Earth911 Special Report:
Labeling
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EXECUTIVE SUMMARY

This report addresses the issues inherent in industry-standard labeling of consumer products for recycling and proposes an end-of-life communications solution. The labeling strategies referred to in this paper are those intended to demonstrate commitment to product stewardship and increase recycling participation by informing consumers on two vital pieces of information about an item:

1. Is there a local recycling market; and,
2. What steps are required to recycle it?

Lack of information and confusion are among the greatest contributors to the currently stagnant recycling rate (under 35 percent) in the U.S. In general, communication is at the pinnacle of complexities in recycling. Every touchpoint with consumers has potential to motivate, change behavior, build loyalty and cause confusion. By the time a product has been selected, purchased, used and reaches its end of life, a consumer has been exposed to multiple messages about an item. Problems arise when the messages are mixed, inconsistent, incomplete, vague, wrong and/or misleading, which they frequently are. For example, many marks indicate the environmental impact of a product (made with recyclable or recycled materials, environmentally friendly, etc.) but may not convey that an item is able to be recycled. There are over 600 (1) such marks known to be in use, so the potential for confusion and misinterpretation is high.
Not only is consumer education lacking, how the stakeholders in the industry talk with each other about the issues surrounding recycling is complex as well - as evidenced by the language used to describe environmental responsibility.

“The terms product stewardship and extended producer responsibility (EPR) are often used differently by stakeholders involved in the product stewardship movement.”

– Product Stewardship Institute

Principles of Extended Producer Responsibility

The Product Stewardship Institute, Product Policy Institute and the California Product Stewardship Council led an effort to reach consensus on definitions of “product stewardship” and “extended producer responsibility (EPR) in April 2012. (2)

These definitions are important because when stakeholders - manufacturers, retailers, consumer product companies (CPCs) - acknowledge and agree that responsibility surrounds product end-of-life, meaningful conversation must take place to form actionable solutions for the benefit of consumers. Much of this talk takes place around the idea of industry-standard labeling, based on a model solution implemented in the UK.

The most significant consideration in creating a label that can be used across many products is that, in the U.S., recycling is local. While environmental initiatives may involve multiple states and infuse the public consciousness from coast to coast, the ability to recycle and the methods of recycling most often stop at city and county borders. What constitutes curbside access in one city is an afternoon’s drive in another. Merely suggesting that a material, product or package has recyclable qualities is not enough to make an impact on the overall recycling rate in the U.S.; consumers need an easy, quick resource that tells them, “Can I recycle this near me?” Additionally, if an item cannot be recycled, what are the proper disposal options?

Indications are that consumers are primed for more information than they are currently getting on the products and packages that could be recycled. More consumers are tuned into green issues, and while many remain skeptical of green claims, enough have demanded transparency and facts about consumer products.

The Earth911 Recycling Directory, which is the backbone of the Earth911 Recycling Locator, delivers information on recycling anywhere and anytime through multiple interfaces including websites, mobile and traditional phone lines. Through this report, Earth911 seeks to motivate brand owners, CPCs, and those with a stake in the sustainability initiatives of their companies to create a streamlined communication process about product end-of-life through a centralized resource.
LABELING 101

HISTORY OF LABELING – AND LABELING PROBLEMS – IN THE U.S.
The advent of curbside recycling resulted in a national recycling rate increase from 6.4% in 1960 to 34.1% by 2010, with a surging growth in the 90s that slowed by the 2000s. Along with curbside collection in the mid-to-end century came the need for detailed disposal directives to ensure safety, compliance and lower contamination. Recycling messages and mandated labels began appearing on consumer products as manufacturers tried to communicate an end-of-life message to consumers—the harbinger of greenwashing. These messages, however unintentionally, could be misleading, while other labels created to inform about disposal methods quickly became obsolete.

Even well-intentioned efforts evolved into consumer confusion as labels were unable to keep pace with advancements in disposal technology or a surge in legislation to regulate waste. Manufacturers who opted to use a static label to convey a disposal message are still financially liable for the costs of re-labeling when that static message proves ineffective or is invalidated by changes in the industry or laws.

