

# Plastic Pollution Prevention and Packaging Producer Responsibility Act

## Non-Regulatory Public Workshop: Covered Material Categories and Source Reduction Baseline Reporting Guidance

SB 54 (Allen, Chapter 75, Statutes of 2022)

Department of Resources Recycling and  
Recovery (CalRecycle)

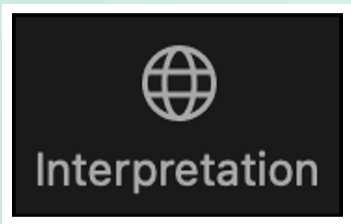
June 23, 2025



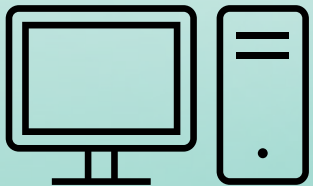
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# Today's Focus

- Present and solicit feedback on:
  - Covered material categories (CMCs) and *Draft* CMC Reporting Guidance
  - *Draft* Source Reduction Baseline (SRB) Reporting Guidance
- All previous public workshop materials are available on CalRecycle's SB 54 webpage under "Past Events."
- Not addressing today:
  - Regulations or draft regulatory text. Please refer to CalRecycle's SB 54 regulations webpage for regulatory updates.

# Agenda

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## **Moderator**

Marcus Santillano, Environmental Program Manager, Packaging EPR Section

## **Topic 1: Covered Material Categories**

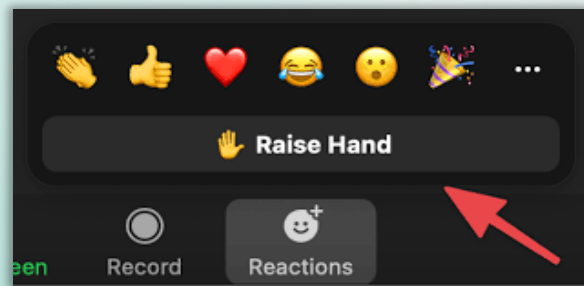
Rachel Messina, Environmental Scientist, Knowledge Integration Section

## **Topic 2: Draft Producer Reporting Guidance - Source Reduction Baseline**

Vanessa Cervantes, Environmental Scientist, Knowledge Integration Section

# Questions and Comments

- To make a comment in-person, please line up at the podium.
- To make an oral comment via Zoom, please raise your hand and the host will unmute you.



- To make a written comment via Zoom, please use the chat box.

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# Opening Remarks

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**Marcus Santillano**

Environmental Program Manager, Packaging EPR Section

# **Topic 1. Covered Material Categories**

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

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**Rachel Messina**

Environmental Scientist, Knowledge Integration Section



# Overview of Topic 1 Presentation

- **Part 1: Background**
- **Part 2: Feedback on Covered Material Categories**
- **Part 3: *Draft* Producer Reporting Guidance for Covered Material Categories**

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# Part 1. Background Information

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# Publication History

- **December 28, 2023:** [Covered Material Categories List](#)
  - First publication of list of covered material categories considered recyclable and eligible for being labeled compostable
  - PRC Section 42061(c)-(d)
- **July 1, 2024:** [Updates to Covered Material Categories](#)
  - List of covered material categories (updated from Dec 2023)
  - PRC Section 42061(a)
- **December 31, 2024:** [Updated Covered Material Categories List](#)
  - Same covered material categories as July 2024 update
  - List of covered material categories considered recyclable and eligible for being labeled compostable (updated from Dec 2023)
  - PRC Section 42061(e)

For additional background information, including on past workshops, please visit CalRecycle's [SB 54 Covered Material Categories List webpage](#).

# Relevant Definitions

- Covered Material – PRC 42041(e)
- Covered Material Category – PRC 42041(f)
- Packaging – PRC 42041(s)
- Plastic – PRC 42041(t)
- Plastic Component – PRC 42041(u)

Statutory definitions for these terms can be found in [PRC Section 42041](#).

# Covered Material - PRC 42041(e)

“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.

