

Source Reduction Reporting Guidance

Plastic Pollution Prevention and Packaging Producer Responsibility Act (the Act)
Department of Resources Recycling and Recovery (CalRecycle)

August 4, 2026

Note: This document updates the version previously published on July 17, 2026. Changes were made to update the image in Part IV, Example #2 to have larger text and to correct a typo in Example #7.

Disclaimer

This document is informational only, and use of it is optional. It is based on legal authority that was effective as of the date of publication, and it is subject to revision based on changes in applicable laws. In the event of any conflict between this document and any statutory or regulatory provision, the statutory or regulatory provision controls. This document is not intended to issue new statutory interpretations or to provide explanations not dictated by formal regulations. Specific factual scenarios are addressed on a case-by-case basis.

This document is not a waiver of any rights or remedies available to CalRecycle. Users are encouraged to seek the assistance of legal counsel regarding compliance with all laws applicable to their particular circumstances.

This guidance does not provide information on whether packaging components will be considered de minimis. Producers that are participants of the producer responsibility organization, Circular Action Alliance (CAA), may consult with CAA on whether packaging components may be considered de minimis.

Guidance Document Purpose

This document provides general information and guidance concerning estimations of the amount of plastic covered material sold, offered for sale, or distributed in the state, including the number of plastic components and the weight of the plastic covered material (Public Resources Code [\(PRC\) section 42057](#)).

- **Part I** contains an overview of source reduction requirements and responsibilities.
- **Part II** contains relevant definitions and concepts, including a glossary of terms pertaining to source reduction.
- **Part III** contains step-by-step guidance for estimating source reduction metrics.
- **Part IV** contains a subset of examples illustrating source reduction metrics.

Part I: Source Reduction Requirements Basics

Requirements

The source reduction targets, outlined in PRC section 42057, require the producer responsibility organization (PRO) to reduce plastic covered material (as measured by both weight and number of plastic components of plastic covered material sold, offered for sale or distributed in the state by producers compared to the 2023 baseline year) by at least:

- 10% by January 1, 2027
- 20% by January 1, 2030
- 25% by January 1, 2032

In meeting the targets, the PRO must utilize transitions to reusable or refillable alternatives to single-use plastic covered material by at least:

- 2% by January 1, 2027
- 4% by January 1, 2030
- 10% by January 1, 2032

The PRO **may** meet up to 8% of the source reduction requirements in any year through use of post-consumer recycled content in plastic covered material. Source reduction credit for post-consumer recycled content requires CalRecycle approval of an alternative compliance formula provided in the PRO plan.

The source reduction targets for plastic covered material are a collective responsibility that must be achieved through the PRO plan, rather than requirements applied uniformly to individual producers or uniformly to each covered material category. The PRO may achieve the targets from any combination of reductions to weight and number of plastic components from the collective universe of plastic covered material. All participant producers and plastic covered material reach compliance so long as the collective reductions realized through the PRO plan meet or exceed the target amounts.

Source Reduction Implementation and Responsibilities:

The PRO

The PRO must include mechanisms to achieve the collective source reduction targets as part of its PRO plan. The PRO must submit the PRO plan to CalRecycle by October 13, 2026, for approval by January 1, 2027.

The PRO will receive individual source reduction plans from participant producers and consider those plans in the development of source reduction mechanisms included in the PRO plan. The PRO is not required to submit individual source reduction plans to CalRecycle.

The PRO will receive source reduction data from producers annually and determine whether to adjust implementation of source reduction mechanisms to meet the collective source reduction requirements. The PRO must annually report source reduction data and progress toward meeting the source reduction requirements to CalRecycle.

Producers

Producers are required to join the PRO and contribute to implementation of the approved PRO plan (or apply to be an independent producer).

