

Communicating the Recycling Message in a Transition to Product Stewardship

**White Paper
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Prepared by the Product Stewardship Institute

Introduction

The purpose of this white paper is to discuss the benefits and potential challenges of educating consumers about the recycling and safe disposal of their products. This paper reviews the current context for consumer product collection, recycling, and disposal in the United States, along with the challenges and opportunities that this emerging environment presents. In addition, government, retail, and manufacturing sector perspectives are provided in two main areas: on-product messaging and the role of a centralized resource. Finally, this white paper examines lessons learned from centralized outreach and education efforts in British Columbia and the role that a centralized resource could play here in the United States in coordinating our growing number of product stewardship systems.

To attain this information, PSI convened three focus group calls and conducted additional interviews with manufacturers, retailers, and state and local government officials. In addition, PSI interviewed people working for or with one of the eight product stewardship programs in British Columbia. The recommendations of this white paper combine the responses from the focus group participants as well as PSI's analysis as a leader in the product stewardship movement in the U.S.

The Context: Rapid and Recent Emergence of Product Stewardship in the U.S.

Recycling and safe disposal messages for consumer products have traditionally been delivered almost exclusively by state and local governments. Consumers have become accustomed to receiving information from their government municipalities in the form of curbside recycling schedules or household hazardous waste collection announcements. However, the emergence of extended producer responsibility (EPR), a central tenet of product stewardship, has led to the collection of more products through a number of different avenues, including the emergence of collections at retail. There are currently more than 65 EPR laws in 32 states (see Figure 1, right), and nearly all of these laws have been passed in the last five years (see Figure 2, below). In addition to state laws, there are a number of voluntary programs (that may be required in some states) run by industry leaders. See Table 1 for examples of these programs.