Exclusions of covered material can be found in PRC Section 42041(e)(2)(A-H).



# Covered Material Category (CMC) – PRC 42041(f)

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

# Packaging – PRC 42041(s)

- “Packaging” means any separable and distinct material component used for the containment, protection, handling, delivery, or presentation of goods by the producer for the user or consumer, ranging from raw materials to processed goods. “Packaging” includes, but is not limited to, all of the following:
  - (1) Sales packaging or primary packaging intended to provide the user or consumer the individual serving or unit of the product and most closely containing the product, food, or beverage.
  - (2) Grouped packaging or secondary packaging intended to bundle, sell in bulk, brand, or display the product.
  - (3) Transport packaging or tertiary packaging intended to protect the product during transport.
  - (4) Packaging components and ancillary elements integrated into packaging, including ancillary elements directly hung onto or attached to a product and that perform a packaging function, except both of the following:
    - (A) An element of the packaging or food service ware with a de minimis weight or volume, which is not an independent plastic component, as determined by the department.
    - (B) A component or element that is an integral part of the product, if all components or elements of the product are intended to be consumed or disposed of together.

## 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.

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## **Part 2. Feedback on Covered Material Categories**

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# Reviewing the Current Covered Material Categories

- We will be going over the most current covered material categories, by Material Class:

Category ID	Material Class	Material Type	Form
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# Glass Material Class

Category ID	Material Class	Material Type	Form
24_G1N	Glass	Glass	Bottles and Jars w/o plastic component
24_G1P	Glass	Glass	Bottles and Jars w/ plastic component
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
24_G3P	Glass	Glass	Small - Two or more sides measuring 2" or less w/ plastic component

# Glass Material Class

## **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 categories of covered material.

# Ceramic Material Class

Category ID	Material Class	Material Type	Form
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

# Ceramic Material Class

## **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 categories of covered material.



# Metal Material Class (1/2)

Category ID	Material Class	Material Type	Form
24_M1N	Metal	Aluminum	Non-aerosol container w/o plastic component
24_M1P	Metal	Aluminum	Non-aerosol container w/ plastic component
24_M2N	Metal	Aluminum	Foil sheets w/o a plastic component
24_M2P	Metal	Aluminum	Foil sheets w/ a plastic component
24_M3N	Metal	Aluminum	Foil Molded Containers w/o plastic component
24_M3P	Metal	Aluminum	Foil Molded Containers w/ plastic component
24_M4P	Metal	Aluminum	Aerosol can w/ plastic component
24_M5N	Metal	Aluminum	Aerosol can w/ plastic component
24_M5P	Metal	Aluminum	Other Forms w/ plastic component
24_M6N	Metal	Tin/Steel/Bimetal	Non-aerosol container w/o plastic component

# Metal Material Class (2/2)

Category ID	Material Class	Material Type	Form
24_M6P	Metal	Tin/Steel/Bimetal	Non-aerosol container w/ plastic component
24_M7P	Metal	Tin/Steel/Bimetal	Aerosol can w/ plastic component
24_M8N	Metal	Tin/Steel/Bimetal	Aerosol can w/o plastic component
24_M8P	Metal	Tin/Steel/Bimetal	Other Forms w/ plastic component
24_M9N	Metal	Other Nonferrous	All Forms w/o plastic component
24_M9P	Metal	Other Nonferrous	All Forms w/ plastic component
24_M10N	Metal	Other Ferrous	All Forms w/o plastic component
24_M10P	Metal	Other Ferrous	All Forms w/ plastic component
24_M12N	Metal	Metal	Small - Two or more sides measuring 2" or less w/o plastic component
24_M12P	Metal	Metal	Small - Two or more sides measuring 2" or less w/ plastic component

# Metal Material Class

## **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 categories of covered material.

# Paper and Fiber Material Class (1/2)

Category ID	Material Class	Material Type	Form
24_PF1N	Paper and Fiber	Kraft Paper	All Forms w/o plastic component
24_PF1P	Paper and Fiber	Kraft Paper	All Forms w/ plastic component
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
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
24_PF8P	Paper and Fiber	OCC	Waxed Cardboard w/ plastic component
24_PF9N	Paper and Fiber	OCC	Cardboard w/o plastic component

