

US EPR Data Requirements

For California, Colorado and Oregon

Prepared by the Sustainable Packaging Data Council

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About this document

This document provides a practical overview of the data requirements and collection strategies necessary to comply with California, Colorado and Oregon Extended Producer Responsibility (EPR) regulations. It is designed to support teams responsible for gathering and managing packaging data—especially those navigating supplier relationships, data quality challenges, and evolving reporting obligations.

The report includes a summary of key data attributes required under California, Colorado and Oregon EPR and recommended best practices for efficient and accurate data collection. It also outlines the methodology used to develop these recommendations and includes a version history to support transparency and future updates.

Methodology

This guidance was developed through a collaborative effort involving representatives from across the packaging and sustainability ecosystem—including brand owners, retailers, packaging suppliers, data and technology providers, and industry groups. Participants met regularly to evaluate a broad set of potential data attributes relevant to each considered state’s EPR regulations.

Each data attribute was reviewed for its role in enabling compliant and effective EPR reporting, with an emphasis on how the data would be used in reporting outputs. This process helped

identify which attributes should be considered *required* for compliance, and which are *recommended* to support data quality, reporting efficiency, and future-readiness. By tying each data point to a clear reporting use case, the group aimed to provide guidance and transparency into why companies may be requesting specific information—especially from suppliers.

To clarify data ownership and streamline data requests, the attributes were organized into three categories:

- **Product-level information** – Data that typically pertains to the finished packaged goods as a whole (e.g., brand, product name, Global Trade Item Number (GTIN)). This information will, in most cases, be provided by the entity responsible for submitting the EPR report.
- **Component-Level Information** – Data specific to each packaging component (e.g., weight, material, dimensions). This is the primary set of data likely to be requested from packaging suppliers or specification systems.
- **Sales-Level Information** – Data about how much of each product was sold, where, and when (e.g., quantity sold, date of sale, country/province of sale). This information is essential to determine which products are in-scope for each jurisdiction’s reporting requirements.

This distinction was made to help streamline data requests and avoid asking suppliers for information they are unlikely to have or own—particularly product-level details that should remain the responsibility of the reporting entity.

In parallel, a dedicated subgroup worked to define best practices for collecting data from both suppliers and internal stakeholders. Their efforts focused on identifying practical strategies for requesting data, establishing clear roles and responsibilities, and improving data quality across organizations of different sizes and maturity levels. These best practices are intended to support more efficient and reliable data collection, and are outlined in the *Data Collection Best Practices* section of this document.

Data Attributes

This list defines the key data points needed to support Oregon, California and Colorado EPR reporting. Each attribute is grouped into one of three categories:

- **Product-Level Information** – Describes the product as a whole; should be handled internally
- **Component-Level Information** – Describes each packaging component; often collected from suppliers
- **Sales-Level Information** – Describes what was sold, when, and where; handled internally

Definitions

Product-Level Information

Describes the finished packaged goods as a whole; this data is typically sourced internally (i.e., from the brand owner), not from suppliers.

- **Product Code**
 - *Description:* A unique internal ID assigned to each finished product
 - *Why it's needed:* Central to report structure; connects products to sales and packaging data
- **Sales Identifying Code**
 - *Description:* A sales-facing code (e.g., UPC, SKU, item number)
 - *Why it's needed:* Connects product records to external systems or sales-level data
- **Product Description**
 - *Description:* A human-readable description of the product (e.g., “Organic Granola Bar”)
 - *Why it's needed:* Supports internal review and traceability within the report
- **Product Family / Category**
 - *Description:* A multilevel classification of the product (e.g., Food > Snacks > Bars)
 - *Why it's needed:* Helps identify exempt product types; also helps organize reports by category
- **Brand Name**
 - *Description:* The commercial brand under which the product is sold
 - *Why it's needed:* Useful for internal cost analysis and required in some markets, especially for companies that sell both owned and third-party brands
- **Brand Owner?**
 - *Description:* A Yes/No flag to indicate whether your company owns the brand – useful for companies who produce goods for their own company *and* other companies

- *Why it's needed:* Used to determine if your company is legally responsible for reporting
- **First Importer into US?**
 - *Description:* A Yes/No flag identifying whether you imported the product into the US
 - *Why it's needed:* Determines reporting responsibility in regions with first-importer or economic operator rules
- **Use Region / Where Product is Sold**
 - *Description:* Markets or jurisdictions where the product is sold
 - *Why it's needed:* Filters products to include only those relevant to the EPR report being prepared (e.g., Oregon, Canada)
- **Contains Hazardous Material**
 - *Description:* A Yes/No flag to identify products with regulated hazardous substances
 - *Why it's needed:* May trigger exemptions

Component-Level Information

Describes individual packaging components; may be maintained internally or sourced from suppliers.

