



# How2Recycle®

February - July 2024

# Guidelines for Use

*Abbreviated*

# Abbreviated Membership Guide & Rulebook

This is an abbreviated version of the official rulebook and guide for How2Recycle membership. It is not an exhaustive document and doesn't reflect every factor that How2Recycle may consider during recyclability assessments.

How2Recycle updates its Guidelines for Use twice a year. Members of How2Recycle are required to stay up to date with all program changes and follow the most recent version of the Guidelines for Use.

The How2Recycle labeling system is designed to comply with legislation and guidance in the United States and Canada. This includes the US Federal Trade Commission's Guides for the Use of Environmental Marketing Claims. To avoid consumer deception and increase the transparency, reliability, and completeness of recyclability claims, all How2Recycle members must endeavor to be consistent with these laws in all marketing materials, including but not limited to website content and on package language.

How2Recycle is unable to provide legal advice for claims outside of How2Recycle labeling, but works to provide members with timely updates when relevant legislation and guidance changes.

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**How2Recycle**



SECTION

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# News & Important Updates



How2Recycle

# Legislation News

Applicable law is one of the foundational aspects of how How2Recycle assesses recyclability. The program will adapt to ensure that our labels comply with existing and emerging policies.

Read more about upcoming legislation and how this will impact the How2Recycle label on the following pages.

- **Important!** [Canada Check Locally Label Update](#)
- [Canada Legislation](#)
- [Dual Language Labels](#)
- [United States Legislation](#)
- [California Recycling Labeling Policy](#)

Companies who are also members of the Sustainable Packaging Coalition (SPC) can be kept informed about policy updates by signing up for the SPC newsletter and joining the [SPC Packaging Policy Collaborative](#).



# Canada Check Locally Update

How2Recycle has redesigned the **Check Locally** label for products sold in Canada to improve compliance with the strictest interpretation of Québec's Charter of the French Language.

The updated dual language design co-locates all French and English text and provides equal language prominence. Going forward, all label requests for products sold in Canada with a Check Locally component will be assigned the updated label, and the How2Recycle team will proactively update all previously assigned labels. This manual update of each label design is a priority for How2Recycle and will be a focus for the team over the next several months.

We encourage members to update their labels on pack as soon as possible to comply with the law today and avoid potential penalties.

Additional label changes made be deemed necessary as a result of emerging legislation from Environment and Climate Change Canada (ECCC) and ongoing program work into label design.



how2recycle.info

**\*Not recycled in all communities.  
†Pourrait ne pas être recyclable dans votre région.**



How2Recycle

# Canada Legislation News

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## Federal News

In Canada, ECCC has drafted a new regulatory framework regarding recyclability, compostability labeling, and recycled content minimums. The draft was first published in Spring 2023, followed by a public comment period. How2Recycle [provided comments on the draft framework](#), drawing from our experience in recyclability labeling.

ECCC has been reviewing all the comments received and is expected to publish updated draft regulations in early 2024. The draft regulations will be followed by an additional comment period prior to final publication. Similar to legislation in the US, we will continue to follow this closely, and the How2Recycle program will adapt as necessary to comply with applicable laws in Canada.

## National Access to Recycling

In 2024, the SPC is working with a third-party consultant to conduct a new nationwide access to recycling study in Canada. As a result of this study, [recyclability categories for various materials and formats may change](#). Members can expect to receive notice of any changes to labels in July through the Guidelines for Use.



# Dual Language Labels

In addition to the Check Locally update in immediate effect, additional updates to Canadian dual language labels may be required as a result of emerging legislation from ECCC. Future design updates are also under consideration as part of ongoing work with the SPC Packaging Design Collaborative.

## French Language Noun Update

In July 2023, How2Recycle updated all dual English and French How2Recycle labels used on aseptic and gable top cartons sold in Canada to reflect community recycling communications better. Thanks to assistance from the Carton Council Canada, the French package material and noun have been updated to MULTICOUCHE CONTENANT.

## Ongoing Work

How2Recycle works with expert packaging translators and other partners to periodically review and update the French language used in How2Recycle labels to continue increasing clarity and alignment with community recycling guidance. We are conducting an audit of our full portfolio of labels, and members will be informed of any planned language updates.



Since July 2023



How2Recycle



# United States Legislation News

## Federal Level

In the US, the Federal Trade Commission (FTC) is evaluating whether updates to the Guides for the Use of Environmental Marketing Claims (“Green Guides”) are necessary. How2Recycle is designed to comply with the Green Guides, and the way we assess and determine recyclability is built on top of the FTC’s guidance.

How2Recycle [provided comments to the FTC](#) to share our insights from our efforts over the past decade working to implement clear and accurate recyclability communication. We will continue to stay involved in this process and provide member updates as we have them. The program will continue to adapt as needed to ensure that all labels comply with the FTC’s guidance and other applicable laws.

## State Level

Around the United States, several states are adopting new policies related to recycling and labeling that will be factored into the How2Recycle label. **California** is at the forefront of adopting new policy, which you can read more about on the next page.

Within the rulemaking process for its Extended Producer Responsibility (EPR) program for packaging, the State of **Maine** has included a labeling clause that would impose fees if packaging is labeled recyclable but does not meet state criteria. The rules are in draft form and are expected to be further developed in 2024. More information on Maine’s program and rulemaking can be found [here](#). How2Recycle will continue to follow this closely, and factor any decisions into our redesign process.



# California Recycling Labeling Policy

## CA SB 343

As part of California's implementation strategy of [SB 343](#), CalRecycle conducted a characterization study of material types and formats that are collected, sorted, sold, or transferred by solid waste facilities. [Preliminary findings from the Material Characterization Study](#) were published at the end of 2023, with the final results expected to be published in March/April 2024. After the final results are published, companies will have 18 months to comply with the labeling regulations, indicating that implementation will occur in late 2026. More information on the implementation process and updates on CA SB 343 can be found on the [CalRecycle website](#).

How2Recycle is closely tracking this implementation process and will adapt to ensure that our labels comply with the developed rules and the study results. This includes potential recyclability category changes to specific materials once the final list is published, and we are also exploring whether label design changes will be necessary. We are currently assessing the preliminary Material Characterization Study to understand which material forms and types may differ from our current assessment and California's data.

The How2Recycle label will not be changing within the next six months. However, [work is currently underway](#), supported by the SPC Packaging Design Collaborative, to evaluate a label redesign to comply with changing regulations, consumer perception, and recycling innovation. We are expecting this work to be completed by the fall so that we can share our findings and adopt any label changes to enable compliance with the SB 343 implementation timeline.



# 2024 & Future Work

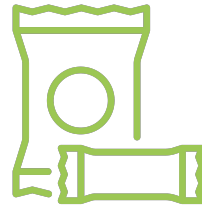
Many things are happening in 2024 and beyond as How2Recycle continues pursuing opportunities with strategic partners to conduct, commission, and support research regarding recyclability.



**The Future of the Label**



**Store Drop-off Recycling**



**PE Film Recyclability**



# The Future of the Label

## Label Design Work

The How2Recycle label design is under review to comply with legislation and meet our goal of clarity in labeling. How2Recycle will be auditing all labels and updating language so that labels reflect community guidance better.

The SPC has launched the [Packaging Design Collaborative](#), which will explore ways that the How2Recycle label can continue to support brands, inform consumers, and include designers in a more meaningful way. The collaborative expects to present findings and propose label design updates in the second half of 2024. How2Recycle will conduct a thorough review of proposed updates to the label prior to implementing program changes.

## Consumer Research

In addition to topics explored in the Packaging Design Collaborative, How2Recycle will be conducting additional consumer research in 2024 with third-party experts on consumer disposal behavior and understanding of the How2Recycle label. This research will build on the [2021 consumer research report](#).



## Dynamic Labeling

We are exploring the role of dynamic labeling, such as QR codes, with the How2Recycle label. Our first step was launching a [pilot with Recycle Check](#), where a How2Recycle label and a Recycle Check QR code are provided in tandem to feature side-by-side on pack.

How2Recycle is working with The Recycling Partnership to share our findings from this pilot and next steps later this year.



# Store Drop-off Recycling

Certain polyethylene based film packaging, including bags, pouches, and wraps, are eligible for a Widely Recyclable label in Canada and a Store Drop-off label in the US. For more information on the evolution of Store Drop-off recycling, read our [Report on the Future of Store Drop-off Recyclability](#).

How2Recycle supports the Store Drop-off stream. We recognize it is not perfect, but we believe increases in recycling access is a step in the right direction. We encourage members to use Store Drop-off eligible flexible films and feature the label on pack.