# Paper and Fiber Material Class (2/2)

Category ID	Material Class	Material Type	Form
24_PF9P	Paper and Fiber	OCC	Cardboard w/ plastic component
24_PF10N	Paper and Fiber	Paperboard	All Forms w/o plastic component
24_PF10P	Paper and Fiber	Paperboard	All Forms w/ plastic component
24_PF11N	Paper and Fiber	White Paper	All Forms w/o plastic component
24_PF11P	Paper and Fiber	White Paper	All Forms w/ plastic component
24_PF12N	Paper and Fiber	Other/Mixed Paper	All Forms w/o plastic component
24_PF12P	Paper and Fiber	Other/Mixed Paper	All Forms w/ plastic component
24_PF16N	Paper and Fiber	Paper and Fiber	Small – Two or more sides measuring 2” or less w/o plastic component
24_PF16P	Paper and Fiber	Paper and Fiber	Small – Two or more sides measuring 2” or less w/ plastic component



# Paper and Fiber Material Class

## **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 categories of covered material.

# Plastic Material Class (1/3)

Category ID	Material Class	Material Type	Form
24_P1P	Plastic	PET (#1)	Bottles, Jugs, and Jars (Clear/Natural)
24_P2P	Plastic	PET (#1)	Bottles, Jugs, and Jars (Pigmented/Color)
24_P38P	Plastic	PET (#1)	Other Rigid Containers, Cups, Lids, Plates, Trays, Tubs
24_P39P	Plastic	PET (#1)	Other Rigid Items
24_P5P	Plastic	PET (#1)	Flexible and Film Items
24_P6P	Plastic	HDPE (#2)	Bottles, Jugs and Jars (Clear/Natural)
24_P7P	Plastic	HDPE (#2)	Bottles, Jugs and Jars (Pigmented/Color)
24_P8P	Plastic	HDPE (#2)	Pails & Buckets
24_P40P	Plastic	HDPE (#2)	Other Rigid Items
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

# Plastic Material Class (2/3)

Category ID	Material Class	Material Type	Form
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
24_P41P	Plastic	PP (#5)	Other Rigid Containers, Cups, Lids, Plates, Trays, Tub
24_P19P	Plastic	PP (#5)	Utensils
24_P20P	Plastic	PP (#5)	Other Rigid Items
24_P21P	Plastic	PP (#5)	Clear Non-Bag Film
24_P22P	Plastic	PP (#5)	Other Flexible and Film Items
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

# Plastic Material Class (3/3)

Category ID	Material Class	Material Type	Form
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
24_P47P	Plastic	Plastic	Small – Two or more sides measuring 2” or less

# Plastic Material Class

## **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 categories of covered material.

# Wood and Other Organic Material Class (1/2)

Category ID	Material Class	Material Type	Form
24_WO1N	Wood and Other Organic Materials	Wood	All Untreated Forms w/o plastic component
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

# Wood and Other Organic Material Class (2/2)

Category ID	Material Class	Material Type	Form
24_WO3P	Wood and Other Organic Materials	Other/Mixed Organic	Other Forms w/o plastic component
24_WO4N	Wood and Other Organic Materials	Other/Mixed Organic	Other Forms w/o plastic component
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
24_WO6P	Wood and Other Organic Materials	Wood and Other Organic Materials	Small – Two or more sides measuring 2” or less w/ plastic component



# Wood and Other Organic Material Class

## **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 categories of covered material.

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## **Part 3. *Draft* Producer Reporting Guidance for CMCs**

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# ***Draft Producer Reporting Guidance for CMCs***

- Purpose of guidance: Provide information on how to categorize covered material items into the appropriate category to help ensure accurate and consistent producer reporting
- Draft guidance document includes:
  - Part I: Important Definitions and Concepts
  - Part II: Key for Categorizing Covered Material
  - Part III: Covered Material Categories List with Examples

