

'Light-blocking' HDPE Bottles (New Zealand only)

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This position statement outlines APCO's decision to recognise high-density polyethylene (HDPE) milk bottles with 'light-blocking' technology as recyclable under the Australasian Recycling Label (ARL) Program in New Zealand. This recognition is time-bound, evidence-based, and subject to ongoing review to ensure ARL outcomes continue to reflect real-world recyclability and protect the integrity of the Program.

The Australian Packaging Covenant Organisation (APCO) has approved a 24-month timebound recognition of 'light-blocking' high-density polyethylene (HDPE) milk bottles as recyclable in New Zealand under the Australasian Recycling Label (ARL) Program. This decision reflects current kerbside volumes, observed system performance, and existing end-market capability, and is subject to annual review to monitor outcomes and respond to any material changes across the packaging and recycling system.

Evidence-led decision and sector consultation

APCO undertook comprehensive consultation with New Zealand's resource recovery sector through multiple channels, including the Recycling Leadership Forum (RLF) and Waste & Recycling Industry Association (WRIA), to confirm that the packaging format meets ARL Program recyclability criteria. Feedback demonstrates that milk bottles with 'light-blocking' technology are collected through kerbside systems, sorted, and are commercially recyclable with end-market pathways.

This decision has been informed by current system conditions, including the scale of material received, processing capability, and market tolerance for this packaging material within mixed plastic stream.

Ongoing monitoring and review

The ARL is an on-pack recycling instruction that reflects evidence-based recovery outcomes, providing consumers with confidence about how to correctly dispose of packaging through existing recycling systems where material is recovered and reprocessed into new packaging or other products. In parallel, APCO continues to work with industry and the recycling sector in New Zealand to monitor system performance and identify emerging risks that may affect recovery outcomes over time.

While the 'light-blocking' bottles are currently being recovered, APCO recognises that the use of carbon black to reduce UV degradation presents recyclability risks. This packaging format can pose processing challenges due to their material formulation and may depress the value of mixed-plastic bales in the market.

APCO will undertake ongoing monitoring and a 12-month review to assess recovery performance, reprocessing capability, and the longer-term viability of end markets for this material. Should new evidence indicate that changes in material volumes, system performance, or market conditions adversely affect recyclability outcomes, APCO reserves the right to amend, further constrain, or withdraw this recognition under the ARL Program.

The **Australian Packaging Covenant Organisation** (APCO) is a not-for-profit organisation that administers the Australian Packaging Covenant under the National Environment Protection (Used Packaging Materials) Measure 2011. Members of APCO commit to meeting annual reporting, action planning, and membership obligations that demonstrate their progress towards sustainable packaging outcomes.

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The **Australasian Recycling Label** (ARL) is a labelling system for Australia and New Zealand, that provides consumers with easy-to-understand recycling information on packaging. In Australia, the ARL program has been acknowledged in the National Waste Policy Action Plan and National Plastics Plan as a key action to improve consumer awareness and increase recycling rates. The New Zealand Ministry for Environment has also endorsed the ARL as the preferred labelling option in New Zealand.