

Rigid Plastic Packaging Container Program Product Manufacturer Self-Determination Checklist

This checklist is designed to assist product manufacturers in determining whether a particular product's rigid plastic packaging container is an RPPC. If you are unsure you sell a product in a regulated RPPC, review and respond to the questions below. For the complete definition of an RPPC, see the California Code of Regulations, Title 14 (14CCR), [Section 17943\(aa\)](#).

If your product is a food, drug, cosmetic, baby formula, medical device; a Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) material; or a hazardous material subject to US Department of Transportation regulations, review the exemption language found in 14CCR [Section 17946.5](#).

RPPC Determination

	Yes	No	
Is the product sold in a packaging container made entirely of plastic except for incidental portions (clarification on incidental below)?	<input type="checkbox"/>	<input type="checkbox"/>	If "no," not regulated.
Is the product sold or offered for sale within California? This includes direct sales, retail sales, and remote sales through distributors, wholesalers and the Internet.	<input type="checkbox"/>	<input type="checkbox"/>	
	Yes	No	Unsure
Is the plastic packaging container composed entirely of plastic, except for incidental portions such as, but not limited to: <div style="display: flex; flex-wrap: wrap; padding-left: 20px;"> <div style="width: 25%;">·Caps</div> <div style="width: 25%;">·Lids</div> <div style="width: 25%;">·Labels</div> <div style="width: 25%;">·Handles</div> <div style="width: 25%;">·Hinges</div> <div style="width: 25%;">·Pigments</div> <div style="width: 25%;">·Colorants</div> <div style="width: 25%;">·Fillers</div> <div style="width: 25%;">·Stabilizers</div> <div style="width: 25%;">·Other incidental packaging elements and additives</div> </div>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does the plastic packaging container have a relatively inflexible or finite shape or form, such that the plastic packaging container retains the same shape empty as when full even if it is designed to be folded or collapsed into a more compact form when not holding a product? <i>Containers that are composed entirely of film plastic as defined by the American Society for Testing and Materials D6988.8 Guidelines for film plastic are not considered to have a relatively inflexible or finite shape or form. Examples include, but are not limited to, plastic wrap, shrink wrap, or carryout bags.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is the product packaging's total capacity or volume from a minimum of eight (8) ounces up to a maximum capacity or volume of five (5) gallons? <i>If you are unsure of the container's volume, there are many tools available online. The following may assist:</i> <ul style="list-style-type: none"> ○ U.S. Liquid Measure Volume Capacity Calculator ○ Formulas to calculate shapes ○ Water-dunk test 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is the container capable of at least one (1) closure, including closure during the original manufacturing process? <i>This includes containers that are both heat-sealed and non-heat-sealed.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If the answer is "Yes" to all of the above, consider the container a regulated RPPC.

If any of the answers are "No," the container may not be considered a regulated RPPC. However, you still may be subject to further review by CalRecycle.

If any of the answers are "Unsure," you may submit an Advisory Opinion Request within 90 calendar days of receiving a Precertification or Certification Notice from CalRecycle (Please review 14CCR [Section 17948.2](#)).