



**SUSTAINABLE PACKAGING
COALITION®**

A PROJECT OF  GREENBLUE™



How2Recycle

2013 Annual Report

April 2014



Table of Contents

Executive Summary	2
Participation	3 - 4
Program & Annual Goals	5 - 6
Background & Development	7 - 13
Legal Considerations	14
Plastic Bags & Films	15 – 16
Feedback Survey	17 – 34
Communications	35 – 36
Partnerships & Stakeholders	37 – 38
Conclusions	39
Acknowledgements	40
Contact	41

Executive Summary

The How2Recycle Label is a voluntary, standardized labeling system that clearly communicates recycling instructions to the public. Variation in recycling programs, unclear labeling, and inaccurate recyclability claims make proper recycling a challenge. The How2Recycle Label was created to provide consistent and transparent on-package recycling information to consumers.

The goals of How2Recycle are to:

- Reduce confusion by creating a clear, well-understood, and nationally harmonized label that enables industry to convey to consumers how to recycle a package;
- Improve the reliability, completeness, and transparency of recyclability claims;
- Provide a labeling system that follows Federal Trade Commission Green Guides; and
- Increase the availability and quality of recycled material.

The How2Recycle Label is a project of GreenBlue's Sustainable Packaging Coalition (SPC). GreenBlue hopes to improve the ease of recycling through uniform and accurate on-package claims. GreenBlue also provides companies with instant recyclability assessments through delivery of How2Recycle artwork and claims.

In 2013, How2Recycle surpassed its goal of 20 participants, with a total of 23 participants by the release of this report. How2Recycle also refined its artwork delivery system, continued collaborating with stakeholder groups, released the 2014 guidance document, and saw ongoing positive trends in survey responses and feedback.

The following report outlines the How2Recycle Label participants, background and development, key program attributes, feedback, and goals.



Participation in How2Recycle

How2Recycle has 23 participants as of April 2014. The label first appeared on package during the 2012 Soft Launch and continued through full implementation in 2013. At the end of the Soft Launch, How2Recycle had 12 participating companies (“participants”). Current How2Recycle participants are:

- Ampac
- Annie’s Inc.
- Best Buy
- CCF Brands
- Clorox
- Coating Excellence International (cei)
- ConAgra Foods
- Ecologic Brands
- Estée Lauder (Aveda Brand)
- General Mills
- Honest Tea
- The Kellogg Company
- McDonald’s
- Microsoft
- Minute Maid
- Nakoma Products
- PAC Worldwide
- REI
- Sealed Air
- Seventh Generation
- Target
- Wegmans Food Markets
- Ziploc

Based on information provided by participants, GreenBlue estimates that over 7,000 stock keeping units (SKUs) carry the How2Recycle Label on over 100 million packages that are either on shelves or were previously purchased by consumers. These numbers will continue to rise as packages undergo design changes in the coming months.

Participation in the How2Recycle Label includes a fee, which covers staff costs, administrative needs, label designs and review, individual packaging recyclability analysis, data upkeep, web programming, access data collaboration, and legal considerations. GreenBlue will continue to pursue grants to assist companies with limited resources who wish to participate.

GreenBlue staff developed the fee structure in consultation with SPC members (Figure 1) to reflect realistic program needs. Participating companies pay an annual flat fee based on their size, as measured by annual revenue. Fee tiers are the same as SPC membership tiers.

Figure 1: How2Recycle Fees

Fee Categories	Fees	
	SPC Members	Non-Members
One-Time Setup Fee <i>(Regardless of size, waived if License Agreement signed without negotiation)</i>	\$1,000	\$1,000
Small Company <i>(Annual revenue less than \$10 million)</i>	\$2,000	\$3,000
Medium Company <i>(Annual revenue between \$10 million - \$1 billion)</i>	\$3,000	\$4,500
Large Company <i>(Annual revenue exceeding \$1 billion)</i>	\$4,000	\$6,000

How2Recycle offers financial sponsorships for the use of the Store Drop-off Label. These sponsorships are available through a partnership with the Flexible Film Recycling Group (FFRG) of the American Chemistry Council (ACC) and are detailed on page 15.

Testimonials

“Consumers need clear, concise communication when it comes to recycling, so materials that can be reclaimed don’t accidentally end up in landfills. This label helps ensure all packaging components are recycled, as intended, to further reduce the environmental impact of our products and promote conservation.”

– Melissa Craig, The Kellogg Company

“We hope the How2Recycle Label program helps to answer more consumers’ questions about recycling our products and encourages more of them to participate in recycling.”

- Amanda Humes, ConAgra Foods

“We are excited to add the How2Recycle Label on additional products, it strengthened our relationship with our customers, contributed to sales growth; and improved overall sustainability value for our customers.”

- Laura Taney, Sealed Air

Program & Annual Goals

Program Goals

The goals of How2Recycle are to:

- Reduce confusion by creating a clear, well-understood, and nationally harmonized label that enables industry to convey to consumers how to recycle a package;
- Improve the reliability, completeness, and transparency of recyclability claims;
- Provide a labeling system that follows Federal Trade Commission Green Guides; and
- Increase the availability and quality of recycled material.

Raising public awareness of plastic film recycling at Store Drop-off locations is an ongoing goal for How2Recycle. GreenBlue and its' partners made significant strides with this goal in 2013. As detailed in the Partnerships section, GreenBlue collaborates with the American Chemistry Council's Flexible Film Recycling Group (FFRG) to promote plastic film recycling. A project led by the FFRG in partnership with Wisconsin's Department of Natural Resources promotes plastic film recycling through the Wrap Recycling Action Project (WRAP).

The How2Recycle Label gained significant attention from GreenBlue staff participation in sustainability, packaging, and government-related conferences and events throughout 2013. GreenBlue continues to be a leading organization in packaging sustainability, and promotion of How2Recycle from GreenBlue staff as well as SPC member companies has been successful in building recognition about the program and its consumer education benefits.

2014 Goals

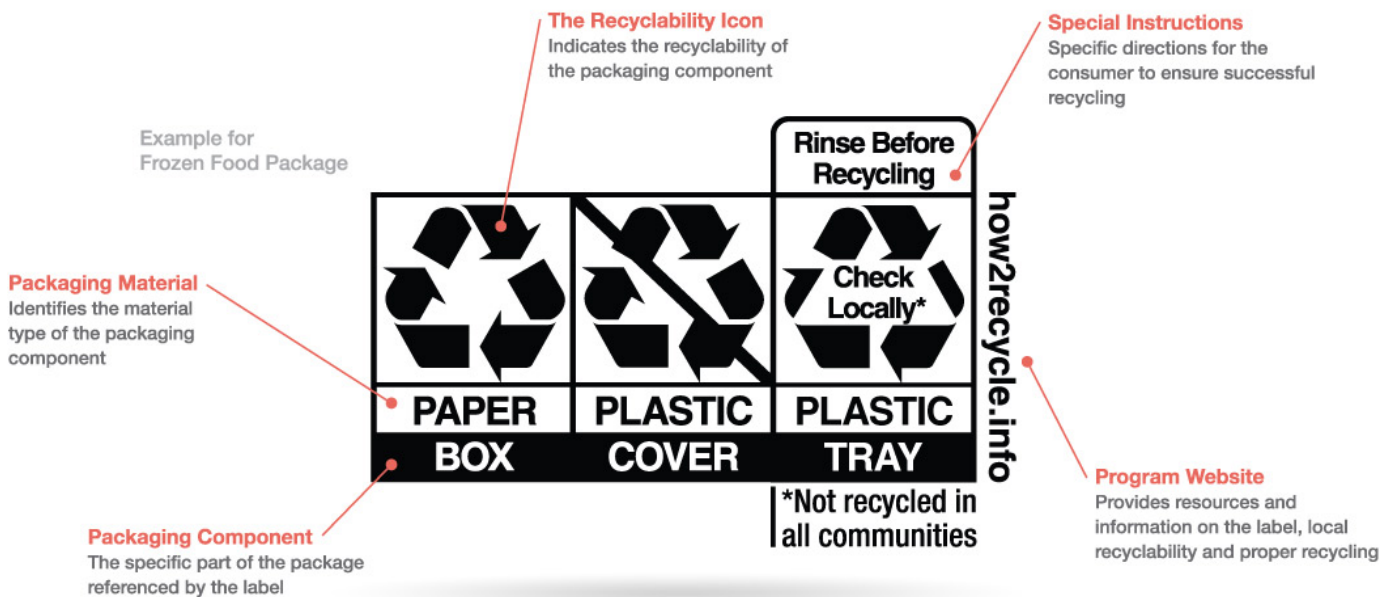
GreenBlue anticipates continued growth, with a goal of 35 participants by the end of 2014. This is possible through direct outreach and recruitment, continued promotion and increased awareness through media and participant feedback, and the help of the sponsorships provided by the FFRG (detailed on page 15).