In 1983, the EPA’s Office of Pesticide Programs directed pesticide manufacturers to add to the disposal section of their labels, “Securely wrap original container in several layers of newspaper and discard in trash.” In the early 2000s, this organization recognized that different states have facilities designed for landfill diversion of household hazardous wastes, such as pesticides, which made previous instruction invalid for numerous consumers. That directive is now obsolete and in violation of most hazardous waste ordinances.

The language was switched to “Contact your Local Solid Waste Agency,” although it was not communicated to consumers how to find that governing body. For communities that do not have a solid waste office, or are responsible for identifying their own solid waste outlets, it was no solution at all.

An area where consumers are provided information that is not actionable, and can actually be unintentionally misleading, is plastic resin codes. In 1988, the Society of the Plastics Industry developed a code for recyclers to identify the resins of plastic, with the understanding that different resins of plastic have different recycling processes so they must be identified and separated prior to recycling.

SPI identified 7 resin codes (6 polymer resins and 1 “other” catch-all), and plastic manufacturers adopted the codes for use on plastic products to recognize what resin the product was made of. The number is placed inside a recycling symbol, even though it does not indicate whether a product contains recycled content or is recyclable to a majority of consumers. (3)
The plastic industry is considering revising the resin ID code in coordination with ASTM International for multiple reasons. The evolution of plastic recycling has made the form of plastic (e.g. bag, bottle) more relevant for the recycling market than the resin code, and the current system marks all forms of a resin with the same symbol. It has also come under criticism from environmental groups that have asked the FTC to take action against the code.

Labeling gets sticky when talking about beverages, too. Container deposit laws (informally known as bottle bills) are a way of incentivizing recycling participation by charging a fee on most beverage containers that is refunded when the product is dropped off for recycling. The first such law was passed in Oregon in 1971, and 10 states currently have such laws in effect (with the last in 2002, passed by Hawaii).

The significance for labeling is that any products that are covered under container deposit legislation must be labeled with the state name and redemption value on the container. If a state passes or repeals a container deposit law (such as Delaware in 2010), the label must be changed to reflect the change in law. Since this is not a national program, manufacturers are accountable for label changes based on legislative efforts in all 50 states.

Many other recycling messages linger today in an attempt to promote local recycling options. Examples include “Please recycle” and “Please contact your local solid waste agency.” These efforts leave consumers without an actionable solution on what to do with these products.
FEDERAL REGULATION

In the U.S., the Federal Trade Commission (FTC) took a stand on the misleading representation of a product’s environmental benefits and created the “Guides for the Use of Environmental Marketing Claims” to influence companies to accurately represent their products. The “Green Guides” set guidelines for controlling consumer perception of products through using specific claims, accurately stating product attributes, and using clear and prominent qualifications to describe a product’s environmental benefits.

The FTC speaks to the issue of green marketing, but does not formally declare vagueness to be objectionable:

"It is deceptive to misrepresent, directly or by implication, that a product or package is recyclable. . . Claims of recyclability should be qualified to the extent necessary to avoid consumer deception about any limited availability of recycling programs and collection sites.” (Sec. 260.7.a)

Some companies with strong sustainability initiatives opted voluntarily to expand informative labels on their products to direct consumers to recycling solutions, especially materials not commonly collected at the curb. But the Green Guides include only an informal guideline: 60 percent or more American communities should have access to facilities that can recycle a given material. Once the magical 60 percent national access threshold is hit, companies have a pass to use the phrase “Please Recycle” to address consumer education. The 60 percent number is loosely assumed to encompass residents with curbside, but even those with single stream recycling don’t get the information they need from a simple “Please Recycle.” The result: widespread confusion, even when companies think they are doing the right thing. (see examples in “The Problems That Labeling Ignores.”)
INDUSTRY-SPEAK VS. CONSUMER LANGUAGE

In addition to recycling and disposal rules differing from one location to another, the terms used to describe materials differ as well, adding another layer of complexity. What a consumer calls a product is highly likely to differentiate from how it is identified on a generic label or referred to by recyclers and waste managers.

