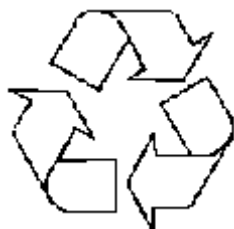


Français	Contact Us	Help	Search	Canada Site
Strategis	Site Map	What's New	About Us	Registration
Competition Bureau	Enquiries	Complaints	Subscribe!	Other Sites

Recyclable Materials

[Previous Section](#) | [Table of Contents](#) | [Next Section](#)

Figure 1



Benefits of Recycling - The use of the Möbius Loop recycling symbol (**Figure 1**) to designate recyclable products deals to a large extent with the potential benefit that can be realized through diversion from waste and reduced resource utilization. This potential cannot be realized unless there are systems and facilities in place to recycle products and packaging. The benefit comes from reduced dependency on resources by separating the product from the waste stream and recovery of materials by directing them to a recycling facility, either through curbside collection programs or drop off sites.

Recyclable claims - Recycling of materials is a rapidly growing industry. It is recognized that claims of recyclability may assist consumers in making choices which will ensure the availability of materials for recycling facilities. The use of the symbol may also provide an impetus to increase the development of appropriate infrastructures for recycling. However, the use of recyclable

claims for materials which are not commonly recycled may have a negative impact on the viability of these infrastructures because of increased costs associated with sorting and rejection of materials that are contaminated.

Infrastructure - The National Task Force on Packaging has defined the term "recyclable" for use in promoting materials. The definition is structured around a minimum threshold value for availability, to the Canadian population, of recycling or collection facilities. A claim of recyclability is reasonably justified if at least one third (1/3) of the of the population in the area where the product is distributed has convenient access to collection or drop-off facilities for recycling. Calculation of the threshold figure will depend on the expected product distribution (e.g.: approximately 9 million for a nationally distributed product, or one third of the local population for a regional product). There is no clear definition for "convenient access," but it is recognized that convenience is very subjective and will vary considerably depending on the demographic makeup of communities. Where no curb-side collection exists, convenience of drop off depots should be determined according to local conditions.

Claims of recyclability are inappropriate when used with products or materials for which a recycling infrastructure does not currently exist. Claims of recyclability by industry (retailers, manufacturers and distributors) should not be made simply because the material is technically recyclable or anticipated to be recyclable in the future. **Where a material or a product cannot be recycled, or is not reasonably expected to be recycled, no claim of recyclability may be made.**

EXAMPLES:

1. plastic garbage bags are made of polyethylene, which is technically recyclable, but when used as intended will invariably end up in disposal facilities such as landfill and not be recycled. Therefore claims that plastic garbage bags are recyclable should not be made.
2. some materials, such as old corrugated containers (occ) are increasingly collected and recycled from commercial establishments and households. Therefore it may be appropriate to label these materials as recyclable when used for commercial applications, but until these materials also reach the one third accessibility threshold for households, they cannot claim to be recyclable when used in retail consumer goods. For example, a corrugated shipping container used and disposed of by commercial or industrial enterprises may be recyclable; but a corrugated container used as a package for retail consumer goods, and sold to households for which insufficient recycling infrastructure exists may not claim to be recyclable.

Qualifying Claims - Where a material or product is being recycled, and one third of the population has access to collection facilities for that material or product, a claim of recyclability may be made if the claim is qualified by an explanatory statement.



Figure 2

EXAMPLES:

1. "RECYCLABLE IN PROGRAMS THAT ACCEPT (MATERIAL NAME)";
2. "WHERE FACILITIES EXIST"

There should also be a clear indication that the claim relates to the product, the packaging materials or both.

Figure 2 shows the use of the qualified recyclable symbol. The same message may be conveyed by the use of the statement without the symbol: "RECYCLABLE WHERE FACILITIES ACCEPT (MATERIAL NAME)."

Recognition of Infrastructure Development Initiatives - It is recognized that recycling infrastructures for all materials are not fully developed. In establishing these infrastructures, public awareness can play a significant role in the success or failure of a program.

In some cases, a material may be collected from a limited number of locations, or the infrastructure has not been sufficiently developed to provide access to recycling as described above. Clear, accurate and meaningful information relating to these programs should not be discouraged. However, in providing information to consumers that recycling has begun for some materials, there should not be any confusion relating to the extent that these materials are collected.

In these exceptional cases, where the one third threshold may not have been reached, but it is desirable to advise consumers of the new initiative, it may be appropriate to make a very specific and restrictive claim.