To increase the volume of artwork delivery, GreenBlue will develop a semi-automated label delivery system. Staff will remain available to assist in labeling decisions and for new, complex, or unique labeling scenarios that require additional work. Additionally, new functionality and resources will be built into the How2Recycle.info website. GreenBlue anticipates the redesign will strengthen the program by enhancing the consumer experience and information available on How2Recycle.info.

GreenBlue will continue outreach efforts for the How2Recycle Label at conferences and events in 2014. GreenBlue will also continue to promote How2Recycle through the GreenBlue blog, 3BL press releases, media outreach, social media, and digital and print publications.

Staff will continue to explore a soft launch of the How2Recycle Label in Canada. Between 2012 and 2013, scoping meetings held in conjunction with PAC NEXT in Canada resulted in development of dual language label mock-ups and consultations with government, retailers, and recyclers.

GreenBlue is also exploring compostability labeling in consultation with the Foodservice Industry Leadership Committee of the SPC.



Background & Development

Development

In 2008, GreenBlue conducted research on current labeling options in the market, uncovering the following problems¹:

- Unclear labels confuse consumers and greenwashing is common;
- No harmonized, consistent labeling system exists across all material types;
- Existing labels are not comprehensively applied to all material types and individual package components;
- Federal Trade Commission (FTC) Guides for the Use of Environmental Marketing Claims (the “Green Guides”) are ignored or inaccurately interpreted; and
- Consumers desire transparency and proactive sustainability efforts from companies, but remain skeptical.

In response, GreenBlue formed a project team of SPC member companies, GreenBlue staff, and additional stakeholders to develop the How2Recycle Label.

Unlike typical recyclability labeling, the How2Recycle Label offers:

- Access to online recycling information via www.how2recycle.info ;
- Specific, targeted recycling instructions;
- Comprehensive component labeling;
- Uniformity across material and package types; and
- Ongoing marketing and outreach.

SPC began development of the How2Recycle Label through evaluation of a successful, UK-based model: the On-Pack Recycling Label (OPRL) program. OPRL is a partnership between the Waste & Resources Action Program (WRAP) and the British Retail Consortium (BRC). OPRL is used by over 100 companies on over 60,000 product lines, with participants saying it improves understanding of recyclability.²

An initial design exercise yielded three primary design options. GreenBlue refined the design options through three qualitative consumer tests, finding the well-recognized chasing arrows to be the most appropriate icon.

¹ GreenBlue’s Labeling for Package Recovery report, October 2011, part of the Closing the Loop series: <http://www.greenblue.org/publications/labeling-for-package-recovery/>

² The On-Pack Recycling Label scheme aims to deliver a simpler, UK-wide, consistent, recycling message on both retailer private label and brand-owner packaging to help consumers recycle more material, more often: <http://www.oprl.org.uk/>

Qualitative and Quantitative Testing

GreenBlue conducted qualitative and quantitative research surveys during the design and development phase of How2Recycle. Three qualitative tests occurred in 2009 and 2010, followed by a quantitative test conducted by Marketing Analysts, LLC (MAi) in 2011. The goals of the consumer testing were to:

- Assess consumer understanding of the label;
- Assess consumer behavior after exposure to the label;
- Confirm that consumers did not confuse the label with recycled content (per FTC request); and
- Evaluate if recycling labels influence purchasing decisions and/or brand perception.

The consumer testing verified that the How2Recycle Label stimulates interest in recycling and is well understood. Approximately eight out of ten consumers tested were at least somewhat interested in seeking more information about recycling after seeing the label. The website attached to the label was the top destination to seek more information, followed by municipal websites, looking for information previously delivered to their home, or calling a recycling center. The URL www.How2Recycle.info also showed strong recall and traffic driving potential.

Consumer testing also found that a Not Yet Recycled Label did not negatively impact consumer purchasing decisions, and consumers did not confuse it with other standard, on-packaging language like “made with recycled content.”

Finally, testing revealed that consumers generally do not understand Resin Identification Codes (RICs). RICs denote resin types for recycling and plastic industries. They were never intended as a consumer communication tool or to make recyclability claims. The general public, however, tend to equate RICs with recyclability and are generally confused by them, which presents a significant messaging challenge.

Additional details of the consumer testing are available upon request.

Resin Identification Codes (RICs)

Resin Identification Codes denote plastic types. The Society of the Plastics Industry (SPI) developed the codes in 1988 to assist in the identification of resin types for the recycling and plastics industries, and they are now required for use in 39 states. However, RICs were never intended as a consumer communication tool or to make recyclability claims. SPI intended for the codes to be largely unseen by consumers, and as a result, not influence consumer purchasing or recycling behaviors.³

³ SPI's information on RICs: <http://www.plasticsindustry.org/AboutPlastics/content.cfm?ItemNumber=823>

RICs are now part of ASTM International standard D7611/D7611M, Practice for Coding Plastic Manufactured Articles for Resin Identification, developed by ASTM International Subcommittee D20.95 on Recycled Plastics. ASTM clarifies that RICs are not “recycle codes,” do not imply inherent recyclability, and should not be in close proximity to environmental claims (including recyclability).⁴ The ASTM Subcommittee reviewed their design and use and changed the standard in 2013 so that the chasing arrows will become a triangle. This change has not yet been adopted in state laws.⁵

The Federal Trade Commission (FTC) Guides for the Use of Environmental Marketing Claims, known as the FTC Green Guides, also pertain to RICs. If an RIC is “conspicuously” placed on a package, it constitutes a recyclability claim. If the package type is not accessible for recycling by a substantial majority (60 percent⁶) of consumers, the RIC without additional qualifying language constitutes a misleading claim. The How2Recycle Label was designed to satisfy this requirement.

GreenBlue actively participates in ASTM conversations as part of D20.95. Our experience and consumer testing show the RICs are confusing to consumers. Our recommendation is to revamp the codes to be more useful to the plastics community while removing the chasing arrows because of consumer confusion surrounding their meaning.

How2Recycle is compatible with RICs. If communities use RICs to communicate to their residents and the RIC is placed inconspicuously, RICs will not conflict with How2Recycle. For example, a resident may see a Check Locally Label on a polypropylene yogurt container (a #5 RIC). The label prompts the consumer to check their local system, where they find clarification on whether the municipality collects polypropylene containers like yogurt cups.

Consumer testing by GreenBlue and other organizations show that the majority of the public does not understand RICs. Interpretations range from a plastics “grade,” popularity, number of times it was recycled, to the presumption that an RIC means something is recyclable. The How2Recycle survey findings corroborate this confusion.

Resin Identification Codes are not universally found on bags and films based on varying legislation and interpretations of the above guidelines. This leads to some consumers asking for the “recycle number” when they see bags and films with the Store Drop-Off Label.

⁴ ASTM’s standard on RICs: <http://www.astm.org/Standards/D7611.htm>

⁵ Information on the ASTM RIC process: http://www.astm.org/SNEWS/ND_2010/d2095_nd10.html

⁶ The FTC’s current version of the Green Guides is available at:
<http://www.ftc.gov/os/2012/10/greenguides.pdf>

Some consumers completing the How2Recycle survey assume that GreenBlue has ownership or control over the RICs. However, the How2Recycle Label does not supersede ASTM guidelines or state legislation. Rather, one of How2Recycle's primary goals is to ensure compliance with FTC Green Guides, which includes consideration of concurrent use of the RICs for plastics.

Federal Trade Commission (FTC) Guidelines for the Use of Environmental Claims (“Green Guides”)

GreenBlue recognizes the significant role of the FTC regarding environmental claims, particularly those regarding recyclability. The first meeting between GreenBlue and the FTC about the How2Recycle Label included a representative from the U.S. EPA and occurred on May 20, 2009. During the meeting, the FTC conveyed the following points:

- The FTC is not able to provide any approvals of labels or claims, or any endorsements;
- The FTC does not involve itself in specific methodological recommendations, but rather relies on the “competent and reliable scientific evidence, defined as tests, analyses, research, studies or other evidence based on the expertise of professionals in the relevant area, conducted and evaluated in an objective manner by persons qualified to do so, using procedures generally accepted in the profession to yield accurate and reliable results;” and
- Issues of concern included potential consumer confusion regarding recyclability and recycled content, and the need for a qualifier in conjunction with Check Locally language.

GreenBlue addressed the above considerations during the consumer testing process. FTC's Bureau of Economics reviewed the quantitative consumer test conducted by MAi Research. GreenBlue made the following changes based on FTC consultation:

- Use of “how2recycle.info” as the website URL from several options presented. Because the quantitative test included “how2recycle.info” on the label and it clarified the label's intent, FTC staff recommended retaining that website; and
- Additional qualifying language. Quantitative research showed high levels of consumer understanding of all aspects of the label, including the use of the term Check Locally. However, some FTC staff members were uneasy with using Check Locally without additional qualifying language. As a result, GreenBlue added the qualifying language “Not recyclable in all communities” to the Check Locally labels, consistent with the negative language encouraged by the FTC Green Guides.

