

# Open letter

To Mr. António Guterres, secretary general of the United Nations

19 December 2020

Your Excellency,

Herewith we respond to your recent [speech](#) on the State of the planet setting the stage for scaled-up Climate Action & ambition.

One of the biggest contributors to waste going into oceans is the global recycling crisis. In fact, since China announced their National Sword Policy in January 2018, there has been a reported 27% increase of waste going into waterways and oceans ([Reuters](#)). Additionally, when recycling fails, climate change expedites.

In addition to banning unnecessary packaging, developing and incentivizing alternative delivery systems and reusable packaging strategies, and re-designing packaging and material innovation -- recycling is one of the most effective ways to address the gravest environmental crises in the world today.

Plagued with greenwashing, conflicts of interests and corruption, recycling has been designed to fail. However, fixing the global recycling crisis is entirely solvable, which is our purpose for this letter to you today. In fact, the solution we present to contribute to increasing recycling rates is quite similar to a treaty that the UN and many UN members enacted in 1968 to address road safety.

Therefore, we propose the launch of a global treaty to initiate the steps needed to end the chronic consumer confusion, thereby helping people, wherever they might be, know which materials are readily recyclable and to help them know how to recycle those materials properly.

In November 2020 the International Waste Platform (IWP) and Recycle Across America/Recycle Across the World (RAW) published two **critical and fundamental** solutions to help resolve the global public confusion about recycling.

These solutions contribute to solving the global recycling crisis and will subsequently help reduce the amount of waste entering waterways and oceans which has been harming the marine environment and wildlife.

In the eight-minute video presented at the UNEP and COBSEA Sea of Solutions Event, titled [“Recycling was Designed to Fail -- So Let’s Fix It”](#), we called out the

misinformation leading to the public confusion about recycling. In the video, we demonstrated how a lack of global standards to verify the recyclability of materials and a lack of communication standards on packaging and on recycling bins and receptacles, has led to the collapse of recycling globally.

The recycling crisis is further inflamed by consumer brands and the virgin plastics industry misleading the public about the ease and recyclability of packaging, along with conflicts of interest from other powerful lobby groups and businesses connected to the recycling industry. Related publications

[The Intercept](#) [Better Government Association](#) [NPR](#) [The Guardian](#) [Waste360](#)

To begin addressing the chronic confusion surrounding recycling, the presentation urges the UN member states to introduce a treaty encouraging the adoption of global standards for communication and labelling for End Of Life disposal instructions, which includes Recycle, Compost and Reuse.

### **Labels on Packaging**

The current marketing guidelines for communicating environmental benefits and disposal instructions on packaging are not regulated by standards. As described in the voluntary guidelines of ISO 14021, declarations or claims of environmental benefit can be self-declared. This voluntary practice of communicating environmental claims has created opportunities for unfair competition and misuse of consumer rights to truthful and accurate information as it is all too common for products to be mislabelled, either intentionally or unintentionally. To help illustrate the source of the public confusion, IWP network partners gathered evidence of printed and/or embossed icons, material identification, and disposal instructions on packaging from 20 countries on 5 continents. The results determined that in most cases, recyclability claims and disposal instructions on labels are either false, absent, misleading, not verifiable, not readable, not relevant to the state of local available collection systems or not related to local availability of effective recycling facilities within reach. This confusion and inconsistency of labelling for End Of Life instructions on packaging contributes to inaccurate material disposal after use, and often costly contamination of nonrecyclable material entering the recycling system.

Nina van Toulon : “One striking [example](#) of a false recyclability claim is the presence of the European Green Dot symbol on products sold in Cambodia, Cameroon, Malaysia, Nigeria, Pakistan and the Philippines, regions with low developed waste management infrastructure and heavily impacted by pollution. The Green Dot logo merely indicates that a company has joined the Green Dot scheme, and *not* necessarily that the package is fully recyclable. And this recycling information has no relevance in the above mentioned

countries, since those countries are not included in the European Packaging and Packaging Waste Directive 94/62/EC.”

### **Labels on Recycling Bins and Receptacles**

RAW gathered images of labels used on recycling bins and receptacles in countries all over the world. These examples demonstrate the vastly inconsistent and confusing labels from one recycling bin to the next not only from country to country, or community to community, *but also from one bin to the next even within one building*. This highlights the urgent need for standardized signage on bins to reduce the costly contamination that is mistakenly thrown in recycling bins and to increase recycling levels.

Mitch Hedlund, Executive Director of RAW presents an analogy to explain the communication confusion on bin labels : “A Precedent Was Set with the UN 1968 [Vienna Convention Road Traffic Treaty](#) which introduced standardized road signage to help people drive properly wherever they are, even if driving rules differ. A UN global treaty to implement standardized recycling labels for packaging and for recycling bins will model the 1968 Road Safety Treaty, because the standardized recycling labels on packaging and recycling bins, will allow people to be able to recycle properly wherever they are, even if recycling rules differ.”

