

Recycling and TB Flex bags

Bill Walters

Updated March 23, 2022

When the public thinks of the word “recycling” they think of the bin they have at home and their local curbside recycling program. Local curbside recycling programs are the avenue for the largest volume of recycling in the U.S. by far. Flexible packaging like ours is accepted by very few curbside recycling programs in the U.S. This is because bags are difficult to sort and get tangled in sorting equipment. This hampers the recycling process and results in them not being accepted. It is misleading to say a bag is “recyclable” when the predominant means for recycling does not widely accept it.

At TB Flex we don’t want to mislead customers either out of ignorance or to trick them into buying a bag. In addition, The Federal Trade Commission Green Guides and a new California law which will go into effect January 1, 2024, penalizes companies who make misleading recyclability claims. These include symbols like unqualified chasing arrows that infer a bag is recyclable when it is not. We don’t want our customers to be penalized.

As far as the regulations go, here are highlights that may be helpful to share with customers and prospects:

- The FTC Green Guides gives an example of a misleading marketing claim as “A packaged food product labeled with a three-chasing-arrows symbol (a Möbius loop) without explanation.”
- In California law, flexible packaging fails two of the four criteria needed to be considered recyclable because:
 1. It is not collected for recycling by programs for at least 60 percent of the population of the state.
 2. It is not of a type and form that routinely becomes new products or packaging through recycling by large volume processing facilities and sent to and reclaimed at reclaiming facilities.

There are special programs we can use to call our bags recyclable. There is additional cost for these programs. To use these programs, we must...

1. Select a bag structure that is a single “mono” material. It must be one material to keep it uncontaminated and useful after it is ground up, re-melted, and turned into some other product. Our PolyRecycle bag is designed for this purpose.
2. Bags can be collected via special programs like How2Recycle and TerraCycle. How2Recycle places bins in grocery stores and major retailers. Materials with the How2Recycle logo can be placed in the bin. Bags must be pre-approved to receive the logo and both TB Flex and our customer must pay a yearly membership fee of \$6-10K. TerraCycle has two collection methods. You can buy large boxes, which will hold several hundred bags. You fill the box with bags and send it to TerraCycle for recycling. You may also pay an annual fee to allow consumers to print free shipping labels from a website. They fill their own boxes with bags and ship them to TerraCycle for recycling.

Some of our competitors make claims that their bags are recyclable. They place the chasing arrow symbol on the bag without explanation or they print words like “Recycle Me”.

The chasing arrows only identify the material composition of the package. The end user must check with their local curbside recycling program to determine if both the material *and* the form of the item (bag, cup, tray, bottle, etc.) is collected and recycled. The vast majority will find that their local program does not accept plastic bags. Almost no curbside recycling programs in the U.S. accepts them (see Appendix I for examples from eight major U.S. cities that do NOT accept plastic bags).

“Recycle Me” is a trademark of the Coca-Cola company. It is a violation of trademark law to print it on the bag. It also is meaningless in the context of a bag with no widespread means available to collect and recycle it.

Misleading the consumer with these inferences or claims of recyclability hurts recycling efforts. Inevitably, some bags with these claims mistakenly will be thrown in a curbside bin where they will hamper real recycling of approved items.



Examples of misleading symbols

Appendix I - Examples of some of the major cities around the U.S. showing they do not accept flexible packaging:

New York City

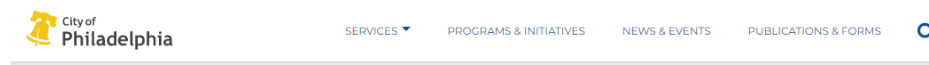


Not Accepted

- Batteries
- "Tanglers" (such as cables, wires, cords, hoses)
- Electronic devices banned from disposal
- Paper with heavy wax or plastic coating (candy wrappers, take-out and freezer containers, etc.)
- Soiled or soft paper (napkins, paper towels, tissues)
- Hardcover books (schools should follow their school book recycling procedures)
- Printer cartridges
- Glass items other than glass bottles and jars (such as mirrors, light bulbs, ceramics, and glassware)
- Window blinds
- Foam plastic items (such as foam food service containers, cups and trays, foam protective packaging, and foam packing peanuts)
- Flexible plastic items (such as single-serve food and drink squeezable pouches and tubes such as toothpaste, lotion, cosmetics, or sports balls such as basketballs, bowling balls, soccer balls, footballs, yoga balls)
- Film plastic (such as plastic shopping bags and wrappers.) Bring plastic bags and film to participating stores for recycling
- Cigarette lighters and butane gas lighters
- Cassette and VHS tapes
- CDs and DVDs
- Pens and markers
- Rigid plastic containers containing medical "sharps" or disposable razors
- Containers that held dangerous or corrosive chemicals

