

Version 1.1

This guide was developed  
and produced by EPI.



[www.enviro-pac.com](http://www.enviro-pac.com)

ner  
Package<sup>TM</sup>



## Greener Package Guidelines for Sustainability Claims

Version 1.1 September 24, 2009

I.	ACKNOWLEDGEMENTS .....	2
II.	INTRODUCTION .....	3
III.	THE PROCESS .....	4
IV.	FTC REQUIREMENTS .....	5
	General Environmental Benefit Claims .....	5
	Recyclable Claims .....	5
	Appropriate Use of SPI Plastic Resin Identification Code .....	7
	Recycled Content Claims .....	7
	Refillable/ Reusable Claims .....	8
	Key points: .....	8
	Degradable/Biodegradable/Photodegradable Claims .....	9
	Compostable Claims .....	9
	Comparative Claims .....	10
	Key Points .....	10
	Use of Green Dot .....	11
	Claims Based on Walmart Scorecard .....	11
	Other Claims Not Addressed by FTC .....	12
V.	REQUIREMENTS FOR GREENER PACKAGE REVIEW OF CLAIMS .....	13
	SOURCE CLAIMS .....	13
	The following questions pertain to the sourcing of the particular material or package .....	13
	Renewable Resource .....	13
	Recycled Content (Pre and Post Consumer) .....	13
	Sustainable Forestry Certified .....	14
	Source Reduced .....	14
	MANUFACTURE .....	14
	Renewable Energy .....	14
	Greenhouse Gas Reduction .....	15
	USE .....	15
	Material Health .....	15
	Shipping Efficiency .....	16
	END OF LIFE .....	16
	Reusable/Returnable/Refillable .....	16
	Recyclability .....	16
	Compostability .....	18
	Waste to Energy .....	18
	Other Claims .....	18
VI.	SUBMIT YOUR FEEDBACK .....	19
VII.	SOURCES USED TO COMPILE GUIDE .....	19

## I. ACKNOWLEDGEMENTS

Environmental Packaging International (EPI) would like to acknowledge the Greener Package Advisory Board for their contribution to these *Guidelines*.

Amy Zettlemyer-Lazar, Walmart  
Robert Parvis, Walmart  
Steve Mojo, Biodegradable Products  
Institute  
Robert Lillienfeld, Use Less Stuff  
Thomas Oris, Morton Salt  
Paul Earl-Torniainen, General Mills  
Adam Pawlick, Palermo's Pizza  
Sharon Reiter-Lindberg, Unilever  
Jack DiMartino, Stonyfield Farms  
Mike LaRocca, GlaxoSmithKline  
David Padula, Paramount Home  
Entertainment  
John Delfausse, Estée Lauder  
Sean Sabre, ModusLink  
Steve Mahler, Carastar  
Nina Goodrich, Alcan

Mike Heldman, International paper  
Bill Wight, Eastman Chemical  
Ron Cotterman, Sealed Air  
George D'Urso, Smurfit-Stone  
Patty Enneking, Klöckner Pentaplast  
Shanna Moore, DuPont  
Derek Trader, Sonoco  
Pamela Long, Little Big Brands  
Eric Hartman, Product Ventures

### **Consultants**

Packaging Knowledge Group (PKG)  
Barry Sanel  
Tim Bohrer  
Frank Perkowski  
Dean Bellefleur  
John Bernardo

## II. INTRODUCTION

In October 2009, Greener Package will launch a database of sustainable packaging materials from packaging suppliers. In order to combat greenwashing, suppliers submitting data can volunteer to have their sustainability claims reviewed by a third party. (For a detailed explanation, please see "Explanation of GreenerPackage.com Database and the Third Party Review" at [GreenerPackage.com/guidelines](http://GreenerPackage.com/guidelines).)

Reviewed listings will be clearly marked on the Web site and favorably positioned compared to non-reviewed listings.

All claims made by suppliers in the database, as well as advertisers on the GreenerPackage.com Web site, will need to conform to the guidelines set forth in this document.

These standards are based on the U.S. Federal Trade Commission (FTC) and Canadian environmental claims guidelines, and Greener Package corporate policies as outlined in this guide. As part of the review, the third-party will check for corroborating material such as test results, data sheets, LCAs, or independent reports to support each claim. While the third-party will review documentation to ensure that it supports the claim, they will not attempt to verify or review documentation submitted for technical accuracy. As such, the review of claims will not constitute:

- 1) An approval or endorsement of product or services by Greener Package or the third-party.  
Or
- 2) A statement of compliance with any laws or regulations, or a legal opinion as to the compliance of the language used in any claims.

