

Draft Screening Criteria for Determining Priority Packaging Types

Released: July 20, 2017

Revised: July 26, 2017

CalRecycle has extended the date for initial comments to August 4, 2017.

Please note that comments received after August 4, 2017 and before the September 19, 2017 workshop will still be considered, but may not be reflected in the documents for the September 19, 2017 workshop. However, one purpose of the workshop is to further discuss the screening criteria.

In preparation for the [September 19, 2017, public workshop](#) on this topic, CalRecycle is soliciting stakeholder input on potential screening criteria, which are listed below along with the data sources that will be used to evaluate each criterion. CalRecycle will consider revising these criteria based on feedback received by August 4, 2017.

Background

Over the last four years, CalRecycle hosted several public workshops on best approaches to handle packaging in the waste stream. At the September 2016 public meeting, CalRecycle's Director instructed staff to develop a comprehensive statewide mandatory packaging model. In March 2017, CalRecycle hosted a workshop soliciting stakeholder feedback on mandatory policy models that the Department could explore.

Given that there is not a one-size-fits-all policy solution for all packaging, the Department is choosing to evaluate which mandatory policy models (e.g., Extended Producer Responsibility, etc.) and instruments (e.g., minimum content, etc.) might be best suited to increasing collection and recovery of specific packaging types. In order to do this, staff are developing a set of screening criteria to determine which packaging types could be prioritized for analysis relative to different mandatory policy approaches.

CalRecycle will use the criteria to evaluate different packaging types to determine their relative priority. After that, CalRecycle will evaluate each packaging type relative to mandatory policy models and instruments, including those discussed at the [March 22, 2017 public workshop](#). The results of these analyses will be shared at the September 19, 2017, public workshop.

Draft Screening Criteria

Criteria Name	Criteria Description
Waste-Related Criteria	
1. Prevalence in waste stream	Does the packaging product/product category contribute significantly to the overall waste stream? Data sources could include: <ul style="list-style-type: none">• 2014 Disposal-Facility-Based Characterization of Solid Waste in California• City of San Diego Waste Characterization Study 2012-2013• 2009/2010 Oregon Solid Waste Characterization and Composition Study

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2. Increasing or steady usage trend	Is the product usage holding steady or increasing?
	Data sources could include: <ul style="list-style-type: none"> • US EPA Advancing Sustainable Materials Management: Facts and Figures Fact Sheet • Industry publications and other data sources
3. Current collection infrastructure	Is the packaging product/product category not collected by California curbside programs?
	Data sources could include: <ul style="list-style-type: none"> • 2015-2016 Centralized Study on Availability of Recycling • 2014 Disposal-Facility-Based Characterization of Solid Waste in California
4. Current processing infrastructure	Are material recovery facilities unable to feasibly process the packaging product/product category collected by California curbside programs?
	Data sources could include: <ul style="list-style-type: none"> • 2016-2017 Materials Recycling and Processing in the United States, Data available for purchase from Governmental Advisory Associates
5. Contamination of material	Is the packaging product/product category highly contaminated in the collection process? Is it a significant contaminant for other material streams?
	Data sources could include: <ul style="list-style-type: none"> • Composition of Commingled Recyclables Before and After Processing, Oregon Department of Environmental Quality • CalRecycle Rate Determination Bale Study
6. Reusability and Recyclability	Is the packaging product/product category designed to be reused and/or recycled?
	Data sources could include: <ul style="list-style-type: none"> • Association of Plastic Design Guide for Plastics Recyclability • Existing statutes defining reusability in other programs (eg, RPPC and SB 270)
Other Environmental Criteria	
7. Greenhouse gas impacts	Does reducing, reusing, or recycling the package product/product category represent a potential net greenhouse gas savings compared to landfilling?
	Data sources could include: <ul style="list-style-type: none"> • California ARB Waste Diversion GHG Emission Reductions • US EPA WARM Model
8. Waterway and marine debris	Does the packaging product/product category contribute to trash-related water concerns and/or negatively impact the waterway and marine environment?
	Data sources could include: <ul style="list-style-type: none"> • California Coastal Cleanup Day Results • Ocean Conservancy trash index • California Ocean Plan • Total Maximum Daily Load data for State and Regional Water Boards

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Staff is seeking initial feedback on the draft screening criteria by August 4, 2017. In particular:

1. Are there other criteria the Department should consider? If so, why?
2. Are there criteria listed above that the Department should *not* consider? If not, why?
3. Are there criteria that the Department should prioritize in the screening process?
4. What limitations to the proposed criteria should the Department be aware of?
5. Are there other data sources the Department should consult when evaluating the criteria?

Staff is also seeking feedback on the point of generation of discarded packaging (draft criteria #9) as a potential screening criteria. For example, should the Department differentiate between discarded packaging generated at residential, commercial, or industrial sources? What data sources should be used to quantify the point of generation of discarded packaging?

This is a first opportunity to comment on the screening criteria. Stakeholders will have an additional chance to comment on the screening criteria and their impact on the selected priority packaging products at the September 19, 2017, public workshop.

Please send comments to packaging@calrecycle.ca.gov.

For more information: <http://www.calrecycle.ca.gov/ReduceWaste/Packaging/>