



**BIODEGRADABLE
PRODUCTS
INSTITUTE**

Guidelines For The Labeling And Identification Of Compostable Products And Packaging

OBJECTIVE

To establish consistent, category-specific identification guidelines that make it easy for consumers, composters and others to identify compostable products and packaging, with the goals of reducing contamination, facilitating food scrap composting programs, and decreasing landfill methane production.

Overview

Compostable products and packaging exist to help facilitate the diversion of food scraps from landfills. Unfortunately, the threat of contamination from “look alike” non-compostable packaging has led some composters to discontinue accepting even certified compostable items.

In order for compostable products and packaging to perform their intended function, they should be readily and easily identifiable by end-users, consumers, composters and others so they can be differentiated from their non-compostable counterparts. The guidelines put forth in this document reflect the belief that a consistent identification strategy employed by product manufacturers and brand owners is a key driver in achieving differentiation and will assist in the acceptance of food scraps and compostable products and packaging on a larger scale.

Intended Audiences

This document has a number of intended audiences, all with an interest in organics diversion and the principles of circular economies.

The primary audiences include **Product and Packaging Manufacturers and Brand Owners**. This document will help these audiences to evaluate their current labeling and identification strategies and to put plans in place for short and long-term changes designed to bring consistency to how compostable products and packaging are labeled and identified.

In addition, this document may be of value to other stakeholders:

- **Composters** are essential to the success of waste diversion systems utilizing compostable products and packaging in the effort to divert organics from landfills. This document is the first iteration of an ongoing collaborative effort between composters, governments, brand owners, and the compostable products industry to reduce contamination and, ultimately, lead to higher quality feedstocks for composters.
- **State and Local Governments** may use this document to inform conversations around labeling and identification requirements for compostable products and packaging, particularly as it relates to product and category-specific manufacturing capabilities that vary with factors like shape, size, and material type.

Stakeholder Engagement

BPI invited and incorporated feedback on these guidelines from a wide array of groups including: the United States Composting Council (including state chapters), the California Compost Coalition, the Compost Manufacturing Alliance, independent composters, the City of Seattle, Zero Waste Washington, the Foodservice Packaging Institute, Sustainable Packaging Coalition, foodservice operators and brand owners. BPI looks forward to ongoing work with these stakeholders and others as the recommendations for labeling and identification are considered and put into practice.

PART ONE

This section outlines the variety of considerations that should be taken into account when determining how to properly label and identify compostable products and packaging.

Legal and Regulatory Considerations

The [Federal Trade Commission \(FTC\)](#) in the United States, the [Competition Bureau \(CB\)](#) in Canada and various state/provincial and local governments across both countries have created various guidelines and laws for marketers of compostable products and packaging to follow when making

claims of compostability. The following are examples of requirements or suggestions that generally become relevant whenever a product or package is marketed as "compostable":

- 1 Provide reliable and scientific evidence of compostability, such as meeting ASTM D6400 or ASTM D6868 compostability standard specification.
- 2 Use disclaimer language for products and packaging to qualify compostable claims if the product cannot be composted at home safely or in a timely way, such as "Commercially Compostable Only."
- 3 Use disclaimer language to indicate that commercial compost facilities are not available to a substantial majority of consumers such as, "Facilities May Not Exist In Your Area."
- 4 Use a Resin Identification Code (RIC) for bioplastic containers over 8 ounces in size. For bioplastics, the RIC is #7.

Use of the term "Biodegradable"

It is illegal in California, Maryland, and Washington to use the term "biodegradable" in marketing claims related to plastic products. This is because "biodegradable" is often used to describe items that do not meet ASTM standards for compostability, and are contaminants for composters.

Washington State Labeling Legislation

The Washington State legislature passed [HB 1569](#) to address labeling and identification for compostable products and packaging. The law went into effect on July 1, 2020 and either requires or suggests items 5 - 8 in addition to existing federal requirements. It also references "industry standards for being distinguishable upon quick inspection" that did not exist prior to the creation of this document.