GreenBlue is confident that the proposed system meets and exceeds both the Green Guides and ISO 14021, is considered acceptable by key FTC staff members (who, however, do not have the authority to make formal or official FTC determinations), and reinforces the FTC's mission regarding consumer claims. Specifically:

- How2Recycle’s Check Locally Label. The How2Recycle label category Check Locally includes a “Not Recycled in All Communities” qualifier that is consistent with examples of negative language provided within the Green Guides. It should also be noted that the U.S EPA is supportive of driving consumer action toward checking their local recycling systems;
- How2Recycle’s Store Drop-off Label. This category is for polyethylene bags, wraps, and films. Though over 60% access to recycling for these materials exists, it is at retail collection points and not through more traditional recycling means like curbside. The Store Drop-off Label acts as a qualifier; and
- How2Recycle’s Focus on Components. Claims of recyclability should be qualified to the extent necessary to avoid consumer deception about limited availability of recycling programs and collection sites. If an incidental component significantly limits the ability to recycle a product or package, a claim of recyclability would be deceptive. A product or package that is made from recyclable material, but, because of its shape, size or some other attribute, is not accepted in recycling programs for such material, should not be marketed as recyclable.

The How2Recycle Label meets these requirements by: 1) requiring all components to be labeled, and 2) requiring messaging specific to the package.

GreenBlue maintained an ongoing dialogue with FTC throughout development of the final label designs, and continues on an as-needed basis.





Data-Based Claims

The Federal Trade Commission (FTC) requires recyclability claims to be based on consumer access to recycling. Access to recycling data, also known as reach data, measures the percent of the U.S. population with access to recycling an item. Reach data includes access to both curbside and municipal drop-off collections.

How2Recycle divides packaging into four categories, defined by different levels of access to recycling. Figure 2 shows the general categories of recyclability used for How2Recycle Label designation. The chart is updated annually based on new access data.

Multiple sources of access data create data gaps and inconsistencies in methodologies. For example, access data for aerosol cans cited by some internet-based resources has not been verified, and information on “coated paper” does not provide enough information for the variety of foodservice coated paper packaging that exists. How2Recycle reflects the best available information.

Figure 2: Recyclability Reference Chart

	 Widely Recycled	 Limited Recycling - Not Recycled in All Communities	 Not Yet Recycled	 Store Drop-off
MATERIAL				
Glass	- Bottles & jars			
Metal	- Cans	- Lids & trays - Aerosols	- Peel-off foil seals	
Paper & Corrugated	- All paper and corrugated packaging		- Laminated or waxed	
Plastics	- Bottles and jars	- Cups, tubs, trays, lids, clamshells, polystyrene/foam	- Films, wrap, pouches, tubes - Degradable & compostable	- Certain bags, films and wraps*
Composite or Multi-Layer		- Liquid food & beverage cartons	- Multi-layer packaging, snack bags	

GreenBlue acknowledges that packages labeled in the Widely Recycled category may land in the hands of consumers with limited or no access. Widely Recycled items are those package types for which there are recycling options accessible for at least 60% of consumers, though access to recycling for most Widely Recycled items is closer to 75% - 85%. GreenBlue staff hypothesizes that consumers without recycling access acknowledge and are aware of living with reduced services. Examples include towns and rural communities with no access, or areas with limited access only through community drop-off centers, which label their bins at drop-off sites.

Access data do not always consider technical recyclability, additives, treatments, or other scenarios that impact recyclability. How2Recycle uses a secondary filter based on technical recyclability, which informs specific messaging and identifies known problem materials in the recycling stream. Access data and all secondary filter information are found in the How2Recycle Guidance Document, available to participants. A simplified version of this document is available to the public.

GreenBlue is currently collaborating with brands, government, and material trade associations to attempt to unify access data collection methodologies and ensure clear and complete data collection, with an understanding of factors creating a margin of error such as multi-family housing recycling collection. A meeting in February 2014 at the U.S. EPA verified interest, and GreenBlue anticipates a few months of analysis and discussion.

Soft Launch (2012) Lessons

Last year GreenBlue published the How2Recycle Soft Launch report detailing the findings and successes of the How2Recycle Label as of March 2013. At the time, twelve companies were participating in the program. GreenBlue estimates that over 3,000 stock keeping units (SKUs) carried the How2Recycle Label on over 50 million packages either on shelves or purchased by consumers. Consumers provided feedback on the program through an online survey.

During the Soft Launch, How2Recycle staff worked through challenges and developed best strategies in conjunction with How2Recycle participants. The How2Recycle Label is most easily incorporated into packaging for new products or while products/packages are undergoing refreshes or other changes.

Updates were made to the license agreement and the general design guidelines of the program based on feedback and stakeholder conversations. The How2Recycle Guidance Document is updated annually and identifies critical design considerations such as: label use with dark colored packaging, eliminating unnecessary or redundant messaging, relocating Resin Identification Codes (RICs) so as to follow both FTC and ASTM guidelines, and labeling bottles with full-body shrink sleeve labels appropriately to reflect the issues with their recyclability.

Please see the Soft Launch Report for further detail, which is available for free upon request.

2013 Summary

As the How2Recycle Label has grown significantly and is gaining more public attention, GreenBlue is developing a semi-automated artwork delivery process for participants and a revamped, more public-facing website based on 2013 feedback. GreenBlue has also refined our approach to working with participant communications departments for joint communication efforts, including strategy, joint press efforts, and social media marketing.

As focus grows on marine debris and litter, use of the “Empty and Replace Cap” message on plastic bottles became increasingly important.

How2Recycle artwork is most frequently applied during existing artwork refreshes. This keeps incorporation of How2Recycle cost effective and on a rolling basis.

As changes are made and lessons are learned throughout the program, the How2Recycle Guidance Document is updated. The 2014 Guidance Document was released in February 2014; the full version is for participants use only. The Guidance Document includes details like artwork color and size requirements, how the program labels different materials, and an overview of the different label types.

The survey section of this report details consumer feedback.

Legal Considerations

Federal Trade Commission (FTC) Guidelines for the Use of Environmental Claims (“Green Guides”)

GreenBlue recognizes the significant role of the FTC regarding environmental claims, particularly those regarding recyclability. GreenBlue maintains an ongoing dialogue with the FTC on an as-needed basis. Please see the Background & Development section for more information.

Considerations for Packages Distributed Outside of the US

For some companies, packages may be designed for both US and foreign markets, or could end up crossing borders. GreenBlue is working with various stakeholders in Canada to develop a dual language label that works concurrently with the US label. Beyond Canada, GreenBlue recommends using a “US Only” qualifier with How2Recycle Labels that might be imported into other countries. Many packages that are clearly designed for US consumers cross borders readily with no legal implications, and a qualifier will clearly designate that the label is based on access within the US.

Plastic Bags & Films

Plastic bags and films present a unique opportunity for the program given that:

- Their use is widespread;
- While access to recycling at curbside is available to less than ten percent of the population, the majority of the population has access to drop-off at a retail location⁷; and
- Bag bans may limit the availability of important collection mechanisms.

GreenBlue developed a special version of the How2Recycle Label for acceptable plastic films that includes Store Drop-off language. This label communicates the specific requirements for recycling plastic bags and films that are primarily polyethylene (#2 HDPE and #4 LDPE) and thus recyclable at retail locations that collect plastic bags. “Recycle if Clean and Dry” on-label messaging was added for the benefit of retailers and recyclers concerned about contamination.

Consultation with the Food Marketing Institute (FMI), the industry group representing grocery retailers, confirmed that this material is desirable, commonly bailed with back-of-house films such as shrink-wrap, backhauled to distribution centers, and usually cost neutral or cost positive. The primary recyclers of this material have the capacity to process additional material. GreenBlue will continue to consult with FMI and individual retailers as increases in packaging using the Store Drop-off Label continue.

GreenBlue and the Sustainable Packaging Coalition are partnered with the American Chemistry Council’s Flexible Films Recycling Group (FFRG) and the Wisconsin Department of Natural Resources for the Wisconsin Wrap Recycling Action Project (WRAP) campaign. This campaign was launched in October 2013 to significantly increase recycling of plastic wraps used for everyday consumer products. The campaign is targeted at Milwaukee, Wisconsin; however, all partners are promoting plastic film recycling outside of this specific location. Additional information on the campaign and a poster (including the Store Drop-off Label) are available for retailers for free download and use at plasticfilmrecycling.org. An example of the educational poster can be seen on page 16.

Since May 2013, the How2Recycle Label has offered financial sponsorships to participating companies for use of the Store Drop-off Label for plastic bags, films, and wraps. These sponsorships are made possible through a grant from ACC’s FFRG. The mission of the FFRG is to increase the collection and recycling of flexible plastic films and educate consumers about the ease and importance of recycling these materials. Sponsorships remain available and target high-volume categories of PE-based flexible film such as store carryout bags, produce bags, dry

⁷ American Chemistry Council’s study on access to plastic retail bags and plastic film (wrap and sack) recycling: <http://plastics.americanchemistry.com/Education-Resources/Publications/2012-Plastic-Film-and-Bag-Recycling-Collection-National-Reach-Study.pdf>

cleaning bags, wraps for new apparel, and shipping packaging from online purchases. Current sponsorship recipients include Coca-Cola (Honest Tea), PAC Worldwide, SC Johnson (Ziploc), and Wegmans Food Markets.