**Brand owners** can support film recycling by featuring the How2Recycle label on all flexible packaging. This increases consumer transparency and the Store Drop-off stream's quality, which facilitates film-to-film recycling and the circular economy.

Many How2Recycle **retailer members** have shared their efforts to support film collection and gather robust data on their Store Drop-off operations with us. This data includes insight into the reprocessing supply chain and helps to support end market strength. In 2024, the SPC [Retailer Collaborative](#) will convene retail SPC and How2Recycle members to focus on the unique sustainability challenges of that sector, including Store Drop-off recycling.

How2Recycle will continue to organize and generate helpful resources for retailer members to better support the PE film recycling stream.

## The Store Drop-off Recycling Directory

In 2023, [the predominant Store Drop-off location directory](#) was taken offline due to funding constraints. We appreciate the work of Stina to have provided this resource. The absence of a directory does not impact the existence of film collection sites, nor is it a reflection of the strength of end markets. We acknowledge that a directory is a critical piece in connecting consumers to the system and providing easier access to participate in recycling this material.

We are working with industry groups and organizations to fill this gap while ensuring accurate and credible data on the stream. We hope to share more on next steps for a film directory in the coming months. Visit [Earth911](#) or [Trex](#) to find a drop-off location today.





# PE Film Recyclability

As How2Recycle continues to support the PE film recycling stream, we are excited about several ongoing projects related the recyclability of this material type.

## Access to Recycling

Data for the collection of PE film for recycling will be updated through the larger [access study for recyclable materials in Canada](#) and through a separate study of Store Drop-off collection access with Resource Recycling Systems (RRS) in the United States. We expect results for both studies to be available within 6 months and hope to announce any recyclability category changes in the July Guidelines for Use update.

## Clean & Dry Protocol

How2Recycle continues to work with partners to develop a quantitative test to understand the limitations of product residue on film for Store Drop-off recycling. At this test validation stage, multiple organizations are evaluating the draft protocol's applicability to diverse product residue categories. As progress continues, the timeline for industry acceptance remains fluid. Members will be kept informed about the progress of this protocol through How2Recycle communications.

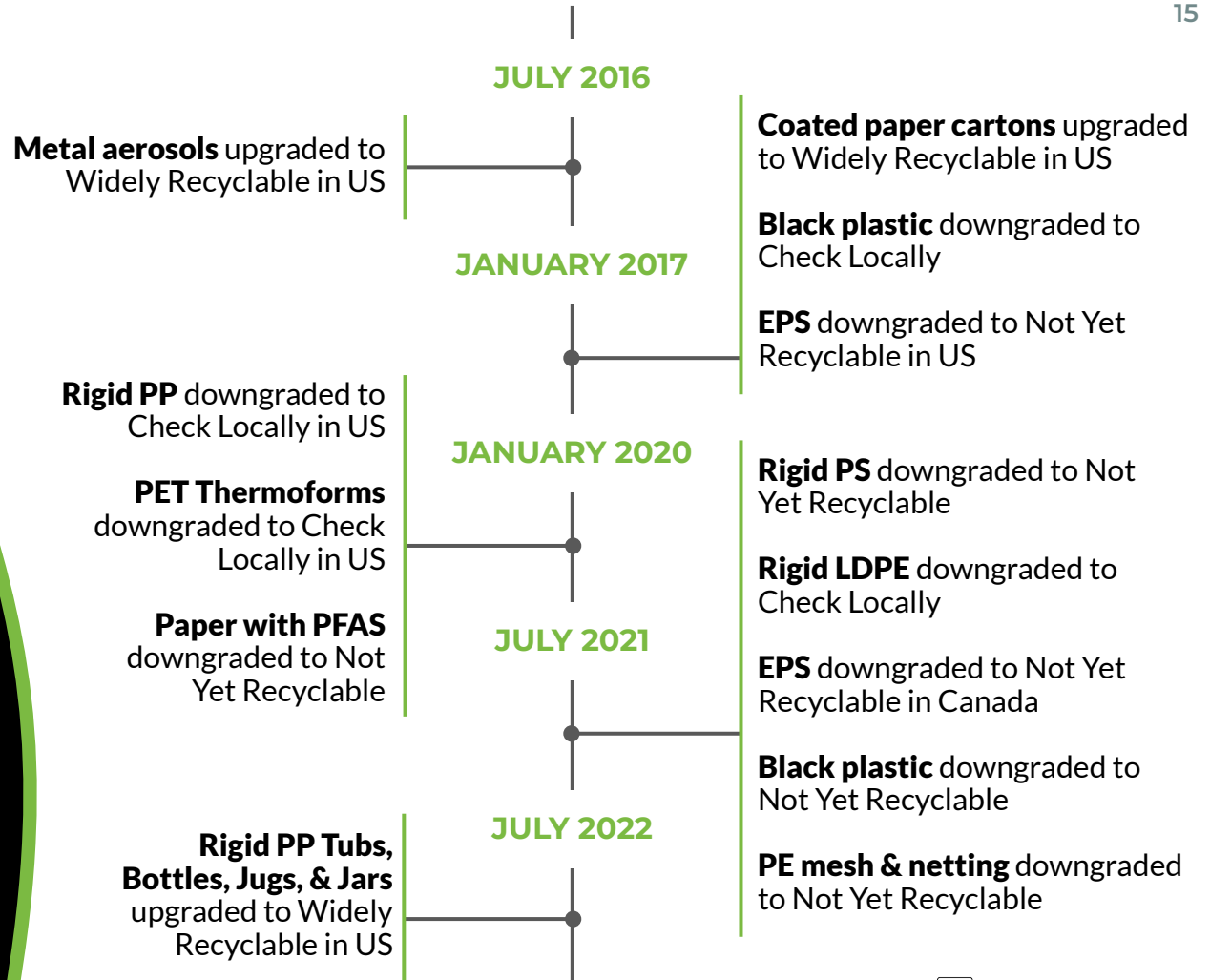
## Stay Involved

If you would like to support the Clean & Dry Protocol testing, please email How2Recycle. Members interested in getting more involved in PE film recycling who are also SPC members should join the [SPC Flexible Packaging Collaborative](#).

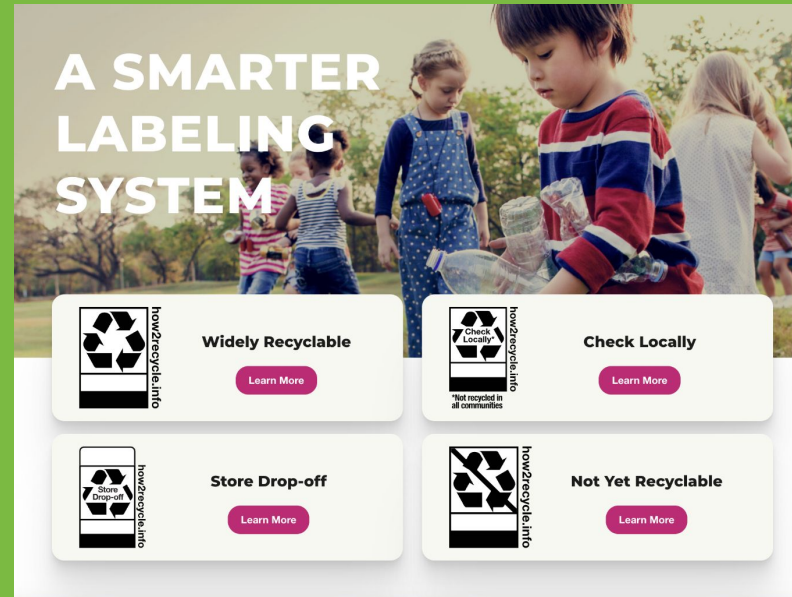
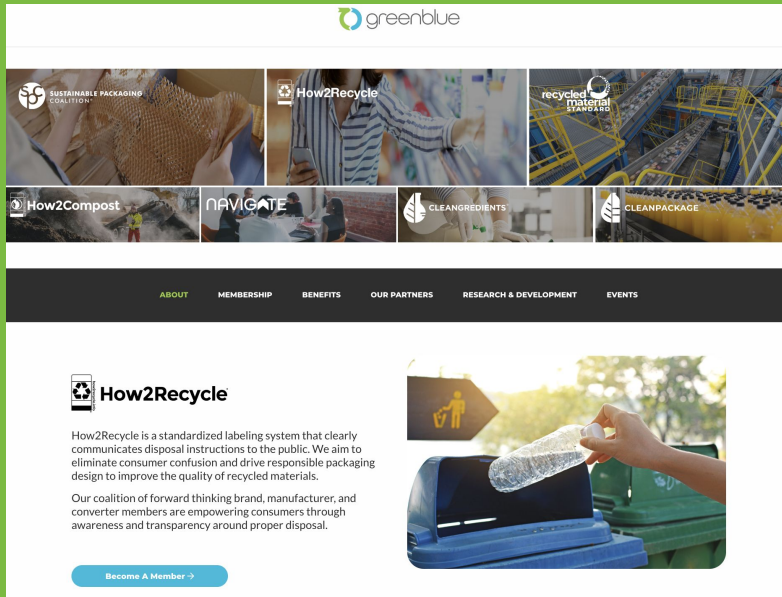


# Recyclability History

This is a brief history of How2Recycle's recyclability designation changes, as announced in the Guidelines for Use.



