

## PROBLEMATIC MATERIALS

*SPC's mission is to bring together sustainable packaging stakeholders to catalyze actionable improvements to packaging systems and lend an authoritative voice on issues related to packaging sustainability.*

*SPC has engaged with the U.S. Plastics Pact since its inception as an activator and as a participant in multiple workstreams. The Problematic Materials workstream worked with Pact Activators to “take measures to eliminate 11 problematic and unnecessary resins, components, and formats by 2025 in order to accelerate progress toward a circular economy for plastic packaging in the United States”.*



The SPC supports the framing of the following materials as “problematic” based on our experience with ongoing challenges to their acceptance, sortation, and processing in recycling and composting infrastructure, as well as material health concerns. Our position is informed by industry data that has been reviewed by our staff, including through our sister program How2Recycle, as well as the current state of affairs of the marketplace. The Association for Plastic Recyclers (APR) has also [expressed support](#) for the Pact’s list and believes it can lead to investments in recovery technologies that will help increase the recovery of currently-problematic materials.

Below, find a table of materials as defined by the USPP and our associated comments, stance, and resources for the identified problematic materials.

Material (as described by USPP)	SPC comments, stance, and resources
Cutlery*	<p>The SPC encourages elimination as the first step to reducing the impacts and emissions of packaging.</p> <p>Read SPC’s <a href="#">Guidance on Compostable Packaging</a> and <a href="#">Reusable Packaging</a>.</p>
Intentionally added <sup>1</sup> Per- and Polyfluoroalkyl Substances (PFAS) <sup>2</sup>	<p>SPC’s <a href="#">CleanPackage</a> program can help companies identify and source alternatives to PFAS.</p> <p>Since January 2020, How2Recycle has determined that any packaging containing intentionally added PFAS <a href="#">will be labeled Not Yet Recyclable</a>. In 2021, How2Recycle <a href="#">established additional criteria</a> for when material health considerations will impact recyclability claims.</p>
Non-Detectable Pigments such as Carbon Black	<p>How2Recycle requires the disclosure of black pigments in plastic packaging. Near infrared (NIR) testing is required for all rigid black packaging. Rigid black plastic packages that are not tested or do not pass testing as Preferred will receive a Not Yet Recyclable label.</p>

Material (as described by USPP)	SPC comments, stance, and resources
Opaque or Pigmented PET – Polyethylene Terephthalate bottles (any color other than transparent blue or green)	How2Recycle requires the disclosure of color in PET packaging. Clear, transparent blue, and transparent green PET bottles are eligible for a Widely Recyclable label.
Oxo-Degradable Additives, including oxo-biodegradable additives	Read SPC’s separate position statement on additives <a href="#">here</a> .
PETG – Polyethylene Terephthalate Glycol in rigid packaging	How2Recycle typically designates this format and material as Not Yet Recyclable and recommends changing to a material or format that is closer to a Widely Recyclable designation.
Problematic Label Constructions – This includes adhesives, inks, materials (e.g., PETG, PVC, PLA, paper)	How2Recycle recommends using labels that have received APR Critical Guidance Recognition for all plastic packaging. Additional considerations and testing may be required for labels that are known to cause reprocessing and sortation challenges.
PS – Polystyrene, including EPS (Expanded Polystyrene)	Polystyrene packaging components, both rigid and EPS, are determined to be Not Yet Recyclable by How2Recycle.
PVC – Polyvinyl Chloride, including PVDC (Polyvinylidene Chloride)	Polyvinyl Chloride (PVC) packaging components are determined to be Not Yet Recyclable by How2Recycle.
Stirrers* & Straws*	As above, the SPC encourages elimination as the first step to reducing the impacts and emissions of packaging.

Learn more about the problematic materials list and the U.S. Plastics Pact’s process for arriving at this list, please visit: <https://usplasticspact.org/problematic-materials/>

In order for the packaging industry to contribute to a stronger marketplace of recovered materials and build trust with consumers, the SPC encourages all Members to work towards the elimination of these materials, as well as the improvement of recovery systems.

We are excited to work with our Member Companies to support their efforts to transition to more sustainable designs and material choices.

To learn more, contact [spcinfo@greenblue.org](mailto:spcinfo@greenblue.org).

Footnotes from USPP:

\*When non-reusable, non-recyclable, or non-compostable per [U.S. Pact definitions](#) and provided as an ancillary item to the primary container.

<sup>1</sup> “Intentionally added” either in the package or in the manufacturing of that package.

<sup>2</sup> “PFAS” or perfluoroalkyl and polyfluoroalkyl substances are defined as the class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom at or above 100 parts per million, as measured in total organic fluorine.