The Trex Company provides participants with an analysis of the recyclability of their films. GreenBlue is collaborating with ACC to develop a protocol specifically for the testing of polyethylene-based films.

With the success of the collaborative efforts to date, ACC plans to expand the WRAP program and the How2Recycle Label will remain an important means of communication. Below is the poster that ACC developed for the WRAP campaign.



Recycle clean, dry plastic bags and film packaging

Recycle if Clean & Dry

Store Drop-off

PLASTIC BAGS / FILM / WRAP

how2recycle.info

- ONLY frozen food bags with the above how2recycle label
- NO prewashed salad mix bags
- NO degradable bags

Examples of items shown: Newspaper Bags, Case Wrap (e.g. snacks, beverage cases), Produce Bags, Retail Bags, Food Storage Bags, Air Pillows, Bread Bags, Dry Cleaning Bags, Napkin, Paper Towel, Bathroom Tissue and Diaper Wrap (packaging).

Recycled plastic bags and wraps can become new packaging or durable home building products.

BEMIS plasticfilmrecycling.org **Ziploc**

Feedback Survey

GreenBlue launched a feedback survey on the How2Recycle website in June 2011. The goal of the survey is to collect feedback from the general public and to corroborate the findings of the pre-launch consumer testing in a qualitative manner. In August 2012, survey revisions allowed for respondents to self identify as consumers, government officials, brand owners/retailers, or “other”. Respondents selecting “consumer” receive the original feedback survey, while all other groups receive the original survey with additional applicable questions. The survey is live on how2recycle.info, collecting ongoing feedback. A general contact form is also available on the website.

In addition to inquiries through the general contact form, survey respondents can indicate that they wish for a response to their feedback. Staff responds to these requests via email.

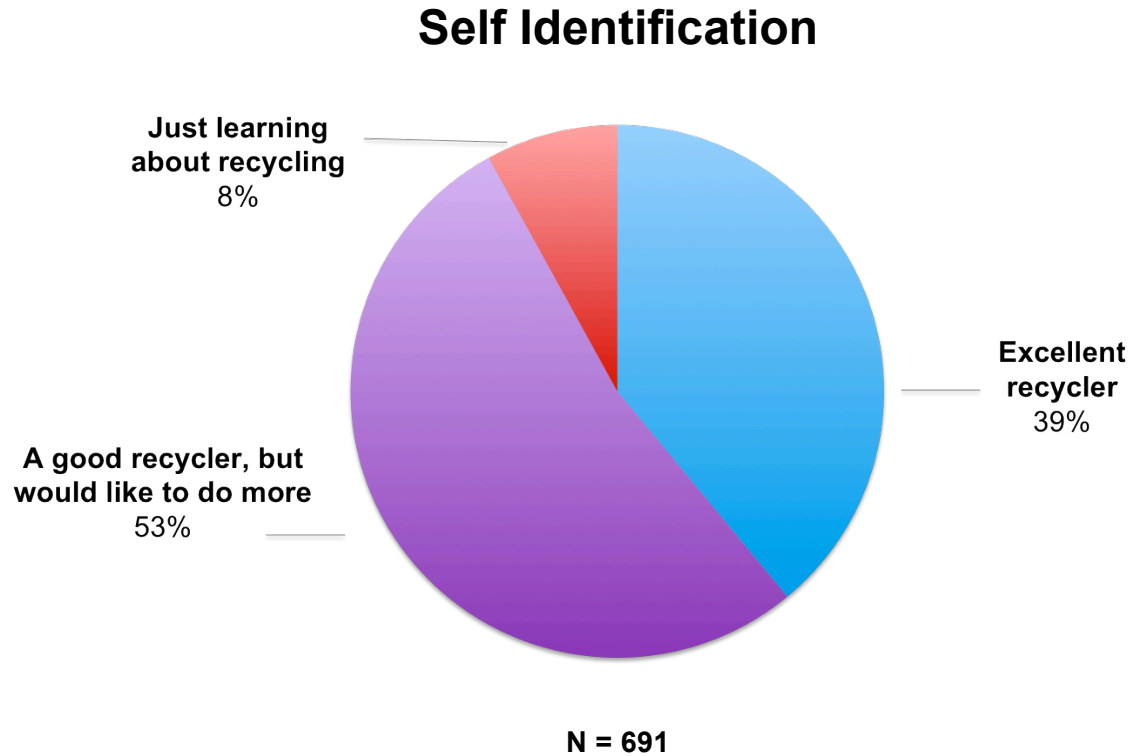
The following analysis of consumer survey results includes data from the survey launch through January 31, 2014. This analysis only includes survey responses from people who self-identified as “consumers,” it does not include responses from those who identified as government officials, brand owners/retailers or “other” (which totaled 53 responses). It also does not include queries sent to the general contact form, which typically collects general recycling questions, media inquiries, and inquiries about using the label on products. The survey relies on consumer initiative to actively choose to take the survey, and thus is a self-selecting group. The survey is anonymous unless a participant chose to include their email address.

The total number of consumer responses, or N, for this time period is 694. Respondents did not answer every question. “No Answers” are removed from each question, making N vary slightly by question. The survey is not statistically significant in that it only captures information from consumers that take the initiative to go to www.How2Recycle.info and fill out the survey. The survey is ongoing and will continue to collect information. How2Recycle survey respondents have the option to request a response to their survey, volunteer to help with How2Recycle outreach, and sign up for the GreenBlue newsletter list.



Question 1: Do you consider yourself...?

Question one allows survey respondents to self select their recycling ethic and behavior. Three multiple-choice options are offered.



Question 2: How did you find out about the How2Recycle Label?

Answer	%
Saw it on a package	58%
Read about it on an internet article or blog	27%
Read about it in printed material	5%
Other	10%

N = 692

If you saw the label on a package, of what brand was the product?	%
Sealed Air	70%
Seventh Generation	11%
Kellogg's	8%
General Mills	4%
Kirkland (Costco)	4%
Clorox	<1%
REI	<1%
Unsure	2%

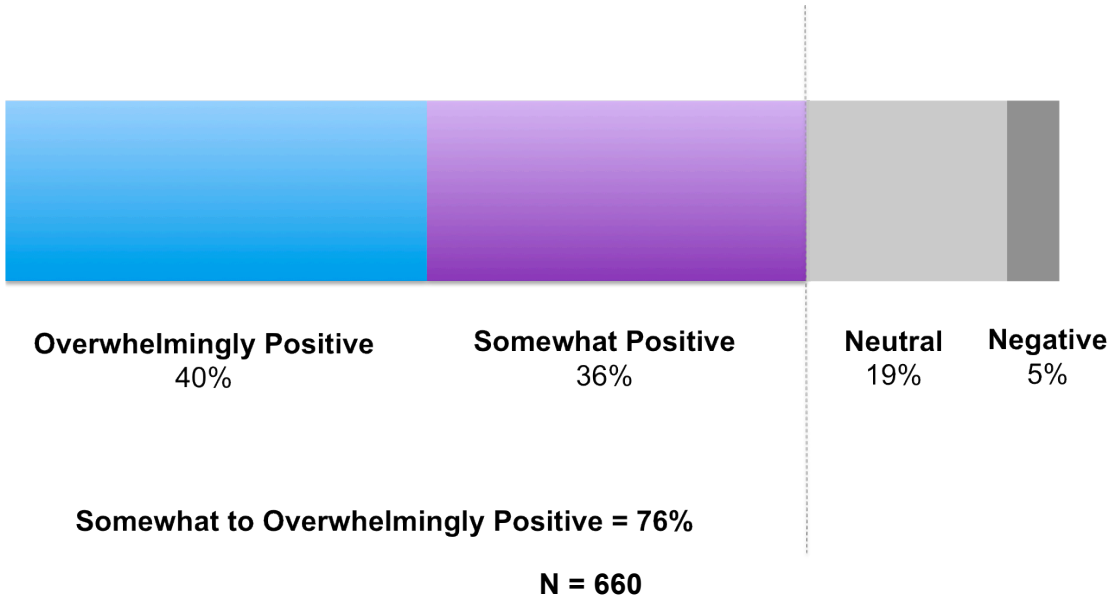
N = 377

Question 2 gauges where exposure to the label occurs. The How2Recycle website and survey launched prior to labels appearing on packaging, resulting in high initial exposure from non-packaging sources; however, as more packages carrying the label have reached market, the majority of consumers are now learning about the How2Recycle Label by seeing it on a package.

Of those that saw the label on a package, a significant majority saw it on the Sealed Air Fill-Air Extreme™ product. This skews the survey analysis toward plastic bag and film reactions and commentary. The nature of mail order and shipments through Amazon and other E-commerce channels like this provide high exposure to consumers, as the label is front and center when they open a package. Other labels may be more intuitive than the Store Drop-off Label, and consumers may not need to search out more information on the website for more commonly known recycling options.

