

SB 54 Plastic Pollution Prevention and Packaging Producer Responsibility Act

Covered Material Category (CMC) List

Released January 1, 2025

Each year, millions of tons of single-use packaging and plastic food service ware are disposed of in California, making up a significant portion of landfill waste and contributing to widespread environmental pollution across the state.

California is holding producers accountable for reducing single-use plastic waste and ensuring that what is produced is either recyclable or compostable. CalRecycle plays a key role by:

- Creating and maintaining a comprehensive Covered Material Category (CMC) list to guide the management of single-use packaging and plastic food service ware.
- Updating recyclability and compostability determinations annually, if appropriate, based on new data.

[The Plastic Pollution Prevention and Packaging Producer Responsibility Act](#) [Senate Bill (SB) 54, Allen, Chapter 75, Statutes of 2022] establishes an extended producer responsibility program to reduce waste associated with single-use packaging and single-use plastic food service ware in California.

The law requires that all single-use packaging and single-use plastic food service ware is recyclable or eligible to be labeled compostable by 2032 [Public Resources Code (PRC) 42050(b)].

CalRecycle publishes the CMC list pursuant to PRC Section 42061. The list establishes the covered material categories themselves and CalRecycle's determinations of which categories satisfy the requirements to be considered "recyclable" or "eligible for being labeled 'compostable'" for SB 54 purposes. The CMC list:

- Establishes a framework to evaluate the recyclability and compostability of materials.
- Guides producers and the Producer Responsibility Organization in fulfilling their reporting and materials management obligations.
- Supports the development of infrastructure needed to achieve California's recycling and composting goals under SB 54.

CalRecycle published an initial assessment of covered material categories deemed recyclable and eligible for being labeled compostable in December 2023 to meet the January 1, 2024, statutory deadline [PRC 42061(c-d)]. Through 2032, CalRecycle must annually update the list [PRC 42061(e)].

The CMC list below is an update to the [CMC list published on December 28, 2023](#). The covered material categories themselves have been updated, as well as some

recyclability and compostability determinations. These changes reflect new data and updated analytical methods.

Please note that the CMC list is not a determination of whether any particular label violates PRC section 42355.51 or 42357. CalRecycle evaluates recyclability and compostability for purposes of SB 54 only, not for the purpose of determining liability under any other law.

The CMC List

Table 1 lists covered material categories and whether they are considered recyclable and/or eligible for being labeled compostable pursuant to Chapter 5.7 (commencing with PRC 42355) as of the annual update on January 1, 2025.

Each covered material category identifies a combination of material type and form that describes covered materials. The categories are intended to apply to each detachable component of covered material individually.

The first through fourth columns of the table describe the covered material in each category.

- The **first column** of the table lists an identification (ID) code for each covered material category.
 - Each category ID starts with a number that references the year of publication of the list. For example, the “24” in category “24_M1N” refers to the July 1, 2024, list of covered material categories.
 - Each category ID has 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
 - Identification codes ending with “N” indicate the category is for material **without** a plastic component.
 - Identification codes ending with “P” indicate the category is for material **with** a plastic component.
 - Note: When a CMC changes, it is assigned a new category ID and its previous category ID is retired. As a result, the category IDs may not be in numerical order.
- The **second column** describes the Material Class.
- The **third column** describes the Material Type.
- The **fourth column** describes the Form of the covered materials included in that covered material category, including whether that covered material includes a plastic component.

The **fifth column** lists recyclability determinations. An indication of yes (Y) means that, based on available data and current assumptions, CalRecycle considers a category to be recyclable

for purposes of PRC section 42061(c). In its evaluation, CalRecycle considered information on jurisdiction recycling program collection and the sorting behaviors of large volume transfer/processing facilities in California. This evaluation does not address the destination or ultimate disposition of materials sorted and sold by large volume transfer/processing facilities. Nor does this evaluation does consider PRC Sections 42355.51(d)(3) through (d)(6), which apply only to specific products, not categories of materials. Recyclability determinations rely on findings described in the SB 343 Material Characterization Study Revised Preliminary Findings Report. For further information concerning SB 343 (Allen, Chapter 507, Statutes of 2021), visit [CalRecycle's webpage](#).

