



NAPCOR Guidance Document on Post Consumer Content

NAPCOR and the PET industry have a long history of developing end-use applications for recyclate produced from post consumer PET packages. In fact, the demand for this material has significantly exceeded the supply for the past dozen years. Recently, in an effort to improve the environmental footprint, more brand owners are requiring their package suppliers to use higher percentages of post consumer content for both food and non-food packaging, requirements that PET is uniquely suited for with respect to plastics.

NAPCOR applauds these efforts that, along with ongoing package “lightweighting, continue to position PET as the environmental package of choice. Many companies are now prominently advertising how much “recycled content” they are using in their packages which has prompted inquiries about what the term means. The Federal Trade Commission (FTC) in their Guides for the Use of Environmental Marketing Claims states:

“A recycled content claim may be made only for materials that have been recovered or otherwise diverted from the solid waste stream, either during the manufacturing process (preconsumer), or after consumer use (postconsumer). To the extent the source of recycled content includes preconsumer material, the manufacturer or advertiser must have substantiation for concluding that the preconsumer would otherwise have entered the solid waste stream.”

<http://www.ftc.gov/opa/reporter/greengds.shtm>

A further reference is provided by law in the state of California and requires all non-food rigid plastic containers to include 25% post consumer content. The CA code states, “Postconsumer’ material means a material that would otherwise be destined for solid waste disposal, having completed its intended end use and product lifecycle.

Postconsumer material does not include material and byproducts generated from, and commonly reused within, an original manufacturing or fabrication process.” (See CA Public Resources Code Section 42300-42301 for complete details,

<http://info.sen.ca.gov/cgi-bin/displaycode?section=prc&group=42001-43000&file=42300-42301>

By this definition, it appears clear that use of internally generated regrinds, preforms, and web scrap does not meet the criteria of postconsumer material and rather should be considered standard industry practice. The energy and greenhouse gas savings as detailed by the Recycled PET LCI are based on the reclamation of post consumer packaging materials and that's what NAPCOR believes is ultimately driving consumer preference.

April 15, 2010