Question 3: How would you describe your experience with the label?

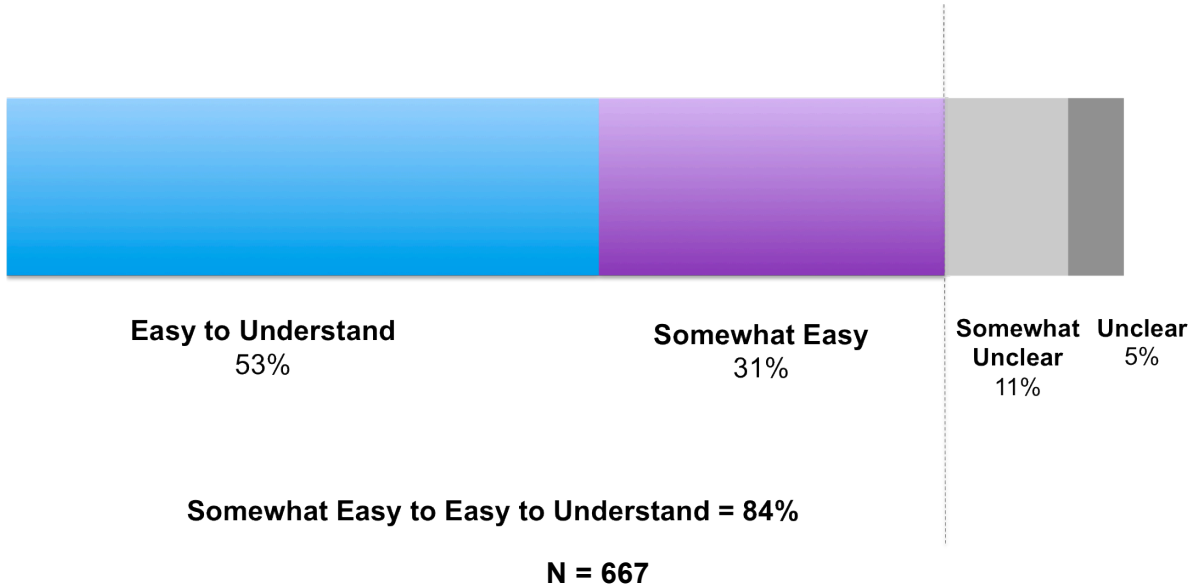
Experience With the Label



Question three allows respondents to rate their overall experience with the How2Recycle Label. Experience with the label has an overall positive trend. 76% of respondents selected overwhelmingly or somewhat positive, while 19% said neutral and 5% said negative.

Question 4: Is How2Recycle Easy to Understand?:

Ease of Understanding

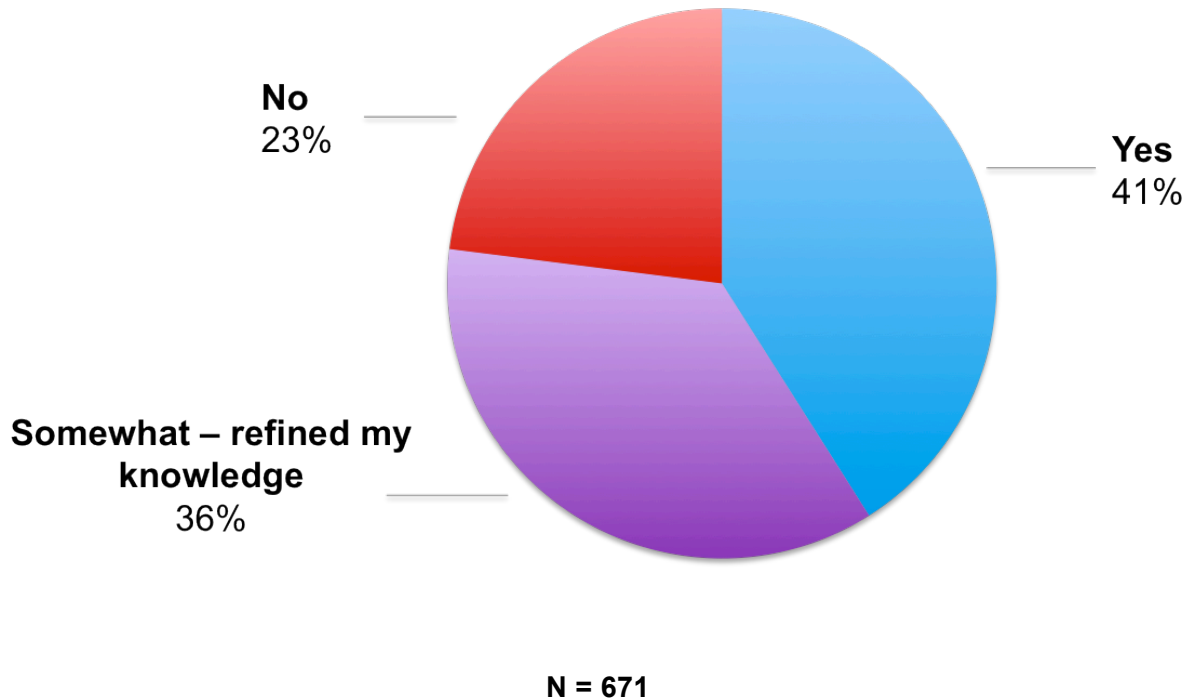


In addition to gauging initial experiences and feelings toward the label, the survey also measures self-identified ease of understanding. Not only do respondents have positive experiences with the label, they also find it easy to understand; 84% of respondents find the label easy or somewhat easy to understand.

While space is not provided for comment in this question, later comments and responses reveal trends among neutral and negative responses including confusion over RICs, concern that the company is not making corresponding sustainability improvements, and the need for more information. Consumers ask to see the “recycling numbers,” assuming that they equal recyclability or because their municipality tells them which RICs to recycle. While How2Recycle is compatible with RIC labeling, reconciling RIC centered outreach with How2Recycle will continue to warrant attention. Consumers desire more information about a company’s sustainability efforts or where they can recycle an item. Finally, only a handful of respondents found the design confusing or unclear.

Question 5: Did the label and/or website teach you something you didn't already know?

Learning New Information

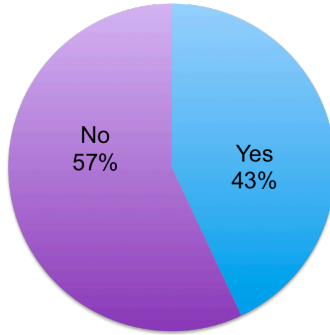


Question five allows respondents to identify whether or not the label or website taught them something new. How2Recycle is both a specific on-package recycling instruction as well as an online tool to provide general recycling information to the public. In 2014, the website will undergo a redesign for additional functionality. The current information available on both labels and the website provide 77% of respondents new or refined information about recycling. The extent to which respondents learn something new also relies on their willingness to spend time on the website reading information.

Website metrics provided on page 35 support widespread activity on how2recycle.info, which staff hope to further increase with website development and additions. Since this survey is web-based, responses are limited to those that took initiative to go to the website and misses other individuals that saw the label but chose not to seek out additional information. It should also be noted that in the pre-launch qualitative consumer testing, 80% said the label made them “somewhat interested” or “very interested” in learning more about recycling. These survey results correlate with the quantitative pre-launch testing.

Question 6: Did you change your recycling behavior based on the label and/or website?

Behavior Change



N = 661

To elaborate on “Yes” answers, respondents receive a fill in the blank form. To elaborate on “No” answers, respondents receive a multiple-choice question, which includes a fill in the blank option.

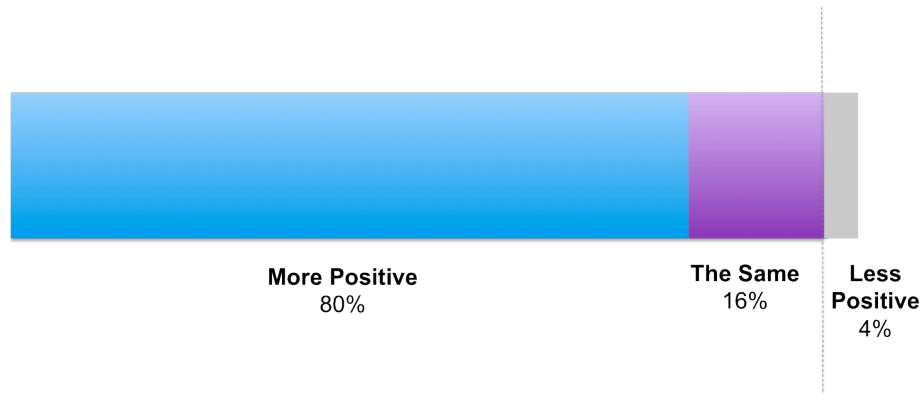
If yes, what did you do differently?	%
Recycled plastic bags/films at Store Drop-off	59%
Changed behavior to follow label instructions	12%
Will start recycling more items	9%
Sought out more information	4%
Will look for How2Recycle Label in the future	4%
Other	12%

If not, why not?	%
I already knew how to recycle my package	61%
I don't have access to recycling this package	20%
I need more information	8%
I don't believe it's actually getting recycled	4%
Other	7%

Most respondents have positive experiences with How2Recycle and learn new information, but less than half change their behavior. A very high percentage did not change their behavior because they already knew how to recycle their package. A possible explanation is that these respondents do have general recycling knowledge and thus indicate that they know how to recycle their package. The number of participants seeing the label on something other than an actual package may also contribute to this trend. Respondents that have seen the label on a package are more likely to change their behavior, as seen in the analysis in the following section.