The chart below shows terms for four material classifications in the Earth911 Recycling Directory, which indexes nearly 350 types of materials. The Recycling Directory makes accommodation for the actual keywords that consumers type into the search engine when looking for a recycling option. For example, “Plastic” is an industry standard term, but a consumer may search on the keyword “Ketchup Bottle.”

<table>
<thead>
<tr>
<th>Earth911 Material Classifications</th>
<th>Glass</th>
<th>Metal</th>
<th>Paper</th>
<th>Plastic</th>
</tr>
</thead>
<tbody>
<tr>
<td># distinct of Materials in Earth911 Directory</td>
<td>10</td>
<td>25</td>
<td>29</td>
<td>59</td>
</tr>
<tr>
<td># of keywords consumers use on Earth911 to search for materials</td>
<td>55</td>
<td>163</td>
<td>117</td>
<td>458</td>
</tr>
<tr>
<td>Average number of words consumers have for each material</td>
<td>5.5</td>
<td>6.5</td>
<td>4</td>
<td>7.8</td>
</tr>
</tbody>
</table>

For a static label to properly direct a consumer to a recycling solution for an item, it needs to convey exactly what type of material or materials are present, where and how they are recycled, and take into consideration that the consumer may not consider the item PET, but a “ketchup bottle.”
Here’s another example of where material composition vs. consumer interpretation can actually lead to waste stream contamination. In South Carolina, a Mrs. Butterworth’s® syrup bottle is made from #1 plastic, which has high recycling availability throughout the state. But the Aunt Jemima® #5 plastic bottle has limited availability, and placed in the waste stream will cause contamination. Only by knowing there is a difference between the two plastics in these brands’ packages will a consumer be likely to properly dispose of each bottle. This may not be the case in all states where the brands are sold; a labeling solution that directs consumers to check for local recycling information is the best, most cost-effective option.
INDUSTRY-STANDARD LABELING CASE STUDY: THE U.K.

One labeling system that has gained popularity and praise is the “On-Pack Recycling Label” (OPRL) in the U.K., which is the industry standard for communicating with consumers. The label is made of three core panels that provide information about the packaging component, material type and recyclability status. OPRL is now used on more than 90% of grocery packaging in the UK and has reportedly resulted in increased understanding by consumers of what is recyclable and what is not, thereby elevating recovery rates of packaging waste post consumer. CPCs wishing to use the labeling standard are required to pay an annual fee, which helps fund the implementation of the program.

“OPRL’s aim is to deliver a simpler, UK-wide, consistent recycling message on both retailer private label and brand-owner packaging, with information based on current local authority recycling services,” states the OPRL website. The label scheme is used on over 75,000 product lines. The categories are based on local authority collection information and therefore provide meaningful information to consumers, referring them to a central national resource, recyclenow.com, the key factor and most critical component of the OPRL. (4)

For other countries to consider a similar labeling system that identifies recycling availability we must examine the differences and consider these factors:

- Size of the country (to determine nearest access to a recycling processor)
- Number of authorities involved in recycling collection
- Presence of funding for recycling programs

Size of the Country. As a comparison between the U.S. and the U.K., the U.K. has an area of 94,060 square miles, which is roughly the size of Michigan (96,716 square miles). The U.K. also has 66 official cities (spread over four countries) that serve as recycling authorities, while Michigan has 93 cities in 83 counties which each provide their own recycling programs.

The sheer size of the U.S. is the first challenge, not to mention the vast differences in resources parted out by county. There are 3,025 cities with populations over 10,000 with organized county or county-equivalent governments in the U.S. Approximately 92 million Americans do not live in an area serviced by curbside, meaning that access to recycling for this population would have to be determined to be reasonable. Among that 30 percent are both people who live in multi-family
housing and those in remote areas. (5) The entire system of collection and transport of waste would have to be overhauled -- and funded -- to accommodate these dwellings.