Producers are required to report annual data on the amount of plastic covered material sold, offered for sale, or distributed in the state to the PRO (or may opt into reporting directly to CalRecycle). **The law provides for the confidentiality of trade secret data submitted to the PRO and CalRecycle, provided that the submission satisfies the requirements of [14 CCR section 18980.14](#) for identifying the trade secrets.**

Producers are required to submit Individual Source Reduction Plans to the PRO according to the PRO's guidance. These individual plans will inform the collective source reduction plan prepared by the PRO and are not binding commitments on behalf of producers. **Individual source reduction plans should not be submitted directly to CalRecycle.**

CalRecycle

CalRecycle will review the PRO plan, including the source reduction component, and as part of the plan review and approval process will determine whether the collective efforts outlined in the plan meet the requirements of statute and regulation. **CalRecycle will not review individual source reduction plans.**

CalRecycle will review annual reports submitted by the PRO, including source reduction data, for compliance with statute and regulations.

Source Reduction Data Reporting and Confidentiality

The PRO will report the number of plastic components and weight of plastic covered material sold, offered for sale or distributed in the state as part of its PRO plan, plan updates, and annual reports submitted to CalRecycle. While the law requires that the PRO include some information in a disaggregated format to CalRecycle, the law provides for the confidentiality of producer-specific financial, production, and sales data, and other trade secret data submitted to the PRO and CalRecycle, provided that the submission satisfies the requirements of 14 CCR section 18980.14 for identifying the trade secrets. See PRC sections [42051.2\(b\)\(5\)](#), [42052\(e\)](#), and [42060\(a\)\(2\)\(E\)](#) for more information.

Part II: Important Definitions and Concepts

Source reduction requirements apply to **plastic covered material**, which includes single-use plastic packaging (primary, secondary, and tertiary) and single-use plastic food service ware. This includes items made entirely of plastic as well as items made partially of plastic (e.g., a paper box with a plastic window).

Note: Refer to [Identifying Covered Materials](#) for guidance on what constitutes covered material and when packaging may not be considered covered material.

Component: An item of covered material that (1) has no physically distinct subparts, or (2) is physically distinct from other pieces or subparts (e.g., distinct with respect to its composition or function). A piece or subpart of covered material is counted as a plastic component if the piece is made partially or entirely of plastic. For example, a piece of covered material made mostly of paper with a plastic lining would count as a plastic component, unless that plastic lining is de minimis.

De minimis exclusion: Elements of packaging that are of de minimis weight or volume are not covered material and therefore not subject to source reduction requirements. Producers may review [PRC section 42041\(s\)\(4\)\(A\)](#) and [14 CCR section 18980.2.2\(b\)](#) for additional language and guidance. CalRecycle will publish and maintain a list of components it has determined to be de minimis on CalRecycle's website. Producers participating in the producer responsibility organization, Circular Action Alliance (CAA), may consult with CAA concerning the de minimis exclusion.

Detachable component: A component that may be completely detached from all other components or material and is either of the following:

- A component that may be detached by consumers or during or after collection without the use of tools, substances, or nonmanual processes. A component is not necessarily “detachable” just because it may become detached during processing.
- A component that a consumer typically detaches or must detach to use the product.

Item: Either a single detachable component or a group of physically connected nondetachable components. In other words, “item” refers to an individual, unitary physical object as a whole. For example, a bottle with a nondetachable label is a single item, and the detachable cap associated with the bottle is also an item.

Plastic: In [PRC section 42041\(t\)](#), plastic is defined as 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.

Material that is synthetic (i.e., human-made) may still be plastic despite being made using naturally occurring ingredients. 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. The PLA would therefore not be considered a naturally occurring polymer.

Plastic component: As defined in [PRC section 42041\(u\)](#), plastic component means any single piece of covered material made partially or entirely of plastic. A single plastic component may constitute the entirety of the covered material item or a subpart (detachable or nondetachable).

