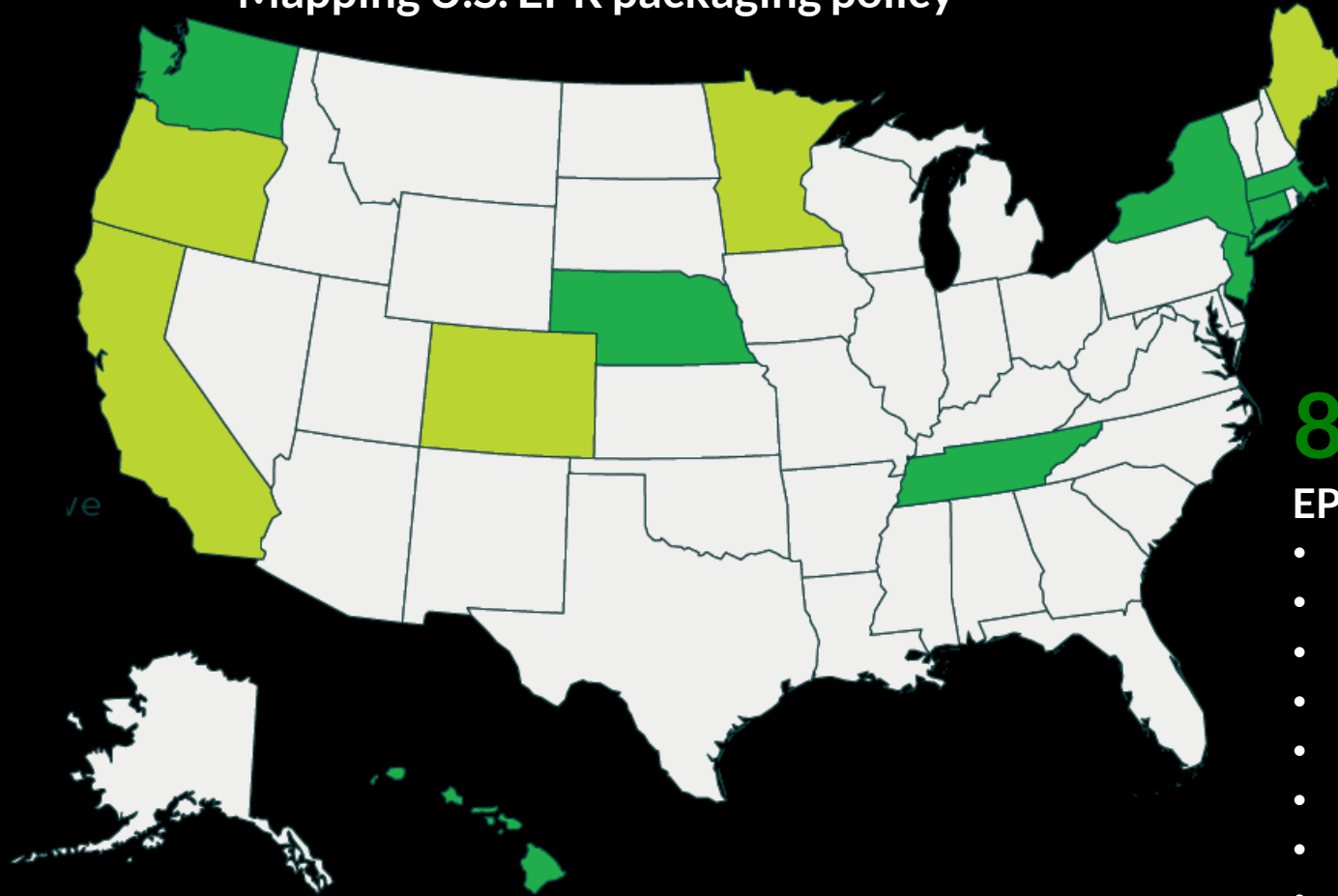
Extended Producer Responsibility (EPR) for Packaging Laws Around the World



Extended Producer Responsibility (EPR)