The **sixth column** lists compostability determinations. For individual covered material items to satisfy the compostability-related criterion of PRC section 42050(b), they must satisfy the requirements for labeling them “compostable” to be lawful. Most of those requirements, however, necessarily apply on item-by-item basis only, whereas the CMC list only concerns covered material on a category-by-category basis. Accordingly, an indication of yes (Y) means that, based on available data and current assumptions, CalRecycle considers a category to be compostable for purposes of PRC section 42061(d) because it encompasses materials that could satisfy the item-by-item requirements for labeling them “compostable” to be lawful. That determination applies per PRC Section 42357(g)(1)(B), which contains the only criterion within section 42357 that applies on a category-by-category basis. Specifically, it requires material labeled “compostable” to be an allowable agricultural organic input under the U.S. Department of Agriculture’s [National Organic Program Regulations](#). To be such an input, (1) paper materials must be newspaper or other recycled paper such as cardboard and must not have glossy coatings or colored inks, (2) woody material must be untreated wood (or other organic materials) without any added synthetic substances, and (3) fiber materials must not have any added synthetic substances. These restrictions are a matter of federal law and are subject to change. Visit [National Organic Program](#) for the most up-to-date information.

For more information about SB 54, including the latest information on the development of regulations, visit the [SB 54 webpage](#) and sign up for the SB 54 [listserv](#), which will keep you updated on any new information regarding SB 54 progress.

Table 1. Covered Material Category List (As of January 1, 2025)

Category ID	Material Class ¹	Material Type ¹	Form ^{2,3}	Recyclable ⁴	Compostable ⁴
24_G1N	Glass	Glass	Bottles and Jars w/o plastic component	Y	
24_G1P	Glass	Glass	Bottle and Jars w/ plastic component	Y	
24_G2N	Glass	Glass	Other Forms w/o plastic component		
24_G2P	Glass	Glass	Other Forms w/ plastic component		
24_G3N	Glass	Glass	Small – Two or more sides measuring 2” or less w/o plastic component	Y	
24_G3P	Glass	Glass	Small – Two or more sides measuring 2” or less w/ plastic component	Y	
24_C1N	Ceramic	Ceramic	All Forms w/o plastic component		
24_C1P	Ceramic	Ceramic	All Forms w/ plastic component		
24_C2N	Ceramic	Ceramic	Small – Two or more sides measuring 2” or less w/o plastic component		
24_C2P	Ceramic	Ceramic	Small – Two or more sides measuring 2” or less w/ plastic component		
24_M1N	Metal	Aluminum	Non-aerosol container w/o plastic component	Y	
24_M1P	Metal	Aluminum	Non-aerosol container w/ plastic component	Y	

Category ID	Material Class ¹	Material Type ¹	Form ^{2,3}	Recyclable ⁴	Compostable ⁴
24_M2N	Metal	Aluminum	Foil sheets w/o a plastic component	Y	
24_M2P	Metal	Aluminum	Foil sheets w/ a plastic component	Y	
24_M3N	Metal	Aluminum	Foil Molded Containers w/o plastic component	Y	
24_M3P	Metal	Aluminum	Foil Molded Containers w/ plastic component	Y	
24_M4P	Metal	Aluminum	Aerosol can w/ plastic component	Y	
24_M5N	Metal	Aluminum	Other Forms w/o plastic component	Y	
24_M5P	Metal	Aluminum	Other Forms w/ plastic component	Y	
24_M6N	Metal	Tin/Steel/Bimetal	Non-aerosol container w/o plastic component	Y	
24_M6P	Metal	Tin/Steel/Bimetal	Non-aerosol container w/ plastic component	Y	
24_M7P	Metal	Tin/Steel/Bimetal	Aerosol can w/ plastic component	Y	
24_M8N	Metal	Tin/Steel/Bimetal	Other Forms w/o plastic component	Y	
24_M8P	Metal	Tin/Steel/Bimetal	Other Forms w/ plastic component	Y	
24_M9N	Metal	Other Nonferrous	All Forms w/o plastic component	Y	
24_M9P	Metal	Other Nonferrous	All Forms w/ plastic component	Y	
24_M10N	Metal	Other Ferrous	All Forms w/o plastic component	Y	