Examples of plastic components include, but are not limited to: plastic labels, plastic tape, plastic windows, plastic handles, plastic safety seals, plastic utensils, plastic adhesives, plastic inks, plastic linings, plastic coatings, plastic meat trays, plastic valves, plastic pizza savers, plastic squeezable tubes, plastic straws, plastic stirrers, plastic bottles, plastic jugs, plastic lids or caps, plastic bulb ends, plastic zippers, plastic dispersions, plastic fasteners, plastic hang tabs, plastic hook-and-loop tapes, plastic bags, synthetic fabric bags, plastic thread, plastic hangers, plastic cold end coatings, plastic elastic loops, plastic barriers, plastic layers, and plastic film wraps.

Source reduction: Source reduction specified in [PRC section 42057](#) applies to **plastic** covered material and requires a reduction in the amount of plastic covered material sold, offered for sale, or distributed in the state relative to the baseline amount established by CalRecycle for 2023. See PRC sections [42041\(aj\)](#), [42057\(a\)\(1\)](#) and [42057\(b\)](#). Methods of source reduction include, but are not limited to, shifting covered material to reusable or refillable packaging or a reusable product or eliminating unnecessary packaging.

Source reduction does not include either of the following:

1. Replacing a recyclable or compostable covered material with a nonrecyclable or noncompostable covered material or a covered material that is less likely to be recycled or composted.
2. Switching from virgin covered material to post-consumer recycled content.

Additionally, according to PRC section 42057(a)(2)(B), up to 8% of source reduction may be achieved through an alternative compliance formula developed by the PRO, subject to CalRecycle's approval of the formula.

Part III: Guidance for Reporting Source Reduction Metrics

For both the source reduction baseline and source reduction reporting required under PRC section 42057(c)(1), two key metrics are required to be reported by producers:

1. **Number of plastic components** of plastic covered material sold, offered for sale, or distributed in the state.
2. **Total weight of plastic** included in the plastic covered material sold, offered for sale, or distributed in the state. The weight must not include nonplastic material, regardless of whether the covered material partially consists of nonplastic (i.e., paper, metal, glass, etc.).

Producers report these metrics for calendar year 2023 as required by 14 CCR section [18980.9](#) for source reduction baseline reporting. Producers report these metrics annually starting in 2026 for source reduction as required by PRC 42057(c)(1). This guidance does not address estimating the total weight of covered material supplied to the market, by covered material category, as required in 14 CCR section 18980.10.2 (a)(1).

A core concept of source reduction is the identification of plastic components. Part II describes what constitutes a plastic component. This part provides additional detail on how to count the number of plastic components and measure the weight of plastic covered material. Examples of how to estimate weight of plastic covered material and number of plastic components are provided in Part IV.

How do you count plastic components?

Each plastic component must be counted, excluding components that are de minimis. See **de minimis exclusions** in Part II, and [PRC section 42041\(s\)\(4\)\(A\)](#).

To count plastic components, follow these steps:

Step 1: Identify each detachable component.

Step 2: For each detachable component, identify the number of plastic components. To do so, identify each subpart that contains plastic and is physically distinct from other pieces or subparts (e.g., distinct with respect to its composition or function).

Nondetachable groupings of multiple plastic subparts that have a consistent composition across the entire item and serve the same function should be counted as a single plastic component.

For example, if a pouch is composed of two layers of different plastic resins laminated together, the pouch is a single plastic component because the

multilayer plastic has a distinct composition and function compared to other parts of the pouch. If the pouch additionally has a plastic pour spout, the plastic pour spout is an additional plastic component because it has a different composition and function from the multilayer pouch.

Step 3: Add together the number of plastic components from each detachable component to get the total number of plastic components.

How do you measure the weight of plastic covered material for source reduction reporting?

An item of covered material may be made of both plastic and nonplastic materials. For source reduction reporting, only the weight of the plastic portion should be included. For example, if a piece of covered material is made of both metal and plastic, only the weight of the plastic portion should be reported.

Step 4: Add together the weight of each plastic component identified previously (weight of plastic only) to estimate total weight of plastic covered material.

