Post-Consumer Recycled Content (PCR) – Policy Priorities

Sustainable Food Policy Alliance (SFPA) member companies have set ambitious goals to integrate postconsumer recycled content (PCR) into our packaging. Increasing PCR in packaging – combined with improved recycling capabilities across the country – is critical to move the U.S. closer to a circular economy.

Based on our experience across a wide variety of packaging materials and formats globally, we have identified the following policy priorities to develop a robust supply of PCR. In order to meet any proposed PCR requirements, there must be significant shifts in our nation's current waste management and recycling systems to collect and sort the resins we use. Most significantly, one key aspect in order to use PCR in our food packaging is that we must ensure that packaging we use has received a no objection letter (NOL) from the U.S. Food and Drug Administration (FDA), which ensures our food contact materials meet the highest standards of safety.

We are supportive of PCR requirements that complement broader efforts to modernize and improve U.S. recycling infrastructure, standardize definitions, dates, and rates across the country, and ultimately improve the quality of PCR – especially for use in food packaging. SFPA supports policy solutions that include the following:

Policy Priorities

1. PCR mandates must be preceded by or combined with an Extended Producer Responsibility (EPR) program to ensure that the system collects and recycles enough material for consumer brands to meet PCR requirements.
2. A market assessment must be performed before a PCR mandate takes effect to determine whether the standard is feasible and sets out an achievable timeline for implementation based on both material availability and realistic packaging technology updates.
3. Uniformity of mandate requirements and implementation dates across states and packaging types is essential given the national reach of the consumer product goods industry. Requirements should focus on primary packaging.
4. Legislative definitions of key terms should align with recognized and widely accepted definitions from organizations such as the Environmental Protection Agency, The Ellen MacArthur Foundation, and the International Organization for Standardization for clarity and consistency purposes. Definitions should allow for all types of technology to produce recycled content, including advanced recycling.
5. A process to allow for an exemption from PCR requirements while regulatory food safety approvals are pending must be included. Producers cannot use food packaging with PCR until the material has been reviewed by the FDA and a NOL has been issued. Today, this is a lengthy process that is conducted on a case-by-case basis.