

# Paper Recycling Symbol Guidelines

&

## Environmental Marketing Claims

# Environmental Marketing Claims

FTC guidelines apply to all environmental claims included in labeling, advertising, promotional materials, and all other forms of marketing. This applies to any claim about the environmental attributes of a product or package. All claims must be truthful and require substantiation. To avoid any consumer deception, follow the general principles described below when making environmental marketing claims.

**Display qualifying claims prominently.** Qualifications or disclosures must be clear, prominent, and understandable to prevent deception. Use symbols and language that are in close proximity to each other. The size of the symbol or claim should be large enough for consumers to identify and read.

**Be clear about what's included in the claim.** Specify whether the environmental attribute or benefit asserted refers to the product, the product's packaging, a service, or a portion or component of the product, package, or service.

**EXAMPLE:**

*This paper package made from 50% total recycled fiber.*

**Don't overstate an environmental attribute.** Claims should not exaggerate the environmental attribute or benefit, expressly or by implication. Avoid implications of significant environmental benefits, if the benefit is in fact negligible.

**EXAMPLE:**

*A package is labeled "50% more recycled content than before." The manufacturer increased the recycled content of its package from 2% recycled material to 3%. Although the claim is technically true, it conveys a false impression.*

**Substantiate comparative claims.** Present claims so that the basis for the comparison is sufficiently clear and avoids consumer deception. Review ISO guidelines: "Environmental Labels and Declarations—Self-declared Environmental Claims" (sec. 6.3) which specify limitations on comparative claims. In addition, the marketer should be able to substantiate the comparison.

**EXAMPLE:**

*An ad claims that the packaging creates "less waste than the leading national brand." The advertiser should be able to support source reduction achievements through calculations comparing the relative solid waste contributions of the two packages.*

## "Degradable" and "Compostable"

Claims about the degradability or compostability of a product or package must be supported by scientific research and require qualifying language.

**Degradable.** A degradability claim is not generally recommended. In addition to qualifications about the rate and extent of degradation, a claim of degradability must be substantiated by scientific evidence that the entire product or package will completely break down within a reasonably short time after customary disposal. As degradation occurs very slowly in landfills, the customary disposal, it is difficult to meet a "degradable" claim.

**Compostable.** Claims that a product or package is compostable require reliable scientific evidence that the entire product or package will break down into, or become part of, usable compost in a composting facility or a home compost pile.

When composting facilities do not serve the majority of consumers where a product is sold, the claim should be qualified as follows:

*"Appropriate facilities may not exist in your area."*

*"Compostable in Municipal Yard Trimmings Composting Facilities."*

*"Compostable in a municipal composting facility. Not suitable for home composting."*

## Avoid:

Avoid the following or similar statements. They are considered vague, unsupported, or unclear and do not follow FTC or ISO general principles for making environmental marketing claims.

- Environmentally Safe
- Earth Friendly
- Environmentally Friendly
- Non-polluting
- Green
- Nature's Friend
- Ozone Friendly

# Paper Recycling Symbol Guidelines & Environmental Marketing Claims

**T**he recycling symbol is visible on more and more consumer products—from those found in grocery stores to home improvement centers. To ensure that the recycling symbol is used appropriately, the Federal Trade Commission (FTC) and the International Organization for Standardization (ISO) have set up guidelines for its use, as well as the use of broader environmental marketing claims.<sup>1</sup>

First issued in 1992, the FTC guidelines have been updated to provide additional clarification on making “green” marketing claims. Use this publication as a reference on the appropriate and consistent use of the recycling symbol and any environmental claims for paper products or packaging.

*This guide is intended for informational purposes only and should not be considered legal advice.*

<sup>1</sup> This guide is based on the Federal Trade Commission’s (FTC) *Guidelines for the Use of Environmental Marketing Claims* (1998) and the International Organization for Standardization’s (ISO) *Final Draft International Standard (FDIS) 14021, Environmental labels and declarations – Self-declared environmental claims (Type II environmental labeling)*, 1999. Those sources, as well as state law and regulation, are the ultimate authorities. To review these guidelines yourself, visit the FTC website at [www.ftc.gov](http://www.ftc.gov) or the ISO website at [www.iso.ch](http://www.iso.ch).