Imagine if there were no standardized road signs, and every business, school, house, and entity had to design their own stop sign and speed limit signs for the road closest to them. Simply put, people would not be able to drive safely. Now imagine if the industries and companies that were able to influence road safety policies, or had the power to prevent policies -- were the tow-truck companies, the auto-body repair shops and the casket-making companies. And imagine if they massively funded certain non-profits locally, nationally and globally to create endless studies and accident clean-ups, while also creating more of the confusion that causes the accidents.” Related publication [The Intercept](#)

“Essentially, that’s what has been happening historically with recycling in many countries around the world when installing recycling labels on bins. For instance, in the U.S. and in many countries, every business, airport, school, stadium is tasked with having to design their own recycling labels for their bins in their buildings -- and therefore the public is experiencing millions of inconsistent and often ineffective labels on recycling bins. This confusion causes the public to not only make mistakes at the recycling bins, but it also causes them to be apathetic or even sceptical about recycling. And as a result of that, there are literally millions of tons of ‘garbage’ being thrown in recycling bins across the U.S., and that contamination in the recycling system makes recycling cost prohibitive and ruins the quality and demand for the materials.

The inconsistent and confusing labels on bins throughout society have been acceptable to the recycling industry and remained in place because in many cases, the biggest

influencers of the recycling industry are actually companies and industries that profit from recycling *not* working. [New York Times](#)

This is why none of the recycling industry, packaging industry, plastics and fossil fuel industry, or the non-profits they fund, have engaged in, or even been willing to pilot the standardized label solution for recycling bins.

### **Our proposed solution for the cited problems is Harmonized Standards for Mandatory Labels of End Of Life Disposal Instruction On Packaging and Standardized Labels On Recycling Bins and Receptacles**

This scheme will require all that all brand-owners/producers:

- A. *Participate*** in a scheme for on-pack communication using standardized pictograms.
- B. *Provide or report*** Third Party verification for the disposal instruction for their products and/or packaging via a digital system which verifies availability and practice of collection for the specific product for the labelled end of life. In this scheme, a packaging and/or product can be labelled Recyclable, Compostable (includes Anaerobic Digestion, AD) or Reusable.
- C. *Design*** their packaging in accordance with a harmonized standards for communication of environmental benefits

Nations such as the UK, USA and Australia have seen widespread adoption of self-verified standardized packaging recyclability labels over the last decade and hence we already know can be readily implemented at scale. That leaves 192 nations without a standardized packaging label system. Whilst there are vast variations in the recycling infrastructure between nations, we believe that packaging harmonisation is possible; this is the first step towards standardizing on-pack recycling instructions. The transition that would be needed is Third Party verification or certification schemes and brand owners would need to design their packaging in accordance with standards described below.

#### **Labels for Disposal Instructions**

***Recycle:*** a product and/or packaging can be labelled, Recycle if it has been verified by a Third Party that collection, sorting and mechanically recycling of the particular product is in available and practiced at scale in the area where collected; after mechanical recycling the product will become either a commercially viable raw material or new product. A fundamental step will be to determine base level packaging designs that are verifiably recycled in each area of collection.

***Industrial Compost:*** a product and/or packaging can be labelled, Industrial Compost if it has been determined by a Third Party (examples: TÜV, Din Certco, BPI) to be compliant with an international standard for industrially compostable products (EN 13432, ASTM D6400, AS 4736); it has been independently determined that collection and industrial composting (or anaerobic digestion) is available and practiced at scale in the area where collected; and that after composting the biomass will be used as a soil amendment. The certification must be verifiable and the certifier's logo for Industrial Compost must be printed directly on the product and/or packaging as the disposal instruction. Labelling with the term, *Biodegradable* will not be allowed as it can be confused as being a disposal instruction.

***Home Compost:*** a product and/or packaging can be labelled, Home Compost if it has been certified by a Third Party to be compliant with standards for both industrially compostable products (EN 13432, ASTM D6400, AS 4736) and home compostable products (AS 5810-2010); and it has been determined that home composting is available and practiced in the area where used; and that after composting, the biomass can be used as a soil amendment. The certifications must be verifiable and the certifier's logo for Home Compost must be printed directly on the product and/or packaging as the disposal instruction. Labelling with the term, *Biodegradable* will not be allowed as it can be confused as being a disposal instruction.

***Reuse:*** a product and/or packaging can be labelled, *Reusable* if it has been determined to have been designed to accomplish its purpose for a minimum amount of times or rotations in a system of reuse.

***Recycle After Reuse:*** a product and/or packaging can be labelled, *Reusable* and also *Recycle after Reuse* if the recyclability of the product has been verified in accordance with the standards for recyclability described above.

### **Standards for placement of labels on packaging**

As a measure to maximize clarity of End Of Life labelling for consumers and to protect market competition, the front of the packaging must be free of all eco-labels, marks, graphics and icons which communicate environmental benefit. All eco-labels other than End Of Life, must be located together and separately from End Of Life labels. For example: if disposal instruction labels are printed on the Back Left Side of the packaging, then other labels, marks or icons should be printed on the Back Right Side. Resin codes are provided for recyclers only and should therefore be printed in a separate space, preferably on the bottom of the packaging.