The United States & EPR

Mapping U.S. EPR packaging policy



5 states currently have EPR packaging laws

- California
- Colorado
- Maine
- Minnesota
- Oregon

8 states introduced EPR legislation in 2025

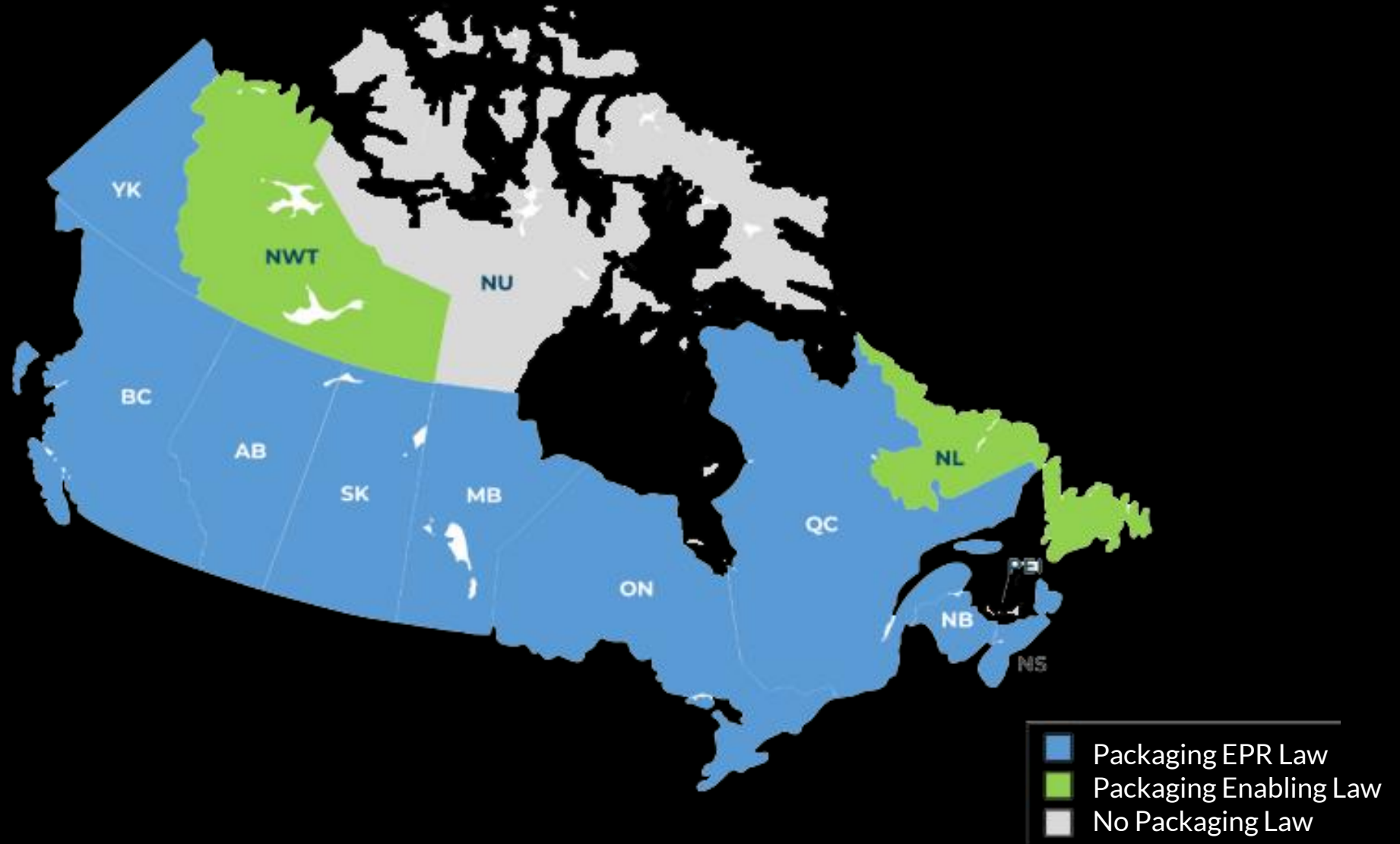
- Connecticut
- Hawaii
- Massachusetts
- Nebraska
- New Jersey
- New York
- Tennessee
- Washington

Extended Producer Responsibility (EPR)