**A review of materials by Greener Package and the third-party should not be used as a substitute for comprehensive professional advice about your particular packaging/product environmental claims.**

If making environmental claims, please carefully review this Guide. Section II of this guide will summarize environmental claim requirements that are based on the U.S. Federal Trade Commission (FTC) and Canadian environmental claims guidelines, and Greener Package corporate policies. Section III will discuss what types of claims can be reviewed and the corroborating documentation that will be required for the review. Database entries are not required to be reviewed by a third-party. Even if you do not choose to have your entry reviewed by a third-party reviewer, Greener Package reserves the right to randomly review entries to prevent greenwashing. All claims made in all advertising on the Web site will also be subject to a third-party review.

### **III. THE PROCESS**

1. Suppliers go to GreenerPackage.com/research and click on a link to begin the data submission process. They will be prompted to set up an account with mBlast, the database platform used by GreenerPackage.com.
2. After setting up an account within the mBlast database platform used by Greener Package, the supplier clicks a link to submit a raw material or converted package.
3. After answering a number of performance-related questions (size, styles, features, etc.) the supplier encounters a series of packaging sustainability-related questions.
4. Each sustainability question allows the supplier to check a box in order to make a claim. (Suppliers may also make open-ended claims in a short 1-sentence summary area, as well as in an extended description area.)
5. If a supplier checks any box to any sustainability question, a second question will appear, requiring the supplier to confidentially upload documentation backing up the claim. The documentation is for the reviewer only, and will not be made public on the database. The screen (along with the Greener Package Sustainability Guidelines) explicitly indicates which types of documentation are acceptable.
6. After answering all the sustainability questions, the supplier is asked whether she or he wants to pay for a third-party review.
7. If the supplier checks “yes” then at the end of the data entry session, there will be a link to the third party reviewer's payment site. The supplier enters their credit card and pays a \$330 fee.
8. The entry is assigned by the GreenerPackage.com staff to one of the authorized third-party reviewers, either EPI or PKG, who will access the database, review the claims being made, and look at the backup documentation supplied by the supplier.
9. Within five (5) business days, the reviewer will send an email to the supplier indicating that either 1) they have no objections and that the entry can be published in the Greener Package database with all the privileges and benefits of a reviewed listing, or 2) there are specific objections that prevent the listing from being published as a reviewed listing. The email will contain the specific objections and will make recommendations to remedy the shortcomings of the claims. The listing will not be published until the objections are addressed—either the claim is withdrawn or backup documentation provided and the claim re-submitted for review (see #10).
10. The supplier may remedy their claims and may re-submit their claims for a subsequent review. Please note that a subsequent review fee of \$110 must be paid at the time of re-submitting their claim, which pays for the reviewer's time.

## IV. FTC REQUIREMENTS

### General Environmental Benefit Claims

The following types of general environmental benefit claims are discouraged unless accompanied by qualifying text:

- Sustainable
- Eco-friendly
- Green
- Natural
- Environmentally safe
- Eco-responsible

Without qualifying text, consumers are likely to interpret these claims to mean that the packaging does not have much of an environmental impact. In most cases, substantial qualifying text will be needed. Therefore, it is best to limit claims to specific environmental attributes.

### Example

A wrapper is labeled: "Environmentally Friendly because it was not chlorine bleached, a process that has been shown to create harmful substances." This claim is deceptive if the production of the paper wrapper created other harmful substances. Consumers are likely to interpret that no significant harmful substance was released when producing the wrapper. A claim that the wrapper is "bleached with a process that substantially reduces, but does not eliminate, harmful substances associated with chlorine bleaching" would not, if substantiated, overstate the product's benefits and is unlikely to be deceptive.

California law requires that any company that makes any general environmental claim to also provide upon request documentation that includes the following:

- (1) the reasons why the company believes the representation to be true;
- (2) any significant adverse environmental impacts directly associated with the production, distribution, use, and disposal of the product;
- (3) any measures that are taken to reduce the environmental impacts directly associated with the production, distribution, and disposal of the product; and
- (4) violations of any federal, state, or local permits directly associated with the production or distribution of the product.
- (5) whether or not, if applicable, the consumer good conforms with the uniform standards contained in the Federal Trade Commission Guides for Environmental Marketing Claims for the use of the terms "recycled," "recyclable," "biodegradable," "photodegradable," or "ozone friendly."

