

# **SB 54 Public Workshop**

## **SB 54 Plastic Pollution Prevention and Packaging Producer Responsibility Act**

**May 1, 2024**

**Department of Resources Recycling and Recovery  
Packaging EPR Section, Knowledge Integration Section**

# **Topic: Covered Material Categories (CMC)**

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## Overview and Purpose of Workshop

The Department of Resources Recycling and Recovery (CalRecycle) has scheduled a non-regulatory workshop on **May 1, 2024**, from 10:00AM to 3:00PM, in the Byron Sher Auditorium, located on 2nd Floor, 1001 I Street, Sacramento, CA 95814, to consult with the public, the regulated community, and other interested persons to solicit feedback on some of the requirements outlined in [SB 54 \(Allen, Chapter 75, Statutes of 2022\)](#).

The topic of this workshop will be Covered Material Categories and the Needs Assessment.

The Covered Material Categories portion of the workshop is split into two parts:

- **Part 1** will discuss background information.
- **Part 2** will discuss an updated timeline and the covered material categories with proposed updates, noting the proposed changes to covered material categories published in December 2023.

The purpose of this document is to provide an overall outline of what is going to be discussed and the type of feedback CalRecycle plans on soliciting in advance of the workshop. All requests for feedback or informational items to share with interested parties will be specified in a gray textbox.

This document and workshop will not address any topics pertaining to regulations or draft regulatory text.

Previous workshop information can be found on the SB 54 [webpage](#) under *Events*.

## **Part I. Background**

CalRecycle published [a list of covered material categories](#) and their recyclability and compostability evaluations in December 2023. The list can be found on CalRecycle's [SB 54 webpage](#).

CalRecycle presented on covered material concepts and covered material categories at its April 25, 2023, June 28, 2023, and September 27, 2023 public workshops, including presenting drafts of the covered material category list. Workshop public notices and discussion documents can be found on CalRecycle's [Public Notices](#) page.

Previous workshop information can be found on the [SB 54 webpage](#) under *Past Events*.

### **Abbreviations and Acronym List**

- CA: California
- CalRecycle: California Department of Resources Recycling and Recovery
- CMC: Covered Material Category
- Department: California Department of Resources Recycling and Recovery
- PRO: Producer Responsibility Organization
- PRC: Public Resources Code (California Statute)
- SB: Senate Bill
- SR: Source Reduction

### **Relevant Definitions**

#### Covered material – PRC 42041(e)

(1) "Covered material" means both of the following:

(A) Single-use packaging that is routinely recycled, disposed of, or discarded after its contents have been used or unpackaged, and typically not refilled or otherwise reused by the producer.

(B) Plastic single-use food service ware, including, but not limited to, plastic-coated paper or plastic-coated paperboard, paper or paperboard with plastic intentionally added during the manufacturing process, and multilayer flexible material. For purposes of this subparagraph, "single-use food service ware" includes both of the following:

(i) Trays, plates, bowls, clamshells, lids, cups, utensils, stirrers, hinged or lidded containers, and straws.

(ii) Wraps or wrappers and bags used in the packaging of food offered for sale or provided to customers by food service establishments.

(2) Notwithstanding paragraph (1), "covered material" does not include any of the following:

(A) Packaging used for any of the following products:

(i) Medical products and products defined as devices or prescription drugs, as specified in the Federal Food, Drug, and Cosmetic Act (21 U.S.C. Secs. 321(g), 321(h), and 353(b)(1)).

(ii) Drugs that are used for animal medicines, including, but not limited to, parasiticide products for animals.

(iii) Products intended for animals that are regulated as animal drugs, biologics, parasiticides, medical devices, or diagnostics used to treat, or administered to, animals under the Federal Food, Drug, and Cosmetic Act (21 U.S.C. Sec. 301 et seq.), the federal Virus-Serum-Toxin Act (21 U.S.C. Sec. 151 et seq.), or the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. Sec. 136 et seq.).