EXAMPLES:

1. "RECYCLABLE IN (CITY XX)"
2. "PLEASE RETURN TO (STORE NAME) FOR RECYCLING"
3. "FOR INFORMATION ON RECYCLING (MATERIAL NAME), PLEASE CALL 800-XXX-XXXX"
4. "RECYCLABLE IN LIMITED COMMUNITIES, CALL 800-XXX-XXXX FOR DETAILS"

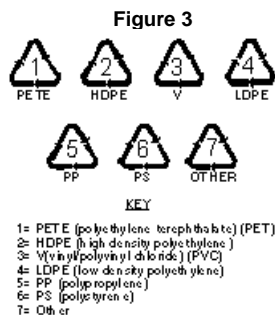
Specific Instructions - If a product or package is identified as recyclable, and it is composed of several materials which cannot be recycled together, there should be specific instructions on the proper preparation of the material for deposit in the recycling infrastructure.

EXAMPLE:

"REMOVE METAL STAPLES BEFORE RECYCLING"

Möbius Loop - Because the two Möbius Loop recycling symbols are still not widely understood, it is recommended that the symbols always be used with explanatory text.

Plastic Sorting Codes - The Society of the Plastics Industry (SPI) has developed a set of symbols that identifies various plastic resins for the purpose of sorting materials (**Figure 3** below). The use of these symbols is not intended to be a claim of recyclability and has enhanced the industry's attempts to address the technical problems associated with the collection, sorting and recycling of plastics. In some instances, municipal collection programs will advise consumers to separate their plastics by SPI code numbers to ensure minimal contamination when only one or two types of plastic are collected.



Use of Sorting Codes - In most cases these codes are applied on the bottoms or sides of containers as recommended by SPI. However, when the symbols appear conspicuously printed next to environmental claims, the association with these claims and the similarity to the Möbius Loop recycling symbol could give the general impression that the container is recyclable.

EXAMPLE:

SPI code next to "NO CFC" symbol on expanded polystyrene foam products.

In these cases, the SPI code will be considered to be a claim of recyclability.

Recycled Content in Materials

[Previous Section](#) | [Table of Contents](#) | [Next Section](#)

Source of Recycled Content - The recycled component of a product can originate from many sources: industry, commercial and institutional establishments, and households. Generally, any diversion of materials from the waste stream provides positive solid waste reduction benefits. However, the recycling process is related specifically to the reprocessing of materials which have already served their intended purpose. For this reason, any reference to recycled content **excludes** the primary (virgin) portion of "in-house" materials that are routinely reprocessed on the premises as part of the manufacturing process and would never have been sent for disposal. For example, in the production of plastic goods, waste materials and trimmings are normally reground and reincorporated in the production line, whether for the same product, or another product manufactured by that company. Similar

operations occur in the glass, paper, steel and aluminum industries.

Figure 4



Claims of recycled content may be made using the Möbius Loop symbol shown in **Figure 4** with a recycled content disclosure as a percentage, by weight, of the product or total material. Where a claim of recycled content is made, it will be assumed that the recycled components are "post-use" materials as described in the National Packaging Protocol (NAPP) definitions ([Appendix 4](#)). That is, they are materials from articles that have served their intended purpose and which have been diverted from the waste stream for reprocessing into new articles. This may include waste materials diverted from household, institutional, commercial or industrial sources.

The **calculation of recycled content** should be based on the relative proportions of materials that make up the final product. That is, based on the total weight of raw materials required for the production, the calculations are based on the percentage of post-use materials that are being recycled.

EXAMPLE:

if a production run requires 1000 kg of raw materials, and it is composed of 700 kg virgin materials and 300 kg post-use materials, then the correct claim is 30% recycled material. Calculating the recycled content in this manner provides confidence that the declared content is an accurate reflection of the materials used.

Figure 5



Figure 5 shows the recycled content symbol used to claim 30% recycled content. The same information may be conveyed in words (30% recycled content) adjacent to the symbol. In the absence of recycled content disclosure, the claim will be interpreted to mean 100% recycled materials.

Möbius Loop - Because the two Möbius Loop recycling symbols are still not widely understood, it is recommended that the symbols always be used with explanatory text.