Question 7: If you saw the label on a product, is your impression of the company that makes that product...?:

Impression of Company



N = 639

Consumers are more positive about companies that use the How2Recycle Label.

Respondents have the opportunity to explain their answers to this question. The breakout below summarizes these explanations. The breakout is a summary of trends, does not imply ranking, is not inclusive of all comments, and strives to maintain the anonymity of respondents.

Reasons for “more positive”:

- Cares about the environment
- Is trying to be transparent
- Has larger sustainability goals
- Is being honest

Reasons for “less positive”:

- The packaging isn’t recyclable
- It does not include the “recycling number”
- It is confusing

Reason for “the same”

- I expect this type of information
- It requires effort
- I don’t know if the company is taking other steps toward sustainability

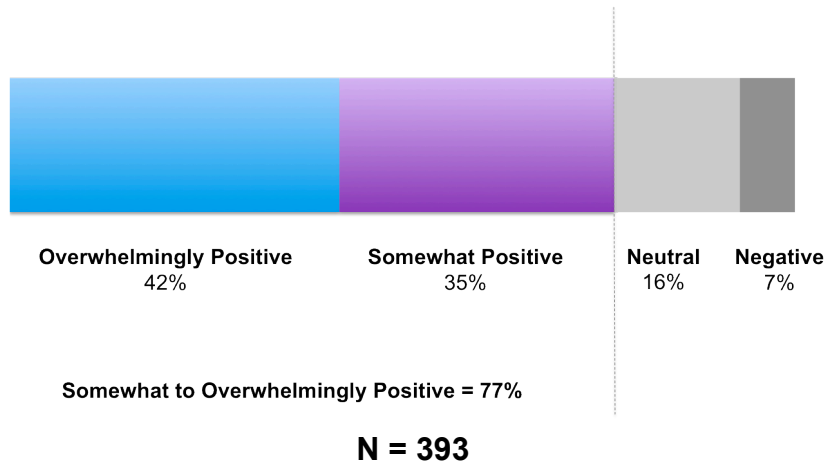
Feedback regarding the “recycling numbers” (RICs) reiterates consumers’ misunderstanding of these items and suggests the need for further education.

Survey Results: Comparison Between “Saw it on a Package” and All Other Exposures

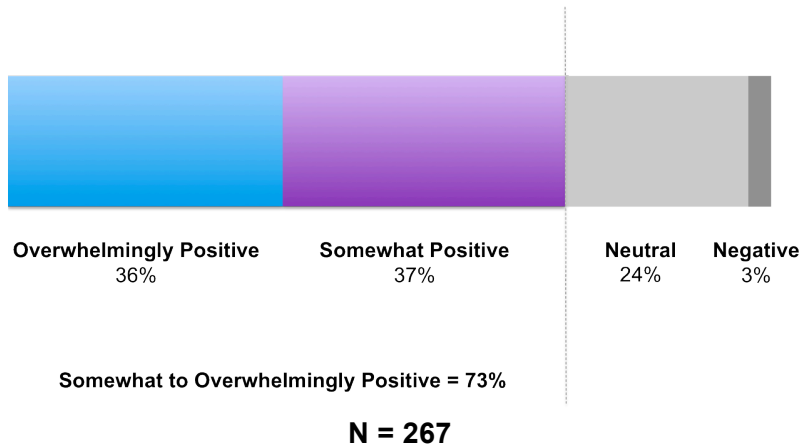
The following section compares responses from consumers that saw the label on a package (Group A) against consumers that saw the label through all other exposure types (Group B). The goal of this comparison is to examine any differences between exposure types. As more packages using the How2Recycle Label enter the market, GreenBlue anticipates a higher percentage of respondents will see the label on a package. Response numbers are 404 for Group A and 290 for Group B.

Question 3: How would you describe your experience with the label?

Experience with Label
On a Package



Experience with Label
Not on a Package



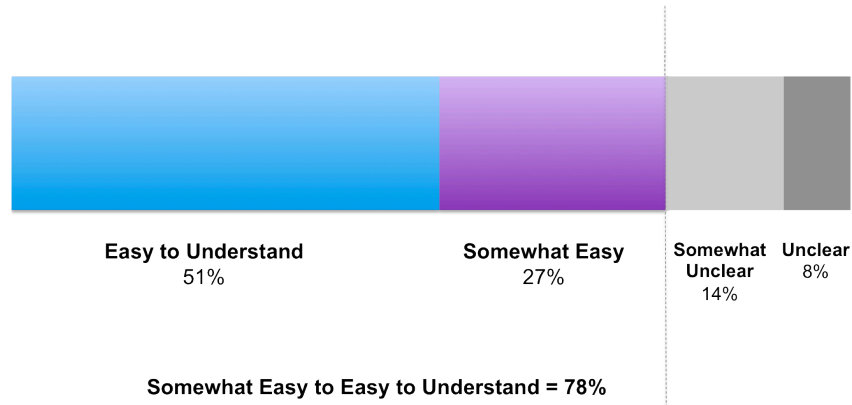
No significant differences are found between Group A and Group B. Group A shows slightly higher percentages of Overwhelmingly Positive and Somewhat Positive experiences; however, Group A also shows a slightly higher percentage of Negative experiences. This result indicates that exposure type does not greatly influence a consumer’s portrayal of the label.



Question 4: Do you find the label...?:

Ease of Understanding

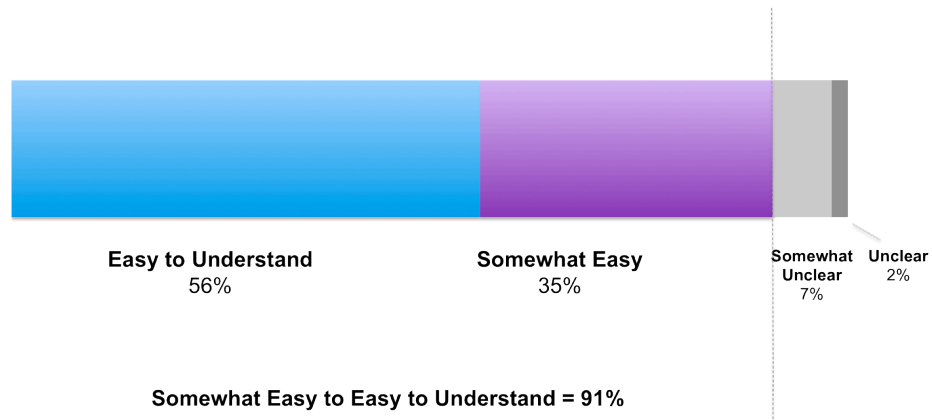
On a Package



N = 394

Ease of Understanding

Not on a Package



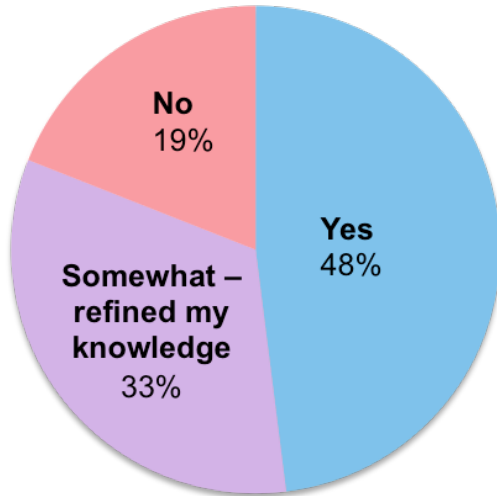
N = 274

Group A shows a slightly lower ease of understanding. While the two groups have similar results for the “Easy to Understand” or “Somewhat Easy to Understand” categories, Group A shows slightly higher numbers in “Somewhat Unclear” and “Unclear.” When consumers see the label on a package they face new information in a new format, sparking more confusion than exposure via all other outlets. However, 78% of Group A still finds the label somewhat easy to easy to understand. The comparison in this question shows that exposure to the label on a package does require a learning curve, though small in nature. A working hypothesis is that as more packages carrying the label hit the market, the label will become something consumers are used to seeing, resulting in less confusion.

Question 5: Did the label or website teach you something you didn't already know?