# Check out our new websites!



At the end of 2023, How2Recycle refreshed our **industry facing micro-site** (left) within our parent nonprofit, GreenBlue's website and our **consumer facing website** (right). We will continue to update it periodically and publish new resources.

Many of our resources and blog posts have new URLs. Please be sure to update your resources linking to our website.



SECTION

2

# How2Recycle Program Foundations



# Definition of Recyclability

For each package, you will receive a How2Recycle label and a **custom recyclability assessment**. Each assessment considers:

Applicable Law

Collection

Sortation

Reprocessing

End Markets

Consistency, Common Sense, Consumer Experience, Material Health

The How2Recycle label was designed to comply with the FTC's Green Guides and the Competition Bureau Canada's Enforcement Guidelines. We regularly consult with the FTC to ensure our labels avoid consumer deception.

We reference the Sustainable Packaging Coalition's 2020-2021 Centralized Availability of Recycling Study and additional data to assess national recycling access for package types.

We consider how successfully materials sort in a Material Recovery Facility (MRF) based on size, shape, and other physical attributes to ensure they're properly recycled.

We consider how successfully materials are reprocessed by entities. We consult experts and reference well-established industry guidance like the APR Design® Guide and the suite of paper testing protocols.

Materials with no end market cannot be considered recyclable. How2Recycle assesses demand, scale, value, and time for each material to categorize the strength of end markets.

For a deeper understanding of our definition of recyclability and assessment criteria, read the How2Recycle [Guide to Recyclability](#).



**How2Recycle**

# US General Recyclability Categories

These are the general overall recyclability designations of various material formats and the percent of the population that has access to recycling these formats in the **United States**. This list does not consider attachments, labels, size, additives, interaction between components, consumer preparation, testing, and many other attributes that are assessed during How2Recycle's process.

## Rigid Plastic

## Paper

## Metal

## Glass

## Flexible Plastic

60% - 100%

Access



how2recycle.info

**Widely  
Recyclable**

clear PET bottles & jars;  
HDPE rigids; PP tubs,  
bottles, jugs, & jars

uncoated & clay coated  
wood fiber; aseptic &  
gable top cartons;  
molded wood fiber

aluminum & steel  
beverage cans,  
food cans, &  
aerosols

soda-lime glass



how2recycle.info

**Store  
Drop-off**

flexible PE film bags,  
wraps, & pouches

20% - 60%

Access



how2recycle.info

**Check  
Locally**

clear, colored, & opaque  
PET thermoforms; LDPE  
rigids; PP drink cups &  
other rigids

1-side poly coated  
paper; 1-side heat seal  
coated rigid paper

aluminum foil;  
aluminum food  
trays

\*Not recycled in  
all communities

0% - 20%

Access



how2recycle.info

**Not Yet  
Recyclable**

multi-layer films & rigids;  
PVC; PS; other plastics;  
black plastic rigids;  
squeeze tubes;  
PP & PET film




2-side poly coated  
paper; innovative  
coatings on fiber;  
non-wood fiber

stainless steel

borosilicate glass

# Canada General Recyclability Categories

These are the general overall recyclability designations of various material formats and the percent of the population that has access to recycling these formats in **Canada**. This list does not consider closures, attachments, labels, size, additives, interaction between components, consumer preparation, and many other attributes that are assessed during How2Recycle's process.

|                      |   | Plastic  | Paper  | Metal   | Glass                     |
|----------------------|---|--|--|---|---------------------------|
| 50% - 100%<br>Access |  <p><b>Widely Recyclable</b></p>   | <p>clear PET bottles, jars, &amp; thermoforms; HDPE rigids; PP containers; flexible PE film bags, wraps, &amp; pouches</p> | <p>uncoated &amp; clay coated wood fiber; aseptic &amp; gable top cartons; molded wood fiber</p> | <p>aluminum &amp; steel beverage cans, food cans, &amp; aerosols; aluminum food trays</p> | <p>soda-lime glass</p>    |
| 20% - 50%<br>Access  |  <p><b>Check Locally</b></p> <p><small>*Not recycled in all communities.<br/>*Pourrait ne pas être recyclable dans votre région.</small></p> | <p>colored, &amp; opaque PET thermoforms; LDPE rigids</p>  | <p>1-side poly coated paper; 1-side heat seal coated rigid paper</p>                             | <p>aluminum foil</p>  |                           |
| 0% - 20%<br>Access   |  <p><b>Not Yet Recyclable</b></p>   | <p>multi-layer films &amp; rigids; PVC; PS; other plastics; black plastic rigids; squeeze tubes; PP &amp; PET film</p>     | <p>2-side poly coated paper; innovative coatings on fiber; non-wood fiber</p>                    | <p>stainless steel</p>  | <p>borosilicate glass</p> |

# Resin Identification Codes

Resin Identification Codes (RICs) indicate the type of plastic used in a package and are not meant to communicate overall recyclability.



How2Recycle does not consider how RICs are defined or interpreted for recyclability assessments.

How2Recycle **strongly recommends removing the RIC on flexible film**, as it may confuse consumers when used alongside the Store Drop-off label and when featured on PP films (#5) and multi-layer films (#7) that are Not Yet Recyclable. However, if you elect to include a RIC on film (not recommended), it may only be in an ASTM equilateral triangle.

It is acceptable to keep the RIC molded into rigid plastic packaging.

**How2Compost** labeling is available to communicate comprehensive recovery instructions to consumers on pack alongside How2Recycle labels.

To use the How2Compost label, you must be a US based How2Recycle member and receive **BPI certification** for each package. You may also acquire a sublicense from BPI if your supplier holds the compostable certification. There are certification costs, but How2Compost membership is free for eligible How2Recycle members.



## How2Compost

# Compostable Packages

For packages that become saturated with food or other organic matter and are not eligible for a favorable recyclability category, compostable packaging may be a suitable option.

HOW2COMPOST  
Learn More About  
How2Compost: US Only

how2compost.info

CREATING A CLEANER WORLD THROUGH COMPOSTING

**Learn more about the How2Compost label:**

The How2Compost label informs consumers of a product's compostability. We partner with the Biodegradable Products Institute (BPI) to ensure every item we label is certified compostable at industrial facilities.

**COMPOSTABLE\***  
**CONTAINER**

\*Not in backyard; Composting programs for this container may not exist in your area.

Email [how2compost@greenblue.org](mailto:how2compost@greenblue.org) for additional information and next steps.



How2Recycle

# Overall Recyclability

We identify ways members can improve their package design by assigning one of three overall recyclability categories for each complete package we assess.

## Optimally Recyclable

The entire package meets all the criteria for the best design practices in their material category.

## Recyclable but Needs Improvement

The majority of the package or the whole package is recyclable, but it falls short of being categorized as Optimally Recyclable.

## Partially Recyclable or Not Yet Recyclable

The package includes one or more components that feature the Check Locally or the Not Yet Recyclable label, or design attributes that make it difficult for the consumer to recycle properly.



# APR & Optimal Package Design

How2Recycle aligns with the Association of Plastic Recyclers (APR Design® Guide) and testing protocols when assessing sortation potential and technical recyclability of plastic packages. Additional recyclability factors can cause a technically recyclable package to receive a Not Yet Recyclable label.

While recyclable, packages with detrimental features create challenges for Material Recovery Facilities (MRFs) and recyclers and ultimately reduce the quality and yield of recycled material. **Leverage the design recommendations How2Recycle provides for all not Optimally Recyclable packages** to improve your package's recyclability, even when a Widely Recyclable or Store Drop-off label is issued. To be categorized as Optimally Recyclable, all features of a plastic package must be listed as Preferred in the APR Design® Guides.

As How2Recycle and APR work towards greater alignment, testing requirements and recyclability assessments may change. Any updates impacting label assignments will be proactively communicated to members.