- **Component Code**
 - *Description:* Unique internal ID for the packaging component
 - *Why it's needed:* Connects packaging components to product data
- **Packaging Component Type**
 - *Description:* Physical form (e.g., bag, tray, bottle)
 - *Why it's needed:* Used for material reporting categorization
- **Component Description**
 - *Description:* Human-readable name for the component (e.g., "PET Bottle")
 - *Why it's needed:* Assists with identification, tracking, and audits
- **Component Quantity**
 - *Description:* Number of instances this component appears per product unit
 - *Why it's needed:* Used to calculate total material weight per product unit
- **Packaging Level**
 - *Description:* The component's relationship to the product (Primary, Secondary, or Tertiary)
 - *Why it's needed:* Helps determine whether the packaging is in or out of scope for EPR fees & reporting
- **Separability**
 - *Description:* Whether the component is physically attached to another component (e.g., Standalone component, attached to another component (removable), attached to another component (non-removable))
 - *Why it's needed:* Helps determine how to report the component—separately or combined with another

- **Parent Component**
 - *Description:* If the component is attached and non-removable, this field captures the Component Code of the parent item it is permanently affixed to.
 - *Why it's needed:* Clarifies whether a component should be reported as a standalone item or as part of another component. This supports accurate separability logic, which is required across EPR programs to determine whether two materials must be combined into a single reporting line, and in California can assist in determining the number of plastic components in an item.
- **Rigidity / Plastic Form**
 - *Description:* Rigid, flexible, or expanded foam
 - *Why it's needed:* Used for plastic classification
- **Contains Beverage?**
 - *Description:* Whether the packaging component contains a beverage
 - *Why it's needed:* Some beverage containers are exempt from EPR laws due to preexisting deposit return systems (DRS)
- **Printed Paper?**
 - *Description:* Indicates non-packaging components that are included in product packaging, like user guides or warranty documentation, or mail and other promotional materials sent directly to consumers
 - *Why it's needed:* Helps to determine material category including whether the material is covered at all
- **Recyclability Substantiation**
 - *Description:* Evidence that the component is recyclable, based on industry guidance or testing (e.g., APR Preferred Design Recognized, Trex compatibility, Fibre Box Association/AF&PA criteria, MRF acceptance, or other documented sortation and reprocessing results). This attribute covers all forms of proof, not only certifications, and can demonstrate recyclability even when the component includes features typically considered detrimental.
 - *Why it's needed:* Supports accurate material category assignment and validates recyclability claims. Collecting this information helps confirm recyclability when design features may otherwise raise concerns and strengthens auditability of reported data.
- **Compostability Certification**
 - *Description:* Indicates whether the component has demonstrated compostability through third-party certification and standardized test methods (e.g., BPI, TÜV OK compost, Compost Manufacturing Alliance).
 - *Why it's needed:* Compostable materials form distinct material classes in California and Colorado EPR frameworks. California requires that items marketed or treated as compostable also comply with AB 1201, which effectively limits compostable claims to certified compostable fibers (this will go into effect 12 months after CalRecycle publishes a formal list of approved certification programs). Capturing certification details helps determine whether the component falls within compostable material categories, supports accurate

material classification, and validates compliance with state-specific compostability rules.

- **Recyclability Detractors**

- *Description:* If evidence of recyclability is unavailable, identifies whether the component contains elements known to be incompatible with or detrimental to recycling processes. Examples include EVOH barriers, metallized films, optical brighteners, full-body non-perforated shrink sleeves, wet-strength coatings, and adhesives that interfere with fiber or plastic reclamation.
- *Why it's needed:* Presence of detrimental elements can help producers choose the appropriate material category. For reference:
 - [APR Design® Guidance](#): lists detrimental additives, coatings, and inks for plastics.
 - [AF&PA Guidelines](#): notes fiber-recycling contaminants.

