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Federal Trade Commission/Office of the Secretary
Room H-135 (Annex B)
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

RE: Green Guides Regulatory Review, 16 CFR Part 260, Comment, Project No. P954501

**Comments of the National Recycling Coalition Regarding
the Federal Trade Commission's Guides for the Use
of Environmental Marketing Claims**

The National Recycling Coalition, Inc., (NRC) is based in Washington D.C. and was founded in 1978 as a not-for-profit organization whose objective is to eliminate waste and promote a sustainable economy through advancement of sound management practices for natural resources. We have thousands of members across the country that include local, state and regional recycling coordinators, government regulators, recycling advocates, large consumer product companies, manufacturers that use recycled content in their product line, small entrepreneurs and recycling processors. Our members are in the business of recycling materials generated from homes, offices and industrial units large and small, rural and urban. As a broad-based Coalition, NRC represents all aspects of recycling.

NRC is pleased to comment in response to the FTC's systematic review of its Guides for the Use of Environmental Marketing Claims (the Guides). We understand that the FTC will hold one or more hearings on specific issues that should be addressed during the FTC review, and we look forward to participating in those sessions and providing additional comment as appropriate.

For over 25 years, the NRC has supported product labeling for recyclability and recycled content. *Although only one aspect of environmental marketing claims, recycling claims are integral not only to consumer education but also to the success of our nation's efforts to divert and recover materials from the waste stream and realize recycling's many environmental benefits.* As a result, NRC strongly supports improvements to the FTC Guides that will produce accurate and useful information for the consumer.



1. NRC's recent research confirms the continuing need for accurate environmental marketing and labeling to motivate and assist consumers in their recycling behavior.

In 2007, NRC undertook a major research project to find out what is already known about recycling behavior in the U.S., specifically around perceptions, attitudes, *iconography*, and *messages*. The focus was on factors that could be influenced by a national communications campaign, not on logistical issues such as curbside pick-up availability. NRC wanted to find out more about the "sometimes" recyclers rather than the "always" or "never" recyclers, since this was the group we have the best opportunity to motivate to recycle more frequently. However, our research provided important insights into the value of education and information on establishing and maintaining recycling behavior.

As part of the research, over 90 existing articles and studies were reviewed as a predicate to our primary research, using ethnographic studies, to confirm the behavioral elements of recycling behavior, particularly the differences between "always" and "sometimes" recyclers, and how to bridge the gap. The complete bibliography for the NRC research can be found in the Appendix.

In general, we found our target audience of "sometimes" recyclers believes that recycling is important, but they just don't do it consistently. In order to boost the recycling behavior of the "sometimes" recyclers, we will need to increase their motivation using a combination of positive feelings (emotional drivers), appeals to their self-image (aspirational drivers), and logical reasons (rational drivers). We know that people derive personal satisfaction from participating in recycling activities, as it appeals to both community interest (altruism) and self interest.

Among the barriers to regular recycling, one study identified inconvenience (37%) and *lack of knowledge about what is recyclable* (34%) as key barriers. In one study, 51% of respondents said they rely on "the symbol on the package" to which items are recyclable. Knowledge of recycling procedures and belief in one's ability to recycle are significant predictors of recycling behavior. Education around what is recyclable boosts recycling behavior by increasing perceived competence and decreasing perceived difficulty.

Our research goes on to indicate that a combination of communication techniques may yield significant gains in terms of recycling compliance. Programs that combine *education* with incentives, *steps that make the recycling behavior easy*, or individual behavioral commitments are more effective than simply informing people about conservation opportunities. Positively framed messages manifest a significantly higher level of belief and a more favorable attitude. Communication around recycling is more effective when it is vivid concrete, and personal.

In sum, greater awareness about what is recyclable can spur higher levels of recycling behavior. However, that message must also be credible, and that is the value of the Guides -- *to ensure that the recycler can depend on the accuracy of environmental messages associated with consumer products and services*.

2. Guides for environmental marketing claims that establish credibility, are equitably applied, and rigorously enforced also influence organizational behavior and motivate product and service organizations to invest in sustainable practices.

Product and service providers of all sizes are establishing or have established sustainability goals and programs in response to the demand for socially responsible behavior by customers and by society at large. These programs require significant investment in business practices that may

include redesign of products and packaging design, changes to production processes, modification of supply chains, and changes to distribution practices. As only one example, NRC has first-hand knowledge of its members' efforts to optimize the functionality of packaging while minimizing the environmental impact. Recycling is greatly enhanced when packages with high materials recovery value are used. These companies' best interests are served when the public is aware of these efforts and can use environmental claims and iconography to inform and motivate their recycling behavior.

However, sustainability measures may quickly lose their value to organizations and businesses if the public is non-responsive to environmental claims due to ignorance, confusion, or lack of faith in the in the credibility of claims. In that environment, competitors who make no investment in sustainable practices gain advantage, and the overall recycling system is harmed by the use of non-recyclable materials or materials of low value that contaminate and compromise the materials value chain.

3. NRC urges the FTC to conduct a hearing focused solely on environmental claims associated with recycling.

NRC believes that a number of critical aspects of recycling have evolved over the past 10 years to suggest that environmental claims related to recycling require careful examination by FTC as the basis for any changes to the Guides. We recommend that the hearing focus, at a minimum, on the following issues:

- Consumer awareness and motivation (as outlined above)
- The role of environmental claims in business/corporate sustainability plans and programs
- The relative value of qualitative guidelines vs. quantitative standards for recyclability and recycled content claims.
- The enforcement process and the enforcement capacity of FTC that ensures credible, equitably applied guidelines.
- "New" materials, such as electronic waste, or problematic products, such as plastic shopping bags, and the impact on recycling and the associated guidelines
- An assessment of certification programs and their value for consumer awareness and education.
- A review of the value of SPI Plastic Resin Codes
- A review of critical terminology, such as "sustainability, "carbon neutral" and other climate change terms.
- Given the multi-participant nature of the recycling system, the accuracy and "ownership" of environmental claims on recycling.

We appreciate this opportunity to support the FTC in its review of the Guides, and we look forward to additional participation with you on these vital issues. Please feel free to contact me if you have any questions or comments on any of the above.

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Executive Director

Attachment

Appendix

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