(iv) Infant formula, as defined in Section 321(z) of Title 21 of the United States Code.

(v) Medical food, as defined in Section 360ee(b)(3) of Title 21 of the United States Code.

(vi) Fortified oral nutritional supplements used for persons who require supplemental or sole source nutrition to meet nutritional needs due to special dietary needs directly related to cancer, chronic kidney disease, diabetes, malnutrition, or failure to thrive, as those terms are defined as by the International Classification of Diseases, Tenth Revision, or other medical conditions as determined by the department.

(B) Packaging used to contain products regulated by the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. Sec. 136 et seq.).

(C) Plastic packaging containers that are used to contain and ship products that are classified for transportation as dangerous goods or hazardous materials under Part 178 (commencing with Section 178.0) of Subchapter C of Chapter I of Subtitle B of Title 49 of the Code of Federal Regulations.

(D) Packaging used to contain hazardous or flammable products classified by the 2012 federal Occupational Safety and Health Administration Hazard Communication Standard (29 C.F.R. 1910.1200).

(E) Beverage containers subject to the California Beverage Container Recycling and Litter Reduction Act (Division 12.1 (commencing with Section 14500)).

(F) Packaging used for the long-term protection or storage of a product that has a lifespan of not less than five years, as determined by the department.

(G) Packaging associated with products covered under the architectural paint recovery program established pursuant to Chapter 5 (commencing with Section 48700) of Part 7.

(H)

(i) Covered material for which the producer demonstrates to the department that the covered material meets all of the following criteria:

(I) The covered material is not collected through a residential recycling collection service.

(II) The covered material does not undergo separation from other materials at a commingled recycling processing facility.

(III) The covered material is recycled at a responsible end market.

(IV) Until January 1, 2027, the producer annually demonstrates to the department that the material has had a recycling rate of 65 percent for three consecutive years. On and after January 1, 2027, the producer demonstrates to the department that the material has had a recycling rate at or over 70 percent annually, as demonstrated to the department every two years.

(ii) If only a portion of the covered material sold in or into the state by a producer meets the criteria of clause (i), only the portion of the covered material that meets the criteria of clause (i) is exempt from this chapter and any portion that does not meet the criteria is a covered material for purposes of this chapter.

#### Covered material category – PRC 42041(f)

“Covered material category” means a category that includes covered material of a similar type and form, as determined by the department.

#### Plastic – PRC 42041(t)

“Plastic” means a synthetic or semisynthetic material chemically synthesized by the polymerization of organic substances that can be shaped into various rigid and flexible forms, and includes coatings and adhesives. “Plastic” includes, without limitation, polyethylene terephthalate (PET), high density polyethylene (HDPE), polyvinyl chloride (PVC), low density polyethylene (LDPE), polypropylene (PP), polystyrene (PS), polylactic acid (PLA), and aliphatic biopolyesters, such as polyhydroxyalkanoate (PHA) and polyhydroxybutyrate (PHB). “Plastic” does not include natural rubber or naturally occurring polymers such as proteins or starches.

#### Plastic Component – PRC 42041(u)

“Plastic component” means any single piece of covered material made partially or entirely of plastic. A plastic component may constitute the entirety of the covered material or a separate or separable piece of the covered material.

### **Overview of Covered Material Categories**

Covered material categories (CMCs), as defined in PRC 42041(f), are groupings of covered material by type and form. Covered material categories serve many functions in statute. For example, producers will report data by covered material category, and

CalRecycle will publish lists of covered material categories considered recyclable or compostable.