- **Reusable / Refillable Design**

- *Description:* Indicates whether the packaging is designed for reuse. Options may include:
 - Designed for Reuse – for products clearly designed or labeled for reuse
 - Refillable – intended to be refilled by consumers or within a reuse system
 - Returnable – collected, washed, and reused
 - Other – pilot or alternative reuse formats
- *Why it's needed:* Determines whether the component qualifies as single-use packaging. California's definition of "covered material" under SB 54 excludes packaging that meets the state's criteria for reusable packaging. Because covered material is defined in PRC §42041(e) as packaging that is "typically not refilled or otherwise reused by the producer," identifying reuse attributes is essential to determine whether the item is considered single-use and therefore subject to EPR reporting and fees. Colorado's framework may use reuse designations for future fee modulation or design improvement incentives.

- **Intended Number of Uses**

- *Description:* Captures how many times the packaging is designed to be reused under normal conditions within a reuse/refill system.
- *Why it's needed:* California requires substantiation when claiming that packaging meets the state's reuse definition for exemption from covered-material reporting. Documenting the intended number of uses provides evidence to support exemption claims. While Colorado does not currently require this, the information supports future fee modulation.

- **Dimensions (Length, Width, Height) + Unit of Measure (UOM)**

- *Description:* Physical dimensions of the component in standard units. Only required for 3D components such as bottles, tubs, trays, closures, and fitments; not required for films, sheets, or other 2D materials.
- *Why it's needed:* Used to identify "small format" items for component classification

- **Weight + Unit of Measure (UOM)**

- *Description:* Weight of the component alone, in grams or other unit of measure

- *Why it's needed:* Required to report weight by material category
- **Majority Material Class**
 - *Description:* Identifies the material category that makes up the majority of the packaging component by weight (e.g., paper/fiber, plastic, metal, glass, ceramic).
 - *Why it's needed:* This classification is critical for narrowing down assignment to the correct material reporting category.
- **Other Material Classes Present**
 - *Description:* Identifies all additional material categories present in the component besides the majority material (e.g., Plastic + Metal for foil-lined films; Paper + Plastic for coated paper).
 - *Why it's needed:* Helps determine whether a component is a multi-material laminate. Also supports classification for California's "with plastic component" logic.
- **Majority Material**
 - *Description:* Material(s) used, including one majority and up to two additional minority materials (e.g., *Corrugated, CCNB, Kraft Paper, Glass, Aluminum, PET, LDPE*)
 - *Why it's needed:* Required for categorizing materials for reporting
- **Count of Plastic Features**
 - *Description:* Identifies the number and type of plastic features present on a component. Examples include:
 - Windows
 - Labels or films
 - Handles or fitments
 - Adhesive layers
 - Inks, dispersions, coatings
 - Other plastic additives
 - *Why it's needed:* Supports California's "with plastic component" reporting logic, which requires identification of non-plastic packaging that incorporates plastic elements.
- **Plastic Material Weight**
 - *Description:* The weight of plastic present in a component whose majority material is not plastic (e.g., paper carton with plastic windows, plastic coatings, plastic-based adhesives, or films).
 - *Why it's needed:* Required for California's "covered material with plastic component" rules, which apply fees to packaging with plastic features even when the base material is non-plastic. Also supports source reduction assessments.
- **Post Consumer Recycled (PCR) Content**
 - *Description:* % of PCR content in the packaging component
 - *Why it's needed:* While not currently required for Oregon or Colorado EPR reporting, this may be useful for source reduction tracking in California.
- **Resin Identification Code (RIC)**

- *Description:* For plastic components, indicates the specific plastic resin used in a packaging component, represented by the standard #1–#7 coding system (e.g., #1 PET, #2 HDPE).
- *Why it's needed:* Some plastic reporting categories (e.g., Oregon category *PET (#1) - Bottles, Jugs, and Jars; Clear/Natural*) require a component to display a resin identification code in order to apply to the material reporting category.
- **Paper Coating(s)**
 - *Description:* Surface coatings on paper components (e.g., plastic coating, clay coating, wax coating, aqueous coating, wet-strength or barrier coatings, etc)
 - *Why it's needed:* May impact classification as recyclable or compostable
- **Paper Coating Side(s)**
 - *Description:* Indicates whether the paper component has a coating on one side (single-sided) or both sides (double-sided).
 - *Why it's needed:* This detail helps assess the recyclability of fiber-based packaging. Double-sided coatings may hinder fiber recovery during recycling and may affect how the component is categorized in EPR material reporting. California explicitly treats double-sided plastic-coated paper as a multi-material laminate, which affects its covered material category and recyclability status.
- **Opacity**
 - *Description:* Visual transparency (e.g., Translucent/transparent or Opaque)
 - *Why it's needed:* Can affect how packaging is sorted or treated in recycling streams, particularly plastic and glass
- **Color**
 - *Description:* Material color (e.g., Unpigmented, Light Green/Blue or Colored, Unbleached, etc.)
 - *Why it's needed:* Affects how packaging is sorted or treated in recycling streams, particularly plastic and glass; impacts material reporting category

Sales-Level Information

Details sales transaction information, typically sourced from internal systems. If region-specific sales information is not available because of unique selling situations, consider other CAA-approved reporting methods.

