

Members' Guide to the How2Recycle Pro Label Rollout

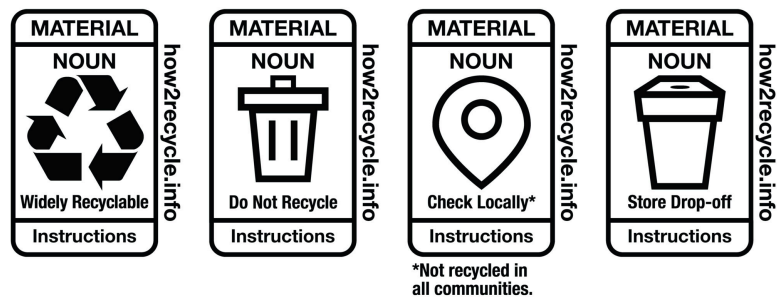
Our Refreshed Label Designs



Overview

In August, How2Recycle will begin the phase out of the current How2Recycle Legacy Labels, and in early September, we will roll out the new How2Recycle Pro Labels to members. The new labels were created through input and feedback from the SPC Packaging Design Collaborative in 2024, alongside extensive consumer research. The resulting labels are easier to read, clearer to consumers, and intended to comply with new recyclability labeling regulations. We are excited to provide the new How2Recycle Pro Labels for members to use on packages beginning in September.

HOW2RECYCLE PRO LABELS



We have over 14,000 existing unique How2Recycle labels, a majority of which are being converted to the new How2Recycle Pro design. We have tens of thousands of label requests with labels assigned that will need to be transitioned to the new labels. This is a complex process, and at the same time we are taking the opportunity to implement new procedures that will help ensure compliance in the future.



Please be sure to read all of the information provided, as it is your responsibility as a How2Recycle member to properly manage your portfolio.

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Glossary

Before we dive into the information in this resource, here is a glossary of terms to help you understand everything you need to know for the How2Recycle Pro Label rollout:

How2Recycle Legacy Labels (aka Legacy Labels)	These are the How2Recycle labels you are used to seeing, the current labels the program has been assigning. These labels will be replaced by the new How2Recycle Pro Labels
How2Recycle Pro Labels (aka Pro Labels)	The newly redesigned labels, with new symbology and a simplified layout. Intended to improve consumer understanding and comply with legislation.
How2Recycle Plus	Dynamic QR code enabled label offering, powered by The Recycling Partnership's Recycle Check to provide on-pack, scannable, localized acceptance information to consumers. How2Recycle Plus is an additional add on to How2Recycle membership.
How2Recycle Members	Companies that participate in the How2Recycle Program. These include Brand and Retailer Members, who use the labels on their own packaging, and Converter/Material Manufacturer Members who apply for pre-qualification of packages to be sold to Brand and Retailer Members.
How2Recycle Guidelines for Use	Semiannual programmatic guidance for How2Recycle Members. Includes information on program requirements, recyclability category changes, and label implementation. All members are required to read and be familiar with the contents of the Guidelines for Use every publication period (six months).
Label	A "label" is considered the complete How2Recycle instructions. A label may be made up of one or many tiles.
Tiles	The individual component instructions, for example a Widely Recyclable tile for a Paper Box, or a Store Drop-off tile for a Plastic Bag
How2Recycle Member Platform (aka the Platform, the Member Platform)	Our custom online application where members submit label requests
Label Request Status	<p>The status of a label request determines what action is needed on a label request, whether by a Member or the How2Recycle team. The statuses on the How2Recycle Member Platform include:</p> <p><i>Draft, Request Submitted, More Info, Proof Needed, Proof Pending Approval, Approved, R&D Completed, Second Look, Declined to Label, and Deactivated.</i></p> <p>As of May 2025, we have added two new statuses: Proof Needed – Warning and Completed – Declined to Label, Failure to Submit Proof. More information on the new statuses can be found here.</p>

Pre-Rollout and Legacy Labels

How2Recycle Legacy Labels will continue to be assigned until the rollout in August 2025.

If your request is processed prior to August, but you do not wish to print the Legacy label, you have the option to wait until the Pro rollout to submit a proof with the new Pro label. When the request status changes to "Proof Needed," please add a comment stating that you will be waiting for the Pro label prior to submitting a proof. Your request will remain in Proof Needed. Once the new Pro label is assigned, it will automatically be added to your label request, where you can download it to apply it to artwork, and then submit the new Proof.

After the rollout, Legacy Label Proofs will be approved through February 1, 2026.

Beyond this date, only Pro Labels will be eligible for approval. Members can decide if they would like to use the Legacy Label between the Pro rollout and Feb 1, but must be aware of the implications on products sold in California if the product will continue to be sold into California past October 4, 2026.