<https://www1.nyc.gov/assets/dsny/site/services/recycling/what-to-recycle>

Philadelphia



What to keep out of the bin

Not everything with a recycling symbol is accepted as curbside recycling. Some materials aren't safe or useful for recycling. Learn what to keep out of your recycling bin.

- Plastic bags
- Metal hangers
- Tanglers (hoses, cords, ropes, chains)
- Flammables (propane tanks, rechargeable batteries, fuel)
- Needles and syringes
- Clothing/bedding
- Styrofoam™
- Disposable plates, cups, and takeout containers
- Greasy or food-soiled paper and cardboard
- Tissues, paper towels, and napkins
- Light bulbs
- Cassette tapes (VHS and audio)
- Pots and pans

<https://www.phila.gov/programs/recycling-program/what-to-recycle/#what-to-keep-out-of-the-bin>

Seattle



Keep Bags Out of Your Recycle Cart

Plastic bags and plastic wrap don't belong in your recycling cart as of January 2020.

This includes:

Plastic wrap: Examples are what comes on paper towels or toilet paper, bread bags, food storage bags (like Ziplocs), cling wrap, and dry cleaning bags.

Plastic bagged recyclables: Put your stuff loose in the cart. Workers at the recycling facility cannot see what's inside the bags to properly sort them.

What you can do with your plastic bags:

- Take them back to be recycled. Go to plasticfilmrecycling.org to find a drop-off location near you.
- Throw them out. It may feel wrong, but it will help make recycling work for everyone.

Thin plastics, like bags and wrap, get tangled in recycling equipment, and the processing facility has to shut down. Stopping the equipment to remove the plastic slows processing down, driving up costs and is a potential safety risk for workers.



<https://www.seattle.gov/utilities/your-services/collection-and-disposal/recycling/recycle-right>

Atlanta



CITY OF ATLANTA CURBSIDE RESIDENTIAL RECYCLING PROGRAM

*Residents are encouraged to call
Department of Public Works Customer Service with other questions: 404-330-6333.*

Q: Are plastic bags recyclable?

A: Plastic bags are not recyclable through the city's program, because they are not able to be processed by the machinery in the recycling facility. We encourage residents to return plastic bags to their local grocery, drug, and home improvement stores to be recycled or to reuse them. More information on recycling plastic bags can be found at www.abagslife.com and www.earth911.com.

<https://www.atlantaga.gov/Home/ShowDocument?id=13789#:~:text=A%3A%20No%20sorting%20of%20recyclables,incluing%20newspaper%2C%20cardboard%20and%20magazines.>

Chicago



Materials that **are accepted** in the Chicago Blue Cart Program & Recycling Drop-off Centers:

- Glass jars and bottles
- Aluminum cans, foil and pie tins
- Tin or Steel cans
- Cereal boxes, paper towel rolls
- Cardboard (flatten all boxes)
- Plastic bottles and containers (# 1-5, 7 accepted)
- Junk mail, magazines and catalogs
- Telephone books
- Paper bags
- Office paper and file folders
- Newspaper and inserts
- Beverage cartons (milk, juice, soy cartons)
- Beverage carrier stock: plastic rings and cardboard carrying cases
- wrapping paper (no bows or ribbons, please)
- paper greeting cards

No flexible packaging listed

https://www.chicago.gov/city/en/depts/streets/supp_info/recycling1/blue_cart_residentialrecyclingacceptedmaterials.html

Boston

BOSTON TRASH AND RECYCLING GUIDE

We offer recycling and trash collection for residential properties in the City of Boston.

ITEMS YOU CAN RECYCLE IN THE BLUE BIN

Remember to always **rinse and wash your items** before putting them in the recycling.