**Please note:** no claim of APR approval or recognition may be made without undergoing the complete APR Design® for Recyclability Recognition process, which includes review of test results by a Technical Review Panel and issuance of a recognition letter. How2Recycle encourages companies to pursue APR Recognition.

## Detrimental Features

APR and How2Recycle jointly urge members to optimize package design.

APR recommends removing these detrimental features because they have the most significant impact on the recycling stream's quality.

### All Plastic Packaging

- Paper labels
- Metal containing attachments, closures, pumps, & sprayers

### PET Packaging

- Pressure sensitive & shrink sleeve labels that have not received APR Critical Guidance Recognition

### Rigid HDPE Packaging

- PP attachments, including caps, that are >10 wt% of the package





# Design for Optimal Recyclability

## Optimally Recyclable

If your package is not Optimally Recyclable, we will provide recommendation(s) on how to improve the design. Consider these Optimally Recyclable package examples.



### PET Bottle

Many **pressure sensitive labels** can be **problematic** during reprocessing and degrade the value of the recycled material. This bottle uses pressure sensitive labels specifically designed for recycling that have received **APR Critical Guidance Recognition**.

This bottle also uses a **closure that is Preferred by APR**.



### Paper Box

This paper box has a **clay coating** (no poly extrusion or other innovative coatings) and is constructed of rigid paperboard made of **wood fiber**.

There are **no plastic, metal, or other non-paper attachments**, which can reduce recycled fiber yields and create wear on recycling equipment.



# Package Testing

We are here to help! If you are unsure if your package requires testing or how best to conduct required testing, you can reach out to How2Recycle.

There are tests your company may be required to complete for a package to be eligible for a more favorable label. The test protocols How2Recycle relies on to support sortation and reprocessing are developed by third-party organizations and widely accepted within the industry in the US and Canada.

The following pages detail commonly required testing. Please note that this list is not exhaustive and your package may require additional testing not listed here.

- [Testing for Fiber Packaging](#)
- [Testing for PE Film](#)
- [Testing for Rigid Plastics](#)
- [Testing for Sortation Potential](#)
- [More About Package Testing](#)



# Testing for Fiber Packaging

Some rigid and flexible fiber based packaging may require technical recyclability testing to be eligible for a more favorable How2Recycle label. How2Recycle may decline to label flexible paper innovations until testing is completed.

Examples of attributes that may require testing:

- Plastic laminates & coatings
- Foil & metallization
- Repulpable, sealable & other coatings
- Bagasse, bamboo, & other non-wood alternative fibers

Based on our [Material Health](#) rule, some fiber packages require testing for PFAS.

Both Repulpability (Part 1) and Recyclability (Part 2) must be completed at a partner lab for any flexible or rigid fiber package requiring testing. Packaging must be tested **as it would enter the recycling stream**, including all print and decoration, against an appropriate wood fiber control.

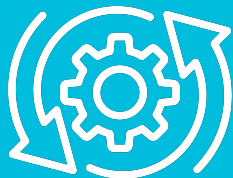
- The **OCC-E Protocol** should be followed for unbleached fiber packaging.
- The **SBS-E Protocol** should be followed for bleached fiber packaging.

Currently these are the only two protocols How2Recycle accepts when a fiber package requires technical recyclability testing. The How2Recycle team is aware of ongoing work in the paper industry to develop new test methods and will inform members if any new protocols will be accepted in our assessment.

## Partner Labs

**OCC-E paper testing:** University of Wisconsin Stevens-Point, Innofibre (Quebec), Western Michigan University

**SBS-E paper testing:** Western Michigan University



# Testing for PE Film

How2Recycle requires the transparent, data-driven test protocol for Store Drop-off recyclability: **APR's Critical Guidance Protocol for Polyethylene Films** when testing is required to demonstrate a PE film structure's compatibility with the PE recycling stream.

PE films may require APR's Polyolefin Packaging Articles Sink or Float Evaluation when Critical Guidance testing is not required, but the film's density is a concern. This test may be completed by members in-house.

Eligible PE films will receive a Store Drop-off How2Recycle label in the US and a Widely Recyclable label in Canada.

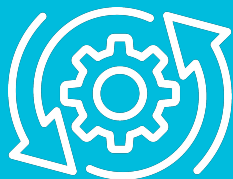
To be eligible for a Store Drop-off label, **testing is required** for PE film packaging with **any of the following attributes\***:

- Metallized layers & metallic ink
- Unfilterable barrier layers (i.e., PP, nylon, & EVOH)
- Barrier & innovative coatings (i.e., AlOx, SiOx, & PVOH)
- Combination of multiple functional layers, barriers, or coatings
- Cold seal adhesive
- PP attachments (i.e., zippers & labels)
- Fillers or PE attachments causing the overall density of the structure to exceed 0.996 g/cm<sup>3</sup>

\*Some structures may not require testing if they have received APR Recognition or have been pre-qualified with How2Recycle. We may require testing for other attributes not listed or new combinations of previously tested structures.

## Partner Labs

All APR Critical Guidance testing must be completed at an APR candidate lab. If you are unsure if a certain facility is appropriate, reach out to the How2Recycle team.



# Testing for Rigid Plastics

How2Recycle relies on the industry-developed **APR protocols** when requiring technical recyclability testing for rigid plastic packages.

Examples of attributes that may require testing:

- Scavengers & oxygen ingress barriers
- Barriers (i.e., EVOH, nylon, AlOx, & SiOx)
- Fillers & integrated desiccants
- Functional additives, layers, & coatings

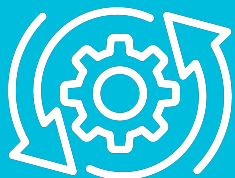
Some structures may not require testing if they have received APR Recognition or have been pre-qualified with How2Recycle. We may require testing for other attributes not listed.

## Required APR Test Protocols

- **HDPE or PP containers** with fillers or additives that increases the resin density to 0.97 - 1.0 g/cm<sup>3</sup>, Polyolefin Packaging Articles Sink or Float Evaluation may be completed in-house.
- **HDPE containers**, Critical Guidance Protocol for HDPE Rigid Containers.
- **PP containers**, Critical Guidance Protocol for PP Rigid Containers.
- **PET containers**, Critical Guidance Protocol for Clear PET Resin and Molded Articles. If an innovation exhibits time dependent behavior (e.g., oxygen scavengers), the Preparation of PET Articles with Potential Time Dependent Behavior should be followed before testing.

## Partner Labs

All Critical Guidance testing must be completed at an APR candidate lab. If you are unsure if a certain facility is appropriate, reach out to the How2Recycle team.



# Testing for Sortation Potential



APR has published several sortation potential protocols in order to help the industry better determine **what packaging may be difficult to sort at MRFs** based on its design attributes. All sortation potential protocol tests should be preceded by APR's **compression protocol**.

Specific sortation tests can determine packaging's sortation potential based on:

- Size (small packages)
- Shape (2D/3D sortation test coming soon)
- Color & Near Infrared (NIR) Identification (plastic packages)
- Metal & Metallic Components (plastic packages)

A conservative Not Yet Recyclable label may be assigned until required testing is completed.

## Partner Labs

All APR sortation potential testing must be completed at an APR candidate lab. If you are unsure if a certain facility is appropriate, reach out to the How2Recycle team.



# More About Package Testing

## Test Requirements

The How2Recycle team proactively communicates which test(s) are required to support a more favorable recyclability category. Without testing, your package may receive a conservative label or we may decline to provide a label. Testing should be completed at third-party facility to ensure objectivity and credibility. In-house or member conducted test results are only appropriate for specific, limited situations.

## Test Articles

In all recyclability testing scenarios, test articles should be representative of the package as it would enter the recycling stream, including all print, decoration, and attachments present after consumer use. Attributes under evaluation should be tested at the highest level or worst-case scenario, such as the maximum coverage and darkest color ink if the exact print is unknown or varies.

## Data Ownership

The member who conducts the test owns the results, and that data will only apply to that member's packages. Data or test results are not shared between different members, even if multiple members have the same packaging format. How2Recycle will only share data between members with explicit written permission from the data owner.

## Utilizing Other Tests

Testing can help fill gaps when the data required to determine a package's recyclability are missing. If no industry standards fit your situation, alternative routes to gathering data may exist.

The How2Recycle team can help review your test plans. A **MRF flow test** may be appropriate to study the sorting potential of an innovative or unusual package.