**Comparison:**
One US state (Michigan) & the U.K.

- Michigan
  - 96,716 sq. miles
  - 93 cities
  - 88 counties

- United Kingdom
  - 94,060 sq. miles
  - 66 cities
  - 4 countries

**Number of authorities involved in recycling collection.** In the U.S., the management and recovery of waste is the domain of many varieties of businesses: municipalities, independent waste collectors and recyclers, and small businesses. In the U.K., this business is largely influenced by WRAP, a non-profit organization funded by all four governments across the UK and the EU and which runs programs in England, Scotland, Wales and Northern Ireland. WRAP works to increase the commodity value of recyclables and participating in recycling, as well as influence the design and consumption of products and packaging. (6)

**Presence of funding for recycling programs.** In the U.K., recovery of recyclable products and packaging is dictated by the law and made the responsibility of waste collectors to establish return, collection and recovery. (7) The closest equivalent to such legislation in the U.S. would be bottle bills, which are only active in 10 states (Michigan is one). All but one of these laws were passed in the 1970s and 1980s, and numerous attempts by states to enact these laws over the past 10 years have been met by fierce rebuttal and strong lobbying from manufacturers.

In the U.K. the financial burden of end-of-life disposal is shared by numerous parties, which allows its countries to fund recycling programs and collaboratively communicate their availability to consumers. In the U.S., individual states decide their own recycling legislation, and each city is responsible for the finances of recycling. Adapting the WRAP/OPRL model, especially without the inclusion of a dynamic directory of recycling information as used by the U.K., is not a good model to determine recycling availability.
THE PROBLEMS THAT LABELING IgNORES

WIDESPREAD CONFUSING AND AN EVER-CHANGING RECYCLING LANDSCAPE

Static labels make an assumption: people can easily recycle an item because curbside recycling has greatly increased. But CPCs shouldn’t stop at the question “Is my product recyclable?” CPCs need to be able to provide an answer to the question “Where can consumers recycle my product?” Knowing there is curbside available isn’t enough. Static product labeling might answer the question “Is it recyclable?” but it ignores the two important principles of proper disposal:

1. Ease of recycling is subject to the local market where a product is purchased.
2. Even if a local recycling market exists, consumers can only recycle if publicly available collection opportunity (e.g. drop-off or pick-up) exists.

Solid waste curbside collection in the U.S. is largely offered at the city level, so to document and report recycling availability involves correspondence with thousands of cities on a regular basis, which Earth911 does. The picture of recycling availability in the U.S. currently looks like this:

Earth911’s research into curbside programs finds that on average, these programs service about 70 percent of the population of a city. Other residents either fall under the category of multi-family housing or live in a neighborhood not served by curbside. It would be impossible to convey this information on a static product label, without sending consumers to a dynamic information source where they can search for recycling opportunities in their area.
RECYCLING HAPPENS LOCALLY

Similar to a non-specific label, pointing a consumer to “check locally” does not properly direct to a proper disposal resource. Consumers may not be aware of where to ask for direction on harder to recycling materials, or motivated enough to do the research. Further, once they discover their localized solution, what is “local” for a rural community may mean a 15-mile drive to a drop-off facility, but curbside availability for a top 25 city. For example, the City of Phoenix accepts appliances at the curb, but 50 miles away in Wickenburg (which has curbside recycling), consumers must drive 10 miles for the nearest location to drop-off appliances. Additionally, the frequency with which recycling information changes means that the only viable label would be one that is generic in nature and points to a dynamic resource with frequently updated data.