- **Pizza boxes:** remove food, pizza savers (pizza tables), and liners
- **Aluminum and tin cans:** including potato chips and coffee cans
- **Paper:** newspaper, magazines, catalogs, paperback books, white and colored paper
- **Boxboard:** paper bags, egg cartons, and cereal boxes
- **Glass:** jars and bottles
- **Plastic:** all containers (except plastic bags), including food, soda, water bottles, and jars

<https://www.boston.gov/sites/default/files/file/2020/04/1395%20-%20pw%20booklet%20web%202020.pdf>

Los Angeles



RECYCLING

PAPER/ PAPEL

METAL/ METAL

PLASTIC/ PLÁSTICO

GLASS/ VIDRIO

THESE CLEAN & EMPTY ITEMS GO INTO THE BLUE BIN

ESTOS ARTÍCULOS LIMPIOS Y VACÍOS VAN AL BOTE AZUL

NOT ACCEPTED/ NO ACEPTADO

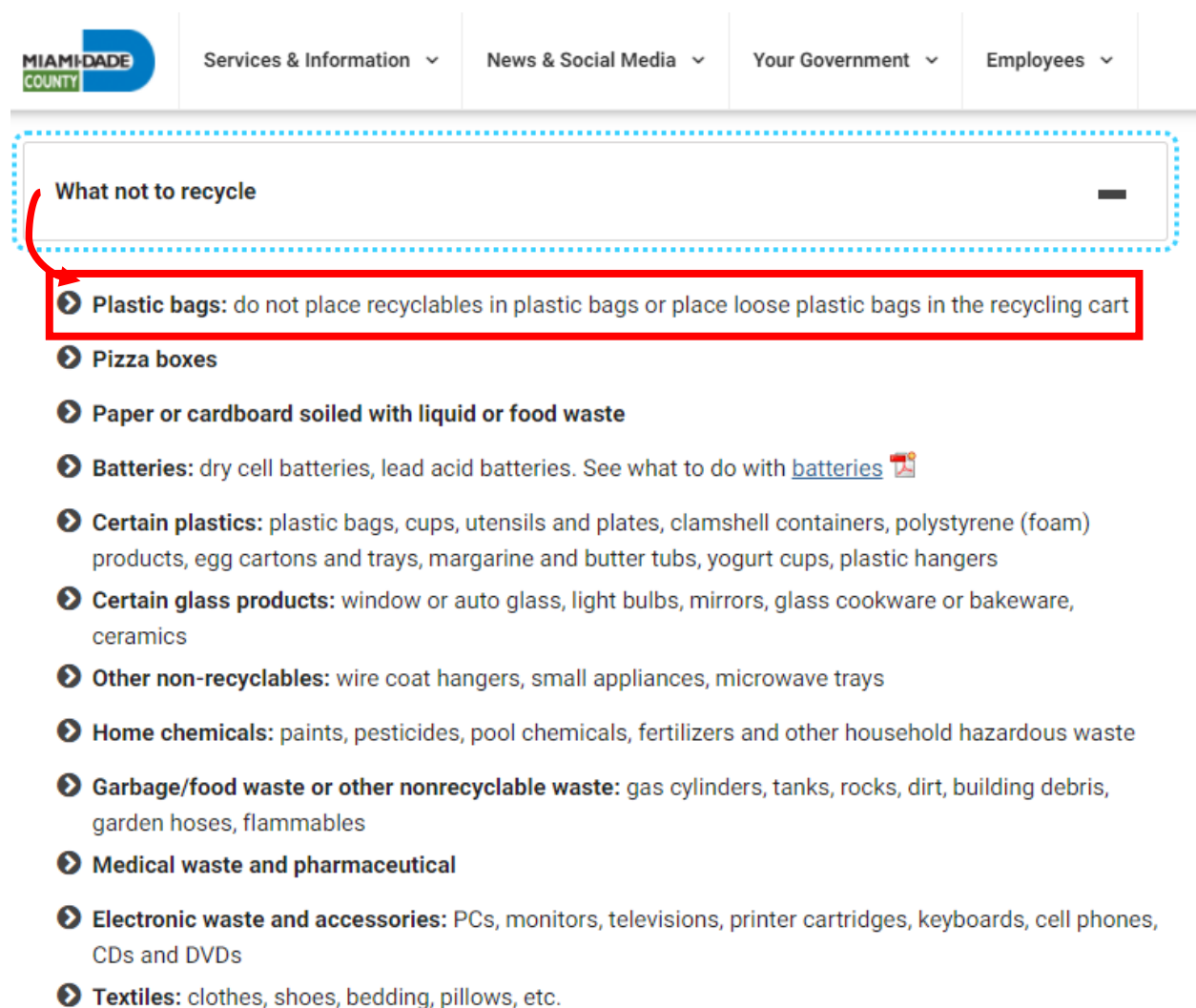
- ALL BATTERIES / Baterías
- STYROFOAM / Poliestireno
- HARDWARE / Herramientas
- PAINT CANS / Tanques de pintura
- FILM PLASTICS / Envoltura de plástico