As the industry evolves and new protocols arise, How2Recycle may expand or change which protocols are required. We are developing a **standard for accepting protocols** which will be shared publicly once available. Members are encouraged to present new, scientifically backed protocols for consideration.



# Proving Recyclability

Changes in legislation, access to recycling, and innovations in technology contribute to a dynamic recyclability landscape. In response, we provide guidance for members, partners, and industry groups to propose updates to a package format's recyclability category and label eligibility.

## Future Guide to Recyclability

How2Recycle's [Guide to Future Recyclability](#) offers a roadmap to understanding emerging and innovative packaging format recyclability. It provides insight into:

- Assessment criteria and considerations to achieve future recyclability
- Recommendations for strategizing future recyclability
- Examples of current recyclability-challenged packages
- What data are needed to prove recyclability

## Presenting Your Case to How2Recycle

If you believe a particular package format should be eligible for a different recyclability category and placed under review by How2Recycle, we ask you to submit scientifically credible data from third parties to support the claim. Please use the Future Guide as a tool for this process.

We understand that making a case for recyclability takes significant time and resources. How2Recycle is equally committed to thoroughly reviewing provided information, ensuring there is ample scientifically credible evidence to support the recyclability claim. Before enacting a recyclability category, we verify that the claim is not misleading to consumers and meets all recyclability requirements.





SECTION

3

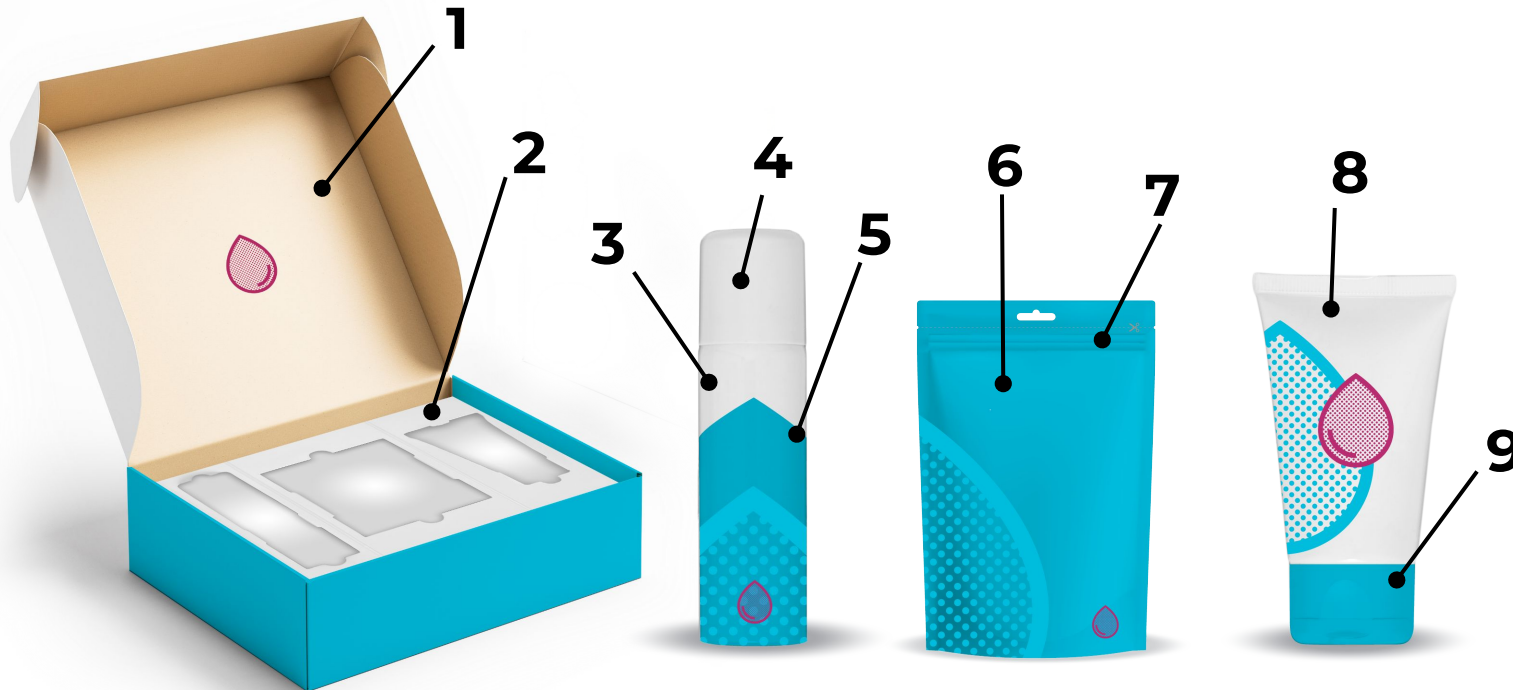
# Requesting How2Recycle Labels



How2Recycle

# Package Components

If this was your package, these are all of the components you need to enter on your request. See the [assigned label](#) this package would feature on pack.



## Components

1. Paper **Box**
2. Paper **Tray**
3. Metal **Can**
4. PP **Cap**
5. PET **Label**
6. PE **Pouch**
7. PE **Zipper**
8. HDPE **Tube**
9. PP **Cap**



## Different Format



These are **NOT the same package format** because the bottles have different closures.

## Same Format



These are the **same package format** because they use the same closure, materials, and label type and coverage.

# Similar But Different Packages

Packaging that are similar but differ by materials, closure types, coatings, additives, or other factors may require separate requests.



These are **NOT the same package format** because one box has a window.



These are the **same package format** even though they are different shapes. They have the same materials, coatings, and function.



**How2Recycle**

# Information Needed on Every Request

Certain packaging formats and attributes require more details to complete a label request. Read the following pages for what information is needed and why.

## All Package Types

- [Material Health](#)
- [Pre-qualified Packages](#)
- [Package Size](#)
- [RFID Tags](#)
- Labels on [Plastic Packages](#) & [Other Packages](#)
- Product Application [PE film](#) & [Other Packages](#)
- [Consumer Preparation](#)

## Plastic Packages

- [Black Plastic & Colored PET](#)
- [Closures & Seals on Plastic Packages](#)
- [All Plastic Packages](#)

## Fiber Packages

- [Coatings & Additives on Fiber Packages](#)
- [Attachments on Paper Packages](#)



# Material Health Rule

How2Recycle encourages finding safer alternatives to substances that are hazardous to the environment and human health. We may render a package **Not Yet Recyclable** if it contains intentionally added substances that are harmful or potentially harmful to the environment and/or organisms. Read more about this rule [here](#).

In partnership with ChemFORWARD, the SPC launched [CleanPackage](#), a database of verified safer alternative materials that can connect companies with suppliers based on leadership in human and environmental safety and interest in increasing consumer trust.

**Fiber packages** containing intentionally added per- and polyfluoroalkyl substances (PFAS) are assigned a Not Yet Recyclable label. How2Recycle may require lab testing to verify PFAS-free claims on package formats where PFAS use is known. If the total fluorine concentration exceeds **100 ppm**, the package will receive a Not Yet Recyclable label.

The following package formats historically have contained PFAS:

- Take-out containers
- Fiber foodservice packaging
- Molded fiber plates, bowls, & trays
- Bakery & deli paper wraps
- Microwaveable popcorn bags
- Grease-resistant paper bags



# Pre-qualified Packages

Material manufacturers and converters receive a pre-qualification letter for eligible packages by submitting a label request.

These letters are not certificates. **The How2Recycle program is not a certification program** and this letter and label are for marketing purposes only.

**Pre-qualification does not guarantee a specific How2Recycle label will be assigned.**

Factors including attachments and product applications may impact the package's ability to be recovered and affect the label assigned. Brands and retailers must submit a label request for the final package application feature the label on pack.



If you are **using a pre-qualified package**, include the following in your request:

- Supplier name
- Package trade name
- Pre-qualification letter as an attachment (if available)
- Reference the pre-qualified structure at the component level
- Any modifications or additions to the pre-qualified package, such as applied labels and closures



# Package Size



Share the exact dimensions for package components **less than 3 inches** in height, length, width, or diameter. **Submit a separate request** when the same package has drastically different version sizes, such as mini or trial sizes. Only include closure dimensions for **plastic caps on metal cans**, such as aerosols and composite canisters.

**Small packages** that are less than 2 inches (5 cm) in any dimension are at risk for not sorting properly at MRFs. We may require testing for these packages and assign a conservative label until testing is complete.

**Large, bulky containers** are also at risk for not sorting properly at MRFs. Make sure to include the volume of your container in your request if larger than 2 gallons (7.5 liters).