Learning New Information

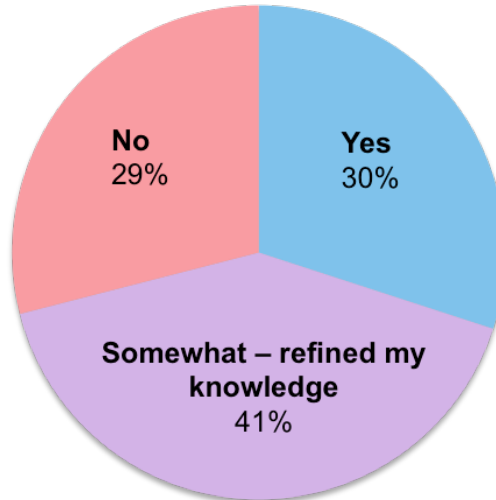
On a Package



N = 394

Learning New Information

Not on a Package



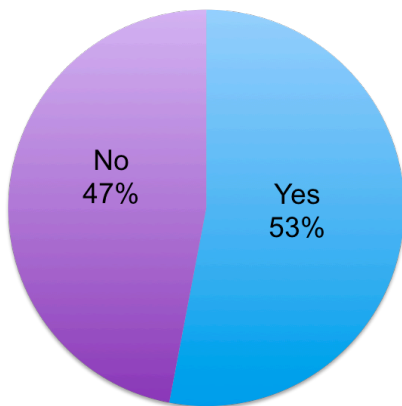
N = 278

Respondents that see the How2Recycle Label on a package learn more new information than those that do not. 81% of respondents in Group A learned new or refining information, while only 71% in Group B learned new or refining information. This shows a trend toward greater education by way of on package labeling. Providing new information is an essential link in successful behavior change.

Question 6: Did you change your recycling behavior based on the label and/or website?

Behavior Change

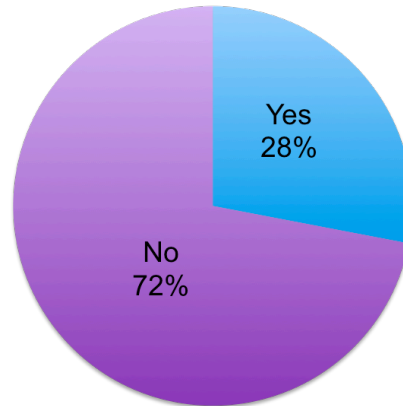
On a Package



N = 388

Behavior Change

Not on a Package



N = 274

To elaborate on “Yes” answers, respondents receive a fill in the blank form. To elaborate on “No” answers, respondents receive a multiple-choice question, which includes a fill in the blank option.

The most commonly seen “Yes” answers are as follows

- Recycled plastic bags/films at Store Drop-off
- Changed behavior to follow label instructions
- Will start recycling more items
- Sought out more information
- Will look for How2Recycle Label in the future

The multiple-choice options for “No” answers are as follows

- I already knew how to recycle my package
- I don’t have access to recycling for this package type
- I don’t believe it’s actually getting recycled
- I don’t believe it really makes much of a difference
- Other [fill in the blank]

Seeing the label on a package sparks more behavior change than seeing the label in other exposures, likely because there is an immediate recycling decision to be made when seeing the

label on a product. More than half of those that saw the label on a package changed their behavior, while only about a quarter that saw the label elsewhere did. The label drives consumers to recycle plastic film, seek more information, follow How2Recycle instructions, and recycle more. This behavior change fulfills the program goals of increasing and improving the quality of recycling. Those that did not change their behavior claimed that they already knew how to recycle, do not have access, or need more information.

For respondents that did not see the label on a package, about 80% claimed that they did not change their behavior because they already know how to recycle. However, this number is significantly lower for the group that saw the label on a package (41%). This difference indicates that some consumers believe they know how to recycle, but may change this view when they see the label on a package and learn new information.

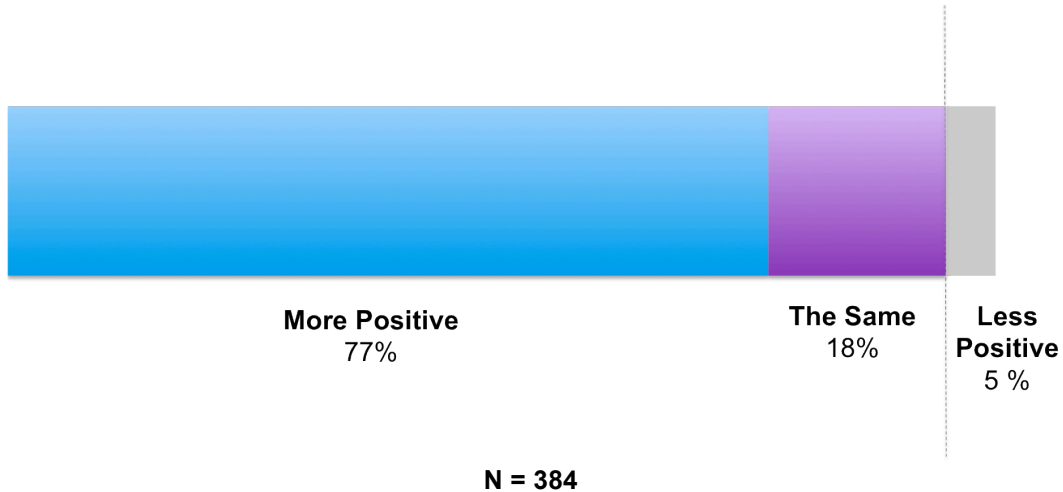
In both Group A and Group B, some consumers claim that they do not have access to recycling and thus did not change their behavior (30% in Group A and 11% in Group B). For Group A, we know that most respondents see the label on plastic film. We also know that Store Drop-off access is available to the majority of the US population. This may indicate an area of needed education to explain what Store Drop-off means and what materials are compatible in these bins. Results may also include respondents from other countries that really do not have access to these locations. GreenBlue is actively working with several key industry partners on educational pilots to shape further outreach efforts.



Question 7: If you saw the label on a product, is your impression of the company that makes that product...?:

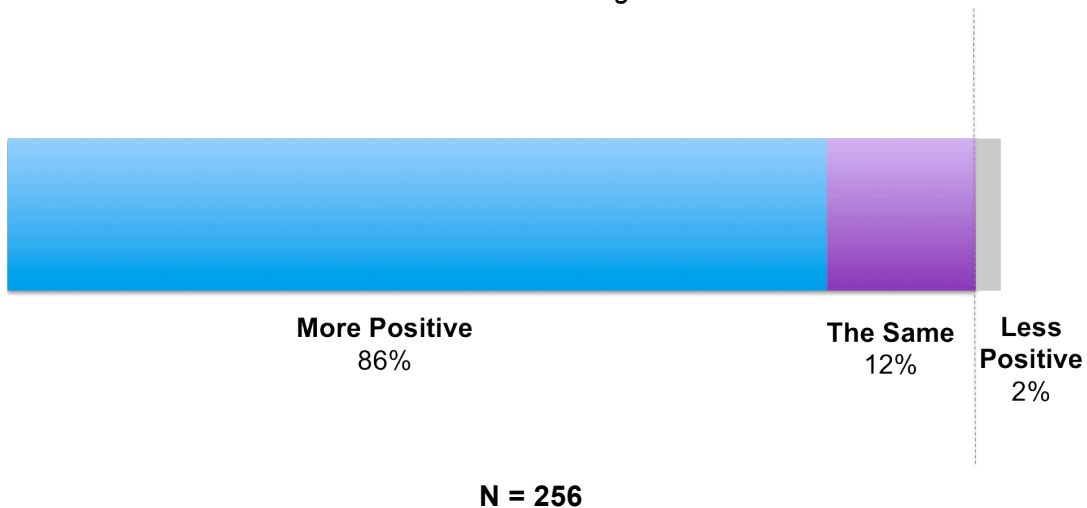
Impression of Company

On a Package



Impression of Company

Not on a Package



There are no significant differences in impression of a company between Group A and B. Group B has almost a 10% higher “More Positive” view. Despite the difference, both groups show significant positive views of companies that use How2Recycle and very low less positive views.

Qualitative Comments

The following comments come from the How2Recycle.info survey. They are representative of common trends and themes in comments and other general contact. They are corrected for spelling or capitalization errors. GreenBlue staff responds to all questions and to comments as necessary if the commenter leaves their email address.

“Yes, is there anyway this can become a federal mandate? They should make manufacturers put labels on every one of their products much like how the FDA does with food labels!”

This comment is a great example of general support and acknowledgement that How2Recycle is a group effort. More information on outreach and coordination is available in the Stakeholder Outreach and Communications sections.

“It is my understanding that dry plastic bags and film have no recycling value due to the fact that there is not a clean, energy efficient process to recycle the product.”

We sometimes receive commentaries of skepticism about the value of recycling, especially plastics. Consumers question if materials are actually recycled or if they are worth recycling. If consumers leave their contact information, a GreenBlue representative will respond giving them information about their question or comment.

“I consider myself a pretty good recycler and I try to recycle as much as possible, but I was still unaware of all that may be recycled, such as the plastic bags that hold cereal. If I didn't know this, then others out there don't know as well.”

This comment is an example of general support from a consumer with high recycling effort, but desire to improve the behaviors and recycling motivations of others. It also shows that a recyclability educational awareness campaign may be needed to address confusion.