Now - Aug. 25, 2025

Legacy Labels
Assigned



Aug. 25, 2025 - Jan. 31, 2026

Legacy Label Proofs Allowed,
Pro Labels Assigned



Starting Feb. 1, 2026

Legacy Label Proofs
No Longer Approved



Label requests from 2022 or earlier that are still in "Proof Needed" will be moved to "Completed - Declined to Label, Failure to Submit Proof." More information on proof archiving can be found [here](#).

Why would I want to keep a Legacy Label?

This is up to your company and the printing timelines you may already have in motion. An example of this is if you have a product that is Widely Recyclable, and will remain Widely Recyclable, even considering the changes in California, then the legacy WR label is still appropriate and not in violation of SB 343. If you already have this product in print or already have the logistics in motion to print it soon, then it may make sense to keep it. However, members are advised to be completely aware of all of the changes that may impact their portfolio. We do recommend switching to the new Pro Labels as soon as is feasible.

Why can't I keep the Legacy Labels forever, as long as they are compliant?

The goal of How2Recycle is to provide clear, consistent disposal instructions to consumers. Ideally, once the Pro rollout is complete and members begin to print Pro Labels on packaging, consumers will start to recognize the new symbology (with help from the How2Recycle Forward campaign). While we recognize that there will be a mix of labels out there in the world for some time, we intend for all packages to have transitioned over the next two years, so that consumers aren't confused by what they are seeing and know to look at the same reliable symbology to understand what to do with their empty packages.

July Guidelines for Use Decision Changes and Priority List

Our next Guidelines for Use update will be published in late July 2025, prior to the rollout. It will include:

- Updates to recyclability classifications
- Clarifications for SB 343 and other recyclability assessment changes
- A priority list of product categories that should transition to Pro Labels as soon as possible



Please ensure that your team reviews and implements the guidance upon release in July 2025.

How the Transition Will Work

We are updating all our labels to the new How2Recycle Pro designs. These will automatically be applied to active Approved, Proof Needed, and Proof Pending Approval label requests in the Member Platform. For the most part, there is no action needed from members to receive a Pro Label.

To complete the transition, members will still need to submit a proof showing the new Pro label applied to packaging artwork. Until a new proof is submitted and approved, your packaging is not officially transitioned to the Pro label. Additionally, some older requests will be moved to a Deactivated status. If you are still using a label from one of these requests, you will need to duplicate the request, fill out the updated label request form, and resubmit it for reassessment.

More detailed guidance on submitting updated proofs and managing deactivated requests can be found in the following sections.

Platform Closure During Transition

Due to the maintenance-intensive nature of the label transition, we will be required to close the How2Recycle Member Platform for a short period of time to ensure the transition is efficient, complete, and uninterrupted. **The How2Recycle Member Platform will be closed from August 25, 2025, to September 2, 2025**, while we complete a scheduled import of new Pro Labels. The platform will reopen on Wednesday, September 3, 2025.

Please note that this timing is **forecasted to the best of our ability**, but may shift slightly based on several factors outside of our control. We will communicate promptly if timelines shift and appreciate your flexibility during this process. Our goal is to minimize disruption while ensuring a smooth and accurate transition to the new label system.

During this time, Members will not be able to submit new requests or view or download assigned labels. However, you will still be able to draft new requests and access all existing data in the platform. **Please note that email responses and label request turnaround times may be delayed in the days following the import. We appreciate your patience and recommend planning ahead where possible.**

PLATFORM CLOSURE



How2Recycle Pro Implementation Process

Once the How2Recycle Pro rollout is complete, all new label requests will receive a Pro Label.

From this point on, we will only be issuing Pro Labels and any label request processed after the rollout will receive a Pro label (even if it was submitted before the rollout).