Additionally the **package size can influence the consumer facing language** in your assigned label. For example, a similar shape container may receive a label calling it a cup when it holds single serving, but a tub when it holds multiple servings.



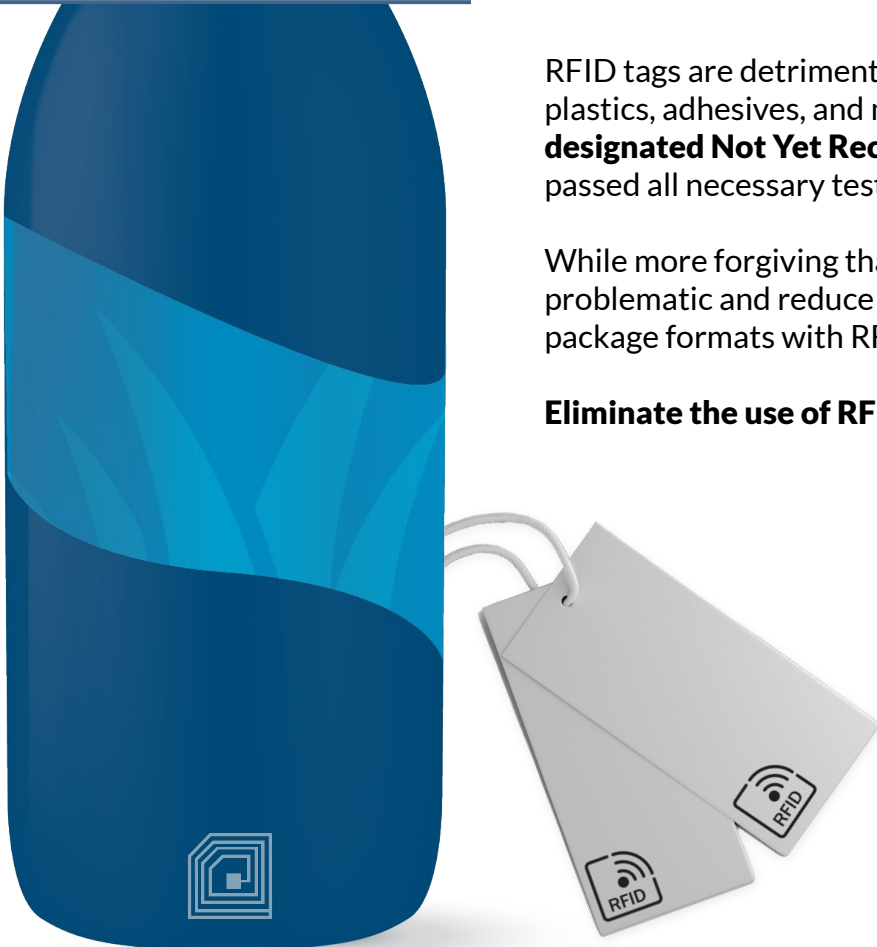
How2Recycle

# RFID Tags

RFID tags are detrimental to plastic recycling because of the potential for contamination from the plastics, adhesives, and metals used in the RFID tag. **Plastic packages with RFID tags will be designated Not Yet Recyclable**, even when retailers require their use, unless the package has passed all necessary testing.

While more forgiving than when on plastic packages, RFID tags on paper packages may still be problematic and reduce recycling yields. Technical recyclability testing may be required for some package formats with RFID tags applied.

**Eliminate the use of RFID tags when possible.**





# Labels on Plastic Packages



To optimize recyclability, HowRecycle recommends using labels that have received **APR Critical Guidance Recognition** for all plastic packaging. If you are using a label with APR Critical Guidance Recognition:

- You must **include the producer and specific product name as it appears in the recognition letter** in your label request.
- We also strongly recommend attaching the letter to your request.

Full body **shrink sleeves** on plastic containers that have not received APR Critical Guidance Recognition are required to have a full length perforation in order to be eligible for a two tile label instructing the consumer to remove the label.

**Pressure sensitive, spot glued, and in-mold labels** that cover a significant portion of a plastic container can cause sortation challenges. How2Recycle may require NIR sortation potential testing for labels that exceed 75% coverage of plastic containers.

Additional testing may be required for **metallized labels and labels with metallic decorations** or ink because they can cause reprocessing and sortation challenges.

Similarly, additional information and testing may be required for **white PE labels on PE film packages** due to density concerns.



# Labels on Other Packages

For all packaging formats, be mindful of **label materials**. Using a label material that is dissimilar to the package body may be detrimental to recycling.

## Paper Packages

It is best practice to direct print on paper packages. **Pressure sensitive labels** on rigid paper packaging should be made of paper substrate.

## Metal Packages

It is best practice to direct print on aluminum and steel packages when possible. Paper or plastic **pressure sensitive and wraparound labels** don't negatively impact the recyclability of aluminum and steel cans and aerosols, but will not be recycled themselves. **Shrink sleeves** on aluminum cans and aerosols can be detrimental to MRF equipment.

## Glass Packages

Glass recycling is generally forgiving to labels, including pressure sensitive labels and shrink sleeves, but may reduce overall yields. During the recycling process, glass is crushed and most labels can be easily separated or will burn off during glass making.



# Product Application Limits for PE Film



Because of contamination concerns in the Store Drop-off recycling stream, product application can render a technically recyclable PE film as Not Yet Recyclable. The basis for this rule includes **collection concerns** (safety hazards, odor, mold, pests, etc.), **reprocessing concerns** (discoloration, odor in recycled material), and **recyclers' attitudes**. These limits also apply to PE films collected in Canada through curbside collection programs. Work is ongoing to develop quantitative product residue limits.

The following product applications make a package ineligible for a Store Drop-off How2Recycle label.

- **Wet, moist, sticky, goeoy, or oily**, including:
  - Condiments & dressings
  - Wet baby food & wet pet food
  - Dairy products
  - Refrigerated meats
  - Drinks containing sugar
  - Liquid soaps, detergents, & personal care products
- **Hazardous or potentially hazardous**, including medical waste, pesticides, & herbicides
- **Dirt or dirt-like**, including growing media & sand
- **Lacking strong end markets**, including salty snacks & chocolate products
- **Difficult or unreasonable for the consumer to prepare** as 'Clean & Dry' to be recycled via Store Drop-off.



# Product Application Limits

Sometimes the **product may render a package Not Yet Recyclable**, even if the packaging is a recyclable material. Certain product applications can impact reprocessing because of residue or present health & safety concerns. Similar packaging structures may receive different How2Recycle labels depending on the degree and type of residue.

The How2Recycle team may ask for photos of the package contents and/or product samples to evaluate residue left behind in a package - please keep in mind that this can impact label request turnaround time.

Provide additional details when your package has direct contact with a product that:

- Leaves a **thick, sticky, or oily residue**
- Classifies as **flammable, corrosive, or highly reactive**
- Has **hazard warnings** about environmental or human exposure



# Consumer Prep Rule



If consumers have to take special actions or use tools to recycle a package properly, we will not provide additional instructions. Read the full description of the consumer prep rule.

Package formats **designated Not Yet Recyclable under the consumer preparation rule** include:

- Full body shrink sleeves on plastic containers that have not received APR Critical Guidance Recognition and do not have a full length perforation
- High coverage paper labels on plastic containers that are not very easy to remove
- Pressure sensitive, non-PE labels on PE film that have not received APR Critical Guidance Recognition and are not very easy to remove
- Packages that must be cut with scissors in order to empty and clean, when that package format needs to be clean & dry for recycling

Exceptions may be made for special actions that are clear, reasonable, and well-known and accepted by the general public to prepare the item for recycling, such as flattening corrugated boxes and removing lidding film.



# Colored Plastic Packages

Disclose if any plastic components in your package are **colored black**. Submit a separate request for product variations that have black plastic components. **NIR testing is required for all rigid black packaging**, including HDPE, PP, and PET packaging (see more [here](#).) This doesn't impact packages when only the closure is black.

Rigid black plastic packages that are not tested or do not pass testing as Preferred will receive a **Not Yet Recyclable** label. Rigid, sortable black plastic packages that pass testing are eligible for a more favorable recyclability category.

## PET Packages

Always include the color of your PET packaging and if it is **transparent or opaque**. Clear material has the highest value as a recycled stream since it has the widest variety of end-use applications. **Clear, transparent blue, and transparent green PET bottles** are eligible for Widely Recyclable.



# Closures & Seals

Closures and seals can impact the recyclability of your package and influence the consumer preparation instructions on your assigned label. Provide complete details about each type of closure and **list all closures and seals as separate package components**.