#### Summary of Uses of Covered Material Categories in Statute – CalRecycle Responsibilities

- CalRecycle is required to establish and post a list of covered material categories by July 1, 2024 – PRC 42061(a)
- CalRecycle’s data requests must be consistent with the established covered material categories – PRC 42060(a)(2)(C)(i)
- CalRecycle is required to conduct a material characterization study of covered material categories that are disposed of in California landfills and publish the results on its internet website – PRC 42061(a)(2)
- CalRecycle is required to calculate and publish recycling rates being achieved in the state for each covered material category by January 1, 2026 – PRC 42061(b)
- CalRecycle must publish a list of covered material categories that are deemed recyclable by January 1, 2024 – PRC 42061(c)
- CalRecycle is required to publish a list of covered material categories that are deemed compostable by January 1, 2024 – PRC 42061(d)
- CalRecycle is required to conduct a needs assessment designed to determine the necessary steps and investment needed for covered material, by covered material category– PRC 42067(a)
- CalRecycle is required to publish a list of covered material categories that are not in compliance with the requirements of SB 54 – PRC 42082(a)

#### Summary of Uses of Covered Material Categories in Statute – Producer & PRO Responsibilities

- The PRO may organize itself into subcommittees or some other similar structure, including delineation by covered material category, to ensure sufficient focus on each covered material category to better enable each category to meet the recycling rates required – PRC 42051(e)
- In developing the budget, the PRO may determine investments the PRO will make based on covered material categories – PRC 42051.1(i)(4)
- The PRO is required to annually report data, some of which is reported by covered material category – PRC 42052
- The PRO is required to create a fee structure that is categorized by covered material category - PRC 42053(d)

## **Part II. Updates to Covered Material Categories**

### **CMC Item 1: Estimated Timeline for Covered Material Category List Development**

Statute Sections: PRC 42061(a)(1), PRC 42061(c), PRC 42061(d)

Pursuant to PRC 42061(a)(1), CalRecycle will establish and post a list of covered material categories by July 1, 2024. Additionally, CalRecycle published a list of covered material categories deemed recyclable and compostable by January 1, 2024.

CalRecycle developed the covered material categories list using information from:

- (1) existing producer reporting systems and other categorizations relevant to single-use packaging and plastic single-use food service ware;
- (2) sorting categories being used in the SB 343 material characterization study and data from SB 343 data collection; and
- (3) feedback from interested parties.

The following timeline provides information on when CalRecycle has provided draft versions of the covered material categories list for feedback and when CalRecycle anticipates publishing and updating the list.

Estimated Timeline:

- **June 28, 2023** (June Public Workshop) – First draft of covered material categories list provided for feedback from interested parties.
- **September 27, 2023** (September Public Workshop) – Second draft of covered material categories list provided for feedback from interested parties.
- **December 28, 2023** – Publication of list of covered material categories that are deemed recyclable and compostable, along with list of covered material categories.
- **May 1, 2024** (May Public Workshop) – Proposed updates of covered material categories provided for feedback from interested parties.
- **February - May 17, 2024** – Soliciting non-regulatory public comments on covered material categories published in December 2023 and proposed updates from the May 1<sup>st</sup> workshop.
- **By July 1, 2024** – Publication of updated list of covered material categories.

**Informational Item for Interested Parties:** The above estimated timeline provides information on expected public review periods and when the list will be published and updated.

## **CMC Item 2: Covered Material Category List**

### **Structure of Covered Material Category List**

Most covered material categories, aside from those for small items, are defined by four major characteristics that together describe the covered material included within that category:

1. **Material Class** – Broad category of material for which the covered material is predominantly composed of.
  - a. Options: (1) Glass\*, (2) Ceramic\*, (3) Metal, (4) Paper and Fiber, (5) Plastic, (6) Wood and Other Organics
2. **Material Type** – More specific category of material, within Material Class, for which the covered material is predominantly composed of
  - a. Options: See Tables below for Material Types within each Material Class.
3. **Form** – Categories based on shape and other form-related factors. Forms are specific to Material Type.
  - a. Options: See tables below for Forms, by Material Class and Material Type.
4. **Presence of Plastic** – Items with a non-excluded plastic component will be characterized as a plastic covered material category while items with no plastic component will be considered a nonplastic covered material category.

