Australasian Recycling Label

ARL PROGRAM MANUAL

This document serves as the comprehensive policy and procedural framework for the Australasian Recycling Label (ARL) Program (the Program). It details the methods by which the Program maintains a robust and accurate recycling label scheme and licenses program members to display the designated disposal logo on their packaging.

May 2025

Table of Contents

List of Figures

List of Tables

1. Introduction to the ARL Program Manual

The Australasian Recycling Label (ARL) Program Manual provides a comprehensive operational framework for the ARL Program, ensuring that all stakeholders, including businesses, government agencies, industry bodies, and consumers, understand the Program's structure, objectives, and requirements.

This manual details the policies, processes, and governance structures that underpin the ARL Program, ensuring consistency, transparency, and integrity across its application. It serves as a key reference document for program participants.

The ARL Program is designed to provide consumers with clear, evidence-based recycling information while aligning with national recycling infrastructure capabilities. As such, this manual establishes the necessary operational guidelines, decision-making criteria, and quality assurance measures that support the accurate application of the ARL.

1.1 Overview of the Program

The Australasian Recycling Label (ARL) is an evidence-based labelling program designed to increase recycling rates and improve the quality of recycled materials. Administered by the Australian Packaging Covenant Organisation (APCO), the Program:

- Guides consumers on how to dispose of packaging correctly.
- Encourages brand owners to design packaging for recyclability.
- Reflects the capabilities of Australian and New Zealand recycling systems.

Since its inception in 2018, the ARL Program has gained widespread recognition as a leading initiative for consumer education on correct packaging disposal. It ensures that packaging design aligns with the realities of recycling infrastructure, thereby addressing systemic barriers to effective resource recovery. The ARL Program actively supports Australia's National Packaging Targets and broader sustainability goals by simplifying consumer recycling instructions and fostering better packaging design.

Please see the figure on the following page to determine whether you're eligible to use the ARL Program.

CONTACT:
A: Suite 2, Level 14, 55 Clarence Street, Sydney, NSW, 2000
E: apco@apco.org.au
P: (02) 8381 3700

1.2. Is the ARL Right for You?

1. **Do you sell packaging intended for household consumption and disposal in Australia and/or New Zealand?**

   Yes

   No, my packaging is only sold outside of Australia and New Zealand.

2. **Do you sell packaging with your own organisation's branding on it?**

   Yes

   No, I sell products that have already been packaged elsewhere and do not have our business's details on pack.

3. **Is the packaging of your products normally disposed of in household kerbside bins?**

   Yes

   I sell products to other businesses and am not sure how the packaging is disposed.

   No, my products are mostly used away from home.

4. **Are your products individually packaged for consumer use?**

   Yes

   No, my products are sold in bulk to other businesses (B2B).

5. **Do you have sufficient space on your packaging to label with the ARL?**

   Yes

   No, the space for the ARL is very limited.

   If you answered Yes to all, the ARL is right for you.

Figure 1. Determining Eligibility to Use the ARL.

If you don't place your own brand on the packaging you supply, you can still support your customers by completing and sharing the PREP assessments. Unsure or have any questions? Contact the **ARL Team.**

1.3. Program Principles

The ARL Program is built on four key principles:

1. **Continuous Improvement**: Regularly updates thresholds and processes to reflect the recycling landscape. This ensures that the Program remains responsive to changes in technology, infrastructure, and consumer behaviour.
2. **Evidence-Based**: All decisions are underpinned by rigorous analysis and stakeholder consultation, mitigating the risk of greenwashing and fostering confidence among consumers and industry participants.
3. **Transparency**: Provides clear information to stakeholders about recyclability criteria and program updates. Regular updates and public consultation ensure that stakeholders are kept informed and can contribute to the Program's evolution.
4. **Consistency**: The Program aligns with recycling systems in Australia and New Zealand to ensure accurate labelling outcomes. Its rules and thresholds are designed to reflect regional recycling infrastructure.

1.4. Participation Requirements for the ARL Program

Participation in the ARL Program is open to APCO members and international affiliates who meet the following requirements:

- Agree to the T&Cs
- Complete Competency Courses
- Develop internal compliance processes
- Obtain and verify packaging specifications
- Complete PREP assessment
- Design ARL artwork
- Submit the first ARL artwork for APCO approval
- Apply ARL on-pack
- Track and report on the use of the ARL

In Australia, **Small to Medium Enterprises (SMEs)** with an annual turnover under $5 million can access the ARL Program through the ARL Marketplace. This initiative provides affordable access to the ARL, along with resources and training to support compliance.

2. ARL Program Governance

The ARL Program is supported by a strong governance framework that ensures decisions are evidence-based, reflect the current state of recycling systems, and incorporate feedback from stakeholders across the recycling and packaging value chains. The Program evaluates recyclability outcomes on a national scale, representing the entire market in both Australia and New Zealand.

This approach acknowledges that differing perspectives on recyclability outcomes for certain materials or packaging formats may arise. APCO carefully assesses representative feedback and acts as the ultimate decision maker, ensuring decisions are balanced and informed.