# CMC Item 1: Glossary of Terms (1/4)

## Describing Material Type and Form

- **Container:** A lidded or fully sealed item that holds or stores a good, and serves a packaging, serving, or transporting function. Examples include carton, bottle, tub, and lidded bowl.
- **Component:** An item of covered material that (1) has no pieces or subparts or (2) is a piece or subpart of an item of covered material that is distinct in its composition or function compared to other components.
- **De minimis:** Per [PRC Section 42041\(s\)\(4\)\(A\)](#), an element of the packaging or food service ware with a de minimis weight or volume, which is not an independent plastic component, as determined by the department, is not packaging.
  - If a plastic component is considered de minimis, it should not be considered when evaluating how to categorize an item into a covered material category.
  - An item should not be considered de minimis if:
    - It is an independent plastic component
  - An item is not likely to be considered de minimis if:
    - Its presence on an item makes it more difficult to recycle or prevents recyclability.
    - Its presence on an item makes it more difficult to compost or prevents compostability.
    - Its management creates health or safety risks.

# CMC Item 1: Glossary of Terms (2/4)

## Describing Material Type and Form

- **Detachable component:** A component that may be detached completely from other components or material and is (1) designed to be easily detached by consumers or through waste/material collection or (2) typically detached by the consumer through regular usage.
- **Dominant material:** For items composed of multiple materials, the dominant material is the material which comprises the highest percentage of the item, by weight.
- **Flexible/Film:** Designed or intended to bend and change its shape and form through its use or the use of the good contained within. For flexible packaging, shape is influenced by the good contained within and may mold around the good. Examples include bubble wrap, plastic film on microwavable dinner, toothpaste tube, pouches.
- **Form:** Characteristics of material other than its specific dominant material, such as shape, size, functionality, and performance. Forms are specific to material type.
- **Item:** Either a single detachable component or a group of non-detachable components.
- **Material Class:** Broad categorization of the predominant materials. There are six material classes: Glass, Ceramic, Metal, Paper/Fiber, Plastic, Wood & Other Organic Materials.
- **Material Type:** More specific categorization of the predominant material within a Material Class (e.g., aluminum is a Material Type within the Metal Material Class).

# CMC Item 1: Glossary of Terms (3/4)

## Describing Material Type and Form

- **Multi-Material Laminate:** A particular material type that has multiple layers (2 or more) of mixed materials that are bonded to each other. Materials may be bonded or coated with plastic or non-plastic material. Examples include aseptic and gable top cartons.
- **Other Forms:** Categorization of covered material not clearly fitting within other categories. Innovations that constitute new forms not currently identified in the CMC framework would fall within “other forms” categories. If newly developed covered material does not fit into an existing category, it can be categorized as in an “other forms” category until the CMC list provides a more specific category.
- **Plastic:** “Plastic” is defined in PRC Section 42041(t). If a polymer is derived from human-made processes, it is not considered a naturally occurring polymer even if it is derived from natural materials. For example, PLA synthesized from corn using bacterial conversion and other processes, resulting in the polymerization of lactic acid to PLA, is a human-made process that results in plastic derived from natural materials.
- **Plastic component:** Any single piece of covered material made partially or entirely of plastic (PRC 42041(u)). The definition of “plastic” can be found in PRC 42041(t).
  - Examples of plastic components include: plastic label, plastic tape, plastic window, plastic handle, safety seal, utensils, plastic bottle, plastic jug, plastic lid or cap, and film wrap.



# CMC Item 1: Glossary of Terms (4/4)

## Describing Material Type and Form

- **Rigid:** Maintains its shape and form through ordinary usage. For rigid containers, the item maintains its shape and structure even when empty (or the good has been used). Examples include soup can, laundry detergent bottles, and bowls.
- **Textiles:** Material formed by synthetic fibers, non-synthetic (natural) fibers, or a combination of both. Examples of synthetic fibers include polyester and nylon. Examples of non-synthetic fibers include cotton and linen.