If the closure contains **any PVC, metal, silicone, or other materials**, clarify how the consumer uses it and if you can separate it from the rest of the package.



Indicate **whether the consumer removes the closure during regular use** (i.e., twist-off cap or snap-on lid) **or** if it remains on the package during the use of the product (i.e., flip-top or disc caps).



If your package has a **tamper-evident seal**, provide the material composition and a brief description of its location (i.e., induction seals and neck bands).



Optimally Recyclable plastic packages use closures & seals listed as Preferred in the APR Design® Guide.

If present, don't forget to include the **lidding film** in your label request. Depending on the end use, composition, and the container the lidding film is attached to, the lidding film may require discarding before recycling the container. Your assigned label may instruct consumers to "discard seal" in the label's instruction tab.



How2Recycle

# Plastic Packages

How2Recycle recommends following the [APR Design® Guide for Plastics Recyclability](#) and ensuring all additives, barriers, and coatings are Preferred by APR.

Some common plastic additives are considered **workhorse additives** and are not known to impact plastic recycling. These can include thermal stabilizers, antistatic agents, slip and antiblock agents; for a complete list of workhorse additives, see the APR Design® Guide.

Other additives and attributes may cause reprocessing issues. **Provide details about all additives, barriers, and coatings present**, such as:

- Attachments
- Barrier & tie layers
- Foils & metallized layers
- Fillers
- Bio-, photo-, & oxo-degradable additives
- Adhesives
- Coatings
- Metallic inks & decorations

How2Recycle may request additional reprocessing and sortation testing. Without testing, your package may receive a conservative label.

## Flexible PE Films

When submitting a request for a package with a PE film component, don't forget to also include these details:

- Resin types (i.e., LDPE, HDPE, LLDPE, MDPE)
- Fillers and the film density when fillers are present
- Compatibilizers and their loading
- Overall density of the structure when PE attachments (i.e., labels) are present





# Paper Coatings & Additives



Paper coatings and additives perform different functions, including barrier properties, sealability, appearance, and scuff resistance. Some of these materials may cause reprocessing issues and reduce overall yields.

Include detailed information about all present:

- Additives
- Coatings (i.e., clay, UV, heat, & pressure sealable)
- Other alternative & repulpable coatings
- Laminates, extrusions, & poly coatings
- Metallic layers & decorations
- Liners
- Fluorinated or polyfluoroalkyl substances, chemicals, coatings, & additives (PFAS)

Confirm if a coating is on **one or both sides** of the paper component and if it is **flood coated or pattern applied** as these factors influence the recyclability assessment. See the page on [Fiber Testing](#) for more information regarding paper packaging with specialty coatings.



# Attachments on Paper Packages



Attachments on paper packaging can reduce overall recycled material yields and create wear on MRF and recycler equipment. While some attachments are tolerated, others need to be removed before recycling. This will affect the package's overall recyclability and may influence the consumer preparation instructions on your assigned label.

Provide detailed information about all components present, including:

- Seals & stickers
- Hangers & handles
- Fasteners & other plastic attachments
- Metal cutters, spouts, & other attachments
- Windows & blister trays

**Each attachment needs to be listed as a separate component in your label request.**

To design a paper package for Optimal Recyclability, How2Recycle recommends removing non-paper attachments or moving to all paper attachments.



SECTION

4



# Applying How2Recycle Labels



How2Recycle

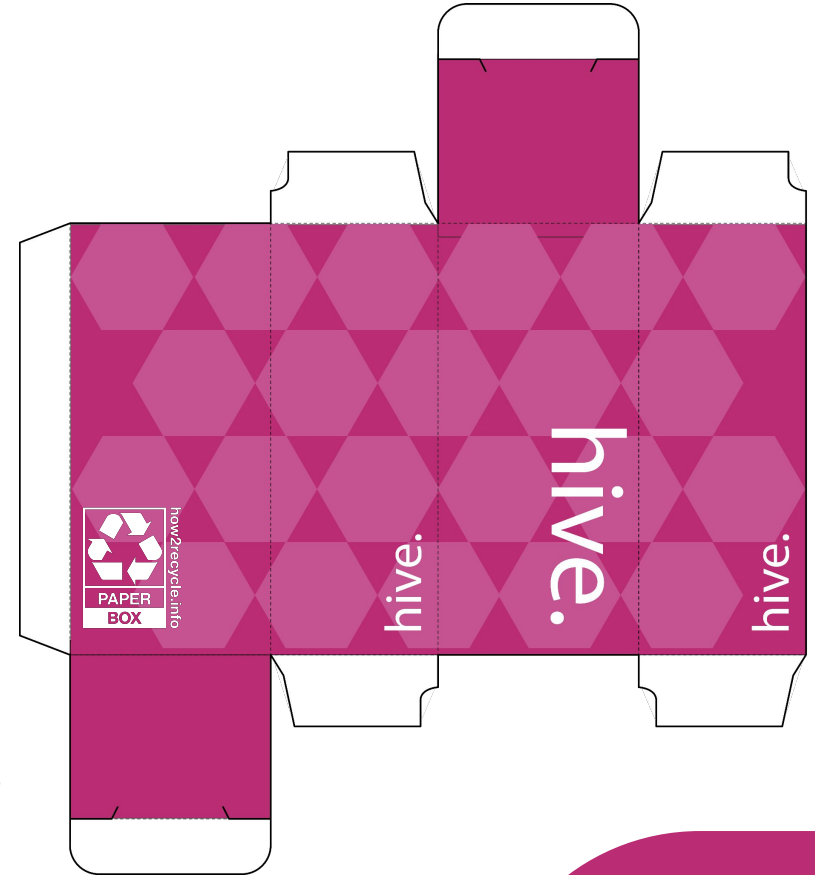
# On Pack Label Rules

## Label Checks

- ❑ The label assigned in the request is the same label on the proof.
- ❑ The label follows rules on sizing and color.
- ❑ The fonts in the label have not been changed.
- ❑ All parts of the label are present, including the instruction tab and website URL.
- ❑ *If selling in multiple countries, geographic qualifiers have been used and placed correctly.*

## Package Checks

- ❑ Label(s) are placed on the correct component(s).
- ❑ The How2Recycle label is easy to find and read.
- ❑ Only permitted sustainability messaging & the label are used.
- ❑ All on-pack claims are specific and clear.
- ❑ Qualifying statements regarding recyclability have been used if a Store Drop-off, Check Locally, or Not Yet Recyclable label was assigned.
- ❑ Chasing arrows are not used outside of the label, including RICs.

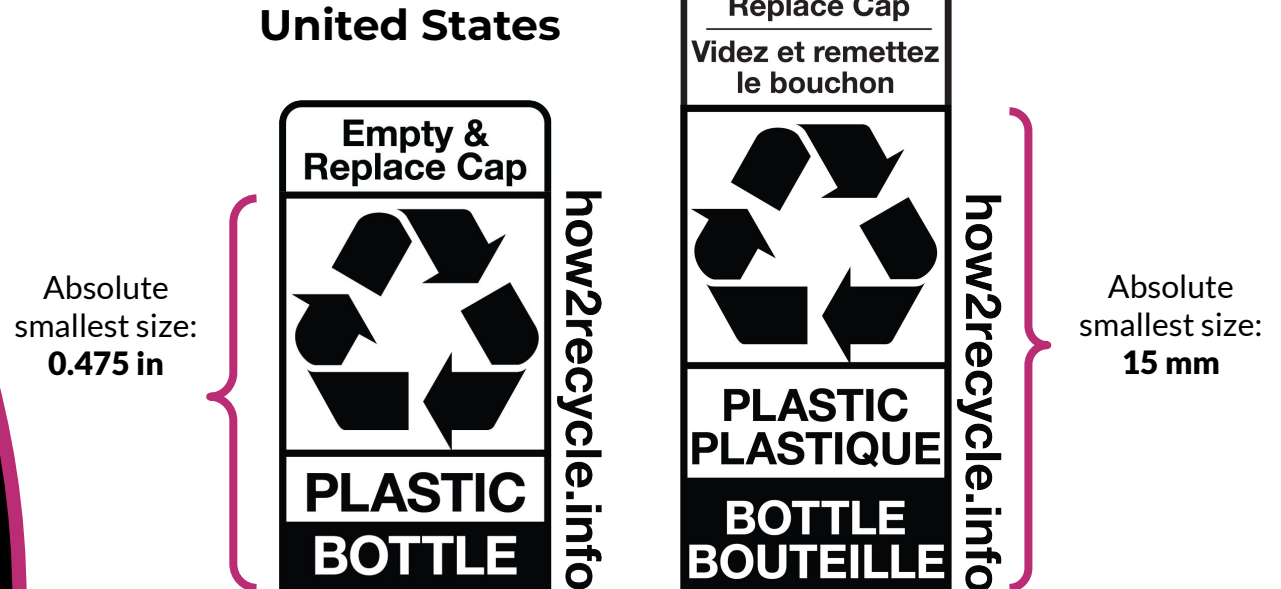


# Minimum Label Size Required

Always start with a larger label and scale down as needed without going below these minimums so all label elements are legible. Difficult-to-read and small labels can cause consumer confusion and frustration.