Part IV: Examples for Estimating Source Reduction Metrics

Disclaimer: The hypothetical examples and numbers provided here are for illustrative purposes only and are not intended to reflect product-specific data. In real-world applications, covered materials may vary in material composition or in the number of plastic components or weight of plastic covered material. For the purposes of the hypothetical examples, the total number of units sold, offered for sale or distributed in the state was assumed to be 1,000 units. Components marked as “not necessary to report” are assumed to contain no plastic.

Example #1: Deodorant container

Step 1: Identify each detachable component

- Main plastic container
- Plastic outer cap
- Plastic inner cap

Step 2: For each detachable component, identify the number of plastic components

- Main plastic container
 - Main plastic container (including barrier and finishing layers): 1 plastic component
 - Base/dial with nondetachable inner screw: 1 plastic component
 - Inner platform: 1 plastic component
 - Plastic labels (front and back, including adhesive used to attach labels and ink used on labels): 1 plastic component
 - Assumption: Both labels are nondetachable, have the same composition and function.
- Plastic outer cap: 1 plastic component
- Plastic inner cap: 1 plastic component



Step 3: Add together the number of plastic components from each detachable component

- Main plastic container: 4 plastic components
- Plastic outer cap: 1 plastic component
- Plastic inner cap: 1 plastic component

Total plastic components per unit: 6 plastic components per deodorant container

Step 4: Add together the weight of each plastic component

- Main plastic container (including barrier and finishing layers): 1.02 oz.
 - Base/dial with nondetachable inner screw: 0.3 oz.
 - Inner platform: 0.05 oz.
 - Main container labels (front and back): 0.115 oz.
- Plastic outer cap: 0.16 oz.
- Plastic inner cap: 0.05 oz.

Total plastic covered material by weight per unit: 1.695 oz. (0.106 lbs.) per deodorant container

Total number of units of deodorant sold, offered for sale or distributed in the state in a reporting year = 1,000 units

Total number of plastic components to be reported = 6 plastic components × 1,000 units = 6,000 total plastic components

Total weight of plastic covered material to be reported = 0.106 lbs. × 1,000 units = 106 lbs. total plastic covered material.

Example #2: Aseptic carton with plastic screw cap

Step 1: Identify each detachable component

- Plastic screw cap (plastic lid)
- Carton

Step 2: For each detachable component, identify the number of plastic components

- Plastic screw cap (plastic lid): 1 plastic component
- Carton
 - Carton body (including plastic layers, adhesives, and inks): 1 plastic component
 - Plastic neck for screw cap (plastic lid): 1 plastic component

Step 3: Add together the number of plastic components from each detachable component

- Plastic screw cap (plastic lid): 1 plastic component
- Carton: 2 plastic components

Total plastic components per unit: 3 plastic components per aseptic carton with plastic screw cap
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Step 4: Add together the weight of each plastic component