Companies making general environmental claims should be prepared to provide this type of documentation upon request to Greener Package.

### Recyclable Claims

According to U.S. FTC guidelines, the fact that technology exists to recycle an item is not enough to support a recyclable claim. Even though an item may be fully recyclable from a *technical* standpoint, it may not be recyclable from a *practical* standpoint if there is a limited infrastructure and/or opportunities in place for a consumer to recycle the good. Therefore, if municipalities are

not collecting the packaging and/or material recycling facilities (MRF's) do not have the technology or ability to recycle the packaging, recyclable claims cannot be supported.

### Key points

- ∞ A product or package should not be marketed as recyclable unless it can be collected, separated or otherwise recovered from the solid waste stream for reuse, or in the manufacture or assembly of another package or product, through an established recycling program. Claims of recyclability should be qualified to the extent necessary to avoid consumer deception about any limited availability of recycling programs and collection sites.
- ∞ A package that is made from recyclable material, but, because of its shape, size or some other attribute, is not accepted in recycling programs for such material, should not be marketed as recyclable.
- ∞ If package has both recyclable and non-recyclable components, the recyclable claim should be adequately qualified to avoid consumer deception about which portions or components of the product or package are recyclable. The recyclable component should also be easily separable by the consumer for recycling.
- ∞ Under US FTC Guidelines, the use of the Möbius Loop (three chasing arrow symbol) alone, with no qualifying text, constitutes a claim that the packaging and product are made of 100% recycled materials and are universally recyclable.



### Example 1: Plastic PP (5) bottle (accepted at recycling facilities in 15% of US communities)



#### Deceptive Label:

- “Recyclable”
- “Recyclable where facilities exist”

These claims are deceptive because, unless evidence shows otherwise, reasonable consumers living in communities not served by programs may conclude that recycling programs for the bottle are available in their area.

#### Acceptable Label:

- “This bottle may not be recyclable in your area”
- “This bottle is recyclable in 15% of U.S. communities”

These claims are acceptable because they state the limited availability of recycling facilities for the bottle.

*Please note that PET bottles with a neck that are clear, green or light blue could have a “recyclable” claim. HDPE bottles of any color can also have a “recyclable” claim. All other plastic bottles need to have qualifying language.*

### Example 2: Plastic clamshell



#### Deceptive Label:

- ∞ “Recyclable”

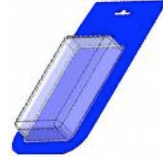
This claim is deceptive in the U.S., since plastic clamshells are generally not accepted for recycling. No recycling claim should be made for this product in the U.S.

### Example 3: Blister pack (paper backing, plastic front)

Deceptive Label:

- ∞ “Recyclable”

The claim is not qualified to apply to just the paper portion of the package. The plastic portion will not be accepted for recycling.



Acceptable Label:

- ∞ “Paper portion of this packaging is recyclable.”

This claim is acceptable if the company has data to prove that the substantial majority of U.S. recycling facilities (60%) will take the paper that is used. The paper portion of the package should be easily separable for recycling. *(Please note that paperboard with high gloss or hot stamps may not be accepted in the substantial majority of recycling facilities (60%).)*

### Appropriate Use of SPI Plastic Resin Identification Code

The Society of the Plastics Industry (SPI) code consists of a design of arrows in a triangular shape containing a number (1-7) and abbreviation identifying the component plastic resin.



It should only be used on:

- ∞ Predominant materials (materials made of one plastic only can use 1- 6. ANY Plastic with multiple materials (example- PET with nylon lining) must use the number 7 “other.”
- ∞ The bottom of plastic containers or bottles; otherwise, it will constitute a recyclability claim.
- ∞ Meet the additional guidelines found at:  
<http://www.plasticsindustry.org/AboutPlastics/content.cfm?ItemNumber=823>

Any SPI code claim, other than 7, of plastics with a oxo-biodegradable additives will be required to provide Greener Package documentation from the Association of Postconsumer Plastic Recyclers confirming that the bottle meets or exceeds the APR Critical Guidance Document and APR General Guidance Document Bottle-to-Bottle protocol and/or documentation that show that states, where the product is being sold, have approved the use of the predominant resin code on the product.

### Recycled Content Claims

#### Key points

- ∞ Must meet FTC definition of recycled content:
  - **Pre-consumer:** materials that have been recovered or otherwise diverted from the solid waste stream, during the manufacturing process. Pre-consumer material does not include materials and by-products generated by and commonly reused in an original manufacturing process. This would exclude materials such as rework, regrind or scrap generated and reused in the same process from being considered pre-consumer recycled content.

