



KEY MESSAGES FOR GOVERNMENTS

The following key messages aim to assist governments in the implementation of the Recommendations for Action from “Can I Recycle This?” A Global Mapping and Assessment of Standards, Labels and Claims on Plastic Packaging (UNEP & Consumers International 2020¹). Governments have a critical role to improve and promote consumer information on plastic packaging to progress towards a more circular economy for plastic.

Regulate to ensure that consumer information available in the market is aligned with the principles of the *Guidelines for Providing Product Sustainability Information*

1. On-pack labels to be actionable and relevant

Consumers presume that on-pack labels about disposal are relevant and applicable to their local waste collection, but this is not always the case.

Sustainability information on packaging is barely regulated leading to a great variety of communication with different levels of credibility. This can cause consumer confusion and mistrust even towards credible consumer information.

ACTIONS

Governments can regulate to ensure that only communication aligned with the ten principles of the *Guidelines for Providing Product Sustainability Information* (UN Environment & ITC, 2017², hereafter “the Guidelines”) about the sustainability of plastic packaging

appears in the market. The principles can be incorporated into existing legislation on environmental marketing or guidance documents can be issued to direct companies and labelling organisations in the provision of sustainability information.

Promoting dialogue between managers of waste infrastructure in the public and private sector and label developers can ensure that labels offer clear and contextualised guidance to consumers, which aligns with the principles of the Guidelines.

Governments should require companies to prove that a ‘recyclable’ claim is proven to work “in practice and at scale³” in order to use this claim. However, more accurate data is necessary to assess and validate such claims. Governments should aim to collect annual recyclability rate data in their country which can be utilised in labels and other consumer information tools to provide reliable and locally relevant information to consumers.

The Ellen McArthur Foundation conducts an annual recyclability rate survey to understand whether the recyclability of plastic packaging is proven to work “in practice and at scale⁴”.

Member states of the Basel Convention will start to report data on plastic collection and recycling rates from 2022. Publishing this data will allow consumers to have a better view of the local plastic waste collection facilities in their area, which will help them to align their actions with what on-pack messaging directs them to do.

1 The United Nations Environment Programme (UNEP) & Consumers International (2020) “Can I Recycle This?” A Global Mapping and Assessment of Standards, Labels and Claims on Plastic Packaging <https://www.oneplanetnetwork.org/resource/can-i-recycle-global-mapping-and-assessment-standards-labels-and-claims-plastic-packaging>

2 UN Environment & ITC (2017) Guidelines for Providing Product Sustainability Information. UNEP. <https://www.oneplanetnetwork.org/resource/guidelines-providing-product-sustainability-information>

3 Ellen MacArthur Foundation (2020) The Global Commitment 2020 Progress Report. <https://www.newplasticseconomy.org/assets/doc/Global-Commitment-2020-Progress-Report.pdf>, p.67

4 Ibid., 67.

IMPACT

Permitting in the market only sustainability information which aligns with the Guidelines will create a stronger and more reliable landscape of consumer communications.

Labels and claims which reflect the actual conditions in the markets in which they operate, and which clearly convey information, can help guide consumers in their purchasing and disposal decisions.

2. Update use of the pre-2013 Resin Identification Codes

The plastic Resin Identification Codes (RIC) were updated in 2013 to change the symbol from a triangle of three 'chasing arrows' to an enclosed triangle. However, not all government legislation has been updated. Some areas still allow pre-2013 codes, with the 'chasing arrows' symbol although the RIC does not indicate recyclability of a material.

The principle of *clarity* in the Guidelines states that imagery used in communications should not be misleading.

ACTIONS

Legislation should be updated to enforce the use of the new enclosed triangular design.

In August 2020, Oregon's Recycling Steering Committee in the US proposed removing the chasing arrows around the RIC, becoming one of the first US states to do so⁵.

IMPACT

Ensuring that the 'chasing arrows' symbol is only used to indicate whether a material is recyclable will create a more consistent landscape of communications on disposability of plastic packaging and ensure proper disposal of waste.