- 5 Use of the word "compostable".
- 6 Use of a third-party certification logo to verify that an item meets ASTM standards for compostability.
- 7 Use of identification that makes the product or packaging distinguishable upon quick inspection in both public sorting areas and in processing facilities.
- 8 Use of distinctive color schemes, green or brown color striping, or other adopted symbols, colors, marks, or design patterns that help differentiate compostable items from non-compostable materials.

Third-Party Certification Requirements

While use of a certification mark is optional for other certification providers, products certified by the [Biodegradable Products Institute](#) must include the BPI Certification Mark.



Technical Considerations

Today, manufacturers of compostable products and packaging have three primary techniques for labeling and identification:

- 1 Printing is a reliable method of delivering specific information on a product or package, whether through visual elements like a stripe, or with words and symbols. Printing, however, may not be possible -- or may be a significant challenge -- on many of the products covered by these guidelines.
- 2 Material coloring and tinting are options for achieving visual differentiation. These techniques, however, are not sufficient on their own to clearly identify compostable products and packaging.
- 3 Embossing, debossing or otherwise etching compostable items may make it possible to deliver the information required. This messaging strategy is most effective when the wording is prominently featured on the products and packaging and is legible by consumers and composters. The category specific chart and graphical examples in Part Two of this document recommend a "Prominent Emboss" approach of the word "compostable".

In the future, innovation will bring new solutions, expanding the possibilities beyond printing, coloring and embossing. This document will be updated as these solutions move closer to reality.

Spatial Considerations

Along with technical challenges, lack of space is often cited by manufacturers and brand owners as a challenge when considering language and logo usage on compostable products and packaging. Some of the spatial challenges for existing regulatory requirements are detailed below.

- 1 Including the word "compostable" alone (especially on smaller items) does not meet the FTC's Guides for the Use of Environmental Marketing Claims
- 2 Including "Commercially compostable only. Facilities may not exist in your area." does meet FTC guidelines, but is lengthy and may be a challenge -- but not impossible -- to emboss.
- 3 Including a third-party certification logo alone (without any qualifying language) does not meet FTC guidelines, and the logo alone may not be recognized by all consumers.

When adequate space is a challenge, the overall recommendation of these guidelines is to include as much of the required content as possible on all products where labeling is an option. When

spatial constraints make it truly impossible to fit all required content on the products themselves, the recommendation is to include all required content on packaging and marketing collateral.

Composter Considerations

Composters require high-quality feedstock to manufacture high-quality compost. In order to achieve this, visually inspect the feedstock to assure there is little to no contamination. Making sure that compostable products and packaging are readily and easily identifiable makes it possible for them to distinguish compostable from non-compostable items.

Connection to Food Scraps

Only common elements of the food service waste stream are covered by this document, and are eligible for BPI certification. Compostable versions of foodservice products and packaging make it easier to divert organics at scale because they can be included with food scraps in the same bin.

Brand Owner Considerations

Brand owners often customize products and packaging to communicate their own brand and message. This can include specific branding standards, such as logos, colors, and images. Manufacturers are strongly encouraged to share these guidelines with their brand owner partners and to work together to incorporate them wherever and whenever possible.

Consumer and End-User Considerations

In residential and commercial environments, consumers and end-users are generally tasked with determining which bin to put their products and packaging in after use. In this way, they are the first line of defense in the effort to provide composters with a contaminant-free stream of organic material.

The labeling and identification recommendations in this document are driven by a desire to make it as easy as possible for consumers and end-users to distinguish between compostable and non-compostable products and packaging. To facilitate the quick decision making that is often required at the point of disposal, manufacturers acknowledge that more work needs to be done with various stakeholders on consumer and end-user education to augment improvements in labeling and identification techniques for compostable products and packaging.

Manufacturing Limitations, Market Preferences, and Financial Considerations

There are a number of factors driving the feasibility and timeframes associated with the labeling and identification strategies recommended in Part Two of this document.

First, many of the strategies that are called for are not in practice today and will require significant time and investment to implement. The recommendation to manufacturers and brand owners is to follow a phased approach, starting with categories where manufacturing and technology limitations are not present.