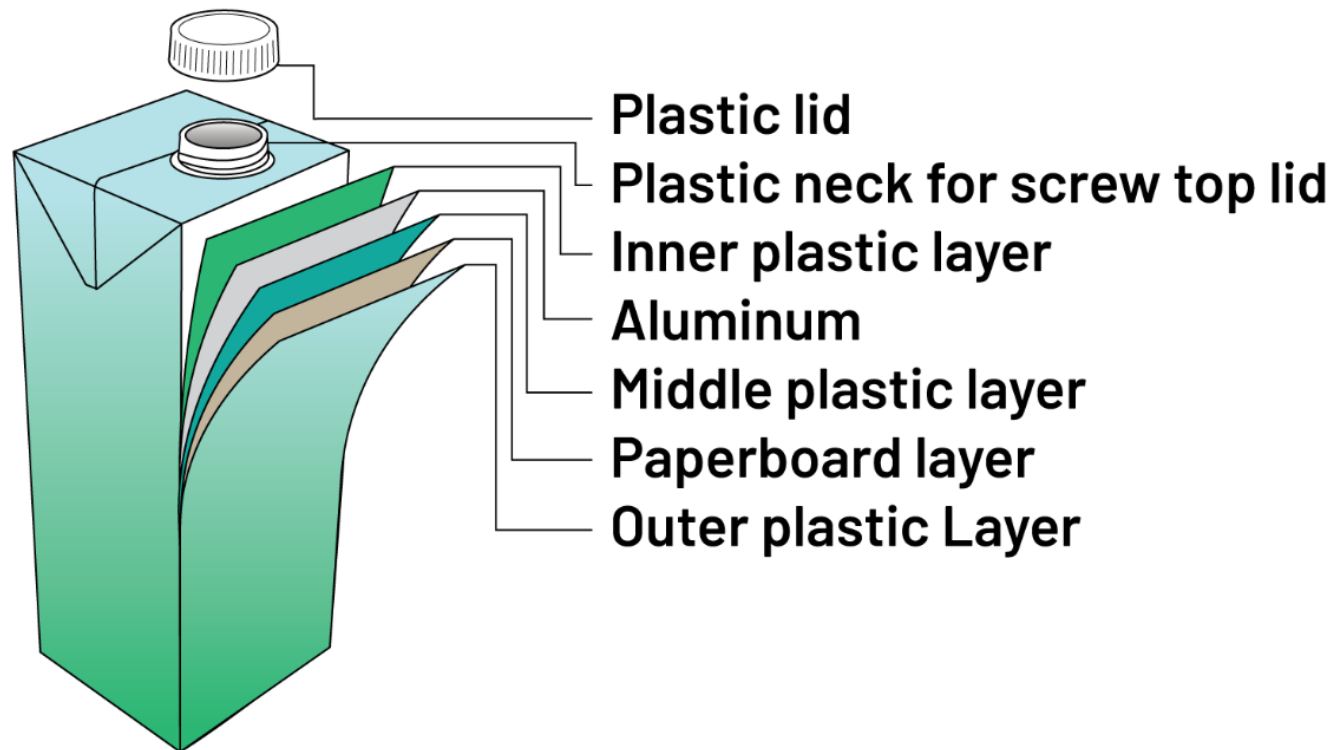
- Detachable plastic screw cap (plastic lid): 0.08 oz.
- Plastic neck for screw cap: 0.08 oz.
- Carton body (weight of three polyethylene layers, adhesives, and inks only): 0.372 oz.

Total plastic covered material by weight per unit: 0.532 oz. (0.033 lbs.) per aseptic carton with plastic screw cap
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Total number of units of aseptic cartons with plastic screw caps sold, offered for sale or distributed in the state in a reporting year = 1,000 units

Total number of plastic components to be reported = 3 plastic components × 1,000 units = 3,000 total plastic components

Total weight of plastic covered material to be reported = 0.033 lbs. × 1,000 units = 33 lbs. total plastic covered material.



Example #3: Glass bottle with plastic label and tamper-proof ring

Step 1: Identify each detachable component

- Glass bottle
- Plastic screw cap

Step 2: For each detachable component, identify the number of plastic components

- Glass bottle
 - Glass bottle (including plastic cold end coating): 1 plastic component
 - Inner plastic insert/spout: 1 plastic component
 - Nondetachable plastic tamper-proof ring: 1 plastic component
 - Plastic labels (front and back, including adhesive used to attach labels and ink used on labels): 1 plastic component
 - Assumption: Both labels are nondetachable and have the same composition and function.
- Plastic screw cap: 1 plastic component



Step 3: Add together the number of plastic components from each detachable component

- Glass bottle: 4 plastic components
- Plastic screw cap: 1 plastic component

Total plastic components per unit: 5 plastic components per glass bottle with a plastic label and tamper-proof ring
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Step 4: Add together the weight of each plastic component

- Glass bottle (weight of cold end coating only): 0.016 oz.
- Inner plastic insert/spout: 0.8 oz.
- Nondetachable plastic tamper-proof ring: 0.08 oz.

- Plastic labels (including adhesives and ink for the label): 0.016 oz.
- Plastic screw cap: 0.32 oz.