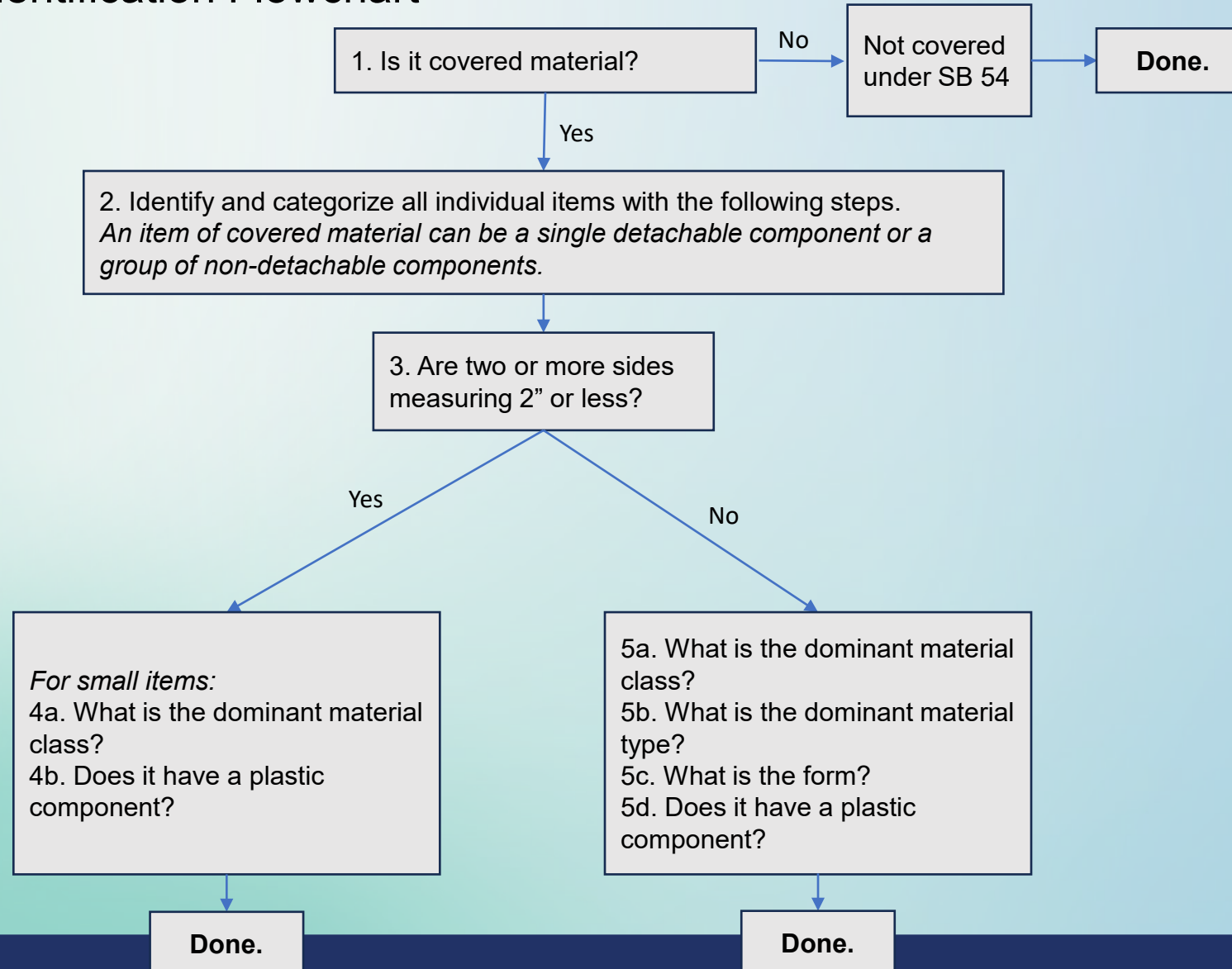


### **Request for Feedback:**

CalRecycle is seeking feedback from interested parties on the glossary of terms, including recommendations on additional terms that should be added to the glossary; and feedback on whether draft definitions provide sufficient clarity.