Second, certain market preferences are determining factors for how many compostable items are produced. For example, adding color to clear items will fundamentally change the value proposition (e.g., ability to see the food inside), and there may be scenarios where conventional packaging will be used instead of compostable packaging if design elements like striping or tinting are required.

Third, the investments required to implement some of the recommended strategies will significantly change the economics for manufacturers and brand owners, and some of those costs are likely to be passed on to their downstream customers. Compostable products and packaging are already sold at significant premiums relative to their conventional counterparts, and it is possible that the labeling and identification approaches proposed here will increase those premiums. This could lead to reduced market acceptance of these items.

PART TWO

This section makes specific recommendations for the labeling and identification of compostable products and packaging, recognizing that products and materials may have different options. These recommendations address the considerations outlined in Part One and incorporate the results of a manufacturer survey designed to identify current and potential identification methods in use and/or in development across the compostable products and packaging industry.

Part Two of the document is divided up into two sections:

- 1 A comprehensive chart displaying the full set of labeling and identification techniques available, by category and material type.
- 2 A set of mocked up illustrations designed to make the recommendations in the chart easier to visualize, accompanied by estimates of availability based on Manufacturing Limitations and Market Preferences.

Recommendations Chart

The chart on page 9 shows possible labeling and identification techniques available for specific categories and material types. When multiple labeling and identification options are presented, they are listed in order of availability and/or industry preference. The footnotes in the chart correspond to text and color recommendations that vary depending on the primary method of labeling.

For example, the options for the Bioplastic Clamshell category are displayed as follows: Emboss* 1,2 | Color 3 | Print 1,2,3. The first option recommends a Prominent Emboss approach on this product, with significant embossment, debossment, or etching of the word "compostable", and including all other required messaging elements indicated by the footnotes. Tinting of the product in conjunction with prominent embossment is a subsequent option, followed by printing.

While the categories and material types displayed in the chart represent the majority of the products and packaging categories likely to be disposed of in organics bins, it is not an exhaustive list. One notable omission from the chart are products made from plant-based fibers only like napkins, tissues, paper towels, and wipes. These items are generally recognized as compostable, are largely exempt from BPI's labeling requirements and are specifically excluded from Washington's regulations.

When multiple options are presented below, they are listed in order of current industry-wide availability and/or industry preference.

	Bioplastics	Bioplastic Coated Paper/ Paperboard	Uncoated Paper / Paperboard and Wood	Molded Fiber
Beverage Cups	Print ^{1,2,3} Emboss ^{*1,2} Color ³	Print ^{1,2,3}		
Food Containers - Round	Print ^{1,2,3} Emboss ^{*1,2} Color ³	Print ^{1,2,3}		
Food Containers - Square	Emboss ^{*1,2} Color ³ Print ^{1,2,3}	Print ^{1,2,3}		
Food Containers - Clamshell	Emboss ^{*1,2} Color ³ Print ^{1,2,3}	Print ^{1,2,3}		Emboss ^{*1,2} Color ³ Print ^{1,2,3}
Portion Cups	Print ^{1,2,3} Emboss ^{*1,2} Color ³		N/A	Emboss ^{*1,2} Color ³ Print ^{1,2,3}
Lids for Cups	Emboss ^{*1,2} Color ³ Print ^{1,2,3}			Emboss ^{*1,2} Color ³ Print ^{1,2,3}
Lids for Containers	Emboss ^{*1,2} Color ³ Print ^{1,2,3}			Emboss ^{*1,2} Color ³ Print ^{1,2,3}
Cup Sleeves			Print ^{1,2,3}	
Plates	Emboss ^{*1,2} Color ³ Print ^{1,2,3}	Print ^{1,2,3}	N/A	Emboss ^{*1,2} Color ³ Print ^{1,2,3}
Bowls	Emboss ^{*1,2} Color ³ Print ^{1,2,3}	Print ^{1,2,3}		Emboss ^{*1,2} Color ³ Print ^{1,2,3}
Meat Trays	Emboss ^{*1,2} Color ³ Print ^{1,2,3}	Print ^{1,2,3}		
Wraps & Sheets		Print ^{1,2,3}	Print ^{1,2,3}	
Bags (i.e. carryout, produce, kitchen liners)	Print ^{1,2,3} & Color ³		N/A	
Cutlery	Emboss ^{1,2} Color ³		N/A	
Straws	Color ^{3,4}	Print ^{1,2,3} Color ³		
Straw Wrappers			Print ^{1,2,3}	
Stirrers, Picks, Chopsticks & Splash Sticks	Print ^{1,2,3}		Color ^{3,4}	
Coffee Pods	Color ^{3,4} Emboss ^{1,2} Print ^{1,2,3}			
Sachets & Pouches	Print ^{1,2,3}	Print ^{1,2,3}		
Flexible Packaging (i.e. chip/snack bags, wrappers)	Print ^{1,2,3}			
Other (i.e. sushi grass)	Color ^{3,4}			