Total plastic covered material by weight per unit: 1.26 oz. (0.079 lbs.) per glass bottle with a plastic label and tamper-proof ring

Total number of units of glass bottle with plastic label and tamper-proof ring sold, offered for sale or distributed in the state in a reporting year = 1,000 units

Total number of plastic components to be reported = 5 plastic components × 1,000 units = 5,000 total plastic components

Total weight of plastic covered material to be reported = 0.079 lbs. × 1,000 units = 79 lbs. total plastic covered material.

Example #4: Plastic, stand-up barrier pouch with perforated tear-notches and resealable zipper closure

Step 1: Identify each detachable component

- Main plastic film pouch
- Detachable film pouch top

Step 2: For each detachable component, identify the number of plastic components

- Main plastic film pouch
 - Main plastic film pouch (including plastic layers, plastic barrier layers, plastic tie layers, plastic inks, and plastic adhesives): 1 plastic component
 - Zipper: 1 plastic component
- Detachable film pouch top: 1 plastic component

Step 3: Add together the number of plastic components from each detachable component

- Main plastic film pouch: 2 plastic components
- Detachable film pouch top: 1 plastic component

Total plastic components per unit: 3 plastic components per plastic stand-up barrier pouch

Step 4: Add together the weight of each plastic component

- Main plastic film pouch (including plastic layers, plastic barrier layers, plastic tie layers, plastic inks, and plastic adhesives): 0.051 oz.
- Zipper: 0.1 oz.
- Detachable film pouch top: 0.0051 oz.

Total plastic covered material by weight per unit: 0.1561 oz. (0.0098 lbs.)
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Total number of units of plastic, stand-up barrier pouch with perforated tear-notches and resealable zipper closure sold, offered for sale or distributed in the state in a reporting year = 1,000 units

Total number of plastic components to be reported = 3 plastic components × 1,000 units = 3,000 total plastic components

Total weight of plastic covered material to be reported = 0.0098 lbs. × 1,000 units = 9.8 lbs. total plastic covered material.

Example #5: Plastic bottle with a paper label

Step 1: Identify each detachable component

- Plastic container
- Plastic lid
- Plastic foam seal

Step 2: For each detachable component, identify the number of plastic components

- Plastic container
 - Plastic container: 1 plastic component
 - Paper label (including plastic adhesive and plastic ink): 1 plastic component
 - Assumption: The plastic in the adhesive and ink is a nondetachable grouping and consists of 1 plastic component together. The paper, as a nonplastic component, is not counted toward the plastic components.
- Plastic lid: 1 plastic component
- Plastic foam seal (including plastic adhesive and plastic ink): 1 plastic component

Step 3: Add together the number of plastic components from each detachable component

- Plastic container: 2 plastic components
- Plastic lid: 1 plastic component
- Plastic foam seal: 1 plastic component



Total plastic components per unit: 4 plastic components per plastic bottle with paper label
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Step 4: Add together the weight of each plastic component

- Plastic container: 0.35 oz.
- Paper label (weight of plastic adhesive and plastic ink only): 0.002 oz.
- Plastic lid: 0.1 oz.
- Plastic foam seal: 0.052 oz.

Total weight of plastic covered material per unit: 0.504 oz. (0.032 lbs.) per plastic bottle with paper label

Total number of units of plastic bottle with a paper label sold, offered for sale or distributed in the state in a reporting year
= 1,000 units

Total number of plastic components to be reported = 4 plastic components × 1,000 units = 4,000 total plastic components

Total weight of plastic covered material to be reported = 0.032 lbs. × 1,000 units = 32 lbs. total plastic covered material.