Canada and EPR

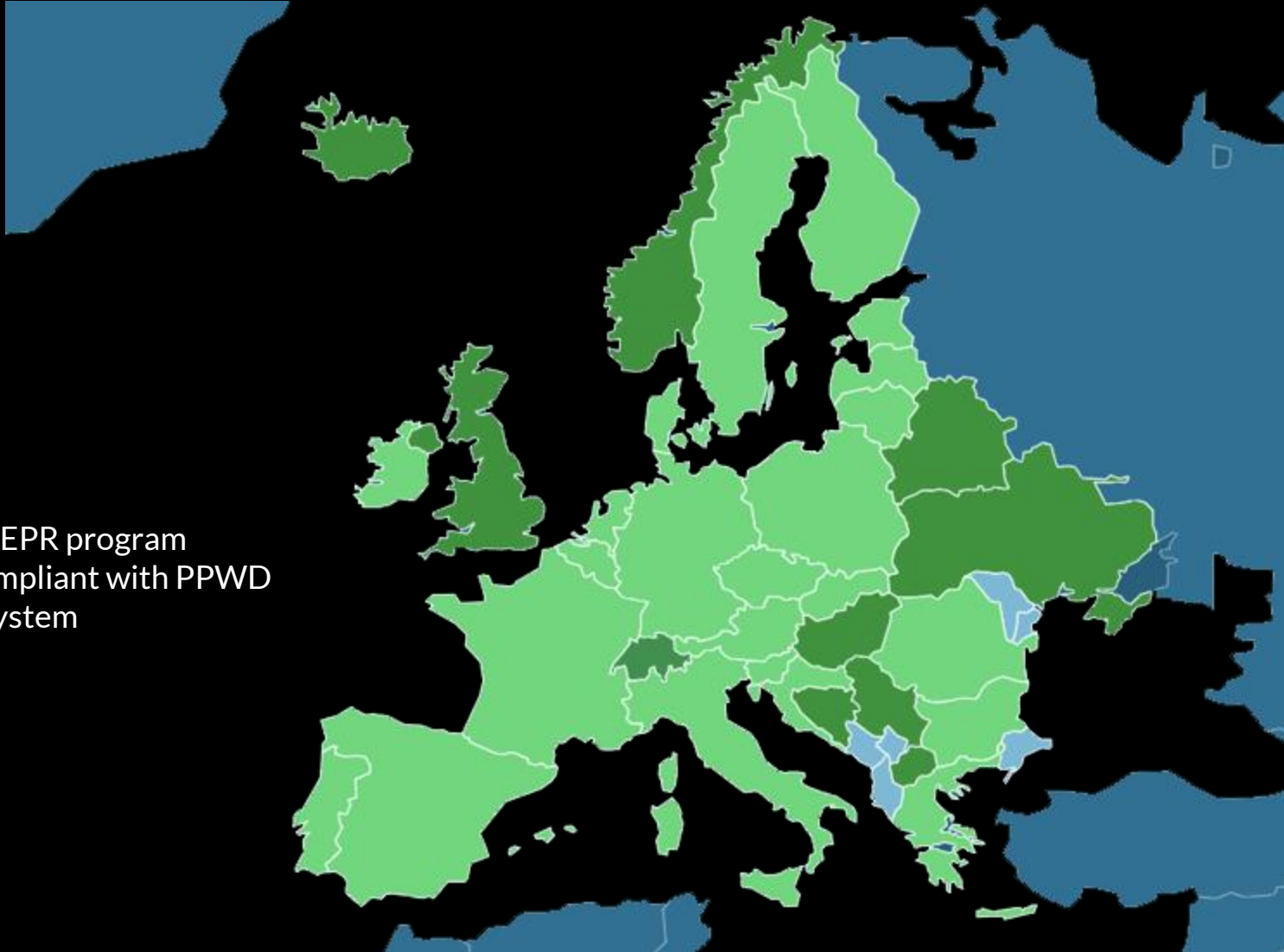
Law Passed

- 2009 - Manitoba
- 2014 - British Columbia
- 2015 - Saskatchewan
- 2021 - Ontario
- 2022 - Alberta
- 2023 - Quebec
- 2023 - New Brunswick
- 2023 - Nova Scotia
- 2024 - Canada Federal
Plastics Registry



Extended Producer Responsibility (EPR)


EMEA and EPR



Green: Non-EU with EPR program
Blue: EU member compliant with PPWD
Light Blue: No EPR system

Forced Labor Prevention


Understand legal frameworks like the Uyghur Forced Labor Prevention Act (UFLPA) and best practices for ensuring ethical supply chains.

 Uyghur Forced Labor Prevention Act, 2023


- Creates a rebuttable position that all goods from Xinjiang are made with slave labor
- To date >10,000 shipments valued at \$3.6Bn have been detained

 Tariff Act Section 307

- Prohibits goods made with forced labor

 Trafficking Victims Protections Reauthorization Act


- Addresses labor trafficking

 Federal Acquisition Regulation (FAR)


- Contains anti-trafficking provisions for government contractors

 Australia Modern Slavery Act

- Requires reporting on modern slavery risks and actions

 EU Corporate Sustainability Due Diligence Directive (*under consideration*)

- Requires large companies to identify and address human rights abuses in their value chains

 EU Forced Labour Regulation

- Bans products made with forced labor from the EU Market
- Like UFLPA but more strict

 UK Modern Slavery Act in Supply Chain Act

- Requires businesses to report on steps taken to address modern slavery risks

 German Supply Chain Due Diligence Act 2021

- Mandates human rights due diligence for large companies

 French Duty of Vigilance Law

- Requires large companies to identify and prevent human rights violations

Forced Labor Prevention

Best practices for procurement

1. Know your suppliers
2. Tell people
3. Prove It
4. Make it easy on yourself



QUESTIONS