 No common products made in this material.

N/A Products have been exempted from either BPI's requirements or WA's labeling law.

For ALL products where printing or embossing is possible, the word "COMPOSTABLE" should be included.

1 The text "Commercially compostable only. Facilities may not exist in your area." should be included.

2 BPI Certification Mark for BPI Certified Products should be included. Other certification marks may also be included.

3 Inks for printing or coloring (including tinting) should be green or brown.

4 The use of material color (including tinting) could be used on its own for products where other options are not technically possible. However, it would require others outside the compostable products industry to agree voluntarily, or through regulatory measures, that the color would not be used with non-compostable products.

* Indicates where "Prominent Emboss" should be used.

Mocked Up Illustrations

Beginning on page 11, mocked up illustrations of major product categories and material types are displayed. These drawings are examples of what finished products might look like when the recommendations for labeling and identification by category and material type are put into practice. The brand names used are fictional placeholders designed to make the illustrations look more realistic.

To the right of or below every example is a set of two “sliding scales” with additional information on the labeling and identification technique(s) illustrated. Many of the recommendations in these guidelines will require new investments to achieve, and will also require downstream partners, end-users and consumers to adjust to new versions of products and packaging.

Manufacturing: An Inside Look

In order to adopt many of the recommendations outlined here, manufacturers will need to make changes that involve time, money and human resources. For example:

- Adding or changing embossing requires that new molds be made and installed for every shape and size of a given product.
- Adding color will require identifying FDA approved inks and colorants, recertifying with BPI, and creating new print plates for every shape and size of a given product.
- For items that are not printable today, advancements in technology will be required before scalable printing will be possible.

- 1 The “Manufacturing Limitations” sliding scale is designed to give the reader a sense of current availability and estimated future availability based on the investments required to achieve the recommended labeling and identification method.
- 2 The “Market Acceptance” sliding scale is designed to give the reader a sense for how the recommendations may be viewed by customers in food service and retail marketplaces today. For example, transparent packaging is often used with fresh foods recognizing that consumers “eat with their eyes” and may want to see the food to confirm freshness. Switching to a tinted package may help with labeling and identification for composters, but this may not be acceptable for brand owners and their consumers. Additionally, incorporating green or brown colors to signal that a product or package is compostable may be beneficial for identification purposes, but brand owners may be reluctant to use these colors if they conflict with their own existing branding guidelines.

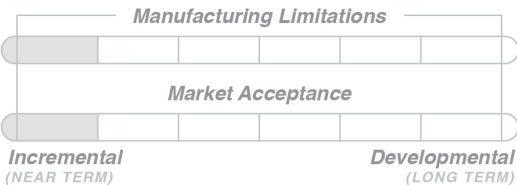
Note: In the drawings that follow, the use of the marks Fresh Start, Right Pack, Right Snacks and Fresh Brews are fictitious and not intended to represent existing brands.

COLD BEVERAGE CUP & LID
BIOPLASTIC



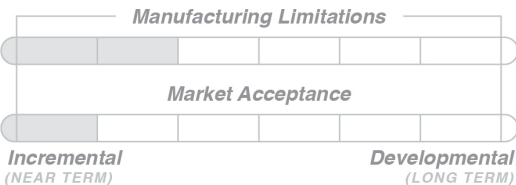
PRINT

Widespread printing capabilities exist.



EMBOSS

"Prominent Emboss" features significant
"Compostable" call out in available marking area.