Example #6: Cereal Box

Step 1: Identify each detachable component

- Paperboard box
- Plastic inner bag

Step 2: For each detachable component, identify the number of plastic components

- Paperboard box: (including plastic coatings, plastic adhesive, and plastic ink): 1 plastic component
 - Assumption: The plastic in the coatings, adhesive, and ink is a nondetachable grouping and consists of 1 plastic component together. The paper, as a nonplastic component, is not counted toward the plastic components.
- Plastic inner bag (including all plastic layers and adhesives): 1 plastic component

Step 3: Add together the number of plastic components from each detachable component

- Paperboard box: 1 plastic component
- Plastic inner bag: 1 plastic component

Total plastic components per unit: 2 plastic components per cereal box

Step 4: Add together the weight of each plastic component

- Paperboard box (including plastic coatings, plastic adhesive, and plastic ink): 0.003 oz.
- Plastic inner bag: 0.101 oz.

Total weight of plastic covered material per unit: 0.104 oz. (0.0065 lbs.) per cereal box
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Total number of units of cereal boxes sold, offered for sale or distributed in the state in a reporting year = 1,000 units

Total number of plastic components to be reported = 2 plastic components × 1,000 units = 2,000 total plastic components

Total weight of plastic covered material to be reported = 0.0065 lbs. × 1,000 units = 6.5 lbs. total plastic covered material.

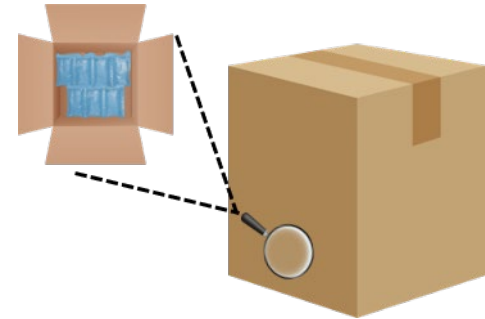
Example #7: Corrugated cardboard shipping box containing plastic air pillows and sealed with tape

Step 1: Identify each detachable component

- Corrugated cardboard shipping box
- Perforated plastic air pillows

Step 2: For each detachable component, identify the number of plastic components

- Corrugated cardboard shipping box
 - Cardboard box (including plastic adhesive between cardboard layers): 1 plastic component
 - Assumption: The plastic in the adhesive used to construct the corrugated box consists of 1 plastic component. The cardboard box, as a nonplastic component, is not counted toward the plastic components.
 - Plastic tape (2 discontinuous pieces including the plastic backing and plastic adhesive): 1 plastic component
 - Assumption: Both pieces of tape are nondetachable and have the same composition and function.
- Perforated plastic air pillows (7 pillows): 7 plastic components
 - Assumption: Air pillows separated by perforations, whether the air pillows remain attached or not, are each considered a plastic component



Step 3: Add together the number of plastic components from each detachable component

- Corrugated cardboard shipping box (including plastic adhesive): 1 plastic component
- Plastic tape (2 discontinuous pieces including the plastic backing and plastic adhesive): 1 plastic component
- Perforated plastic air pillows: 7 plastic components

Total plastic components per unit: 9 plastic components per corrugated cardboard shipping box containing plastic air pillows

Step 4: Add together the weight of each plastic component

- Corrugated cardboard shipping box (including plastic inner adhesive on box): 0.001 oz.
- Plastic tape (2 discontinuous pieces including the plastic backing and plastic adhesive): 0.0009 oz.
- Perforated plastic air pillows: 0.07 oz.

Total weight of plastic covered material per unit: 0.0719 oz. (0.0045 lbs.) per corrugated cardboard shipping box containing plastic air pillows

Total number of units of corrugated cardboard shipping box containing plastic air pillows and sealed with tape sold, offered for sale or distributed in the state in a reporting year = 1,000 units

Total number of plastic components to be reported = 9 plastic components × 1,000 units = 9,000 total plastic components

Total weight of plastic covered material to be reported = 0.0045 lbs. × 1,000 units = 4.5 lbs. total plastic covered material.