- **Post-consumer:** are materials that are generated by household, commercial, industrial or institutional facilities in their role as end users of the product, and which can no longer be used for their intended purpose.
- ∞ Both pre and post-consumer material are considered recycled content.
- ∞ Claim must be able to be substantiated.
- ∞ Percentage of recycled content by weight should be identified
- ∞ Distinctions may be made between pre-consumer and post-consumer materials.
- ∞ If only some of the package components have recycled content, the recycled content claim should be adequately qualified to avoid consumer deception about which portions or components of the package have recycled content.
- ∞ Under U.S. FTC Guidelines, the use of the Möbius Loop (three chasing arrows symbol) alone, with no qualifying text, constitutes a claim that the packaging and product are made of 100% recycled materials and are universally recyclable.



*Greener Package requests that all recycled content claims include a percentage, even if it is 100%. Additionally, any use of the Möbius Loop (three chasing arrow symbol) must have text as to whether you're claiming recycled content (with %) or making a 'recyclable' claim.*

## Refillable/ Reusable Claims

### Key points

- ∞ The claim that the packaging is refillable or reusable must be such that:
  - it can be reused/refilled for their original purpose.
  - it was designed with the intent to be reused/refilled.
  - there is a system in place to collect and return the package; or there are facilities or products which exist that allow the consumer to reuse or refill the package.
- ∞ Qualifying language should be used to inform consumers about in-house systems for refilling/reuse. Example: "This is a refillable container. Please bring it to ABC Corp to have this container refilled."
- ∞ If making a claim that an item is "refillable/reusable x times" make sure you have documentation to back up this claim.

### Examples

#### Acceptable:

A paper grocery bag is labeled "reusable." The bag can be brought back to the store and reused to carry groceries but will fall apart after two or three reuses, on average. Because reasonable consumers are unlikely to assume that a paper grocery sack is durable, the claim does not need to be qualified to indicate the limited reuse of the sack.<sup>1</sup>

#### Not acceptable:

A claim that a tin container, sold containing candy, is "reusable" is not acceptable, since in this case it can only be reused for storage for items other than the product that was sold. *A package should not be marketed with an unqualified reusable/refillable claim, if it is up to the consumer to find new ways to refill the package.*

#### Not acceptable:

---

<sup>1</sup> See 16 CFR §260.6 (c), Example 3

A hard plastic DVD case is marked as “reusable,” since it can be used to store the DVD for the useful life of the product. This is considered long-life packaging and a claim of re-use is not acceptable. However, a claim that the DVD case can be used to store the product for its useful life is acceptable, provided this is true.

## **Degradable/Biodegradable/Photodegradable Claims**

### **Key points**

- ∞ Unqualified claims of degradability, biodegradability or photodegradability should be substantiated by competent and reliable scientific evidence that the entire product or package will completely break down and return to nature, i.e., decompose into elements found in nature within a reasonably short period of time after **customary disposal**. *Note that ‘customary disposal’ of most packaging is in a landfill.*
- ∞ Oxo-biodegradable claims will likely be considered by consumers to be equivalent to a biodegradable claim; therefore, must meet the same criteria.
- ∞ Most landfills are fundamentally anaerobic and many parts of it tend to be dry, both of which severely limits/prevents photodegradation and oxo-biodegradation from occurring.
- ∞ Any biodegradation that happens in landfills is very slow and produces methane.
- ∞ Claims of degradability, biodegradability, oxo-biodegradable or photodegradability should be qualified to the extent necessary to avoid consumer deception about:
  - (1) the product’s or package's ability to biodegrade in the environment where it is **customarily disposed** (*Note that ‘customary disposal’ of most packaging is in a landfill*); and
  - (2) the rate and extent of degradation.
- ∞ All claims should be based on competent and reliable scientific evidence.
- ∞ Testing to back up degradability, biodegradability or photodegradability claims should be based on the finished package/components, NOT the finished material that is used.
- ∞ Testing data should be available for consumers and interested parties if they have questions.
- ∞ There are restrictions on the use of these terms for plastic bags and plastic food service ware in some states and local municipalities as in California and Minnesota.

## **Compostable Claims**

### **Definition**

Compost- is the result of bacterial decomposition in the presence of oxygen at a reasonable rate of decomposition (usually 90 days or less), leaving no toxic residue.