### **Mandatory Verifiability of other eco-logos or claims of environmental benefit:**

All communication of environmental benefit on packaging and in marketing should be independently verifiable.

As stated previously, the use of the term, “*biodegradable*” in a mark or in a marketing communication of any type should not be allowed to prevent confusion.

## **2. Standardized Labels for Recycling Bins and Receptacles**

We are urgently requesting that the UN replicate what they achieved in 1968 for road safety, and now apply that logic to recycling bins and receptacles.

This actionable component of the proposed treaty specifically focusses on introducing the society-wide standardized labels for recycling bins which have been developed and proven to help the public understand how to effectively and successfully separate their waste, wherever they are, regardless of varying recycling rules. Municipalities would indicate on the standardized labelling system, which recyclables they accept and how the public needs to sort those recyclables.

RAA/RAW has proven in the past ten years, that standardized labels for recycling bins solve the public’s confusion about recycling.

The society-wide standardized label solution for recycling bins has been developed, tested, and is proven to be the most readily accessible tool to address the chronic public confusion about recycling and the subsequent crippling contamination. *The solution can be easily vetted, and if accepted, the standardized label designs will be donated to the UN and participating countries.* The standardized label solution can be implemented quickly and inexpensively, and once in use, the environmental, societal and economic benefits of the solution can be precisely measured to show its impact.

And much like standard road signage can be adapted to the unique needs of each country, community and road, the standardized labels displayed on recycling bins can also be adapted to meet the unique recycling needs of each country, municipality and market for recycled commodities.

### **The Efficacy of Standardized Labels on Recycling Bins and Receptacles**

In North America, there are currently more than 9 million recycling receptacles that have standardised labels, displayed on recycling bins in airports, schools, universities, offices, national and municipal parks, city streets, residential and household setting, multi-family housing, hospitals, industrial settings, corporations, government offices, sports stadiums, etc. In many of those instances the recycling rules differ, therefore the standardized labels have been adapted to each unique type of recycling system. The standardized labels on recycling bins have repeatedly increased recycling levels 50-400% and significantly decreased costly contamination, sometimes eliminating it entirely. Additionally, there are now more than twelve recycling bin manufacturers in North America that are starting to adhere the standardized labels on their bins before they ship the bins to their customers.

RAA/RAW is willing to donate its' proven concept and artwork to the UN and all countries wanting to implement standardized bin labels.

Yours sincerely,

Australia, Heidi Tait at [Tangaroa Blue Foundation](#) / Australian Marine Debris Initiative

Australia, Anthony Peyton at [PREP](#)

Cambodia, Pises Say and Manon Orinel at [CleanGreenCambodia](#)

Cameroon, Raymond Peka at [Main de Reve Cameroon](#)

Democratic Republic Congo, Guillaume-Trésor Kakesa at [DRC Waste Platform](#) /Eco-Citizens "REC"

India, Manik Thapar at [Eco Wise Waste Management](#)

Indonesia, Nina van Toulon and Jane Fischer at [Indonesian Waste Platform](#)

Malaysia, Theresa Ng at [Malaysians Against Marine Debris](#)

Myanmar, Friedor Jeske at [Thant Myanmar](#)

New Zealand, Ella van Gool at [The Aotearoa Plastic Pollution Alliance](#)

Nigeria, Sonigitu Ekpe at [Nigeria Waste Platform](#)

Norway, Fanny Pindsle at [Hold Norge Rent](#)

Pakistan, Ali Syed at [Pakistan Waste Platform](#)

Philippines, Dann Diez at [Philippine Waste Platform](#)

Russia, Olga Mironenko at [Russian Waste Hub](#)

USA, Mitch Hedlund at [Recycle Across America, Recycle Across The World](#)

About RAA/RAW

Recycle Across America/Recycle Across the World (RAA/RAW) is a 501(c)(3) non-profit organization that has developed the first and only society-wide standardized labelling system for recycling bins to help eliminate the public confusion surrounding recycling and to improve the economics of closed-loop manufacturing. RAA and the standardized labels have been identified as a world-changing solution by Ashoka Global Innovators for the Public and are being referred to as “one of the most important environmental fixes taking root today.” For more information about the society-wide standardized label initiative, visit [www.recycleacrossamerica.org](http://www.recycleacrossamerica.org) or contact [info@recycleacrossamerica.org](mailto:info@recycleacrossamerica.org).

### **About IWP**

International Waste Platform, initiated in 2018, is an international co-owned non-profit stakeholder platform with participants from 30 country networks united to collaborate on Ocean Action, Climate Action, addressing pollution from land-based, riverine and marine-based sources and advancing Circular Economy development. Representatives committed themselves to align objectives, to support the implementation of strategies of Ocean Action and Climate Action, as well as to share ideas, best practices, concepts, programs, knowledge and opportunities; including the reduction of plastic debris at the source, before it enters rivers and the coastal environment.

<https://internationalwasteplatform.org/>

### **Contact information**

Nina van Toulon [nina@indonesianwaste.org](mailto:nina@indonesianwaste.org)

Mitch Hedlund [mitch@recycleacrossamerica.org](mailto:mitch@recycleacrossamerica.org)