Average Recycled Content - Almost all industries experience variability of supply, and cannot be sure that the recycled content is consistent between production runs. Therefore, it is permissible to indicate the average recycled content based on an average over a period of three to twelve months depending on the production profile of the industry involved. The exact time

frame will be negotiated with each affected industry and its appropriateness will be reviewed at each revision of this document. At the present time, under the Environmental Choice Program, fine paper products are operating under a three month weighted average from a single mill location.

Quantifying Claims - Because consumers are concerned with the specific benefits attributable directly to end user return of materials for recycling, industries may want to indicate the quantity of recycled materials originating from specific sources such as curbside collection systems, drop-off depots, fine paper from commercial sources, etc. This can be achieved by being specific in the claim.

EXAMPLES:

1. THIS PRODUCT CONTAINS 50% RECYCLED MATERIAL, INCLUDING 10% FROM HOUSEHOLD COLLECTION PROGRAMS
2. MADE WITH 65% RECYCLED POST- CONSUMER MATERIALS
3. 100% RECYCLED CONTENT - 80% COMMERCIAL, 20% HOUSEHOLD
4. 100% RECYCLED CONTENT - 60% POST- CONSUMER, 40% PRE- CONSUMER

Degradable Materials

[Previous Section](#) | [Table of Contents](#) | [Next Section](#)

Definition - A degradable material is one which breaks down in such a way that the resulting materials can be easily assimilated into the environment without having any significant negative impact on the environment. Degradability claims on package labels usually refer to biodegradability and/or photodegradability. While many materials are ultimately degradable, the conditions under which these materials are disposed of, usually through landfill, may hinder the degradation process. Degradation can take place in air, on land and in the water. Generally, in order to biodegrade, there must be biological action under specific conditions. In order to photodegrade, light must be present.

Supportable Claims - An unqualified claim that a product or package is degradable, biodegradable or photodegradable should be supportable by competent and reliable scientific evidence that the entire product or package will completely break down (i.e. decompose) after customary disposal and create no significant toxic residues. That is, biodegradable materials should be capable of undergoing decomposition into carbon dioxide, methane, water, inorganic compounds or biomass in which the predominant mechanism is the enzymatic action of micro-organisms. Photodegradable materials should be capable of undergoing a significant loss of properties after exposure to representative amounts of sunlight. The capability of these materials to degrade should be measurable by standardized tests, in a specified period of time, reflecting available disposal conditions.* Any evidence provided to support such claims should be recognized by the scientific community at large, and not just by a small group or individual company.

**Derived from May 14, 1993 Main Committee Ballot of American Society for Testing and Materials (ASTM) committee on Terminology for Environmental Labelling of Packaging Materials and Packages. (D10.46)*

Limitation to Claims - Materials exposed to the open air may degrade through the action of light and/or biological processes. There are, however, limitations on the types of products that could legitimately claim to be degradable through atmospheric exposure. The product would normally need to be used outdoors, with the period of degradation sufficiently long that the useful life of the product would not be affected.

EXAMPLE:

a soil cover that acts as an artificial mulch for gardens and flower beds that will survive a growing season, but will degrade sufficiently so that it may be tilled into the soil for the next season.

Waste in a sanitary landfill site is deprived of air, moisture and light, retarding significantly any degradation of the product. In the context of consumer items destined for landfill, current scientific opinion indicates that degradability claims as an environmental benefit may not be supportable. Products or packaging materials that are not diverted from the waste stream will invariably end up in disposal facilities such as landfill so any claim of degradability would not be appropriate.

Conditions found in liquid disposal facilities such as municipal sewage systems or septic systems will usually provide adequate conditions for biodegradation to occur. Claims of degradability may be appropriate for products normally disposed of through the waste- water system providing the by-products of degradation and/or the products in question create no significant toxic residues, and will not harm the sewage collection and treatment facility.

Qualifying Claims - If a claim of degradability is used, it should be accompanied by a statement indicating the conditions under which degradation will occur, or a recognized test method that was used to determine the degradability.

EXAMPLE:

"Degradability determined in accordance with OECD test No.301B"

There are a number of establishments that provide test methods and facilities for verifying claims of degradability.

Non-exaggeration of Benefits - In addition to the technical aspects of degradability, claims should not exaggerate the perceived benefit. If a product is only partly degradable, those ingredients that are identified as degradable should comprise a significant part of the product. Making degradable claims for minority ingredients could create the erroneous impression that the degradability of these ingredients is significant in relation to the waste generated by the total product and, thus, would not be appropriate.