- **Product or Sales Identifying Code**
 - *Description:* Ties sales data back to a specific product
 - *Why it's needed:* Required to associate volume with specific product/package records
- **Quantity of Sale**
 - *Description:* Number of units sold in the reported transaction
 - *Why it's needed:* Determines volume subject to reporting and fee calculations
- **Date of Sale**
 - *Description:* Date or month in which the product was sold
 - *Why it's needed:* Filters sales by the appropriate reporting window

- **Country of Sale**
 - *Description:* Country where the product was sold to the end customer
 - *Why it's needed:* Determines applicability under national EPR programs
- **Province/State of Sale**
 - *Description:* State or other sub-national region (e.g., Oregon, Colorado, Ontario)
 - *Why it's needed:* Determines which sales are applicable to regional EPR fees
- **Customer Type**
 - *Description:* Business or consumer (B2B vs. B2C)
 - *Why it's needed:* Some schemes treat commercial and consumer sales differently as it affects what end-of-life stream the packaging ends up in

Data Attribute Requirements

Product-Level Information	California	Colorado	Oregon
Product Code	Required ▾	Required ▾	Required ▾
Sales Identifying Code	Required ▾	Required ▾	Required ▾
Product Description	Recommended ▾	Recommended ▾	Recommended ▾
Product Family / Category	Required ▾	Required ▾	Required ▾
Brand Name	Recommended ▾	Recommended ▾	Recommended ▾
Brand Owner?	Required ▾	Required ▾	Required ▾
First Importer into US?	Required ▾	Required ▾	Required ▾
Use Region / Where Product is Sold	Recommended ▾	Recommended ▾	Recommended ▾
Contains Hazardous Material	Required ▾	Required ▾	Required ▾

Component-Level Information	California	Colorado	Oregon
Component Code	Required ▾	Required ▾	Required ▾
Packaging Component	Required ▾	Required ▾	Required ▾

Component-Level Information	California	Colorado	Oregon
Type			
Component Description	Recommended ▾	Recommended ▾	Recommended ▾
Component Quantity	Required ▾	Required ▾	Required ▾
Packaging Level	Required ▾	Required ▾	Required ▾
Separability	Required ▾	Required ▾	Required ▾
Parent Component	Required ▾	Required ▾	Required ▾
Rigidity / Plastic Form	Required ▾	Required ▾	Required ▾
Contains Beverage?	Required ▾	Required ▾	Required ▾
Printed Paper?	Required ▾	Required ▾	Required ▾
Recyclability Substantiation	Recommended ▾	Recommended ▾	Recommended ▾
Compostability Certification	Required ▾	Required ▾	Not Needed ▾
Recyclability Detractors	Required ▾	Required ▾	Required ▾
Reusable / Refillable Design	Required ▾	Recommended ▾	Not Needed ▾
Intended Number of Uses	Required ▾	Recommended ▾	Not Needed ▾
Component Length	Required ▾	Required ▾	Required ▾
Component Width	Required ▾	Required ▾	Required ▾
Component Height	Required ▾	Required ▾	Required ▾
Dimension Unit of Measure	Required ▾	Required ▾	Required ▾
Weight	Required ▾	Required ▾	Required ▾
Weight Unit of Measure	Required ▾	Required ▾	Required ▾
Majority Material Class	Required ▾	Required ▾	Required ▾
Other Material Classes Present	Required ▾	Recommended ▾	Recommended ▾

Component-Level Information	California	Colorado	Oregon
Majority Material	Required ▾	Required ▾	Required ▾
Count of Plastic Features	Required ▾	Not Needed ▾	Not Needed ▾
Plastic Material Weight	Required ▾	Not Needed ▾	Not Needed ▾
Post Consumer Recycled (PCR) Content	Recommended ▾	Recommended ▾	Recommended ▾
Resin Identification Code (RIC)	Recommended ▾	Required ▾	Required ▾
Paper Coating(s)	Required ▾	Recommended ▾	Recommended ▾
Paper Coating Side(s)	Required ▾	Recommended ▾	Recommended ▾
Opacity	Required ▾	Required ▾	Required ▾
Color	Required ▾	Required ▾	Required ▾