Figure 1. Number of Products Covered by State EPR Laws, 2011

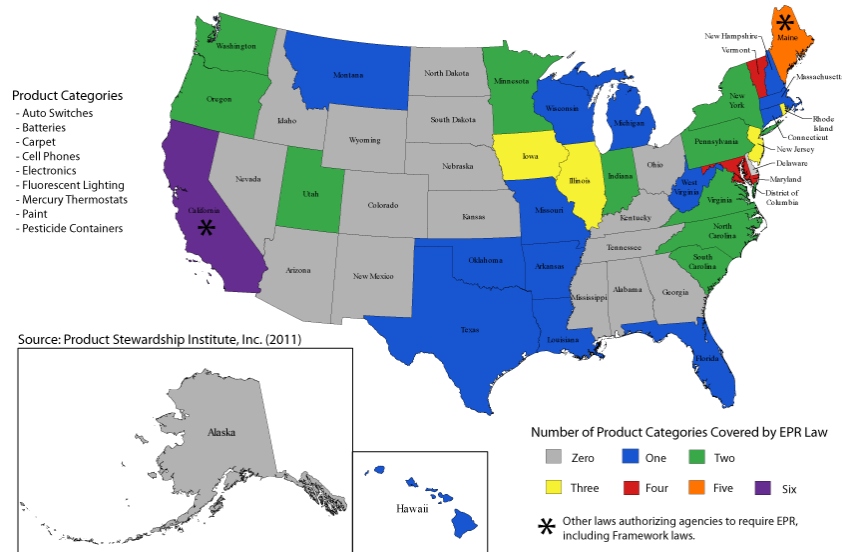


Figure 2. EPR Laws Passed in the U.S. since 2000

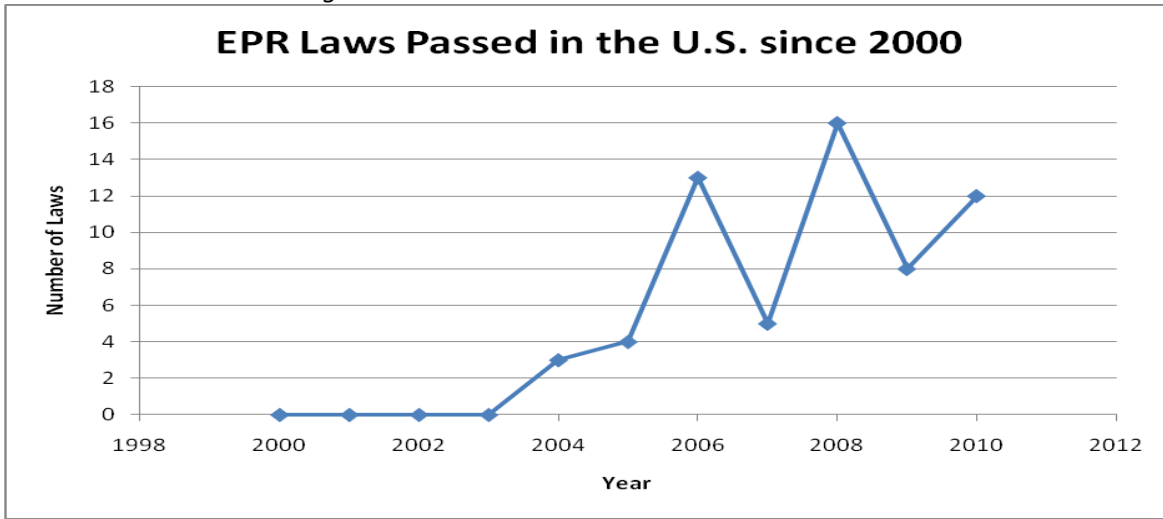


Table 1. Examples of Voluntary Programs run by Manufacturers and Retailers

Product	Manufacturer Programs	Retailer Programs
<i>Ceiling tiles</i>	Armstrong World Industries	
<i>Disposable cameras</i>	Kodak	
<i>Electronics</i>	A number of companies	Best Buy, Office Depot, Office Max, Staples
<i>Mercury lamps</i>		Home Depot, Lowe's
<i>Mercury light switches</i>	End of Life Vehicle Solutions (ELVS)	
<i>Mercury thermostats</i>	Thermostat Recycling Corporation	
<i>Pesticides</i>	The Pesticide Stewardship Alliance (TPSA)	
<i>Rechargeable batteries</i>	Call2Recycle	

To communicate the spectrum of mandatory and voluntary collection programs being introduced, manufacturers and retailers have taken on a larger role in providing recycling and safe disposal information. However, current program information and availability generally varies on a state, and often on a community level. This system has resulted in a *patchwork* of different recycling and safe disposal messages and the means by which they are communicated to consumers. This new dimension of recycling has thus created a greater need for a coordinated national outreach and educated strategy for consumer product collection, recycling and disposal.

Challenges and Opportunities Presented as Product Stewardship Grows

As EPR becomes more prevalent in the U.S., a number of challenges arise. In the past, local governments (sometimes with support from state governments) have been the focal point for providing information to

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the general public about how to recycle. While this is still largely the case, a growing number of companies are providing both education and recycling solutions for their products. Creating more opportunities to collect discarded products is critical; at the same time, while it is positive to have more recycling messages being generated, there is some concern that consumers will be confused about what to do with their various products if there are multiple messages. Some manufacturers and retailers that have created recycling programs are concerned that information communicated by someone else will not be accurate (for example, someone may try to bring 25 fluorescent lamps to a program that accepts no more than 10 from one person).

Despite the challenges that arise under EPR systems, many opportunities are also available. This is a time of transition, as consumers gradually become accustomed to receiving recycling messages from manufacturers and retailers as more collection and take back programs are introduced throughout the country. One of the key opportunities offered by Earth911 is that it allows the public to search for a recycling or safe disposal option for a specific *product*, which means they get the information specific to the recycling options for *that* product. This can help to ensure that the information provided for the increasing patchwork of opportunities to recycle different products is accurate and seamlessly incorporates municipal, retail, and other collection options.

Leaders in manufacturing and retail industries have an opportunity to promote a “green” image to consumers, and, increasingly, this marketing tool is giving industry leaders a competitive advantage. Manufacturers and retailers can use creative messaging techniques to communicate with a wide ranging audience. Companies that recognize the growing opportunity created by the emergence of product stewardship programs can position themselves ahead of the curve to gain recognition as a leader in recycling and collection programs.

On-Product Messaging

There is an opportunity to capture consumers’ attention by providing recycling information on the product itself. There was a consensus among focus group participants that providing recycling messages on consumer products is more effective than placing these messages on the packaging materials which are usually discarded before the product. However, participants did note that the success of this method can vary by product. In general, messages provided on the product were viewed as effective but it was noted that this is not a “one size fits all” solution - other methods of communicating with consumers should be used as well.

State and Local Government Perspective

Overall, focus group participants thought that an on-product recycling message would be effective. One respondent commented that the text needs to be large enough to catch people’s attention, and referred to the increased size of the warning label on cigarettes as an example. However, this conflicts with the manufacturers’ concerns about their branding and other labeling requirements.