In addition to the category structure described above, specific covered material categories were created for small items. Categories for small items are defined by three characteristics:

1. **Material Class** – Broad category of material for which the covered material is predominantly composed of. Material Type is not considered for categories of small items.
  - a. Options: (1) Glass\*, (2) Ceramic\*, (3) Metal, (4) Paper and Fiber, (5) Plastic, (6) Wood and Other Organics
2. **Size** – One size category based on measurements of an item's sides.
  - a. Option: Two or more sides measuring 2" or less\*
3. **Presence of Plastic** – Items with a non-excluded plastic component will be characterized as a plastic covered material category while items with no plastic component will be considered a nonplastic covered material category.

\*Indicates proposed change



## Covered Material Categories by Material Class

In the following section, the covered material categories with proposed updates are provided in tables, by Material Class. Each table has four columns.

The first column is an identification code for each covered material category to allow for interested parties making comments to easily identify the covered material category they are referencing (note: CMCs have updated identification codes from the December 2023 draft list).

- Each code starts with one or two letters that indicate the material class of the covered material category:
  - G = Glass
  - C = Ceramic
  - M = Metal
  - PF = Paper and Fiber
  - P = Plastic
  - WO = Wood and Other Organics
- When an identification code ends with “N,” it indicates the covered material category is for material **without** a plastic component. When an identification code ends with “P,” it indicates the covered material category is for material **with** a plastic component.

The second column lists the Material Class and the third column describes the Material Type. The final column describes the Form of the covered materials included in that covered material category, including whether that covered material includes a plastic component.

The proposed updates to covered material categories includes 94 categories, reduced from 98 categories in the December published list, 110 categories in the second draft and 130 in the first draft.

**Table 1. Covered Material Categories within the Glass Material Class**

Category ID	Material Class	Material Type	Form
G1N	Glass	Glass	Bottles and Jars w/o plastic component
G1P	Glass	Glass	Bottle and Jars w/ plastic component
G2N	Glass	Glass	Other Forms w/o plastic component
G2P	Glass	Glass	Other Forms w/ plastic component

Category ID	Material Class	Material Type	Form
G3N	Glass	Glass	Small - Two or more sides measuring 2" or less w/o plastic component
G3P	Glass	Glass	Small - Two or more sides measuring 2" or less w/ plastic component

**Major changes within Glass Material Class:**

*Additions*

- None

*Consolidation*

- None

*Deletions*

- None

*Rename*

- Renamed Material Class to "Glass"
  - Previously: "Glass and Ceramic" Material Class
- Renamed "Small - Two or more sides measuring 2" or less"
  - Previously: "Small - No side greater than 2"

**Table 2. Covered Material Categories within the Ceramic Material Class**

Category ID	Material Class	Material Type	Form
C1N	Ceramic	Ceramic	All Forms w/o plastic component
C1P	Ceramic	Ceramic	All Forms w/ plastic component
C2N	Ceramic	Ceramic	Small - Two or more sides measuring 2" or less w/o plastic component
C2P	Ceramic	Ceramic	Small - Two or more sides measuring 2" or less w/ plastic component

**Major changes within Ceramic Material Class:**

*Additions*

- None

*Consolidation*

- None

*Deletions*

- None

*Rename*

- Renamed Material Class to “Ceramic”
  - Previously: “Glass and Ceramic” Material Class
- Renamed “Small - Two or more sides measuring 2” or less”
  - Previously: “Small - No side greater than 2””

**Table 3. Covered Material Categories within the Metal Material Class**

<b>Category ID</b>	<b>Material Class</b>	<b>Material Type</b>	<b>Form</b>
M1N	Metal	Aluminum	Non-aerosol container w/o plastic component
M1P	Metal	Aluminum	Non-aerosol container w/ plastic component
M2N	Metal	Aluminum	Foil sheets w/o a plastic component
M2P	Metal	Aluminum	Foil sheets w/ a plastic component
M3N	Metal	Aluminum	Foil Molded Containers w/o plastic component
M3P	Metal	Aluminum	Foil Molded Containers w/ plastic component
M4P	Metal	Aluminum	Aerosol can w/ plastic component
M5N	Metal	Aluminum	Other Forms w/o plastic component
M5P	Metal	Aluminum	Other Forms w/ plastic component
M6N	Metal	Tin/Steel/Bimetal	Non-aerosol container w/o plastic component