EMBOSS

"Prominent Emboss" features significant
"Compostable" call out in available marking area.



TINT

Market acceptance could be a challenge for the
tinting of traditionally clear products.



HOT BEVERAGE CUP BIOPLASTIC COATED PAPER



PRINT

Widespread printing capabilities exist.



LID BIOPLASTIC



EMBOSS

"Prominent Emboss" features significant
"Compostable" call out in available marking area.



Full Material Color

MATERIAL COLOR

Most valuable if only compostable products are
produced in colors like green and brown.

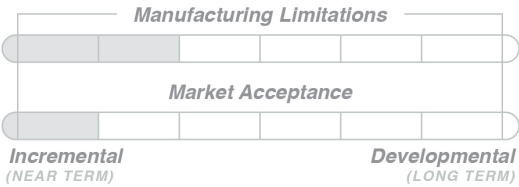


CLAMSHELL
BIOPLASTIC



EMBOSS

"Prominent Emboss" features significant "Compostable" call out in available marking area.



TINT

Market acceptance could be a challenge for the tinting of traditionally clear products.



PRINT

Printing this item will require advancements in technology that are likely to shift economics for manufacturers.



CLAMSHELL BIOPLASTIC COATED PAPER OR MOLDED FIBER



Molded Fiber



Bioplastic Coated Paper
Or Molded Fiber

EMBOSS

"Prominent Emboss" features significant
"Compostable" call out in available marking area.



PRINT

Printing this item will require advancements in
technology that are likely to shift economics for
manufacturers.



**PLATE
BIOPLASTIC**



EMBOSS

"Prominent Emboss" features significant "Compostable" call out in available marking area.



MATERIAL COLOR

Most valuable if only compostable products are produced in colors like green and brown.



PRINT

Printing this item will require advancements in technology that are likely to shift economics for manufacturers.



PLATE BIOPLASTIC COATED PAPER OR MOLDED FIBER



Molded Fiber

EMBOSS

"Prominent Emboss" features significant "Compostable" call out in available marking area.



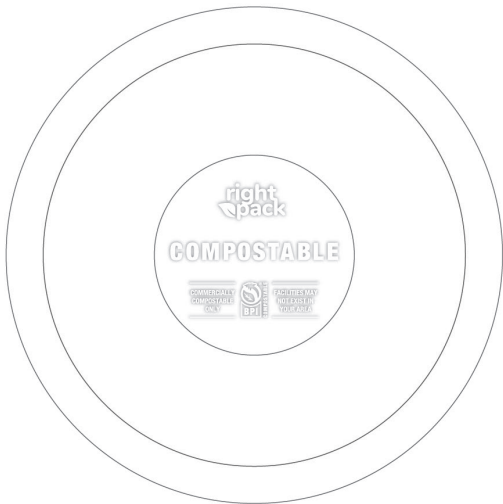
Bioplastic Coated Paper
Or Molded Fiber

PRINT

Printing this item will require advancements in technology that are likely to shift economics for manufacturers.



**BOWL
BIOPLASTIC**



EMBOSS

"Prominent Emboss" features significant "Compostable" call out in available marking area.



MATERIAL COLOR

Most valuable if only compostable products are produced in colors like green and brown.



PRINT

Printing this item will require advancements in technology that are likely to shift economics for manufacturers.



BOWL BIOPLASTIC COATED PAPER OR MOLDED FIBER



Molded Fiber

EMBOSS

"Prominent Emboss" features significant "Compostable" call out in available marking area.



Bioplastic Coated Paper
Or Molded Fiber

PRINT

Printing this item will require advancements in technology that are likely to shift economics for manufacturers.



PORTION CUP & LID BIOPLASTIC



PRINT

Printing is operationally possible but not a regular offering today.



EMBOSS

"Prominent Emboss" features significant "Compostable" call out in available marking area.



EMBOSS

"Prominent Emboss" features significant "Compostable" call out in available marking area.