Category ID	Material Class ¹	Material Type ¹	Form ^{2,3}	Recyclable ⁴	Compostable ⁴
24_M10P	Metal	Other Ferrous	All Forms w/ plastic component	Y	
24_M12N	Metal	Metal	Small – Two or more sides measuring 2” or less w/o plastic component	Y	
24_M12P	Metal	Metal	Small – Two or more sides measuring 2” or less w/ plastic component		
24_PF1N	Paper and Fiber	Kraft Paper	All Forms w/o plastic component	Y	Y
24_PF1P	Paper and Fiber	Kraft Paper	All Forms w/ plastic component	Y	
24_PF14P	Paper and Fiber	Molded Fiber	All Forms w/ plastic component		
24_PF14N	Paper and Fiber	Molded Fiber	All Forms w/o plastic component	Y	Y
24_PF15P	Paper and Fiber	Multi-Material Laminate	Aseptic Cartons		
24_PF5P	Paper and Fiber	Multi-Material Laminate	Gable-top Cartons		
24_PF7P	Paper and Fiber	Multi-Material Laminate	Other Forms w/ plastic component		
24_PF8N	Paper and Fiber	OCC	Waxed Cardboard w/o plastic component		Y
24_PF8P	Paper and Fiber	OCC	Waxed Cardboard w/ plastic component		
24_PF9N	Paper and Fiber	OCC	Cardboard w/o plastic component	Y	Y

Category ID	Material Class ¹	Material Type ¹	Form ^{2,3}	Recyclable ⁴	Compostable ⁴
24_Pf9P	Paper and Fiber	OCC	Cardboard w/ plastic component	Y	
24_Pf10N	Paper and Fiber	Paperboard	All Forms w/o plastic component	Y	Y
24_Pf10P	Paper and Fiber	Paperboard	All Forms w/ plastic component	Y	
24_Pf11N	Paper and Fiber	White Paper	All Forms w/o plastic component	Y	Y
24_Pf11P	Paper and Fiber	White Paper	All Forms w/ plastic component	Y	
24_Pf12N	Paper and Fiber	Other/Mixed Paper	All Forms w/o plastic component	Y	Y
24_Pf12P	Paper and Fiber	Other/Mixed Paper	All Forms w/ plastic component	Y	
24_Pf16N	Paper and Fiber	Paper and Fiber	Small – Two or more sides measuring 2” or less w/o plastic component		Y
24_Pf16P	Paper and Fiber	Paper and Fiber	Small – Two or more sides measuring 2” or less w/ plastic component		
24_P1P	Plastic	PET (#1)	Bottles, Jugs, and Jars (Clear/Natural)	Y	
24_P2P	Plastic	PET (#1)	Bottles, Jugs, and Jars (Pigmented/Color)	Y	
24_P38P	Plastic	PET (#1)	Other Rigid Containers, Cups, Lids, Plates, Trays, Tubs	Y	
24_P39P	Plastic	PET (#1)	Other Rigid Items	Y	
24_P5P	Plastic	PET (#1)	Flexible and Film Items		

Category ID	Material Class ¹	Material Type ¹	Form ^{2,3}	Recyclable ⁴	Compostable ⁴
24_P6P	Plastic	HDPE (#2)	Bottles, Jugs and Jars (Clear/Natural)	Y	
24_P7P	Plastic	HDPE (#2)	Bottles, Jugs and Jars (Pigmented/Color)	Y	
24_P8P	Plastic	HDPE (#2)	Pails & Buckets	Y	
24_P40P	Plastic	HDPE (#2)	Other Rigid Items	Y	
24_P10P	Plastic	HDPE (#2)	Flexible and Film Items		
24_P11P	Plastic	PVC (#3)	Rigid Items		
24_P12P	Plastic	PVC (#3)	Flexible and Film Items		
24_P13P	Plastic	LDPE (#4)	Bottles, Jugs and Jars		
24_P14P	Plastic	LDPE (#4)	Other Rigid Items		
24_P15P	Plastic	LDPE (#4)	Clear Non-Bag Film		
24_P16P	Plastic	LDPE (#4)	Other Flexible and Film Items		
24_P17P	Plastic	PP (#5)	Bottles, Jugs and Jars	Y	
24_P41P	Plastic	PP (#5)	Other Rigid Containers, Cups, Lids, Plates, Trays, Tubs	Y	
24_P19P	Plastic	PP (#5)	Utensils		
24_P20P	Plastic	PP (#5)	Other Rigid Items	Y	
24_P21P	Plastic	PP (#5)	Clear Non-Bag Film		
24_P22P	Plastic	PP (#5)	Other Flexible and Film Items		