Category ID	Material Class	Material Type	Form
M6P	Metal	Tin/Steel/Bimetal	Non-aerosol container w/ plastic component
M7P	Metal	Tin/Steel/Bimetal	Aerosol can w/ plastic component
M8N	Metal	Tin/Steel/Bimetal	Other Forms w/o plastic component
M8P	Metal	Tin/Steel/Bimetal	Other Forms w/ plastic component
M9N	Metal	Other Nonferrous	All Forms w/o plastic component
M9P	Metal	Other Nonferrous	All Forms w/ plastic component
M10N	Metal	Other Ferrous	All Forms w/o plastic component
M10P	Metal	Other Ferrous	All Forms w/ plastic component
M11N	Metal	Metal	Small - Two or more sides measuring 2" or less w/o plastic component
M11P	Metal	Metal	Small - Two or more sides measuring 2" or less w/ plastic component

**Major changes within Metal Material Class:**

*Additions*

- None

*Consolidation*

- None

*Deletions*

- None

*Rename*

- Renamed “Small – Two or more sides measuring 2” or less”
  - Previously: “Small – No side greater than 2””

**Table 4. Covered Material Categories within the Paper/Fiber Material Class**

<b>Category ID</b>	<b>Material Class</b>	<b>Material Type</b>	<b>Form</b>
PF1N	Paper/Fiber	Kraft Paper	All Forms w/o plastic component
PF1P	Paper/Fiber	Kraft Paper	All Forms w/ plastic component
PF2P	Paper/Fiber	Molded Fiber	All Forms w/ plastic component
PF2N	Paper/Fiber	Molded Fiber	All Forms w/o plastic component
PF3P	Paper/Fiber	Multi-Material Laminate	Aseptic Cartons
PF4P	Paper/Fiber	Multi-Material Laminate	Gable-top Cartons
PF5P	Paper/Fiber	Multi-Material Laminate	Other Forms w/ plastic component
PF6N	Paper/Fiber	OCC	Waxed Cardboard w/o plastic component
PF6P	Paper/Fiber	OCC	Waxed Cardboard w/ plastic component
PF7N	Paper/Fiber	OCC	Cardboard w/o plastic component
PF7P	Paper/Fiber	OCC	Cardboard w/ plastic component
PF8N	Paper/Fiber	Paperboard	All Forms w/o plastic component
PF8P	Paper/Fiber	Paperboard	All Forms w/ plastic component
PF9N	Paper/Fiber	White Paper	All Forms w/o plastic component

Category ID	Material Class	Material Type	Form
PF9P	Paper/Fiber	White Paper	All Forms w/ plastic component
PF10N	Paper/Fiber	Other/Mixed Paper	All Forms w/o plastic component
PF10P	Paper/Fiber	Other/Mixed Paper	All Forms w/ plastic component
PF11N	Paper/Fiber	Paper/Fiber	Small – Two or more sides measuring 2” or less w/o plastic component
PF11P	Paper/Fiber	Paper/Fiber	Small – Two or more sides measuring 2” or less w/ plastic component

**Major changes within Paper and Fiber Material Class:**

*Additions*

- None

*Consolidation*

- Combined “Molded Fiber - All Forms of Food Service Ware w/plastic component” and “Molded Fiber – All Forms of Packaging w/plastic component”
  - Updated to form PF2P “Molded Fiber – All Forms w/plastic component”

*Deletions*

- Removed “Multi-Material Laminate – Poly-coated food service ware”
  - Now falls under other CMCs with a plastic component in the Paper and Fiber Material Class