Additionally, recyclability outcomes may be influenced by changes in government legislation or regulation, such as New Zealand's recent kerbside harmonisation updates. APCO remains committed to adapting the Program to align with such developments

2.1 Consultation Framework

Consultation is a cornerstone of the ARL Program's governance, enabling informed and balanced decision-making that reflects the complexities of modern recycling systems. This process draws on a variety of expert inputs, including targeted engagements with key industry stakeholders.

APCO may consult with its Material Stewardship Committees (MSCs) - specialist groups focusing on key material streams such as Rigid Plastics, Flexible Plastics, Fibre, Glass/Metals, and Labels. The MSCs represent the supply chain from production to recycling, providing recommendations on recyclability outcomes and program submissions. These consultations are conducted as needed, particularly when recovery systems face contentious or challenging issues.

In addition to the MSCs, downstream consultation is a critical element of the ARL Program's approach. APCO engages with organisations such as the Australian Council of Recycling (ACOR) to gather broader industry perspectives, including those from Material Recovery Facilities (MRFs) and recycling operators. ACOR's Industry Leadership Group (ILG), in particular, provides valuable insights into the operational realities of recycling systems, helping to ensure that ARL decisions are both practical and scalable.

For the New Zealand market, targeted consultation facilitated by the Recycling Leadership Forum (RLF) enables direct engagement with local stakeholders to account for differences in recycling infrastructure and market conditions. This ensures that the ARL Program remains responsive to the specific needs of each market while maintaining alignment with the Program's overarching goals.

By leveraging input from the MSCs, industry bodies like ACOR, and other relevant stakeholders, APCO ensures that the technical consultation process is comprehensive, equitable, and reflective of the entire recycling ecosystem.
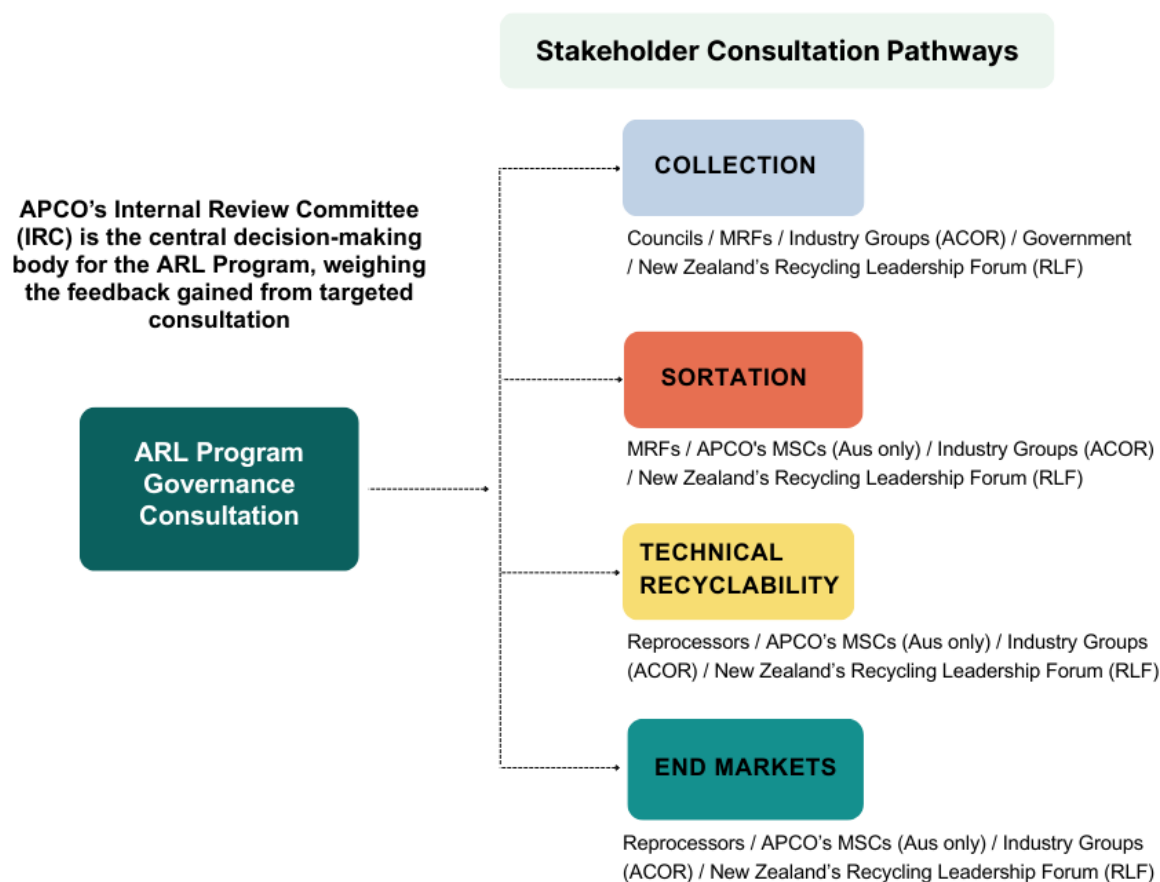
Stakeholder Consultation Pathways

