

# Claim Readiness Report

Claim: Our bottle is 100% recyclable.

**Unsubstantiated — high greenwashing risk**

Report ID	EVS-57ec1c403aa0af9a-v1
Generated	2026-06-28
Claim type	Recyclable / 100% recyclable
Market	US
Coverage	50% (1/2)
Legal review	recommended
Verification	57ec1c403aa0af9a

## Decision

Publish as written? No — do not publish as written

Required before launch:

- Local recycling-rate / facility-availability evidence (not just material type).

Recommended wording: Designed for recycling where collection facilities exist.

## Clarifications needed (answer once)

Question	Why it matters	Accepted answer
Which markets / regions is this sold in?	Recyclability depends on local facilities.	market list
Do all components recycle together (cap / label / liner / adhesive)?	Mixed materials break recyclability.	component breakdown
What share of consumers can access facilities that accept the FULL package?	FTC: a substantial majority (~60%).	access data

## Rule map & risk by market

Market	Risk	Rule	Why it applies
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US	RED	FTC Green Guides — 16 CFR §260.12 (recyclable)	Unqualified 'recyclable' needs facilities available to a substantial majority (~60%) of consumers where sold; caps/labels/liners must qualify too.
EU	RED	Empowering Consumers Directive (2024/825)	Bans generic green claims without recognised proof; applies to consumer-facing product claims from 27 Sep 2026.
UK	RED	DMCC Act 2024 + CMA Green Claims Code	The CMA can act on misleading green claims (fines up to 10% of global turnover).

## Evidence gap table

Requirement	Provided	Enough?	Who	Priority
Material is technically recyclable AND collected/recycled in the markets sold.	Resin code PET #1, How2Recycle label	Met	You (market + recycling-access data)	—
Local recycling-rate / facility-availability evidence (not just material type).	—	Missing	You (market + recycling-access data)	High

## Evidence inventory

Evidence	Type	Quality	What it does not prove
Resin code PET #1	spec_sheet	1/5	self-declared (not independent); no named standard; not third-party-verifiable; no functional unit / boundary
How2Recycle label	certificate	3/5	no named standard

## Exact documents to collect

- Recycling-access / facility-availability data for the markets sold

- Design-for-recycling assessment (APR / RecyClass)
- How2Recycle (or equivalent) label documentation
- Component-level recyclability (cap / label / liner / adhesive)

## Component coverage

- Body / container
- Cap / closure
- Label
- Adhesive
- Liner / coating

## Questions for your supplier

- Are the body, cap/closure, label, adhesive, and liner all recyclable together in one stream?
- Which markets/regions is this sold in?
- What share of consumers there have access to facilities that accept the FULL package?
- Can you provide APR / How2Recycle / third-party design-for-recycling documentation?

## Ready-to-send evidence request

- Subject: Evidence needed to substantiate our environmental claim
- To support the claim "Our bottle is 100% recyclable.", please provide:
  - - Are the body, cap/closure, label, adhesive, and liner all recyclable together in one stream?
  - - Which markets/regions is this sold in?
  - - What share of consumers there have access to facilities that accept the FULL package?
  - - Can you provide APR / How2Recycle / third-party design-for-recycling documentation?
- Documents still needed:
  - - Recycling-access / facility-availability data for the markets sold
  - - Design-for-recycling assessment (APR / RecyClass)
  - - How2Recycle (or equivalent) label documentation
  - - Component-level recyclability (cap / label / liner / adhesive)
- Please include dates, issuers, and any registry / serial references. Thank you.

## Safer wording options

- Conservative: Designed for recycling where collection facilities exist.
- Moderate: Recyclable in many communities — check local availability.
- Higher-risk: 100% recyclable.

## Reviewer attack memo

- Confusing 'recyclable' with 'recycled'
- Ignoring local infrastructure
- Absolute '100% recyclable' covering caps/labels/liners too

## Launch decision matrix

Channel	Status	Required before publish
Website / digital copy	RED	Qualify the wording and keep the evidence trail.
Packaging artwork	RED	Don't print the unqualified claim until the evidence is complete.
Retailer / marketplace listing	RED	Qualify the wording and keep the evidence trail.
Social media	RED	Qualify the wording and keep the evidence trail.
Investor / ESG report	RED	Qualify the wording and keep the evidence trail.

## Action plan

- Replace the claim with safer wording (e.g. “Designed for recycling where collection facilities exist.”).
- Collect the missing documents listed in this report.
- Have legal review the final copy before packaging goes to print.
- Re-run Evisentra once the missing evidence is supplied.

## Assumptions used (until clarified)

- Assumed: 'Local recycling-rate / facility-availability evidence (not just material type).' is not yet evidenced — it remains Missing; the verdict reflects that.

## Source ledger

FTC Green Guides — 16 CFR §260.12 (recyclable) (<https://www.ecfr.gov/current/title-16/part-260/section-260.12>, 2026-06-25); Empowering Consumers Directive (2024/825) (<https://eur-lex.europa.eu/eli/dir/2024/825/oj>, 2026-06-25); DMCC Act 2024 + CMA Green Claims Code (<https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims>, 2026-06-25).  
Method preflight-v0.1; verification 57ec1c403aa0af9a.

## Limits

- Screening decision support, not legal advice or certification.
- Assesses whether the evidence meets the standard; does not re-run experiments.
- Rules are public and re-checkable; your evidence stays private.