Information on recycling programs and recycling availability varies state by state and community by community. While CPCs recognize this and are taking action to reach out to consumers, non-coordinated efforts may actually make the problem worse. At best, it gives rise to a greater consumer demand for information and the necessity for a national platform to communicate recycling information. The following examples demonstrate the problem of confusion in recycling, including curbside programs.
CLEAR GLASS BEVERAGE BOTTLE VS. ALUMINUM BEVERAGE CAN IN UTAH

In Utah, there are eight counties that provide curbside recycling programs for aluminum beverage cans compared to only two counties for clear glass. Though glass is typically thought of as readily recyclable, “please recycle” or “widely recyclable” in this case will not apply to the majority.
PAPERBOARD CEREAL BOX VS. WET-STRENGTH FROZEN FOOD BOX IN CALIFORNIA

Though both cereal boxes and frozen food boxes are made of paperboard, they have dramatically different recycling markets due to the additives used to make paperboard wet-strength. Based on the community, recycling for the cereal box is readily available whereas recycling for the frozen food box is more scarce, even in a recycling-saturated state like California. Curbside is available in 43 counties for paperboard, but only 10 for wet-strength frozen food boxes.
#2 HDPE JUGS VS. #2 HDPE TUBS IN NEW YORK

The process to manufacture narrow-neck HDPE jugs, such as a laundry detergent bottles, and HDPE wide-mouth rigid tubs, such as coffee containers, dramatically changes the rigidity of a product, and therefore, its recyclability. To a consumer, #2 plastics are #2 plastics, regardless of the width of the product’s opening. New York has 46 counties that offer curbside for jugs versus only 16 for tubs.

PSI observed in their white paper: “To communicate the spectrum of mandatory and voluntary collection programs being introduced, manufacturers and retailers have taken on a larger role in providing recycling and safe disposal information...This system has resulted in a patchwork of different recycling and safe disposal messages and the means by which they are communicated to consumers. (8)  

“This new dimension of recycling has thus created a greater need for a coordinated national outreach and education strategy for consumer product collection, recycling and disposal.”

– PSI
INHERENT ISSUES WITH RECYCLING LABELING

On-product and on-pack labeling brings up the following concerns:

- Labeling focus has been primarily on packaging instead of product components
- Limitations of space on a label and shelf-life
- Corporate branding and design guidelines
- Coordinating a unified message among companies in different product categories

Labeling focus is primarily on packaging instead of product components

Despite its success, the OPRL label solution in Europe only goes as far as packaging, just nipping part of the problem, which is defined on the OPRL web site: "Research shows that consumers are often frustrated that they don't know what packaging can and cannot be recycled and are looking for much clearer on-pack guidance to improve their understanding."

Currently in the U.S., labeling initiatives also focus on packaging. In some cases it's critical to make a distinction between the recycling for a package and the contents. Examples are hazardous waste products under state or federal regulations such as pesticides, motor oil, and e-waste. Additionally, contents can change the recyclability of a package. A detergent jug and a motor oil bottle are both made from HDPE and have narrow necks, but because one has motor oil in it, there are far fewer recycling opportunities. Consumers must have a clear, local solution for HHW, which varies widely in every state. "Check with your local solid waste agency" in this case is not a clear directive, but a road map to confusion that leads people to dispose of HHW improperly. A great success story of a product recycling initiative that works is call2recycle.org, which facilitates the recycling of rechargeable batteries and cell phones.

Limitations of space on a label and shelf-life. Anything printed has a shelf-life. It's only as good as long as the information is current. With the rapidly changing, complex environment of recycling, a printed label can become obsolete long before the next label print-run. Additionally, complexities in communicating with consumers can present a barrier to recycling, when one item may have several materials--including the product and its packaging--that each have different recycling market (think of a case of bottled water, or a new pair of shoes and the accompanying packaging).
For example, a label that covers all the components of an LCD television would include the screen itself, detachable power cord, remote control, remote control batteries. Those are just the product materials. A recycling solution for the packaging, including #6 foam plastic, corrugated cardboard and plastic film, must also be communicated. Neither manufacturers, retailers nor consumers have their interests served by a label that is too complex, too vague or too small, and in the end, doesn’t state a clear path to recycling information. Directing consumers to a multimedia-based recycling information source that delivers fast information saves time and encourages recycling. Additionally, a dynamic source of recycling information can indicate other possible disposal methods, such as composting or special collection programs for upcycling.