### **Key points**

- ∞ Should be substantiated by competent and reliable scientific evidence that all the materials in the product or package will break down into, or otherwise become part of, usable compost (e.g., soil-conditioning material, mulch) in a safe and timely manner in an appropriate composting program or facility, or in a home compost pile or device. Example- EN 13432, ASTM D6400 and/or ASTM D6868 test results for large scale municipal or industrial facilities.
- ∞ Claims of compostability should be qualified to the extent the package cannot be safely

- ∞ composted in a home compost pile or device
- ∞ A claim that a product is compostable in a municipal or institutional composting facility may need to be qualified to the extent necessary to avoid deception about the limited availability of such composting facilities. There is a limited amount of municipal and composting facilities in the U.S., so compostability claims always need to be qualified.
- ∞ Composting does not take place in landfills.
- ∞ Testing to back up compostability claims should be based on the finished package/components, NOT the finished material that is used. Data should be readily available to consumers and other interested parties.

### **Example**

Not acceptable:

A manufacturer of plastic clamshells says "This package is compostable." The clamshell can be composted in industrial solid waste composting facilities, but cannot be composted in home compost piles. This claim is deceptive, since it does not have qualifying language that says the package cannot be safely composted in a home compost pile or device.

Acceptable:

"This package can be composted where municipal or industrial composting facilities exist. Appropriate facilities may not exist in your area. Check with your local community as to availability."

OR

"There are currently [X number of] solid waste composting facilities across the country, serving y% of the population."

The claim is not deceptive, assuming that composting facilities are available as claimed and the manufacturer can substantiate that the clamshell can be converted safely to usable compost in solid waste composting facilities.

### **Comparative Claims**

#### **Key Points**

- ∞ Comparative claims should be able to be substantiated. Claims using words like "better" and "most" cannot be quantified. Claims using words such as "larger/smaller," or "more/less" can be quantified using purchasing or manufacturing records or historical data.
- ∞ Claims should be sufficiently qualified and clear what is being compared.

#### **Example**

A claim that a "box contains 10% more recycled content" is too ambiguous. It is unclear whether they are referring to 10% more compared to their previous package or to a competitor's product. The claim should be sufficiently qualified to say that this "box contains 10% more recycled content than our previous package."



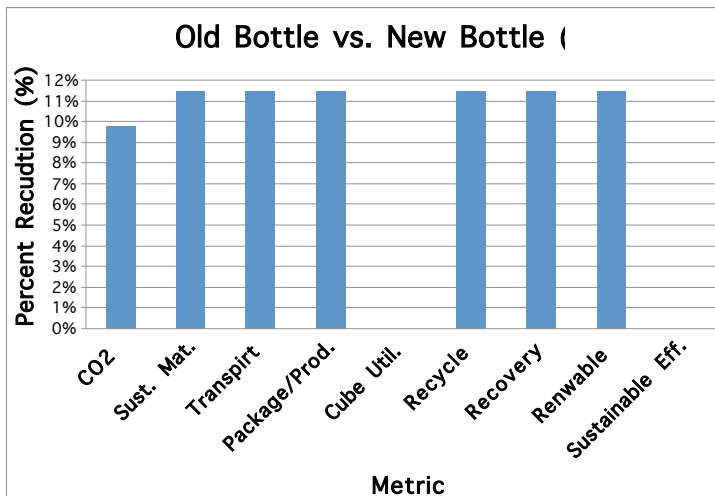
## Use of Green Dot

The Green Dot should not be used to make any environmental claims. It is a protected trademark. Use of the Green Dot on packaging in North America requires a signed license agreement with CSR North America. <http://www.greendot.ca/>

## Claims Based on Walmart Scorecard

It is acceptable to make claims about the percentage reduction/difference of a specific Walmart metric when comparing two packages. It is not acceptable to compare the total normalized score of one package against another.

Metric	Weight	Old Bottle	New Bottle
Greenhouse gas emissions from package production	15%	0.000617471	0.000557105
Evaluation of material type	15%	1.616722852	1.431358852
Average distance to transport material	10%	1.616722852	1.431358852
Product to package ratio	15%	1.616722852	1.431358852
Cube utilization	15%	0.685	0.685
Recycled content	10%	1.245047086	1.102316806
Recovery	10%	4.838704517	4.282612517
Renewable energy to power each facility	5%	1.616722852	1.431358852
Innovation different from energy standard	5%	5	5
<b>Total Normalized Score (out of 10)</b>		<b>2.00</b>	<b>10.00</b>



- ∞ **Acceptable Claim:** “New bottle design reduces the Walmart GHG emission score by 9.8 % compared to previous bottle.”
- ∞ **Not Acceptable Claim:** “New Bottle design increases the Walmart Score from 2 to 10 compared to previous bottle.” This is not acceptable because it only compares the normalized score for 2 products. The total normalized score varies with the number of products being compared, which is always in flux.