If you are having trouble meeting the minimum size requirement or fitting the label on pack, reach out to How2Recycle.

## Canada & Dual US/Canada



**Instruction tabs are not included in the minimum size requirement** because tab sizes vary. Use only the **main label body** to measure.

# Acceptable Color Formatting

## Classic

Traditional black and white.  
Most common



## Inverted

White, or a single light color.  
For darker packages



## One Color

Single, solid dark color.  
For lighter packages



## Classic on Dark

Traditional black and white.  
For darker packages



## Faded Classic

Traditional black with a lightened shade of the package's color



The How2Recycle label colors should not be altered in any way other than the acceptable formats outlined here.

# Unacceptable Color Formatting

**Do not**  
Frame the label\*



**Do not**  
Use more than  
two colors



**Do not**  
Feature a background color other than  
transparent, white, or a lightened  
shade of the surrounding package



**Do not**  
Invert isolated parts of  
the label. Use only one  
color for the entire label



\*A border needed for printing, such as for trapping or a bleed, around the How2Recycle label is permissible.

# Limits on Label Format

The How2Recycle label and iconography are registered trademarks. Modifying the label design, format, and language is strictly prohibited.



Do not remove, shuffle, or de-emphasize any part of the label.

Do not change text or fonts inside the label.

Do not separate tiles or split the label.

Do not use the outdated horizontal label.

Do not remove label elements including the URL, qualifiers, or instruction tab.

Do not stretch or compress the label or label text.









# International Labeling

Geographic qualifiers must be legible on your package and centered above the label tile. The qualifier text cannot be smaller than the smallest text in the How2Recycle label.

## How2Recycle is for use in the United States and Canada.

The table below outlines label options based on where you sell your product.

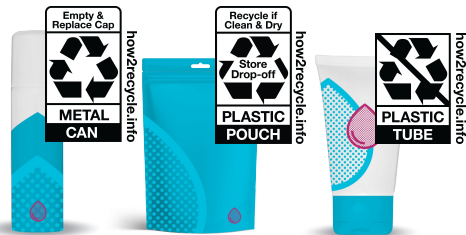
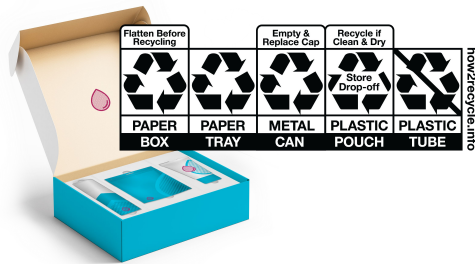
| Sold in US Only   | Sold primarily in US, but also sold elsewhere                                       | Sold in US, Canada & elsewhere<br>(Recyclability of the package is the same in US & Canada) | Sold in US, Canada & elsewhere<br>(Recyclability of the package differs in US & Canada) | Sold in Canada Only   | Sold primarily in Canada, but also sold elsewhere                                   |
|---|---|---|---|---|---|
|  |  |          |      |  |  |
| Geographic qualifier not required   | US ONLY geographic qualifier required   | USA & CAN geographic qualifier required   | USA & CAN geographic qualifiers required  | Geographic qualifier not required   | CAN ONLY geographic qualifier required  |

# Label Placement

**Every component referenced in the assigned How2Recycle label must be featured on pack.** Unprinted components should be referenced on the printed component it is contained within or attached to.

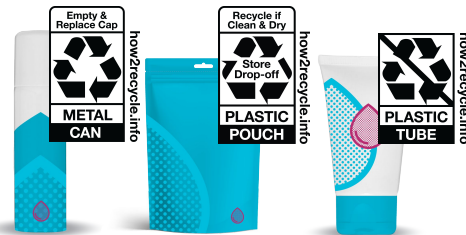
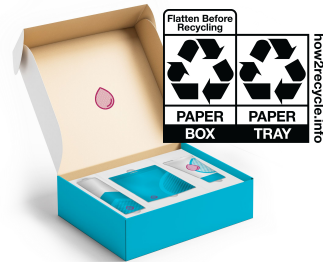
## Best format

Label all components on the outermost one & label all printed components individually



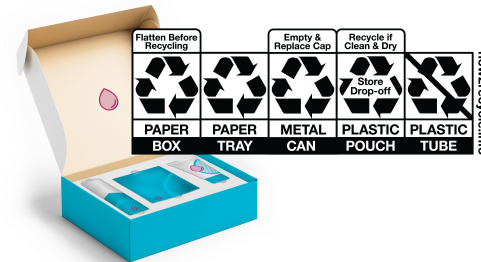
## Good format

Label all printed components individually



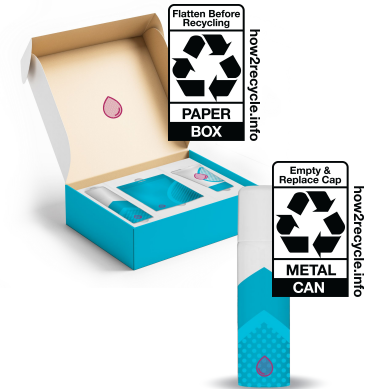
## Discouraged but allowed format

Label all components on the outermost component



## Not permitted format

Not labeling all components



# Label Location

The **label must be featured where the consumer will encounter it** during the product's use or locate it quickly at the time of disposal.

While not encouraged, it is permissible for the product to cover the label as long as it becomes fully visible and is not distorted once the package is open. Ensuring that the consumer spots the label naturally while experiencing the package should be prioritized when determining label placement.



# Permitted Sustainability Messaging

The How2Recycle label should be the only package recyclability messaging; all other recyclability-related claims should be removed unless required by law.



## Material Content Claims

How2Recycle encourages the use of recycled content and source certifications. Recycled content messages should be clear, specific, and cannot use chasing arrows that could lead to potential confusion or conflict with the How2Recycle label.

## Digital Labeling

With approval from the How2Recycle team, members can include the assigned How2Recycle label within a digital QR code or on their website as soon as the label is featured on pack. **Only featuring the How2Recycle label in a digital format is prohibited.** Members are responsible for updating any digital label if the assigned How2Recycle label changes.

## International Labeling

As How2Recycle is applicable only to the US and Canada, we do not interfere with international messaging and symbols. We recognize that other countries may require specific claims and information or use other labeling, such as the Australasian Recycling Label (ARL), the On-Pack Recycling Label (OPRL), and the Triman Label.

# Prohibited Sustainability Messaging

Using prohibited sustainability messaging will cause your artwork proof to be rejected. These are some examples that should not be printed on pack.

*100% recyclable  
#1 PET bottle!*



How2Recycle.info



Infinitely Recyclable



How2Recycle.info

RECYCLE ME



\*Not recycled in all communities

## Generic & Misleading Claims

Use of “100% recyclable”, “fully recyclable”, “completely recycle”, or “infinitely recyclable” claims can be deceptive to consumers and is prohibited. Even Widely Recyclable items have elements (i.e. inks, adhesives, and most incidental attachments) that are not recycled and experience yield loss during the recycling process. Generic and misleading graphics are also prohibited.

## Unqualified Claims

Do not use generic “recyclable” claims for packages with Store Drop-off, Check Locally, or Not Yet Recyclable labels. Store Drop-off and Check Locally labels are qualified recyclability claims and omitting the qualifier is prohibited.

## Duplicative Statements

Duplicative recycling instructions, claims, or images, including chasing arrows are prohibited. It is permissible to include information about product disposal only when the product is not referenced in the How2Recycle label.



**How2Recycle**

# Stay In Touch

Send us an email, check out our website, and follow us on social media!

[how2recycle@greenblue.org](mailto:how2recycle@greenblue.org)

[how2recycle.info](http://how2recycle.info)

[greenblue.org/projects/how2recycle](http://greenblue.org/projects/how2recycle)



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@How2Recycle® (H2R)



How2Recycle is a project of GreenBlue, a 501(c)(3) environmental nonprofit based in Charlottesville, Virginia, United States.

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