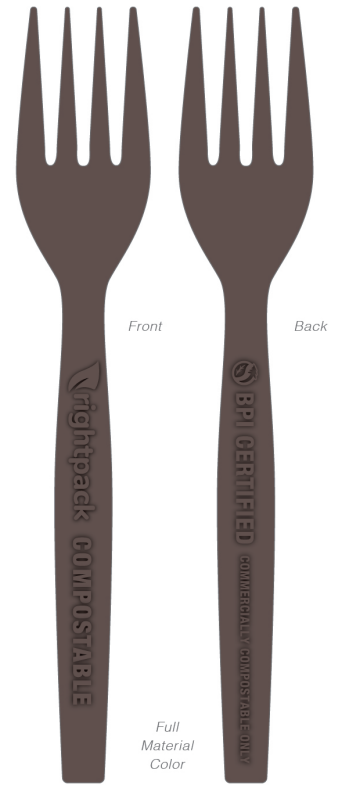
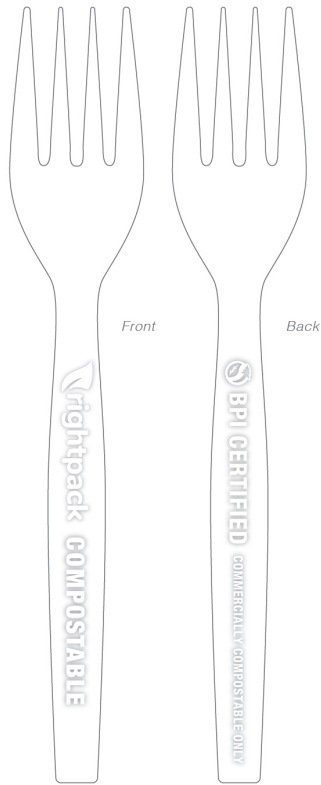
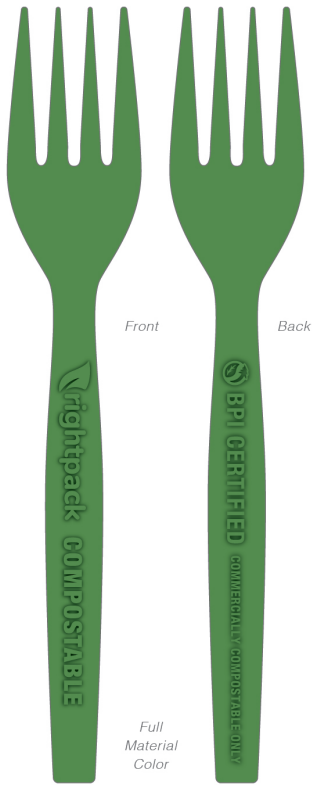
Tinted Bioplastic

TINT

Market acceptance could be a challenge for the tinting of traditionally clear products.

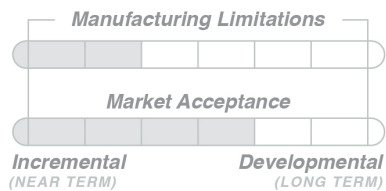


CUTLERY BIOPLASTIC



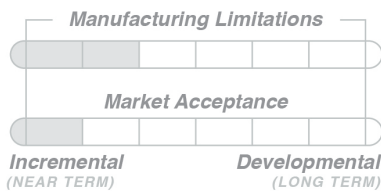
MATERIAL COLOR

Most valuable if only compostable products are produced in colors like green and brown.



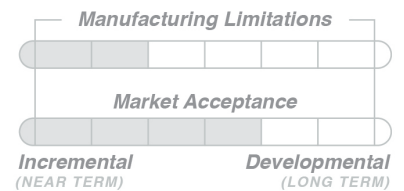
EMBOSS

"Prominent Emboss" features significant "Compostable" call out in available marking area.



MATERIAL COLOR

Most valuable if only compostable products are produced in colors like green and brown.



SOUP CUP BIOPLASTIC COATED PAPER



PRINT

Widespread printing capabilities exist.



LID BIOPLASTIC



EMBOSS

"Prominent Emboss" features significant "Compostable" call out in available marking area.



Full Material Color

MATERIAL COLOR

Most valuable if only compostable products are produced in colors like green and brown.