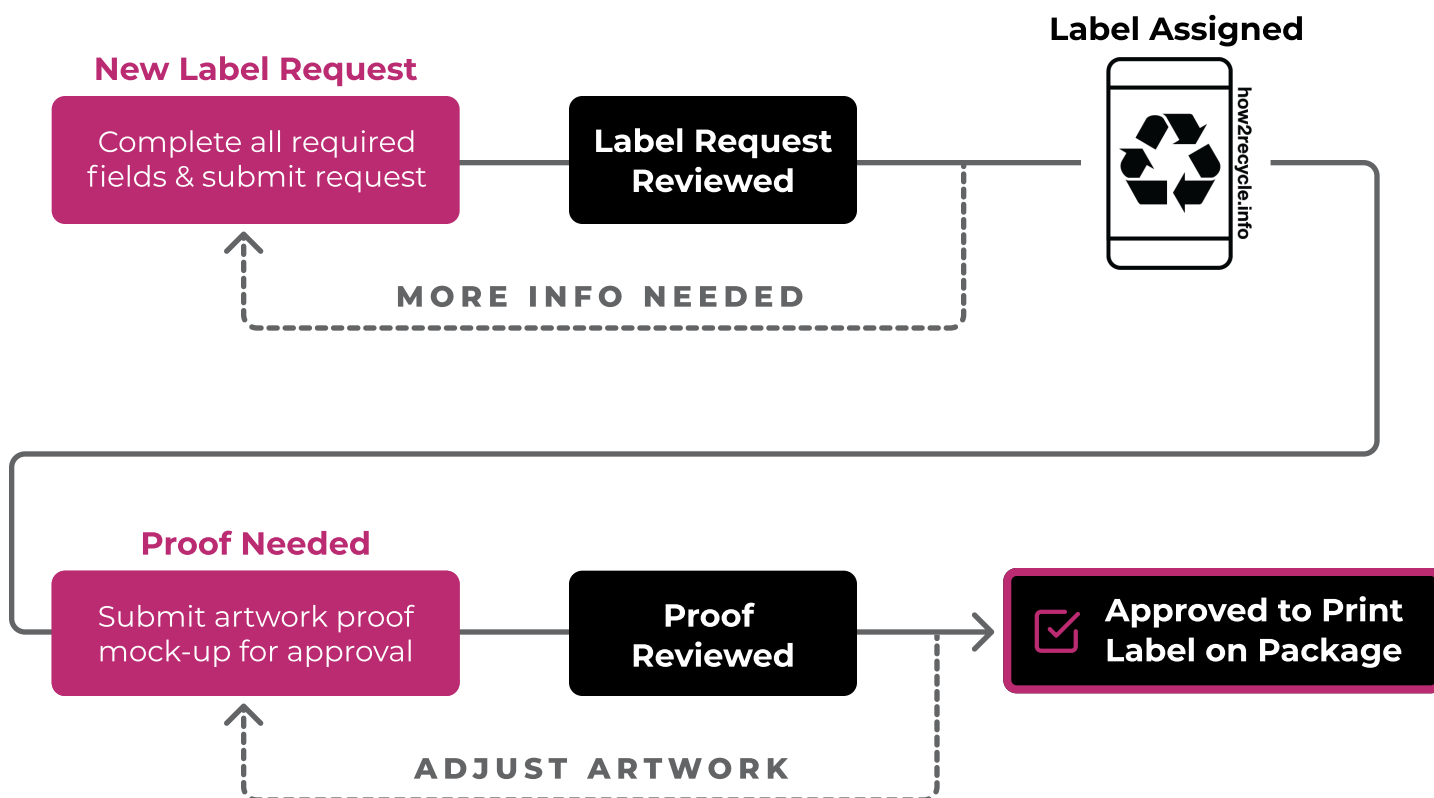
Any existing requests waiting in Proof Needed may be updated to Pro Labels automatically.

Members should review their portfolios and identify which items should be transitioned early, particularly those with packaging changes or new regulatory considerations.

- **A note about proof approval turnaround times:** We are anticipating a significant increase in proofs being submitted for approval in the period following the Pro rollout. While we are planning to increase support to our proof approval process, there will be an increase in turnaround times for proofs during this time. Please anticipate a turnaround time of **7-10 days** for proofs to be approved during the remainder of 2025. It is best to build additional time into your internal timelines to ensure that you can meet any impending deadlines regarding printing.

STANDARD LABEL REQUEST PROCESS

■ Member Action ■ How2Recycle Action



**This is the standard label request process for branded packages; it does not apply to R&D label requests, manufacturer or converters, or any other request that does not require a proof submission. Please view those processes in your latest Guidelines for Use.*

Deactivation of Old Requests

As part of the How2Recycle Pro rollout, we are updating the label request form to better reflect our current recyclability assessment methodology. These updates include revised and expanded questions that capture more detailed packaging information to ensure accurate label outcomes under the current system.

What This Means for Older Label Requests

During the platform closure, label requests approved in **2022 or earlier** will be moved to **Deactivated**. A comment will be added to affected requests to indicate that it was moved to Deactivated due to the age of the request. These older requests do not include sufficient data to be accurately reassessed under the new label criteria and platform structure. If a label from one of these older requests is still being used on active packaging, it is the responsibility of the member to ensure it is up to date.

How to Update a Deactivated Label Request:

1. Log into the Member Platform and locate the deactivated request.
2. Use the "Duplicate" function to create a new request with the same packaging.
3. Complete the updated label request form, including any new questions or data fields.
4. Submit the request for reassessment.
5. Once reviewed by the How2Recycle team, the appropriate Pro Label will be assigned based on the current Guidelines for Use.