Manufacturer Perspectives

The manufacturers generally agreed that any messaging belongs on the product and not the packaging but expressed concern with an on-product recycling message overall. Recognizing that this varies by industry, one manufacturer indicated the challenge of finding space on the product to provide information that is easily readable and eye-catching. Primary batteries can be very small, for example. Prescription drugs are usually dispensed to the patient in different packaging than that provided by the manufacturer. On the other hand, paint cans are much larger and there may be more flexibility. There was also a concern related

to the limitations that branding and design guidelines present in incorporating an outside label or message. Another participant stressed that the message or label must be clear and recognizable, which speaks to a long-term opportunity to have uniform messages across companies within a particular product category as would be done through a stewardship organization.

Retailer Perspectives

A few retailers noted that manufacturers may be limited by the space in which to place an on-product message. As one participant explained, this challenge is similar to an issue retailers encounter when they determine where to place signs and other materials in their store, as strict guidelines often dictate space and design. Another retailer who runs a voluntary collection program pointed out that as long as consumers were directed to accurate program information using an on-product message, this method could be effective.

Role of a Centralized Resource

Throughout this time of transition, where the patchwork of state EPR laws and voluntary recycling programs continues to grow, participants in each focus group expressed the value in establishing a centralized resource that provides recycling program information, education, and outreach. Earth911 was referenced by participants multiple times during discussions related to the potential role for a centralized source of information. In fact, it is clear that Earth911 is already recognized as *the* centralized resource as no other names were raised. Therefore, Earth911 is extremely well positioned to meet the growing demand to provide, and update, recycling and safe disposal information on a national scale. As mentioned above, Earth911's product-specific search system is particularly valuable in the context of growing number and diversity of recycling messages and opportunities.

State and Local Government Perspectives

Each focus group thought state and local governments should continue to provide recycling information to their constituents despite the growing number of manufacturer and retailer messaging initiatives. One retailer noted that government agencies are seen as a trusted resource and they have a responsibility to provide recycling information. However, some government officials expressed the difficulties their agencies face in keeping information up-to-date online, especially as the size of government shrinks but their responsibilities continue to grow. In response, one participant, whose agency puts Earth911's search engine tool on their website, noted that it is a time saver. A centralized online resource that is linked to a government website allows governments to fulfill their role. When that resource is funded by companies promoting their own programs, this both helps to spread the word about those companies' programs as well as providing a free resource to cash-strapped agencies. Although government continues to play a role in communicating with consumers, one participant stated that government should not get involved in the business relationships that exist between manufacturers and retailers.

Manufacturer Perspectives

Overall, the concept of establishing a centralized resource has not yet been fully considered by some manufacturers (particularly those who are not yet taking - or required to take - action on promoting the recycling of their product). However, participants still saw value in providing a one-stop shop for consumers to find information about recycling and safe disposal. One manufacturer could envision a role for a third party to provide this service. Another said her company is already partnering with Earth911 because they found that customers using their recycling program were locating their collection sites through Earth911 anyway. Product branding is important, one participant noted, so as long as companies can include their

branding guidelines, a centralized resource could be a useful tool. In general, the companies liked the idea of hiring a third party to provide this service and were not interested in generating their own information.

Retailer Perspectives

Retailer focus group participants also expressed a value in establishing a centralized resource. For one retailer that runs a voluntary collection program, a centralized resource could be just one of the many ways in which to communicate program information to the consumer. This same participant prefers to direct consumers to the company website to ensure people are receiving accurate information. Another retailer highlighted the lack of coordination in messaging coming from the federal government related to a particular industry, and that a centralized resource would assist the industry as a whole in providing clear and consistent information. Once again, one of the focus group participants mentioned that Earth911 is already acting as a centralized source of information for consumers.

Lessons Learned from British Columbia

The product stewardship community in the U.S. often looks to British Columbia as an example of what the product stewardship future here could look like. The province currently regulates eight product stewardship programs. The Recycling Council of British Columbia (RCBC), a non-profit organization with membership from governments, businesses, and organizations, is a successful centralized resource that promotes the principles of zero-waste through information services.¹ Similar to Earth911, in some ways, RCBC operates call centers to support a recycling hotline and continuously updates information on their online “Recyclepedia.” Interestingly, the Recycling Council of British Columbia first began providing these services not to attract business from stewardship programs, but to provide a general service to its residents. A few stewardship programs later approached RCBC to request greater recognition on the website and a partnership was formed. To date, not all eight programs have enlisted RCBC’s services. Since RCBC had already established a high traffic website directory and a hotline number, the organization was well equipped provide information services to the growing number of product stewardship organizations. Recognizing that it can be difficult to determine pricing for these services based on market share, RCBC charges flat fees: one initial fee for development and an annual maintenance fee. The services focus on providing a centralized resource to the stewardship associations themselves, and these organizations then allocate costs for outreach among their members along with their other costs. A few programs, such as the National Brewers Association of Canada, have existed for a number of years and have high return rates on their own, so they have elected not to partner with RBRC.