**Other Claims Not Addressed by FTC**

For claims that are not currently defined by FTC guidance documents or state laws, such as “carbon neutral” or “renewable resource” claims, Greener Package reserves the right to require suppliers to clearly explain, in their material, how they define these types of terms in order to ensure transparency of all claims on the website. Greener Package also reserves the right to request additional information for clarification about claims.

## V. REQUIREMENTS FOR GREENER PACKAGE REVIEW OF CLAIMS

### INTRODUCTION

This section addresses the database questions where you can indicate which sustainability claims you are making for your material or package. For any claim that you make, you will be required to upload documentation to corroborate the claim (see [Section III The Process](#)). If you cannot provide such documentation, you will not be able to submit the form. The Greener Package advisory board and Expert Network has structured the database in this way specifically to prevent greenwashing.

Any documentation you provide will be used solely by Greener Package's third-party reviewers to verify your claim. Uploaded documentation will NOT be made public, nor will it appear anywhere on the Web site.

### SOURCE CLAIMS

The following questions pertain to the sourcing of the particular material or package.

#### ***Renewable Resource***

It is expected that the FTC will provide guidance on what constitutes a renewable resource in the next version of the Environmental Marketing Claims guidelines, which is projected to come out in 2010. Once the FTC has provided guidance, this claim will be added to the review process.

#### ***Recycled Content (Pre and Post Consumer)***

Pre and post consumer recycled content claims must meet the [definitions](#) found in Section IV of this guide.

Claims of pre and post consumer recycled content need to be designated at one of the following minimum amounts:

- ∞ 10-24%.
- ∞ 25-49%
- ∞ 50-74%
- ∞ 75-99%
- ∞ 100%

If you provide the material or package in multiple recycled content ranges (i.e. in 10-24% or 25-49%, etc), back-up documentation for all recycled content varieties will be required.

Acceptable forms of back up documentation:

- ∞ California Rigid Plastic Packaging Container (RPPC) certification for plastic containers.
- ∞ Letter from material supplier(s)
- ∞ Purchase orders
- ∞ Sustainable forestry chain of custody documentation that shows recycled content amounts.

### ***Sustainable Forestry Certified***

Claim: The material/package has one or more of the following sustainable forestry certifications:

- ∞ Sustainable Forestry Initiative(SFI)
- ∞ Program for the Endorsement of Forest Certification (PEFC)
- ∞ Forest Stewardship Council (FSC)
- ∞ Canadian Standards Association (CSA)
- ∞ American Tree Farm System (ATFS)

Acceptable forms of back up documentation:

- ∞ Certification for particular product being advertised
- ∞ FSC, SFI or PEFC certification number for particular product being advertised

### ***Source Reduced***

Claim: This material/packaging system has been source reduced compared to the current material/package.

This type of claim needs to meet the requirements for [comparative claims](#) outlined in Section IV of this guide.

If you check “yes” to this question, a document upload button will appear, requiring you to upload documentation that makes clear what is being compared and provide a description of the modification/change.

Acceptable back up documentation:

- ∞ Detailed comparison of existing and new material/packaging that includes a photo. It should be clear what is being compared, i.e. current package to previous version sold in the prior year, etc. Comparison also needs to include material and weight information, as well as a description of the modification/change.

## **MANUFACTURE**

The following questions pertain to the manufacturing process of the particular material or package.

### ***Renewable Energy***

Claim: Renewable energy was used in the production of the material or package.

Check all that apply

- ∞ Direct use of renewable energy/ Facility actively powered by renewable energy
- ∞ Indirect use of renewable energy/ Facility located in the state with more green energy
- ∞ Renewable energy credits purchased

When checking one or more of the above criteria, a window will pop up asking for the percentage range of renewable energy used. Corporate annual averages are permitted to be used to calculate renewable energy use, if the product is made in multiple facilities.

- ∞ 10-24%.
- ∞ 25-49%
- ∞ 50-74%
- ∞ 75-99%

- ∞ 100%

Acceptable back up documentation:

- ∞ Internal studies documenting renewable energy use
- ∞ Purchase orders
- ∞ Renewable energy certificates

### ***Greenhouse Gas Reduction***

Claim: Green house gas reduction was achieved in the production of this material or package. This claim does not compare the greenhouse gas reduction of this package to another one. This question pertains to manufacturing production. This type of claim needs to meet the requirements for [comparative claims](#) outlined in Section IV of this guide.