This process helps ensure all labels moving forward are aligned with updated guidance, recyclability determinations, and legal requirements. Members are encouraged to review their portfolios and resubmit packaging that may be affected.

Compliance with California's SB 343

Compliance with the "Truth in Labeling" legislation in California was a driving factor in the redesign of our labels, particularly in moving away from the inclusion of the chasing arrows symbol on all but the Widely Recyclable Label. We are confident that the new labels are in compliance with SB 343, and all other legal guidance concerning recyclability labeling in the U.S. and Canada. We will also be publishing updated decision changes as a result of the Material Characterization Study in California, which will affect certain package types that are considered Widely Recyclable.

However, it is important to note that label assignment and proof approval by How2Recycle does not guarantee compliance with SB 343 or all applicable laws. It is the responsibility of the member to ensure package artwork adheres to all applicable regulations. Members should be familiar with the regulations in California and the determination of what qualifies a package to be labeled as recyclable per the guidance from the state. While the How2Recycle Pro Labels are designed to satisfy California regulations, members are strongly encouraged to thoroughly check the rest of their package artwork to ensure there is no language or symbology that puts them at risk.



Please ensure that you have read the supplementary notices on packages affected by California's SB 343 and recyclability assessment changes over the past several years.

These will be published alongside the July 2025 Guideline for Use. Members are responsible for identifying any of their older label requests that are still in use and updating with additional data as necessary to ensure that the assigned label is appropriate.

What Not to Expect

There are many behind-the-scenes efforts at How2Recycle to ensure a smooth, consistent rollout of the new How2Recycle Pro Label. While we are updating systems, resources, and processes to support this transition, it's important to understand your responsibilities as a member.

This section is intended to set clear expectations about what will not be handled automatically or individually by the How2Recycle team. Some parts of this transition will require your active participation in reviewing and updating your label portfolio.

What the How2Recycle Team Will Not Be Able to Provide:

- **Individualized feedback on which label requests need to be updated**

We will not be flagging specific label requests that need to be transitioned to How2Recycle Pro Labels. The rollout applies to all members, and it is each member's responsibility to determine which products in their portfolio require updates, based on your packaging timelines and recyclability status. We will be sharing a list of materials and formats to prioritize for alignment with SB 343, and a list of those impacted by recyclability assessment changes in the past few years. We recommend that members review that resource and determine their own prioritization due to factors including which products are active and internal printing timelines.

- **Individualized notifications about labels impacted by SB 343**

While we will publish resources and examples to help you understand the implications of California's SB 343, we will not be issuing member-specific notifications. Members must assess their own packaging portfolio based on our guidance. Please refer to the July 2025 Guidelines for Use and our SB 343 summary to support your internal review.

- **Legal advice or guidance (including on SB 343 compliance)**

How2Recycle does not provide legal counsel and cannot advise definitively on what is or isn't considered compliant under SB 343 or any other regulation. Our guidance is designed to support recyclability assessments and labeling best practices, and is aligned with our interpretation of all applicable regulations, but members should consult with internal legal teams or outside counsel for compliance questions.

- **Tailored portfolio reviews**

We do not offer individualized portfolio reviews as part of this rollout. While we are providing tools and resources to support the transition, it is the responsibility of each member to review their own packaging portfolio, assess which products are affected by updated guidance or legislation, and determine where label updates are needed.

- **Immediate harmonization of Legacy and Pro labels in the market**

We recognize that during this transition period, both Legacy and Pro Labels will exist on shelf. While this is expected and acceptable in the short term, our goal is full harmonization over time. Members are encouraged to develop an internal transition plan to migrate to the Pro Label consistently across their packaging lines.

Checklist for Members

Read the July 2025 Guidelines for Use

- Read the supplementary notice on packages affected by California's SB 343
- Read the supplementary notice on recyclability assessment changes over the past several years

To use a new Pro Label on an existing Approved Label request:

1. Access the new label via the label request on the Member Platform
 - Don't see a Pro Label? Refer to [Deactivation of Old Requests](#) to find out why
2. Apply the new label to your artwork
3. Resubmit the proof
 - Label status will return to Proof Pending Approval
4. When approved, you will be notified and can then begin printing the new Pro Label

To resubmit an older label request for a new Pro Label:

1. Identify the previous request
2. Duplicate the request
3. Fill in any additional information required by the label request form
4. Submit the label request
 - If notified that "More Info" is needed, please provide additional information requested
5. When assessment is complete, you will be assigned the new Pro Label appropriate for your product
6. Apply the new label to your artwork
7. Resubmit the proof
 - Label status will return to Proof Pending Approval
8. When approved, you will be notified and can then begin printing the new Pro Label

