

Resin Switching

Discussion #4



- On November 2007, the CIWMB (predecessor to CalRecycle) directed that Resin Switching be removed from the proposed regulation language.

Current Statutes



Public Resources Code (PRC)

Section 42301 (j)(1)

“Source Reduction”

Current Statutes



PRC

Section 42301 (j)(2)(A)

Substitution of different
material type is not source
reduced

Current Statutes



PRC

Section 42301 (i)(3)

Single Resin Type Used for
Determining Recycling Rate

Current Statutes



PRC

Section 42301 (j)(2)(C)

Packaging changes cannot
adversely affect recycling

Material Type

- **Current Regulations: 17943 (b)(14)**

Includes broad feedstock categories such as paper, glass, plastic or aluminum.

- **45-Day Regulations: 17943 (f)**

refers to feedstock categories, such as, but not limited to, paper, glass, aluminum and individual plastic resins.

Source Reduced Container

- **Current Regulations:** 17943 (b)(31)(D)(1)
Allows the manufacturing of a container with a different resin than was used for the non-source reduced container.
- **45-Day Regulations:** 17943 (w)
At the direction of the Board, the proposed regulations do not include resin switching as a source reduction option.

Two Points of View Regarding Compliance

- View Resin Switching is permitted
 - Meets PRC Section 42301 (j)(1)(B)
- View Resin Switching is not permitted
 - Meets PRC 42301 (j)(2) (A) and (C)

See 45-Day Regs and Hand-
Out #4

<http://www.calrecycle.ca.gov/Laws/Rulemaking/RPPC/default.htm>

Key Issues needing to be addressed



- **PRC 42301 (i)(3):**

 - Single resin type defined.

- **PRC 42301 (j)(2)(A):**

 - Substituting a different material type for a material that previously constituted the principal material of the container.

- **PRC 42301 (j)(2)(C):**

 - Packaging changes that adversely affect the potential for the RPPC to be recycled or to be made of postconsumer material.