5 Recommended concept for modernizing Oregon's recycling system (2020). <https://www.oregon.gov/deq/recycling/Documents/rscRecConcept.pdf>, p. 17

3. Change design and restrict use of the Green Dot™ logo

The "Can I Recycle This?" report finds that out of all the reviewed labels, the Green Dot™ logo stands out as the least aligned with the principles of the Guidelines. The logo indicates that a company has joined the Green Dot scheme, which is a scheme related to recycling financing.

The design of this label with the 'chasing arrows' is easily misinterpreted as indicating that a packaging is recyclable and can contribute to the contamination of recycling streams. The label is very common on packaging, and whilst it only applies in the EU, the label can be found on packaging across the world.



Green Dot™

ACTIONS

The Green Dot™ logo should be redesigned to differ from the recycling 'chasing arrows' symbol and would benefit from including explanatory language.

Governments should restrict the use of the label where it bears no relevance.

Since 2017, the Green Dot™ logo is no longer mandatory in France and changes are expected in French law to impose a penalty on companies that sell products with the logo on packaging⁶.

IMPACT

Ensuring that the use of the 'chasing arrows' symbol is restricted or redesigned will remove recycling indications from the Green Dot™ logo to reduce consumer confusion and better enable the correct disposal of plastic packaging.

6 Triman – New upcoming measures in France about the packaging labelling (2020). <https://www.take-e-way.com/news-press/news/news-singleview/article/triman-new-upcoming-measures-in-france-about-the-packaging-labeling/>



Regulate against greenwashing

In the marketplace, there are many examples of misleading or confusing sustainability claims on plastic packaging.

ACTIONS

Governments should regulate or at least set-out strategies to tackle greenwashing effectively.

Regulations which set definitions for common on-package sustainability claims would reduce greenwashing and the use of terms that consumers find confusing and difficult to compare.

The Green Marketing and the Australian Consumer Law (ACL)⁷ is a government document which provides guidelines to ensure that any environmental claims made by a business on labelling, packaging, and advertising are upheld in practice.

France approved a law in February 2020 on the circular economy forbidding companies from using the word “biodegradable” on packaging unless they can prove it is suitable for domestic composting⁸.

IMPACT

Regulating against greenwashing will mean improved practices and communications from businesses on plastic packaging leading to less consumer confusion and better comparability of claims. For example, clearer instructions on how to dispose of plastics labelled as compostable or biodegradable will empower consumers to take the right action.

Promote campaigns that inform consumers on the content of labels and claims, and the actions they should take

Most consumers look for labels on packaging to understand how to dispose of products. If consumers do not understand the meaning and instructions of common labels and claims, they will not be able to properly discard of materials. Improper disposal risks plastic leakage into the environment and contamination of waste streams.

ACTIONS

Organise education campaigns to inform consumers about commonly used terms, claims, labels and symbols on plastic packaging and how to identify credible sustainability information.

Highlight what a misleading claim is and how consumers can report these to relevant bodies in their area.

The Government of Rwanda is raising awareness amongst businesses and consumers about the benefits of using recycled plastics for the circular economy⁹.

Since 2019 in Brazil, São Paulo’s town-hall initiative campaign: *Recicla Sampa* (Recycle Sampa) has aimed to expand awareness, offer advice, and disseminate information to citizens in the city to encourage sustainable habits. The campaign is structured upon the five R’s: rethink, reduce, reuse, refuse and recycle. The online platform and social media content include videos, tutorials, and web docs.

IMPACT

Repeated awareness-raising campaigns targeting consumers to understand the sustainability information displayed on plastic packaging will educate consumers, encourage them to tackle greenwashing and help consumers to contribute towards a more circular plastics economy.

7 Green Marketing and the Australian Consumer Law (2011). <https://www.accc.gov.au/system/files/Green%20marketing%20and%20the%20ACL.pdf>

8 Plancke, M. (2020) French Circular Economy Law brings substantial changes. <https://www.eppm.com/blogs/guest-blogs/french-circular-economy-law-brings-substantial-changes/>

9 Ellen MacArthur Foundation (2020) Organisation report for 2020 reporting cycle Government of Rwanda. <https://www.ellenmacarthurfoundation.org/resources/apply/global-commitment-progress-report/organisation-reports/report/gov/recWggXGvDsqqJEOm>