*Rename*

- Renamed PF2N “Molded Fiber – All Forms w/o plastic component”
  - Previously: “Molded Fiber - All Forms of Packaging w/o plastic component”
- Renamed PF3P “Aseptic Cartons”
  - Previously: “Aseptic Containers”
- Renamed “Small - Two or more sides measuring 2” or less”
  - Previously: “Small - No side greater than 2””

**Table 5. Covered Material Categories within the Plastic Material Class**

<b>Category ID</b>	<b>Material Class</b>	<b>Material Type</b>	<b>Form</b>
P1P	Plastic	PET (#1)	Bottles, Jugs, and Jars (Clear/Natural)
P2P	Plastic	PET (#1)	Bottles, Jugs, and Jars (Pigmented/Color)
P3P	Plastic	PET (#1)	Thermoformed Containers, Cups, Lids, Plates, Trays, Tubs
P4P	Plastic	PET (#1)	Other Rigid Items (including containers)
P5P	Plastic	PET (#1)	Flexible and Film Items
P6P	Plastic	HDPE (#2)	Bottles, Jugs and Jars (Clear/Natural)
P7P	Plastic	HDPE (#2)	Bottles, Jugs and Jars (Pigmented/Color)
P8P	Plastic	HDPE (#2)	Pails & Buckets
P9P	Plastic	HDPE (#2)	Other Rigid Items (including containers)
P10P	Plastic	HDPE (#2)	Flexible and Film Items
P11P	Plastic	PVC (#3)	Rigid Items
P12P	Plastic	PVC (#3)	Flexible and Film Items
P13P	Plastic	LDPE (#4)	Bottles, Jugs and Jars
P14P	Plastic	LDPE (#4)	Other Rigid Items
P15P	Plastic	LDPE (#4)	Clear Non-Bag Film
P16P	Plastic	LDPE (#4)	Other Flexible and Film Items

<b>Category ID</b>	<b>Material Class</b>	<b>Material Type</b>	<b>Form</b>
P17P	Plastic	PP (#5)	Bottles, Jugs and Jars
P18P	Plastic	PP (#5)	Thermoformed Containers, Cups, Lids, Plates, Trays, Tubs
P19P	Plastic	PP (#5)	Utensils
P20P	Plastic	PP (#5)	Other Rigid Items
P21P	Plastic	PP (#5)	Clear Non-Bag Film
P22P	Plastic	PP (#5)	Other Flexible and Film Items
P23P	Plastic	PS (#6)	Expanded/Foamed Hinged Containers, Plates, Cups, Tubs, Trays, and Other Foamed Containers
P24P	Plastic	PS (#6)	Other Expanded/Foamed Forms
P25P	Plastic	PS (#6)	Utensils
P26P	Plastic	PS (#6)	Solid Hinged Containers, Plates, Cups, Tubs, Trays, and Other Solid Forms
P27P	Plastic	PS (#6)	Flexible and Film Items
P28P	Plastic	Plastics and Polymers Designed for Potential Compostability	Rigid Items
P29P	Plastic	Plastics and Polymers Designed for	Flexible and Film Items



Category ID	Material Class	Material Type	Form
		Potential Compostability	
P30P	Plastic	Multi-Material Laminate	Pouches and Envelopes
P31P	Plastic	Multi-Material Laminate	Other Forms
P32P	Plastic	Other/Mixed Plastics	Textiles
P33P	Plastic	Other/Mixed Plastics	Rigid Items
P34P	Plastic	Other/Mixed Plastics	Flexible and Film Items
P35P	Plastic	Plastic	Small - Two or more sides measuring 2" or less

### **Major changes within Plastic Material Class:**

#### *Additions*

- None

#### *Consolidation*

- Combined "Solid Hinged Containers, Plates, Cups, Tubs, Trays, and Other Solid Containers" and "Other Solid Forms"
  - Updated to form P26P "Solid Hinged Containers, Plates, Cups, Tubs, Trays, and Other Solid Forms"

