

# PCR CONTENT REQUIREMENTS

California SB 54 and Washington's SB 5022

Current as of May 2026



## Why This Matters Now

Post-consumer recycled (PCR) content refers to materials recovered from consumer waste (such as plastic bottles, cardboard boxes, paper products) and reprocessed into new, usable products or packaging. Unlike Extended Producer Responsibility (EPR) rules, which are primarily administrative and financial obligations, PCR content requirements cover product formulation, packaging design, supplier relationships, and procurement strategy.

PCR content mandates are a distinct but related layer within the broader packaging compliance picture. They operate on their own timeline and enforcement structure, separate from EPR fee programs.

Two states have enacted PCR content requirements for personal care product packaging: California under SB 54 and Washington under SB 5022 (phased thresholds currently in effect).

## California SB 54: PCR Requirements

California's SB 54 implementing regulations took effect May 1, 2026. The regulations allow PCR incorporation to count toward source reduction targets through an alternative compliance formula. Under the law, the Producer Responsibility Organization (PRO) plan administered by the Circular Action Alliance must describe how PCR content will be incorporated into covered material, including specific amounts.

- Third-party validation is required. PCR content used for compliance credit is subject to independent third-party validation.
- The 2032 recyclability mandate operates in parallel. SB 54 requires that by 2032, all covered single-use packaging and plastic single-use food service ware sold in California be recyclable or compostable.

## Washington's SB 5022: PCR Requirements

In Washington, PCR content thresholds are already phasing in for several plastic packaging categories. Household cleaning and personal care product containers must meet 15 percent PCR content by 2025, 25 percent by 2028, and 50 percent by 2031.

- Covered categories under Washington's recycled content law include plastic beverage containers, plastic trash bags, and household cleaning and personal care product containers ranging from 8 ounces to 5 gallons. Products packaged in plastic aerosol containers are not covered.
- Exclusions are available for certain products. Certain FDA-regulated categories – including prescription and nonprescription drugs, dietary supplements, medical devices, and medical products required to be sterile – are excluded by statute. Other products may qualify for exemption on a case-by-case basis if technical or regulatory barriers can be demonstrated.
- Enforcement is active. Washington's PCR content law functions as a product standard; violations are subject to penalties enforced by the Department of Ecology.

## PCR Compliance Considerations

Compliance with PCR content requirements extends into supply chain and documentation as much as packaging design. Key topics include:

- 1. Packaging inventory.** Map all packaging formats by material type, current PCR content (if any) and applicable state requirements. California and Washington have different covered categories, so inventory should be structured to support both assessments simultaneously.
- 2. PCR-eligible format identification.** Not all packaging can practically incorporate PCR content at required levels. Formats with direct product contact, formats subject to FDA safety standards, and multimaterial constructions (for example, laminated tubes and composite dispensers) may face technical constraints. Identifying which formats are candidates for PCR incorporation and which require redesign or an exemption analysis is typically an early step.
- 3. PCR supplier qualification.** PCR content must be sourced from suppliers who can document that the material was recovered from post-consumer waste streams. (For California specifically, that documentation is expected to support independent third-party validation once regulations are finalized.) Some states are beginning to address PFAS contamination in PCR streams, which may be a consideration in supplier qualification.
- 4. Documentation.** Both California and Washington require documentation of PCR content reporting. Records should be structured to demonstrate the source and quantity of PCR material used and should be maintained in a format that can support third-party review or agency inquiries.

## Key Requirements

Requirement	State	Effective/Deadline
PCR content thresholds (plastic packaging)	California (SB 54)	Effective May 1, 2026; amounts set through PRO program plan
PCR content thresholds (household cleaning and personal care product containers)	Washington (SB 5022)	15% by 2025; 25% by 2028; 50% by 2031
100% recyclable or compostable packaging	California (SB 54)	2032
Third-party PCR validation	California (SB 54)	Required under final regulations

### Primary Sources

[California SB 54 \(Plastic Pollution Prevention and Packaging Producer Responsibility Act\)](#), [CalRecycle SB 54 implementation](#), [Washington SB 5022 \(Chapter 70A.245 RCW\)](#), [Washington Department of Ecology recycled content program](#).