# CMC Item 2: Key for Categorizing Covered Material (1/2)

Figure 1. CMC Identification Flowchart



## CMC Item 2: Key for Categorizing Covered Material (2/2)

- The CMC Identification Flowchart is followed by additional written guidance correlating to each step in the flowchart, including:
  - Detailed explanation of each step in the flowchart
  - Specific statutory references
  - Definitions
  - Graphics showing concepts such as:
    - Detachable components
    - Measuring rigid and circular items
    - Flexible items
    - Dominance
    - Plastic components

**Request for Feedback:**

CalRecycle is seeking feedback from interested parties on the CMC identification flowchart, including suggestions on illustrations to include as part of the guidance to clarify concepts and recommendations on improving user-friendliness of the guidance.

# CMC Item 3: Covered Material Categories List with Examples

- The full table of CMCs, including a description and examples, is included in the guidance document

**Table 1. Data Collection for Covered Material Categories (based on CMC published July 1, 2024)**

Category ID	Material Class	Material Type	Form	Description and Examples
24_G1N	Glass	Glass	Bottles and Jars w/o plastic component	Means glass bottles and jars without any plastic component.  Examples include bottles and jars used to package food and personal care products.
24_G1P	Glass	Glass	Bottle and Jars w/ plastic component	Means glass bottles and jars with a plastic component.  Examples include bottles and jars used to package food and personal care products that have a non-detachable plastic label or plastic tamper evident ring.
24_G2N	Glass	Glass	Other Forms w/o plastic component	Means glass that is not in the form of a bottle or jar without any plastic component.  Examples include ampules and closed-ended tubes.

### **Request for Feedback:**

CalRecycle is seeking feedback from interested parties on the fifth column of the table provided in the draft guidance document (i.e., description and examples of each CMC), including feedback on areas where additional clarity is needed.

# **Topic 2. Draft Producer Reporting Guidance - Source Reduction Baseline**

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

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**Vanessa Cervantes**

Environmental Scientist, Knowledge Integration Section



# Overview of Topic 2 Presentation

- **Part 1: Background**
- **Part 2: *Draft* Source Reduction Baseline Guidance**

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# Part 1: Background

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# Part 1. Source Reduction Baseline Background

- The source reduction baseline is the amount of plastic covered material, including by weight of plastic covered material and number of plastic components, sold, offered for sale, or distributed in the state in the 2023 calendar year [[PRC Section 42057\(b\)](#)].
- CalRecycle published the [Source Reduction Baseline](#) on December 31, 2024:
  - 2.9 million tons of plastic covered material
  - 171.4 billion plastic components
- Supplementary Spreadsheets: Available by PRA request via [CalRecycle Public Records Center](#)



# Part 1. Background – SR Reporting

- Producers of covered material are required to report on the weight of plastic covered material and number of plastic components to measure source reduction progress ([PRC Section 42057\(c\)](#)).
- When estimating the weight of plastic covered material for source reduction, only the weight of plastic is included (i.e., the weight of any paper, metal, glass or other non-plastic is excluded).
- Reporting requirements are listed in [PRC Section 42057](#).

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## **Part 2. *Draft* Source Reduction Baseline Guidance**

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# ***Draft Producer Reporting Guidance for SRB***

- Purpose of guidance: Provide information for source reduction baseline and source reduction reporting of the:
  - (1) number of plastic components of covered material sold, offered for sale, or distributed in the state
  - (2) Weight of plastic covered material sold, offered for sale, or distributed in the state, excluding any weight of non-plastic components
- Draft guidance document includes:
  - Part I: Source Reduction Reporting
  - Part II: Important Definitions and Concepts
  - Part III: Guidance for Estimating Source Reduction Metrics
  - Part IV: Examples

# SRB Item 1. Important Definitions and Concepts

## Definitions Relevant to Source Reduction Baseline:

- Covered Material
- De Minimis
- Plastic
- Plastic Component
- Source Reduction



### **Request for Feedback:**

CalRecycle is seeking feedback from interested parties on the glossary of terms, including: (1) recommendations on additional terms that should be added to the glossary; and (2) feedback on whether draft definitions provide sufficient clarity.