ROUND DELI CONTAINER & LID BIOPLASTIC



PRINT

Printing is operationally possible but not a regular offering today.



EMBOSS

"Prominent Emboss" features significant "Compostable" call out in available marking area.



EMBOSS

"Prominent Emboss" features significant "Compostable" call out in available marking area.



TINT

Market acceptance could be a challenge for the tinting of traditionally clear products.



SQUARE DELI CONTAINER & LID BIOPLASTIC



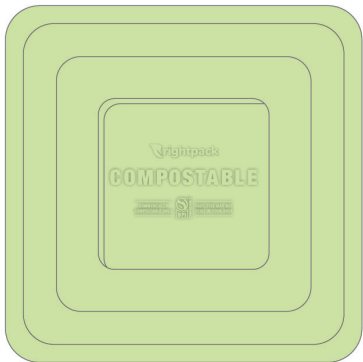
EMBOSS
"Prominent Emboss" features significant "Compostable" call out in available marking area.



TINT
Market acceptance could be a challenge for the tinting of traditionally clear products.



EMBOSS
"Prominent Emboss" features significant "Compostable" call out in available marking area.



TINT
Market acceptance could be a challenge for the tinting of traditionally clear products.



SMALL SNACK PACKAGE BIOPLASTIC



PRINT

Widespread printing capabilities exist.



SACHETS & POUCHES BIOPLASTIC & COATED PAPER



PRINT

Widespread printing capabilities exist.



COFFEE PODS BIOPLASTIC



PRINT

Widespread printing capabilities exist.



BAG BIOPLASTIC



PRINT

Widespread printing capabilities exist.

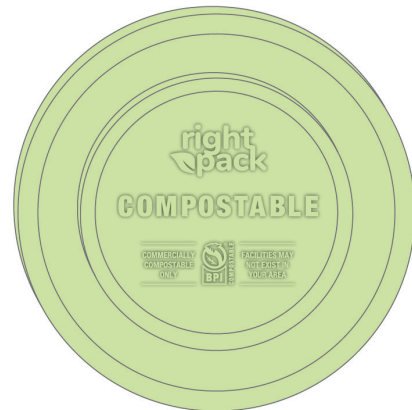


CONTAINER LIDS BIOPLASTIC



EMBOSS

"Prominent Emboss" features significant "Compostable" call out in available marking area.

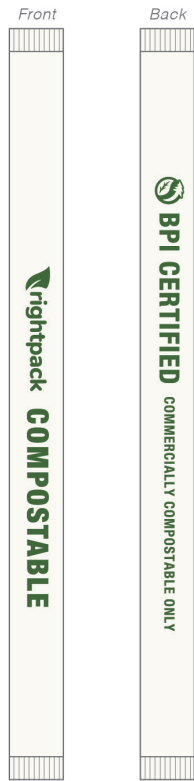


TINT

Market acceptance could be a challenge for the tinting of traditionally clear products.

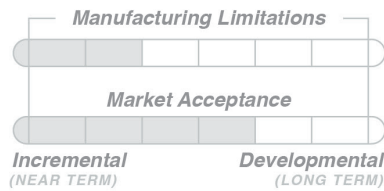


STRAW WRAPPER PAPER



PRINT

Widespread printing capabilities exist.

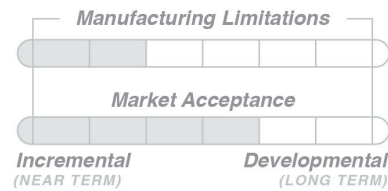


STRAW BIOPLASTIC & COATED PAPER



MATERIAL COLOR

Most valuable if only compostable products are produced in colors like green and brown.

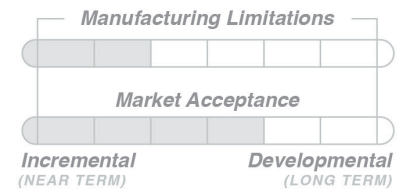


STIRRERS BIOPLASTIC



MATERIAL COLOR

Most valuable if only compostable products are produced in colors like green and brown.



HOT CUP SLEEVE UNCOATED PAPER & PAPERBOARD



PRINT

Widespread printing capabilities exist.