If claiming GHG reduction, you need to indicate which percentage range you achieved in the production of this material or package:

- ∞ 10-24%.
- ∞ 25-49%

A document upload button will appear, requiring you to upload documentation that makes clear what is being compared and provide a description of the modification/change.

Acceptable back up documentation:

- ∞ Internal studies documenting greenhouse gas reduction.

## **USE**

The following questions pertain to use of the particular material or package.

### ***Material Health***

#### **Heavy Metals**

The material meets the Coalition of Northeastern Governors (CONEG) Model Toxics in Packaging Legislation. “Packaging component”, for the purposes of the heavy metal requirements includes:

Individual assembled parts of a package, including, but not limited to, interior/exterior blocking, bracing, cushioning, weatherproofing, exterior strapping, coatings, closures, dyes, pigments, adhesives, stabilizers, inks, labels, and additives.

Heavy Metal Restrictions include the following:

A. Cadmium, Mercury, Lead and Hexavalent Chromium metals cannot be intentionally introduced in any component at any level. Intentional introduction means the act of deliberately utilizing a regulated metal in the formation of a package or packaging component where its continued presence is desired in the final package or packaging component to provide a specific characteristic, appearance, or quality.

B. The sum of the **combined** incidental concentration levels of Cadmium, Mercury, Lead and Hexavalent Chromium for each packaging component shall not exceed 100 ppm. Incidental

means the presence of one or more of these regulated metals as an unintended or undesired component of a package or packaging component.

Claim: The material meets the CONEG heavy metals standards and no heavy metals have been intentionally added. Backup documentation is available.

- ∞ Yes
- ∞ No backup documentation

Acceptable back up documentation:

- ∞ Heavy metals lab test results that meet CONEG standards

### ***Shipping Efficiency***

Claim: A reduction in shipping was achieved in transportation of this material/product due to a reduction in shipping volume per case, reduction in weight, or reduction in shipping distance.

This type of claim needs to meet the requirements for [comparative claims](#) outlined in Section IV of this guide.

A document upload button will appear, requiring you to upload documentation that makes clear what is being compared and provide a description of the modification/change.

Acceptable back up documentation:

- ∞ Detailed description that shows a reduction in shipping volume per case, or reduction in weight, or reduction in shipping distance. For example, this should include for a claim based on a reduction in shipping volume per case, a description of the unit load before and after (i.e. improved cube utilization), and calculations that show that the average pallet load is x% more efficient.
- ∞ Walmart scorecard data with an explanation

### **END OF LIFE**

The following questions pertain to end of life of the particular material or package.

#### ***Reusable/Returnable/Refillable***

Claim: The product is reusable/ returnable/ refillable for the same purpose as originally designated.

Acceptable back up documentation:

- ∞ Documentation that shows EU standard EN 13429 has been met
- ∞ Any internal documentation showing that this is actually feasible and occurring in markets where product is sold

#### ***Recyclability***

Claim: The material/package is recyclable at one of the following levels or through a closed loop system (based on U.S. criteria):

- ∞ The material or package is accepted for recycling in the majority of the communities in the U.S. (over 60%).
- ∞ Recycling is limited for this material or package in the U.S. (10-59% or under).

- ∞ Our company has a system to collect and recycle the used material/package that covers the geographic area of where this material/package is sold.

Acceptable back up documentation:

- ∞ See list below. If the material/package fall into the relevant category as outlined below no documentation will be needed. If you feel your material/package can fall into a higher category then you will need to supply a valid study proving this.
- ∞ If you claimed closed loop recyclability, you must upload one of the following acceptable forms of backup documentation:
  - Documentation showing compliance with EU standard EN 13429
  - Internal documentation demonstrating closed-loop recyclability.