Sales-Level Information	California	Colorado	Oregon
Product or Sales Identifying Code	Required ▾	Required ▾	Required ▾
Quantity of Sale	Required ▾	Required ▾	Required ▾
Date of Sale	Required ▾	Required ▾	Required ▾
Country of Sale	Required ▾	Required ▾	Required ▾
Province/State of Sale	Required ▾	Required ▾	Required ▾
Customer Type	Recommended ▾	Recommended ▾	Recommended ▾

Data Collection Best Practices & Considerations

Effective data collection is the foundation for compliant and accurate EPR reporting. The following best practices are drawn from industry experience and are applicable to gathering data from both internal stakeholders and external suppliers. These guidelines emphasize clarity,

usability, and integration with existing workflows to ensure data is not only collected—but also maintained—in a scalable, sustainable way.

Standardization and Clarity in Requests

- **Define internal ownership** for data collection to prevent duplication and gaps.
- **Use professional, precise language** in all templates and forms to support future translation and reduce ambiguity.
- **Include clear definitions** for each data request. In a spreadsheet request format, these can be provided in a separate definitions tab or via hover-over notes.
- **Specify which products/components you are requesting data for**, especially for complex business models like co-packing or third-party fulfillment.

Intuitive and Balanced Questionnaires

- **Design forms that are intuitive** and easy to complete to reduce the risk of data entry errors or incomplete submissions.
- **Avoid free text fields** where structured picklists or dropdowns can be used; this simplifies data analysis and standardization.
- **Balance the level of detail** required—enough to support reporting and validation, but not so much that respondents become overwhelmed or disengaged.

Integration into Workflows and Continuous Refinement

- **Embed data collection into existing workflows**, such as product development, specification creation, or procurement processes, to promote consistency and reduce redundant follow-up.
- **Establish an ongoing data maintenance strategy**; inaccurate data can have direct financial implications under EPR.
- **Promote an "organic data" mindset**, where information is captured at natural touch points in the product or packaging lifecycle.

Supplier Communication and Education

- **Train buying teams** on the importance of communicating suppliers' packaging changes to the appropriate internal teams responsible for reporting.
- **Provide clear, contextual instructions to suppliers**, particularly when addressing terms that are frequently misunderstood (e.g., post-consumer recycled (PCR) vs. post-industrial recycled (PIR)).
- **Maintain accurate supplier contact lists** with up to date contact information to ensure timely and effective outreach during reporting cycles.

Addressing Data Maturity

- **Tailor data collection strategies** based on your organization's data maturity level:
 - *Starting out*: Focus on foundational education and establishing templates.
 - *In progress*: Refine workflows and introduce validation checkpoints.
 - *High maturity*: Implement automation, detailed audits, and robust governance frameworks.

- **Adapt tools and messaging** based on the data maturity of your suppliers as well, offering support appropriate to their capabilities.

Contributing Sustainable Packaging Data Council Members

This report reflects the collaborative input of representatives from several companies across the packaging and sustainability ecosystem, including (in alphabetical order): Adept EPR AI, Atlantic Packaging, Central Garden & Pet, Costco, How2Recycle, Lorax, Michigan State University, Sonoco, Specright, TOPPAN Packaging Americas, Trayak, and Tyson Foods.

Reference Documentation

Circular Action Alliance (CAA) members can find the following documents on the Producer Guidance page of CAA's website. *Note: these documents are only available to CAA members.*

- CAA – Oregon Reporting Category Definitions V2 – 2025-03-28
- CAA – Preparing to Report your Supply Data – June 2025
- CAA – Covered Materials & Producer Definitions (OR&CO) – June 2025
- CAA – Colorado Reporting Category Definitions – June 2025
- CAA – Covered Materials & Producer Definitions (OR&CO) – August 2025
- CalRecycle – Covered Material Categories Reporting Guidance – September 8, 2025

Version History

Version	Date	Description of Changes
2.0	2026-1-6	Added California and Colorado to document scope. Added new attributes to support California and Colorado. Removed the attribute Perforated Shrink Sleeve because separability already captures this information, and the attribute was overly specific to one component type without improving reporting accuracy. Added additional contributors.
1.0	2025-08-14	Initial document: included methodology, data attributes, and collection best practices.