“I was confused when I first saw the label because I'm used to the old style, but after reading the information on the website, I now see how much more efficient the labeling is, and more precise. I'm glad I took the time to look it up.”

This respondent found the website useful, which is a large part of the How2Recycle Label. Only so much information can be given on a product's packaging, so how2recycle.info is used to fill in the gaps that consumers may come across.

“More products should do this!! It takes away the "guessing game" of recycling”

Some survey responders appreciate the transparency of companies. They feel the label lets them avoid “guessing” what can be recycled.

“There is no number on the plastic indicating what type of plastic it is. This is useless.”

This comment is an example of the trend of misinformation about “recycling numbers.” Comments such as these also illustrate a failure to grasp that recycling is more than just plastics, as well as the documented confusion the RICs create.

“I would love to see other stores/brands with your label to help people properly recycle. I will definitely support stores/brands that carry your label over those that don’t.”

Many respondents sent words of support and generally positive anecdotes.

Overall, these findings corroborate the pre-launch consumer testing, and support continued implementation of the How2Recycle Label. Focus areas for continued education include RICs, film recycling at retail locations, and how the public can become familiar with their local recycling system.

Communications

Media Coverage

How2Recycle received media coverage in online news outlets, online articles, corporate websites, printed news sources, and newsletters. The main focus of these outlets fell in four primary categories: general news sources, sustainability-focused news, other industry news (e.g. packaging news), and directly from participating companies. Examples include the *LA Times*, *USA Today*, *Daily Progress* and NBC 29 (Charlottesville, VA), *GreenBiz*, *Packaging Digest*, *Resource Recycling*, General Mills' website, and Seventh Generation's website.

From the period May 2011 through January 31, 2014, How2Recycle was featured in approximately 150 outlets. In order to obtain a fuller grasp of How2Recycle's media reach and publicity value, GreenBlue contracted with Cone Communications LLC to gather information on media impressions, ad value, and publicity value. Cone analyzed 84 online placements for the period May 2011 through January 2013. The estimated ad value as of January 2013 was \$869,897.32 and the estimated publicity value was \$2,609,691.96.

Website Behavior

How2Recycle.info, launched in October 2011, serves as the top destination to learn more about the label, the program and recycling. The following Google Analytics data provide information on website hits and on site behavior. Unless otherwise noted, the period of analysis is from October 1, 2011 through January 31, 2014.

For this time period, How2Recycle received 55,618 unique visitors, 66,800 total visitors, and 112,682 total pageviews. Unique visitors are each new individual that visits the website. Total visitors include both first time and repeat visitors to the site; this is a count of total visits to the website. About 83.3% of visits to the site are new visits, and 16.7% are returning visitors. Since last year's Soft Launch Report, the number of unique visitors to the website has increased 64%, total visitors has increased 65%, and total pageviews has increased 64%.

Traffic to How2Recycle.info came from a variety of sources. Approximately 18% came from search pages where consumers searched How2Recycle, found the website in the results, and clicked on the link. About 26% came from referrals, or links on other sites. The top referring websites are sealedair.com, reddit.com, and sustainablepackaging.org. Most visitors to how2recycle.info are direct traffic, i.e. they know the web address, and type it into their browser (over 50%).

The majority of visitors (84%) are from the United States. Small percentages of visitors come from other countries including Canada (4%), the United Kingdom (2.3%), Australia (1.5%), and all others (8.2%). The top countries excluding the US are also those that GreenBlue interacts

with regularly to either explore international labels (Canada and Australia) or gain feedback (the UK's On Pack Recycling Label).

How2Recycle sometimes requires consumers to find out more information about their recycling options from other online sources. How2Recycle.info provides various resources to assist consumers, including links to other helpful websites, but limited data is available for the number of clicks for each link. GreenBlue also highlighted the How2Recycle Label through a variety of other methods including a Facebook page, Twitter account, GreenBlue's LinkedIn product page, exhibition booths and tables at conferences, and webinars for a variety of constituents.

Partnerships & Stakeholders

State and Municipal Government

Outreach to government stakeholders will continue to be an essential part of How2Recycle. Government stakeholders provide information on local recycling conditions, keep staff attuned to possible impacts of How2Recycle on recycling programs, provide their experiences with recycling education, and provide an outreach avenue for the program. GreenBlue reached out to government stakeholders during development and soft launch, and will continue outreach and collaboration efforts going forward.

New York City's Department of Sanitation was an essential stakeholder during the development phase. Their concerns about food and liquid contamination of recyclables led to the addition of the "Empty and Replace Cap" messaging to communicate the necessity of emptying containers.

The How2Recycle survey is ongoing. Data collected from the survey launch to the present includes feedback from local government recycling coordinators, state government officials, and other government representatives. This survey, along with our contact form, will continue to be a method of collecting feedback.

GreenBlue has spoken at several government facing conferences and events concerning the How2Recycle Label. These include the Resource Recycling Conference, Plastics Recycling Conference, the Northern California Recycling Association 2013 Recycling Update Conference, Maine Recycling & Solid Waste Conference, Carolina Recycling Association Annual Conference, Indiana Recycling Coalition annual conference, and Environment Virginia Symposium.

How2Recycle has received endorsements from StopWaste (Alameda County, CA), New York City Department of Sanitation, New York State Association for Reduction, Reuse, and Recycling (NYSAR3), and the state of North Carolina. In addition to endorsement, the NYC Department of Sanitation includes information on the How2Recycle Label on their website.

In 2014, GreenBlue aims to provide more information, gather feedback, and facilitate education efforts. In 2013, GreenBlue and the Sustainable Packaging Coalition partnered with the American Chemistry Council's (ACC) Flexible Film Recycling Group (FFRG) and the Wisconsin Department of Natural Resources for the Wisconsin WRAP project (Wrap Recycling Action Project). This campaign was launched in October 2013 to significantly increase recycling of plastic wraps used for everyday consumer products. The campaign is targeted at Milwaukee, Wisconsin; however, all partners are promoting plastic film recycling outside of this targeted location. Additional information on the campaign and a poster (including the Store Drop-off Label) are available for retailers for free download and use at plasticfilmrecycling.org.

Outreach to Other Groups

The non-profit Keep America Beautiful (KAB) is a key partner in the How2Recycle effort. KAB was an early endorser of the label and began a public recycling campaign, I Want to be Recycled, in 2013. This has proven effective in increasing recycling awareness, and KAB has linked to How2Recycle through its campaign website.

Canada

Two scoping meetings have been held in Canada in conjunction with PAC NEXT, and have included a diverse group of stakeholders. GreenBlue has developed mock-ups of dual language labels and is currently consulting with brands on the best way to implement a Canadian label.

Conclusions

In 2013 the How2Recycle Label Program saw significant growth and is on track to meet the SPC's goals. The more commonplace the label is, the more effective it will be. Participants not only gain use of the labeling system, but also receive recyclability analysis and enhanced understanding of design choices that ultimately lead to better decision-making. GreenBlue looks forward to additional participation and collaboration on this important facet of the collective efforts to increase recovery of valuable materials and to shine a spotlight on sustainable materials management.



The How2Recycle Label found on Kellogg's Frosted Flakes



The How2Recycle Label found on Sealed Air's Fill Air Extreme™ product

Acknowledgements

GreenBlue's Sustainable Packaging Coalition developed the How2Recycle Label in conjunction with SPC members and a broader stakeholder group. We'd like to thank the following organizations:

The Design and Development Team:

ConAgra Foods
Design & Source Productions
Environmental Packaging International
The Estee Lauder Companies
MWV
Marks & Spencer Group PLC
Mattel, Inc.
Product Ventures
REI
Shikatani Lacroix
StopWaste.Org
Target
U.S. Environmental Protection Agency

Additional Contributors:

Association of Post-Consumer Plastics Recyclers (APR)
American Chemistry Council's (ACC) Flexible Films Recycling Group (FFRG)
Trex
Waste Management

Endorsements:

Keep America Beautiful
New York City Department of Sanitation
New York State Association for Reduction, Reuse, and Recycling (NYSAR3)
The State of North Carolina
StopWaste.Org (Alameda County, CA)

Special Thanks to:

The On Pack Recycling Label (OPRL) team
How2Recycle is based on the OPRL model developed in the United Kingdom. The British Retail Consortium (BRC) launched OPRL with support from the government-backed Waste & Resources Action Programme (WRAP) in March 2009. The BRC has set up a not-for-profit company to administer the scheme, OPRL Lt. Staff have provided invaluable assistance in the development of the U.S.-based label.



**SUSTAINABLE PACKAGING
COALITION®**

A PROJECT OF  GREENBLUE™

Contact

Danielle Peacock

Project Manager

434.817.1424 x327

danielle.peacock@greenblue.org

Anne Bedarf

Senior Manager

434.817.1424 x314

anne.bedarf@greenblue.org

Kelly Lahvic

Research and Outreach Associate

434.817.1424 x304

kelly.lahvic@greenblue.org