## Where did the recycling symbol come from?

In 1970, Container Corporation of America (CCA), a large producer of recycled paperboard, now part of Smurfit-Stone Corporation, sponsored a contest to design a symbol to be used to promote the recycled content of the company’s paper products.

From more than 500 entrants, Gary Anderson, then a senior at the University of Southern California, won first place.

Anderson’s design—three chasing arrows in the shape of a triangle—was based on 19th Century mathematician

August Ferdinand Mobius’ discovery that a strip of paper twisted once over and joined at the tips formed a continuous single-edged, one-sided surface. The recycling symbol is often called the Mobius loop.

First developed and used by the recycled paperboard manufacturers, the symbol was adopted industry-wide to promote the recycled content of various paper products. Today, the recycling symbol is universally recognized as an identifier of a commodity’s recycled content and recyclability.



# Recycling Symbol

## Use the Recycling Symbol To Identify:

- **Products that are recyclable.**
- **Products made from 100% recycled fiber.**
- **Products made with a percentage of recycled fiber.**

Used alone, the recycling symbol communicates that a paper product or package is both recyclable and made entirely from recycled material. As few products or packages can make both claims, use of the symbol alone is limited. In most cases, the recycling symbol must be accompanied by qualifying statements to clarify the intended claims.

### Products That Are Recyclable

A product or package that meets the “recyclable” criteria, such as newspapers or corrugated boxes, would show the symbol as follows:



Using the recycling symbol to make a claim that a product or package is “recyclable” requires recycling collection programs to be available in a substantial majority of communities for that product or package.

Making a “recyclable” claim is generally not recommended, as it is difficult to meet these criteria. If a “recyclable” claim is made, a qualifying statement should accompany the recycling symbol. Consider the following:

**ACCEPTABLE:**

*“This package may not be recyclable in your area.”*

**UNACCEPTABLE:**

*“Recyclable where facilities exist.” This statement is not acceptable because it may lead consumers to believe that recycling facilities exist in their area.*

## Products Made from 100% Recycled Fiber

Products made from 100% recycled fiber should use either of the following symbols:



If the product or package is made from 100% recycled paperboard, the RPA-100% symbol may be used provided a licensing agreement is in place.<sup>2</sup>



## Products Made With a Percentage of Recycled Fiber

Products or packages made with less than 100% recycled fiber should use the recycling symbol as shown below. The symbol should be accompanied by a legend identifying the total percent (by weight) of recycled fiber. An appropriate legend might read “XX% total recycled fiber.”<sup>3</sup>



<sup>2</sup>In 1995, the 100% Recycled Paperboard Alliance (RPA-100%), whose members represent more than two-thirds of the U.S. recycled paperboard industry, created a trademarked symbol exclusively for products and packaging made from 100% recycled paperboard. Licensing agreements are available to RPA-100% members and 100% recycled paperboard customers, including converters, packaged goods companies, and retailers. For licensing information visit [www.rpa100.com](http://www.rpa100.com).

<sup>3</sup>The U.S. EPA defines recycled fiber to include both pre- and post-consumer fiber.

# RECYCLING SYMBOL

## About the American Forest & Paper Association

The American Forest & Paper Association (AF&PA) is the national trade association of the forest, pulp, paper, paperboard and wood products industry. Its members account for more than 90% of domestic paper and recycled paper manufacturing capacity.

# Examples



Here's an envelope that uses the symbol correctly.

Use the recycling symbol on brochures and other printed materials.



A summary statement of recycled content is appropriate for letterhead.



Paper packaging often contain recycled fiber. Look for the recycling symbol.



This symbol represents that this product is made from 100% recycled paperboard.



Paper bags are one of the few items that can make the "Recyclable" claim. Check the bottom of the bag for the symbol.

**AF&PA**



**American Forest & Paper Association**  
1111 19th Street, NW, Suite 800  
Washington, DC 20036

®

**JUNE 2001**

♻️ **50% TOTAL RECYCLED FIBER**