**Corporate branding and design guidelines.** Labels contribute noise. Among the messaging about responsible disposal are the CPCs’ own brand messages and design standards. The tremendous amount of activity around declaring an eco-friendly connection with a product means there is a lot of noise to add confusion, predicate mistrust and turn consumers off from going green. Just the sheer number of messages used for green marketing cause confusion among consumers. For example, products and packaging are labeled as “recyclable,” “Made from 100% recycled material with 10% post-consumer content,” “Made from 100% recycled material.” But is it recyclable where the consumer lives, and how?

“According to research by the World Resources Institute, Duke University, and the green analyst Big Room Inc., 600 labels worldwide dispatch some sort of eco-benchmark,” notes Ogilvy Earth in its 2011 Green Gap study. “A majority of consumers are distrustful of companies’ environmental claims (57%) and are overwhelmed by the amount of environmental messages in the marketplace (51%).” From that study:

- 59% say it is only acceptable for marketers to use general environmental claims when they are backed up with additional detail and explanation.
- 79% want detailed information readily accessible on product packaging.
The Retail Industry Leaders Association (RILA) says in its 2012 Retail Sustainability Report: “Retailers can educate consumers about product impacts through traditional channels like marketing catalogs, in-store displays, product labels, and advertisements—wherever there are opportunities to highlight environmental and social product information. (9)

But the industry recognizes that, from the consumer’s perspective, a barrage of green messages and the proliferation of ‘green’ seals and certifications can be confusing and may appear inauthentic.”

Coordinating a unified message among companies in different product categories. Manufacturers are driving the popularity of credentialing a product with third-party validation because consumers want, among others, indication that a product is a) produced sustainably and responsibly and b) recyclable. There are several studies that support a trend in consumer purchasing correlating with a perceived environmental benefit. However, with such an exorbitant number of seals and certifications, these marks risk losing their effectiveness, according to 2009 Conscious Consumer Report from BBMG. Lack of effectiveness, too much information (citing multiple materials on one label), and too little information (the non-specific “Please Recycle” label) make consumers work too hard for an answer. Consumers look to labels for guidance, but do not overwhelmingly trust labels as proof of sustainability, nor complete direction for recycling. Only 20% of respondents in the BBMG 2009 study claimed they “always” trust the “Recyclable” logo. In order to build trust among consumers and unite CPCs in a meaningful outreach, labels must clearly answer questions, not raise concerns and also produce measurable, impactful results (more on this in Labeling for Results). (10)
THE NEW CONSUMER
Today’s consumer is more savvy, aware and interested in the direct effect their behaviors have on the environment. The new consumer is active in learning about options, demands more from their favorite brands, and has influence over the decisions that other consumers make. A Nielsen study recently found that two thirds (66%) of consumers around the world say they prefer to buy products and services from companies that have implemented programs to give back to society. (11)

These consumers are twice as likely to adopt sustainable products or services, reward or punish a brand for its practices, and use social media to talk about it. With that kind of dynamic happening among a broad demographic or consumers, brands need to do more than just talk about recycling. The entire spectrum of sustainability becomes a fertile ground for consumer education, with the conversation beginning at the very farthest tip of the supply chain.
Consumers want the big picture, but they also are receptive to learning about the pieces in between. Labels are just one stop along the lifecycle chain of a product. Practicing transparency about its product stewardship puts a CPC in charge of public perception without softening the truth about how much change is required to make a product sustainable. With such education, consumers can begin to see themselves as partners in the process and comprehend the rewards of recycling. If a company is sourcing more responsibly, reducing its water usage, enacting fair-trade practices, reducing energy consumption in the manufacturing process, and setting zero-waste goals, these are vital facts that directly impact the new consumer’s decision about a purchase. Tying the bigger picture of a CPCs dedication to the environment into product end-of-life communications delivers many benefits: innovation, brand differentiation, cost-savings, and more touchpoints for consumer engagement.
LABELING FOR RESULTS