Compostable Materials

[Previous Section](#) | [Table of Contents](#) | [Appendices](#)

Definition - Similar to biodegradation, composting is the biological breakdown of organic materials that produces a soil-like product that is used to enhance, amend or replace soil. While biodegradation may take place as a result of the disposal of a material, composting may require active participation by the end user who must separate organic from inorganic waste for municipal or large scale composting programs or, alternately, compost the material in a household composter after separation.

Supportable Claims - A claim that a product or package is compostable should be supportable by competent and reliable scientific evidence that the entire product or package will completely break down (i.e. decompose) after customary disposal. That is, it will undergo physical, chemical, thermal or biological decomposition in a compost site such that the material and its byproducts in the finished compost are not visually distinguishable and ultimately biodegrade into carbon dioxide, water, inorganic compounds, or biomass, at a rate consistent with known compostable materials and generate no significant toxic by-products*. This evidence should be one that is recognized by the scientific community at large, and not just a small group or individual company.

**Derived from May 14, 1993 Main Committee Ballot of ASTM committee on Terminology for Environmental Labelling of Packaging Materials and Packages. (D10.46)*

Kinds of Composting - There are significant differences between the types of materials that may be composted commercially and those suitable for composting at home. Commercial composting operations, such as those operated by municipal or large scale facilities, function under controlled conditions to better handle a larger variety of materials than can be easily composted in the home.

Qualified Claims - When a claim of compostability is made for a material, and the material cannot be composted in a household composter:

- the claim should indicate that the material must be separated for municipal or large scale composting, and if there are special procedures to be followed for proper separation of the materials,
- there should be reasonable access to composting facilities. "Reasonable" will be determined according to the same general principles as for recycling; that is, one third of the population in the area where the product is distributed has convenient access to collection or drop-off facilities for composting, and
- the claim should be qualified.

EXAMPLES:

1. "SEPARATE FROM WASTE FOR COMPOSTING, WHERE FACILITIES ACCEPT "X"."
2. "SEPARATE PLASTIC MATERIALS BEFORE DEPOSITING IN CURBSIDE COMPOSTING PROGRAM"
3. "THIS PACKAGE IS SUITABLE FOR HOME OR COMMERCIAL COMPOSTING - CUT INTO 1 cm STRIPS FOR USE IN HOME COMPOSTERS"

Unqualified Claims - If there is no indication that the material is intended for municipal or large scale composting, then the claim will be taken to mean that the material is suitable for composting in a household composter, and will break down with no significant toxic residues or other harmful products, under the normal conditions of household composting. In all cases, if the entire product or package is not compostable, the claim should identify the compostable components and/or provide instructions for proper separation of materials.

Recognition of Infrastructure Development Initiatives - It is recognized that composting infrastructures are not fully developed. In establishing these infrastructures, public awareness can play a significant role in the success or failure of a program.

In some cases, a material may be collected from a limited number of locations, or the infrastructure has not been sufficiently developed to provide general access to composting in a given market area. Clear, accurate and meaningful information relating to these programs should not be discouraged. However, in providing information to consumers that composting has begun for some materials, there should not be any confusion relating to the extent that these materials are collected.

In these exceptional cases, where the one third threshold may not have been reached, but it is desirable to advise consumers of the new initiative, it may be appropriate to make a very specific and restrictive claim.

EXAMPLES:

1. "COMPOSTABLE IN (CITY XX)"
2. "PLEASE RETURN TO (FACILITY \ ESTABLISHMENT "X") FOR COMPOSTING"
3. "FOR INFORMATION ON COMPOSTING (MATERIAL NAME), PLEASE CALL 800-XXX- XXXX"
4. "COMPOSTABLE IN LIMITED COMMUNITIES, CALL 800-XXX-XXXX FOR DETAILS".

[Français](#) | [Contact Us](#) | [Help](#) | [Search](#) | [Canada Site](#)

[Strategis](#) | [Site Map](#) | [What's New](#) | [About Us](#) | [Registration](#) | [Competition Bureau](#) |
[Enquiries](#) | [Complaints](#) | [Subscribe](#) | [Other Sites](#)

[Business Services](#) | [Consumer Info](#) | [Merger Info](#) | [Compliance & Enforcement](#) |
[International Affairs](#) | [Our Legislation](#) | [Media Room](#) | [Publications](#) | [Contact the Bureau](#) |
[Search the Bureau](#)

Publication Date: 1993-07-02
Author: Fair Business Practices Branch

[Important Notices and Disclaimers](#)
[Privacy Statement](#)


http://strategis.gc.ca