#### *Deletions*

- Removed "Expanded/Foamed Cushioning and Void Fill"
  - Now falls under P24P "Other Expanded/Foamed Forms"

#### *Rename*

- Renamed "Pouches and Envelopes"
  - Previously: "Mailing Pouches and Shipping Envelopes"
- Renamed "Small - Two or more sides measuring 2" or less"
  - Previously: "Small - No side greater than 2"

**Table 6. Covered Material Categories within the Wood & Other Organic Materials Material Class**

<b>Category ID</b>	<b>Material Class</b>	<b>Material Type</b>	<b>Form</b>
WO1N	Wood & Other Organic Materials	Wood	All Untreated Forms w/o plastic component
WO1P	Wood & Other Organic Materials	Wood	All Untreated Forms w/ plastic component
WO2N	Wood & Other Organic Materials	Wood	All Treated or Painted Forms w/o plastic component
WO2P	Wood & Other Organic Materials	Wood	All Treated or Painted Forms w/ plastic component
WO3N	Wood & Other Organic Materials	Other/Mixed Organic	Textiles w/o plastic component
WO3P	Wood & Other Organic Materials	Other/Mixed Organic	Textiles w/ plastic component
WO4N	Wood & Other Organic Materials	Other/Mixed Organic	Other Forms w/o plastic component
WO4P	Wood & Other Organic Materials	Other/Mixed Organic	Other Forms w/ plastic component
WO5N	Wood & Other Organic Materials	Wood & Other Organic Materials	Small - Two or more sides measuring 2" or less w/o plastic component
WO5P	Wood & Other Organic Materials	Wood & Other Organic Materials	Small - Two or more sides measuring 2" or less w/ plastic component

**Major changes within Wood & Other Organics Material Class:**

*Additions*

- None

*Consolidation*

- None

*Deletions*

- None

### Rename

- Renamed “Small - Two or more sides measuring 2” or less”
  - Previously: “Small - No side greater than 2””

#### **Request for Feedback:**

CalRecycle is seeking feedback on the updated list of covered material categories presented in the tables above. Specifically, CalRecycle is seeking feedback on the major changes outlined above and how small items are defined.

## **Process for Submitting Written Feedback**

CalRecycle has developed a process for requesting written feedback or questions from interested parties. While this process is not a specific requirement, CalRecycle requests all written feedback and questions to be submitted using the specified format below, for the purposes of maintaining consistency in the way in which the information is received, and to aid with expedited review and processing. All written feedback can be submitted to [packaging@calrecycle.ca.gov](mailto:packaging@calrecycle.ca.gov) with the subject line: *SB 54 Covered Material Categories Feedback*. Written feedback can be provided prior to the workshop and after. CalRecycle requests all feedback specific to the May 1, 2024 Workshop and to the proposed updates to the list of covered material categories is submitted no later than **May 17, 2024**. Preferred formats include e-mail, Word document, or PDF. Please note, these comments are not part of the rulemaking process and will only be considered to the extent they concern the covered material categories.

### **Requested Feedback on Specific Concepts or Public Resources Code (PRC) Sections:**

When providing feedback or asking questions on a specific concept or section in statute, please include (1) the Item Number [e.g., Item 1, Item 2], including the specific title, or full PRC section number, including any subsections, (2) feedback or questions related to that concept. For example:

Item 1 – List of Covered Material Categories:  
*Specific feedback related to this item...*

PRC 42061(a)(1)  
*Specific feedback or question related to this section...*

This process can be repeated for each concept or section an interested party wants to address. All feedback and questions can be included in the same email or document.

### **General Questions or Comments:**

When asking general questions or providing general comments on topics related to this workshop that do not focus on a specific concept or specific PRC section, please list each question and comment in numerical order:

Question 1: *General question on this discussion document*

Question 2: *General question on this discussion document*

Comment 1: *General comment on this discussion document*