**Recyclable in the US (substantial majority of municipal recycling facilities (60%)\***

- Glass Bottles and Jars (Clear, Green and Brown)
- PET Bottles with necks (Clear, light Green and very light Blue)
- HDPE Bottles with necks (All colors, but some issues with black)
- Aluminum Cans
- Steel Cans
- Newspaper
- Corrugate (non waxed)
- Cereal type boxes with no bling<sup>2</sup>
- Paper with no bling

\*Based on EPI research

**Not presently recyclable at 60%\* in the US (FTC)** (not available to a substantial majority of consumers or communities through municipal recycling facilities)

- Glass (other than Clear, Green or Brown)
- PET bottles (other than Clear, light green and very light blue)
- All other PET, i.e. Clamshells, blisters, trays, lids)
- HDPE (Black bottles and all other non-bottle HDPE)
- All Plastic films and bags (may only be marked as recyclable within closed loop system and must define that limitation. i.e. return to store x)
- Plastic (All SPI 3 – 7)
- Paperboard (w/bling)
- Paper (w/bling)
- Waxed Corrugate
- Laminates
- Poor designs (Plastic glued to corrugate)
- Packaging with food contamination

\*Based on EPI research

Things that are close but need backup studies (FTC) (?% available to a substantial majority of consumers or communities)

- Steel Aerosols
- Wet Strength Board
- Level of bling on paperboard

---

<sup>2</sup> The term “bling” refers to any type of hot stamping or special coatings like metallic, foils, or holographics,

- Molded Pulp
- Paperboard with limited bling

\*Based on EPI research

### ***Compostability***

Claim: The material or package complies with one or more internationally recognized standards for compostability in industrial composting facilities.

Acceptable back up documentation include test results that meet the following standards:

- ∞ ASTM D6868-03
- ∞ ASTM D6400
- ∞ EU standard CEN 13432, EN 14995 (plastics)

### ***Waste to Energy***

Claim: The material or package has an energy value of greater than 5 mega joules per kilogram, thus meeting EU standard EN 13431 for waste-to-energy.

Material or packages that have energy value of greater than 5 mega joules per kilogram include:

- ∞ Paper
- ∞ Plastic
- ∞ Wood
- ∞ Organic
- ∞ Thin gauge aluminum that is 50 microns or less
- ∞ Any material/product that is at least 50% paper, plastic, wood, or organic material.

Acceptable back up documentation if material or package is not listed above:

- ∞ Documentation that conforms with EU standard EN 13431

### ***Other Claims***

All claims made in the free text portion of the product description will be required to adhere to the guidelines outlined in the first part of this Guide. For claims that are not currently defined by FTC guidance documents or state laws such as “carbon neutral” or “renewable resource” claims, Greener Package reserves the right to require advertisers to clearly explain, in their material, how they define these types of terms in order to ensure transparency of all claims on the website. Greener Package also reserves the right to request additional information for clarification about claims.

## VI. SUBMIT YOUR FEEDBACK

This is a living document and will be reviewed periodically. Your feedback is crucial to provide as accurate a guide as possible. Please submit your feedback at [greenerpackage.com/guidelines](http://greenerpackage.com/guidelines).

Disclaimer: Due to the volume you may not get a response from us. Greenerpackage may incorporate your feedback in future revisions of this guide.

## VI. SOURCES USED TO COMPILE GUIDE

This guide was compiled by Environmental Packaging International (EPI). [www.enviro-pac.com](http://www.enviro-pac.com).

Part 260- Guides for the Use of Environmental Marketing Claims found at <http://www.ftc.gov/bcp/grnrule/guides980427.htm>

Canadian Standards Association (June 2008) Environmental claims: A guide for industry and advertisers, retrieved from Competition Bureau of Canada website found at [http://www.cb-bc.gc.ca/eic/site/cb-bc.nsf/vwapj/guide-for-industry-and-advertisers-en.pdf/\\$FILE/guide-for-industry-and-advertisers-en.pdf](http://www.cb-bc.gc.ca/eic/site/cb-bc.nsf/vwapj/guide-for-industry-and-advertisers-en.pdf/$FILE/guide-for-industry-and-advertisers-en.pdf)

DeMartino, Laura, Assistant Director, Division of Enforcement, Bureau of Consumer Protection, Federal Trade Commission, presentation on February 19, 2009 RCC Web Academy “Environmental Marketing Claims” found at <http://www.epa.gov/epawaste/rcc/web-academy/2009/pdfs/demartino2-09.pdf>

Environmental Packaging International, (2009) Green Marketing Materials

Hartwell, Sara, U.S. EPA- ORCR, presentation on February 19, 2009 RCC Web Academy “Environmental Marketing Claims: What Does It Mean? How Do I Prove It? Is It Really a Good Thing?” found at <http://www.epa.gov/epawaste/rcc/web-academy/2009/pdfs/hartwell2-09.pdf>

Commonly Asked Questions (and Answers) About California’s Environmental Marketing Claims Law (Publication No. 520-97-007) retrieved from <http://www.ciwmb.ca.gov/publications/default.asp?pubid=568>