By 2017, the millennial generation is predicted to have more buying power than any other. They are also the early adopters of social media and streamlined information sourcing. As consumer groups move toward taking more hands-on roles in recycling, reuse and other options to reduce landfiling, the breadth of options for a product’s end-of-life comes under the microscope. Can a product be recycled? Can it be upcycled into something else? What are all the options for proper disposal? The creative reuse of waste is a surging interest that can best be communicated through a dynamic recycling directory which can serve up options that are unknown even to manufacturers.

Labels must communicate on a micro-level with consumers about the recycling of the item that is in their hands at a given moment. Raising the recycling rate is only part of the challenge facing CPCs; navigating the sourcing, production, collection, and recycling of materials in the U.S. is a challenge of historic proportion. A label must communicate succinctly and clearly, leaving the consumer with an actionable solution for obtaining recycling information.
GIVE CONSUMERS WHAT THEY WANT = BRAND LOYALTY
A 2011 poll by NBCUniversal's Green is Universal found that brand loyalty was a key factor in the increasing appetite that consumers have for environmentally responsible brands. The poll claimed 68% of consumers say it’s worth paying more for a green product or service if it is a brand they trust (an increase of 8 points vs. 2 years ago). Additionally, a whopping 93% of consumers in the poll feel they have a personal responsibility to take care of the earth. (12)

“These findings underscore that consumers are increasingly shopping with their values, particularly when it comes to the environment. This is an enormous opportunity for marketers to communicate their brand’s commitment to green, as a way to build both loyalty and returns for their business.”

– Beth Colleton, Vice President, Green is Universal

“In 2012, sustainable brands large and small will increasingly connect consumers, brand teams, suppliers and subject-matter experts in the innovation process to embed sustainability and social purpose into every business strategy, product design and stakeholder relationship,” stated BBMG. Brands that are integrating product stewardship into the life cycles of their products understand that communication with consumers is essential. Considering sourcing, packaging, consumption and end-of-life, each stage presents a new opportunity to interact with the consumer. The moment at which a CPC can open a window with consumers to learn about recycling a product is another important touchpoint that drives brand loyalty – an especially impactful one that provides a sense of satisfaction.
EXTENDED PRODUCER RESPONSIBILITY LAWS AND MEASURING IMPACT

In the U.S. 33 states have enacted EPR laws in the last 10 years for products such as pesticides, paint, automotive fluids and electronics. Along with that comes accountability that offers a vital detail: measurement of results. States with e-waste laws require manufacturers to report on tonnage collected to demonstrate they are in compliance, creating a measurement of impact. As EPR laws continue to be implemented, more consistency will be in place from state to state in how materials are handled for recycling and disposal. The electronics industry, fairly new on the EPR playing field, has over 25 different laws, whereas the paint industry has the same law from state to state because paint product manufacturers came together as an industry to support EPR. It’s in the best interest of CPGs to get ahead of EPR by educating consumers on existing recycling opportunities and helping normalize recycling behaviors among consumers.

Some companies, such as Nestlé Waters, are piloting programs for packaging to test the efficacy of collection points. By understanding where and how recycling is actually working, industries that find themselves facing EPR legislation are in a better position to offer workable solutions and maintain more control over their product domain.
THE SOLUTION THAT MAKES LABELING Viable

Integrating a product into a consumer's lifestyle is one of the best things that can happen to a brand. Consumers make choices based on all kinds of measurable impacts, one of which is sustainability, but it is not the only -- or the most important -- factor. Driving home the message on multiple fronts helps cement the value of a brand. Educate consumers on a company's sustainability efforts, show the many ways a company is having a positive effect on social issues, like the environment, that consumers care about, and empower the consumer to do their part.