Category ID	Material Class¹	Material Type¹	Form^{2,3}	Recyclable⁴	Compostable⁴
24_P23P	Plastic	PS (#6)	Expanded/Foamed Hinged Containers, Plates, Cups, Tubs, Trays, and Other Foamed Containers		
24_P42P	Plastic	PS (#6)	Other Expanded/Foamed Forms		
24_P27P	Plastic	PS (#6)	Utensils		
24_P43P	Plastic	PS (#6)	Solid Hinged Containers, Plates, Cups, Tubs, Trays, and Other Solid Forms		
24_P29P	Plastic	PS (#6)	Flexible and Film Items		
24_P44P	Plastic	Plastics and Polymers Designed for Compostability	Rigid Items		
24_P45P	Plastic	Plastics and Polymers Designed for Compostability	Flexible and Film Items		
24_P46P	Plastic	Multi-Material Laminate	Pouches and Envelopes		
24_P33P	Plastic	Multi-Material Laminate	Other Forms		
24_P34P	Plastic	Other/Mixed Plastics	Textiles		
24_P35P	Plastic	Other/Mixed Plastics	Rigid Items		
24_P36P	Plastic	Other/Mixed Plastics	Flexible and Film Items		

Category ID	Material Class ¹	Material Type ¹	Form ^{2,3}	Recyclable ⁴	Compostable ⁴
24_P47P	Plastic	Plastic	Small – Two or more sides measuring 2” or less		
24_WO1N	Wood and Other Organic Materials	Wood	All Untreated Forms w/o plastic component		Y
24_WO1P	Wood and Other Organic Materials	Wood	All Untreated Forms w/ plastic component		
24_WO2N	Wood and Other Organic Materials	Wood	All Treated or Painted Forms w/o plastic component		
24_WO2P	Wood and Other Organic Materials	Wood	All Treated or Painted Forms w/ plastic component		
24_WO3N	Wood and Other Organic Materials	Other/Mixed Organic	Textiles w/o plastic component		
24_WO3P	Wood and Other Organic Materials	Other/Mixed Organic	Textiles w/ plastic component		
24_WO4N	Wood and Other Organic Materials	Other/Mixed Organic	Other Forms w/o plastic component		Y
24_WO4P	Wood and Other Organic Materials	Other/Mixed Organic	Other Forms w/ plastic component		
24_WO6N	Wood and Other Organic Materials	Wood and Other Organic Materials	Small – Two or more sides measuring 2” or less w/o plastic component		Y
24_WO6P	Wood and Other Organic Materials	Wood and Other Organic Materials	Small – Two or more sides measuring 2” or less w/ plastic component		

Footnotes:

¹For items composed of multiple materials, “Material Class” and “Material Type” refer to the material constituting the greatest percentage of an item’s weight.

² Small – Two or more sides measuring 2” or less refers to dimensions, such as length, width, or height. *For flexible items*, this is measured when the item is laid flat in a relaxed state. If the side being measured is *circular*, the diameter is the appropriate measurement.

³Forms indicating “with a plastic component” refer to items that contain plastic but for which plastic is not the material constituting the greatest percentage of the item’s weight.

⁴Inclusion on this list reflects category-based evaluations of recyclability and compostability and does not constitute a product-specific determination of recyclability or compostability.

Abbreviations and Acronym List

CalRecycle: California Department of Resources Recycling and Recovery

CMC: Covered Material Category

HDPE: High-Density Polyethylene

LDPE: Low-Density Polyethylene

OCC: Old Corrugated Cardboard

PET: Polyethylene Terephthalate

PP: Polypropylene

PRC: Public Resources Code (California Statute)

PS: Polystyrene

PVC: Polyvinyl Chloride