In addition to RCBC’s central role in coordinating consumer messages, it is important to note the collaborative approach adopted by the stewardship programs in British Columbia. Eight stewardship programs came together to create a comprehensive recycling handbook and an informational video. Working through RCBC, one of the stewardship organizations (Encorp Pacific) took the lead on developing the materials and then billed the other organizations for their share. Although not all of the stewardship programs use the same education and outreach strategies, their cooperation to create a handbook and video demonstrates their commitment not only to the success of their own programs, but to the continued success of product stewardship in British Columbia. One stewardship organization offered that her program focuses most of their outreach through the centralized service provided by RCBC; if consumers are looking for a way to properly discard one product, they may be interested in how they handle her product as well.

¹¹¹ Recycling Council of British Columbia, accessed at <http://rcbc.bc.ca/>.

Earth911 is well equipped to provide this support to product stewardship programs as they continue to grow in the U.S. The success of RCBC confirms the notion that a centralized resource is needed by manufacturers, retailers and consumers to serve as a means of communicating and receiving clear and consistent recycling messages. The United States does not have as many mandatory producer responsibility programs as British Columbia, but this is changing fast. Already, manufacturers who are implementing or considering implementing stewardship programs have expressed interest in working with other companies to consolidate both infrastructure and messaging. Because the current U.S. context includes both state-specific programs (such as PaintCare, which is currently operating only in Oregon and soon in California) as well as national programs (such as Call2Recycle), it would be most efficient to establish a focal point such as Earth911 who can not only provide services to individual organizations, but can also facilitate their ability to leverage each others' efforts.

Other Opportunities Identified

Through the focus groups and PSI's general observations, the following additional potential opportunities were identified.

- *Collect data on product searches that do not provide a collection site within a certain distance to present to manufacturers and retailers.* Manufacturers and retailers may be interested in finding out more information on collection gaps.
- *Partner with retailers and manufacturers to provide coupons consumers can print out and use at the store.* These coupons could only be redeemed if the consumer brought an item for recycling or disposal to a retail collection site.
- *Provide a "suggestion banner" that displays recycling information for additional products.* For example, if a consumer is looking to recycle their rechargeable batteries, Earth911 would provide a suggestion to recycle another commonly searched product. The objective is to capture the consumer's attention and provide more information. This is likely to be of particular interest to new stewardship organizations who are interested in leveraging consumer interest related to other products.
- *Target environmentally responsible businesses and convey the benefits of using the recycling search engine application on their company website.* A number of companies serve as collection points for electronics and other products and may be interested to go one step further to provide employees with recycling information, especially if it means that they can ensure that information about their program is accurate and up-to-date.
- *Use Quick Response (QR) codes either on a product or as a sticker that link to the Earth911 website.* QR codes have gained popularity in the U.S. over the past few years. This is an example of a way in which Earth911 can adapt to technological advancements and appeal to younger audiences. The codes could be used to provide information not only about recycling, but also company information about new products on the market or coupons to encourage return business.

Conclusion

The growth of product stewardship, if it continues on the same trajectory as seen in the past five years, is going to significantly change the way waste is managed (and the way we are told to manage waste) in this country. As more laws pass, more companies making more different types of products will be required to create and promote recycling programs. Even more companies will seek to forestall legislation by creating their own voluntary systems, which, if they are to be effective, will require proactive outreach and accurate information for consumers. In a recent example, the primary battery manufacturers have launched an initiative to create a national recycling program and are seeking opportunities to leverage existing infrastructure and educational resources to make their program as efficient as possible. Regardless of who is paying to collect and recycle something, the consumer is integral to the success of the system. With a growing number of opportunities to recycle, it is imperative that the consumer have accurate and up-to-date information available. The best way for a new stewardship organization to start a new recycling program is to assess and build upon existing infrastructure. The same is true for the education and outreach infrastructure. Our analysis concludes that the various stakeholders involved share an understanding of this basic premise, and that Earth911 is the sole service provider positioned to nurture and grow this infrastructure.