For more information scan here: Para más información escanee aquí: or visit/ o visitar: LACITYSAN.ORG

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities. En relación con el Artículo II del Acto de Americanos con Incapacidades, la Ciudad de Los Angeles no discrimina en base de incapacidad física, y si Ud. lo pide, la Ciudad proveerá en un nivel razonable, igual acceso a sus programas, servicios y actividades.

https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-rybb?_afLoop=19058374769791330&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=17aghfafdg_1#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D19058374769791330%26_afWindowMode%3D0%26_adf.ctrl-state%3D17aghfafdg_5

Miami



The screenshot shows the Miami-Dade County website header with navigation links: Services & Information, News & Social Media, Your Government, and Employees. Below the header is a search bar containing the text "What not to recycle". A red box highlights the first search result: "Plastic bags: do not place recyclables in plastic bags or place loose plastic bags in the recycling cart".

- **Plastic bags:** do not place recyclables in plastic bags or place loose plastic bags in the recycling cart
- **Pizza boxes**
- **Paper or cardboard soiled with liquid or food waste**
- **Batteries:** dry cell batteries, lead acid batteries. See what to do with [batteries](#) 🗑️
- **Certain plastics:** plastic bags, cups, utensils and plates, clamshell containers, polystyrene (foam) products, egg cartons and trays, margarine and butter tubs, yogurt cups, plastic hangers
- **Certain glass products:** window or auto glass, light bulbs, mirrors, glass cookware or bakeware, ceramics
- **Other non-recyclables:** wire coat hangers, small appliances, microwave trays
- **Home chemicals:** paints, pesticides, pool chemicals, fertilizers and other household hazardous waste
- **Garbage/food waste or other nonrecyclable waste:** gas cylinders, tanks, rocks, dirt, building debris, garden hoses, flammables
- **Medical waste and pharmaceutical**
- **Electronic waste and accessories:** PCs, monitors, televisions, printer cartridges, keyboards, cell phones, CDs and DVDs
- **Textiles:** clothes, shoes, bedding, pillows, etc.

[https://www.miamidade.gov/global/service.page?Mduid_service=ser1494966732017925#:~:text=Cans%3A%20steel%20and%20aluminum%20food,replace%20cap\)%3B%20glass%20bottles](https://www.miamidade.gov/global/service.page?Mduid_service=ser1494966732017925#:~:text=Cans%3A%20steel%20and%20aluminum%20food,replace%20cap)%3B%20glass%20bottles)

Appendix II – FTC Green Guides and California Law

FTC Green Guides

Page 27 - It is deceptive to misrepresent, directly or by implication, that a product or package is made of recycled content. Recycled content includes recycled raw material, as well as used, 7-reconditioned, and re-manufactured components.

Page 29 - Example 8: A packaged food product is labeled with a three-chasing-arrows symbol (a Möbius loop) without explanation. By itself, the symbol likely conveys that the

packaging is both recyclable and made entirely from recycled material. Unless the marketer has substantiation for both messages, the claim should be qualified. The claim may need to be further qualified, to the extent necessary, to disclose the limited availability of recycling programs and/or the percentage of recycled content used to make the package..

California – Links to article about the law

<https://www.recyclingtoday.com/article/california-plastic-recycling-chasing-arrows-2024-scrutiny/>

<https://www.loeb.com/en/insights/publications/2021/10/new-california-law-limits-use-of-recycling-chasing-arrows-symbol>