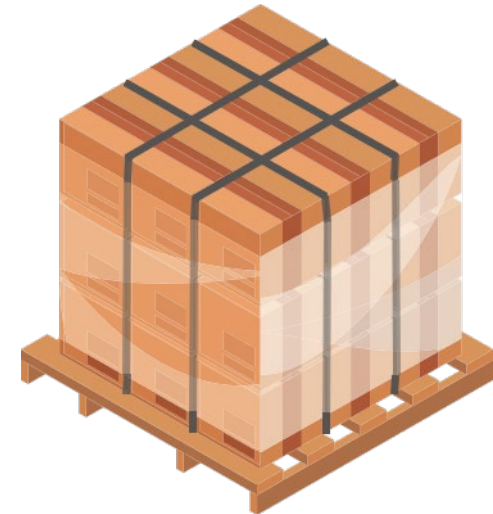
Example #8: Reusable pallet with plastic stretch film and plastic strapping

Step 1: Identify each detachable component

- Plastic stretch film
- Plastic pallet straps

Step 2: For each detachable component, identify the number of plastic components

- Plastic stretch film: 1 plastic component
 - Assumption: One continuous piece of film was used.
- Plastic pallet straps: 4 plastic components
 - Assumption: Four distinct and detachable straps were used.



Step 3: Add together the number of plastic components from each detachable component

- Plastic stretch film: 1 plastic component
- Plastic pallet straps: 4 plastic components

Total plastic components per unit: 5 plastic components per reusable pallet with plastic stretch film and plastic strapping

Step 4: Add together the weight of each plastic component

- Plastic stretch film: 4.8 oz.
- Plastic pallet straps: 1.6 oz.

Total weight of plastic covered material per unit: 6.4 oz. (0.4 lbs.) per reusable pallet with plastic stretch film and plastic strapping

Total number of units of reusable pallet with plastic stretch film and plastic strapping sold, offered for sale or distributed in the state in a reporting year = 1,000 units

Total number of plastic components to be reported = 5 plastic components × 1,000 units = 5,000 total plastic components

Total weight of plastic covered material to be reported = 0.4 lbs. × 1,000 units = 400 lbs. total plastic covered material.

Example #9: Soup can with a de minimis¹ plastic lining

Step 1: Identify each detachable component

- Metal (steel) can
- Metal (steel) can lid

Step 2: For each detachable component, identify the number of plastic components

- Metal (steel) can
 - Metal (steel) can with plastic barrier coating: 0 plastic components
 - Assumption: The metal can, as a nonplastic component, is not counted toward the plastic components. The plastic barrier coating is not counted toward the plastic components as it is de minimis (for the purposes of this example).
 - Paper label (including plastic adhesive and plastic ink): 1 plastic component
- Metal (steel) can lid: 0 plastic components
 - Assumption: The metal lid, as a nonplastic component, is not counted toward the plastic components. The plastic barrier coating is not counted toward the plastic components as it is de minimis (for the purposes of this example).



¹This example is for illustrative purposes only. CalRecycle will publish and maintain a list of all components it has affirmatively deemed to be de minimis on [CalRecycle's website](#) pursuant to CCR 18980.2.2(b)(4). For more information see definition for “de minimis exclusions” in Part II of this document.

Step 3: Add together the number of plastic components from each detachable component

- Paper label (including plastic adhesive and plastic ink): 1 plastic component

Total plastic components per unit: 1 plastic component per soup can with a plastic lining

Step 4: Add together the weight of each plastic component

- Paper label (weight of plastic adhesive and plastic ink only): 0.002 oz.

Total weight of plastic covered material per unit: 0.002 oz. (0.000125 lbs.) per soup can with a plastic lining

Total number of units of soup can with a de minimis plastic lining offered for sale or distributed in the state in a reporting year = 1,000 units

Total number of plastic components to be reported = 1 plastic component × 1,000 units = 1,000 total plastic components

Total weight of plastic covered material to be reported = 0.000125 lbs. × 1,000 units = 0.125 lbs. total plastic covered material.

Abbreviations

- CalRecycle: California Department of Resources Recycling and Recovery
- CAA: Circular Action Alliance
- CCR: California Code of Regulations
- Lb.(s.): Pound(s)
- Oz.: Ounce(s)
- PRC: Public Resources Code
- PRO: Producer Responsibility Organization