## SRB Item 2. Guidance for Estimating Source Reduction Reporting Data

CalRecycle developed guidance for estimating the source reduction reporting data by producers, which provides clarity on the core concepts of how to estimate the number of plastic components and weight of plastic covered material. For more information, please refer to Part III of the draft SRB guidance document.

# SRB Item 2. Guidance for Estimating Source Reduction Reporting Data – Plastic Components

## How do you count plastic components?

1. Which parts of the covered material item include plastic?
2. Is a piece of covered material that contains plastic separable, meaning that it is typically detached by a consumer through ordinary usage or designed to be detached by a consumer or during or after collection?
3. For each separable part of covered material, are there subparts that are distinguishable in terms of resin type, form, or function?

## **SRB Item 2. Guidance for Estimating Source Reduction Reporting Data – Weight**

### **How do you estimate/measure the weight of plastic covered material?**

A piece of covered material may be comprised of plastic and nonplastic components. When providing an estimate of the weight of plastic covered material, only the plastic portion of the covered material is included in the weight estimate. For example, if a piece of covered material is made up of metal and plastic, only the weight of the plastic portion of that item is included in the estimated weight.

### **Request for Feedback:**

CalRecycle is seeking feedback from interested parties on guidance for estimating both number of plastic components and weight of plastic covered material, including whether guidance on counting plastic components provides sufficient clarity.

## SRB Item 3. Examples

SRB guidance document provides illustrative examples of covered material items and how to estimate the number of plastic components and weight of plastic covered material based on the composition of each item.

***Disclaimer:*** The examples and numbers listed here are for illustrative purposes only and are not intended to reflect product-specific data. Components marked as “not necessary to report” are assumed to have no plastic in their composition.

# Aseptic carton with plastic cap (1/2)

## Counting plastic components:

- Inner, middle, and outer polyethylene coatings (3 plastic components)
- Detachable plastic screw top (1 plastic component)
- Plastic neck for screw top (1 plastic component)

Number of units sold, offered for sale, or distributed in 2023: 10,000 units

**Number of plastic components:**  $5 \times 10,000 \text{ units} = 50,000$  plastic components



## Aseptic carton with plastic cap (2/2)

### **Estimating/measuring the weight of plastic covered material:**

- Paperboard (not necessary to report)
- Aluminum foil (not necessary to report)
- Polyethylene coatings: 10 g
- Detachable screw top: 2 g
- Plastic neck for screw top: 2 g

Number of units sold, offered for sale, or distributed in 2023: 10,000 units

**Weight of plastic covered material:**  $(10 \text{ g} + 2 \text{ g} + 2 \text{ g}) \times 10,000 \text{ units}$   
 $= 140,000 \text{ g (140 kg)}$

# Glass bottle with a plastic label and tamper-proof ring that remains on the bottle after the cap is opened (1/2)

## Counting plastic components:

- Plastic label (1 plastic component)
- Detachable plastic screw top (1 plastic component)
- Non-Detachable plastic tamper-proof ring (1 plastic component)

Number of units sold, offered for sale, or distributed in 2023: 10,000 units

**Number of plastic components:**  $3 \times 10,000 \text{ units} = 30,000 \text{ plastic components}$

## **Glass bottle with a plastic label and tamper-proof ring that remains on the bottle after the cap is opened (2/2)**

### **Estimating/measuring the weight of plastic covered material:**

- Glass bottle (not necessary to report)
- Plastic label: 2 g
- Detachable plastic screw top: 4 g
- Plastic tamper-proof ring: 2 g

Number of units sold, offered for sale, or distributed in 2023: 10,000 units

**Weight of plastic covered material:**  $(2 \text{ g} + 4 \text{ g} + 2 \text{ g}) \times 10,000 \text{ units} = 80,000 \text{ g (80 kg)}$

# Plastic stand-up, barrier pouch with perforated tear-notches and resealable zipper closure (1/2)

## Counting plastic components:

- Plastic pouch with perforated tear-notches (2 plastic components)
- Resealable plastic zipper closure (2 plastic components)