Is a product responsibly produced, ethically sourced, and fulfilling the need for cost-effectiveness and eco-sensitivity? Can a consumer easily learn about the merits of a product, its production life cycle, as well as a ready solution for finding recycling? How can you answer these questions for consumers with one label given all its limitations?

The simple answer is that all of that cannot be packed into a label. Brands such as Lowe's have implemented web-based solutions, which also utilize mobile apps, to communicate directly with their customers about select products. Recycling a product at the end-of-life is just one part of the conversation that Lowe's wants to have with consumers.
E-World Online, which manages a network of preferred electronics partners across the country consisting of collectors, recyclers and drop-off locations, implemented the Earth911 Recycling Locator iFrame at e-worldonline.com. Through the Recycling Locator, consumers can instantly find local disposal options for an array of electronic devices. This provides companies who have accountability for e-waste disposal a direct consumer education connection, which is part of e-waste EPR laws in some states.

“...One of the key opportunities offered by Earth911 is that it allows the public to search for a recycling or safe disposal option for a specific product, which means they get the information specific to the recycling options for that product. This can help to ensure that the information provided for the increasing patchwork of opportunities to recycle different products is accurate and seamlessly incorporates municipal, retail, and other collection options.”

— PSI
CONCLUSION

Communication about recycling demonstrates a commitment to product stewardships and is one part of a successful product lifecycle: a direct result of well-informed decision making that takes place at many entry points. Stakeholders in a brand cross the supply chain from sourcing, product development, package design, marketing and more. A product’s end-of-life is another link in this chain, but one that must be clearly understood by the stakeholders to be articulated to consumers. Once a CPC understands and verifies the recyclability of a product, they are in a position to influence consumer behavior. However, they will find their outreach is limited by the facts.

The reality of recycling in the U.S. is that very little is common from border to border. The end result of any label must be to communicate an action and motivate behavior regardless of where consumers live. There is no substitute for fundamental behavior change in consumers when it comes to raising the recycling rate in the U.S. If a consumer can’t find the answer to “where can I recycle this?” a consumer will not recycle correctly if at all.

In order for consumers and brands to get true value from recycling, there must be localized information for a product and package. Earth911 help companies connect consumers to a centralized resource of localized information. The information is readily accessible (Web, mobile or a toll-free number) and current. It’s a simple, informative solution to the labeling conundrum: one-stop delivery of answers in seconds. Earth911 has the capability to provide the most detailed, localized information about proper disposal, whether it is recycling or re-use, in every U.S. ZIP code.
Earth911’s Recycling Directory is the only resource of its kind to connect all the dots of product stewardship together, with an easy-to-implement solution that is cost-efficient and built on over 20 years of expertise in recycling.

- Communicating ways to recycle an item opens a new conversation with consumers.
- A simplified method of delivering recycling information saves time and money for a corporation and requires no costly labeling efforts.
- Consumers gain a more transparent understanding of the recycling process and see more impact from their personal contributions.
- Trust and brand loyalty are a by-product of building relationships with consumers that center around a shared commitment to sustainable actions.

A transparent, full life cycle approach to product stewardship empowers a company to confidently build relationships with consumers by aligning their shared values on environmental issues. Communicating with consumers about the options for recycling a product is a critical component of the overall corporate sustainability blueprint. In the end, communication about recycling is about more than just the end-of-life: it’s about lifestyle, community, and empowerment. Successful end-of-life communications come from building a relationship, through many interactions, reinforcements, and delighting consumers with innovation.

**The best labels don’t answer the questions. The best labels empower consumers to find the answers, wherever they are, whenever they need it, and take immediate action.**

**About Earth911, Inc.**

**Experts in Landfill Diversion and Consumer Engagement**

Through the nation’s largest and most accurate recycling directory, Earth911 connects consumers with over 1.5 million ways to properly dispose of products and packaging in their local communities, helps businesses advance product stewardship, and drives sustainability messaging to an eco-conscious audience.

[Business.earth911.com](http://Business.earth911.com)
Works Cited