Number of units sold, offered for sale, or distributed in 2023: 500,000 units

**Number of plastic components:**  $4 \times 500,000 \text{ units} = 2,000,000 \text{ plastic components}$

# Plastic stand-up, barrier pouch with perforated tear-notches and resealable zipper closure (2/2)

## Estimating/measuring the weight of plastic covered material:

- Plastic barrier pouch: 10 g
- Separable, perforated seal of plastic barrier pouch: 0.5 g
- Plastic inner zipper, front: 1 g
- Plastic inner zipper, back: 1 g

Number of units sold, offered for sale, or distributed in 2023: 500,000 units

**Weight of plastic covered material:**  $(10 \text{ g} + 0.5 \text{ g} + 1 \text{ g} + 1 \text{ g}) \times 500,000 \text{ units} = 6,250,000 \text{ g} (6,250 \text{ kg})$

# Cardboard box sealed with tape (1/2)

## Counting plastic components:

- Plastic tape (2 plastic components)

Number of units sold, offered for sale, or distributed in 2023: 500 units

**Number of plastic components:**  $2 \times 500 \text{ units} = 1,000 \text{ plastic components}$

## Cardboard box sealed with tape (2/2)

### **Estimating/measuring the weight of plastic covered material:**

- Cardboard box (not necessary to report)
- Plastic tape: 3 g (1.5 g per piece of tape)

Number of units sold, offered for sale, or distributed in 2023: 500 units

**Weight of plastic covered material:**  $(3 \text{ g}) \times 500 \text{ units} = 1,500 \text{ g}$  (1.5 kg)



# Wooden pallet with plastic shrink film and plastic strapping (1/2)

## Counting plastic components:

- Plastic shrink film (1 plastic component)
- Plastic pallet straps (4 plastic components)

Number of units sold, offered for sale, or distributed in 2023: 50 units

**Number of plastic components:**  $5 \times 50 \text{ units} = 250 \text{ plastic components}$

# Wooden pallet with plastic shrink film and plastic strapping (2/2)

## Estimating/measuring the weight of plastic covered material:

- 1 piece of plastic shrink film/pallet: 200 g
- 4 plastic pallet straps/pallet: 135 g

Number of units sold, offered for sale, or distributed in 2023: 50 units

**Weight of plastic covered material:**  $(200 \text{ g} + 135 \text{ g}) \times 50 \text{ units} = 16,750 \text{ g} (16.75 \text{ kg})$

**Request for Feedback:**

CalRecycle is seeking feedback from interested parties on the illustrative examples, including suggestions for providing further clarity or whether specific illustrations would help.

# Opportunity for Written Feedback (1/2)

- **For comments related to this workshop and *Draft* CMC and SRB Guidance Documents**
  - CalRecycle requests written feedback be submitted no later than July 13, 2025
  - All written feedback can be submitted to [packaging@calrecycle.ca.gov](mailto:packaging@calrecycle.ca.gov) with the relevant subject line:
    - *"SB 54 Covered Material Categories Feedback"*
    - *"SB 54 Draft CMC Guidance Feedback"*
    - *"SB 54 Draft SRB Reporting Guidance Feedback"*

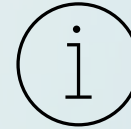
Additional guidance on the process for submitting written feedback can be found at the end of this workshop's Discussion Document.

# Opportunity for Written Feedback (2/2)

- **For Other Questions:**
  - All questions can be submitted to [packaging@calrecycle.ca.gov](mailto:packaging@calrecycle.ca.gov).
- **For Comments or Feedback on the Needs Assessment:**
  - All Needs Assessment comments or suggestions should be submitted to our [Needs Assessment SmartComment Portal](#).



## Ways to stay informed



[Sign-up for our SB 54 Listserv](#)

More information forthcoming; will be distributed through our [listserv](#) and available on the [SB 54 Webpage](#).

Email: [Packaging@CalRecycle.ca.gov](mailto:Packaging@CalRecycle.ca.gov)