APCO's Internal Review Committee (IRC) is the central decision-making body for the ARL Program, weighing the feedback gained from targeted consultation

ARL Program Governance Consultation

COLLECTION

Councils / MRFs / Industry Groups (ACOR) / Government / New Zealand's Recycling Leadership Forum (RLF)

SORTATION

MRFs / APCO's MSCs (Aus only) / Industry Groups (ACOR) / New Zealand's Recycling Leadership Forum (RLF)

TECHNICAL RECYCLABILITY

Reprocessors / APCO's MSCs (Aus only) / Industry Groups (ACOR) / New Zealand's Recycling Leadership Forum (RLF)

END MARKETS

Reprocessors / APCO's MSCs (Aus only) / Industry Groups (ACOR) / New Zealand's Recycling Leadership Forum (RLF)

Figure 2. ARL Program Governance Structure.

2.2. Internal Review Committee (IRC)

As noted in the figure above, the IRC is the central decision-making body for the ARL Program. Comprising of APCO's Executive Team, the IRC makes decisions based on technical consultations, including input from the MSCs, feedback from industry stakeholders such as ACOR, and other targeted consultations.

The IRC ensures that the ARL Program remains underpinned by accurate, evidence-based information reflecting the recycling systems in Australia and New Zealand. It also considers evolving regulatory landscapes and emerging recycling technologies to maintain the Program's relevance and accuracy.

Refer to the [ARL Program IRC Charter](#) for further information.

2.3. Independent Third-Party Review (ITPR)

In cases where disputes arise, APCO may convene an Independent Third-Party Review (ITPR). The ITPR is a neutral, external process, free from affiliation with APCO or program stakeholders. This ensures a fair and transparent review of ARL decisions.

The ITPR process is used only when all other governance pathways, including technical consultations and IRC deliberations, have been fully explored. If the ITPR cannot resolve the dispute, APCO and the disputing party may proceed to formal mediation.

If APCO identifies significant risk associated with a decision that is at odds with the findings of the ITPR, it reserves the right to maintain its original position and not adjust the decision.

Refer to the [ARL Program Complaints Procedure and Dispute Resolution Policy](#) for further information.

2.4. Impartiality and Conflicts of Interest

The ARL Program upholds the highest standards of impartiality and transparency in assessing recyclability outcomes. Given the complexity of recycling systems and the need for evidence-based decision-making, APCO has established safeguards to ensure that all assessments and determinations are free from bias and undue influence.

Managing Risks to Impartiality
- APCO proactively identifies and reviews potential risks to impartiality in recyclability decision-making, particularly where stakeholder interests may conflict.
- Mechanisms are in place to monitor and manage these risks, ensuring that program decisions remain independent and grounded in technical evidence.
- Transparency is embedded throughout the decision-making process to maintain confidence in the integrity of ARL outcomes.

Ensuring Impartiality in ARL Criteria
- Recyclability determinations under the ARL Program are based on a structured, multi-stage review process that incorporates technical consultation, stakeholder engagement, and internal governance oversight.
- All assessments and recommendations provided are recorded and reviewed objectively.
- The ARL Program does not permit individual commercial interests to influence recyclability decisions; outcomes are determined based on the collective industry landscape and real-world recycling system performance.

Independent Decision-Making and Oversight

- The Internal Review Committee (IRC) acts as the final decision-making body, ensuring that all recyclability outcomes align with the Program's governance framework and reflect the state of recycling infrastructure across Australia and New Zealand.
- In cases where a dispute arises regarding a recyclability determination, an Independent Third-Party Review (ITPR) may be conducted by an external body with no affiliation to APCO or program stakeholders.

2.5. Governance Documentation

To maintain the integrity and confidentiality of the ARL Program, APCO implements internal record-keeping processes for all governance activities. These processes ensure accurate documentation while protecting the sensitive commercial information associated with program submissions.

- IRC Agendas and Minutes: The Internal Review Committee (IRC) maintains agendas, minutes, and associated documentation for internal use only. This measure safeguards the commercial sensitivities of submissions and discussions, ensuring confidentiality for stakeholders.
- Submission Records: detailed records of all submissions, including consultation feedback and supporting evidence, are securely stored and accessible only to authorised personnel.
- Transparency in Decision-Making: While internal records remain confidential, APCO ensures transparency by clearly communicating decisions and their rationale to stakeholders without compromising sensitive information.

By implementing these internal record-keeping practices, APCO is committed to protecting stakeholder information while maintaining robust governance and accountability across the ARL Program.

3. ARL Criteria and Thresholds

3.1. Definition of Recyclability in the ARL Program

The ARL Program defines 'recyclable' based on the criteria set out in the Sustainable Packaging Guidelines (SPGs). Packaging or a packaging component is considered recyclable if it meets both of the following conditions:

- **Collection Access**: The material can be recovered at scale. This means that at least 80% of the population in a given geographical area must have convenient access to a collection service that accepts the packaging or packaging component.
- **End-Market Recovery**: At least 70% of the item's weight must be successfully reprocessed into a new product, a component incorporated into a product, or a secondary raw material (excluding energy recovery).

3.2. Determining ARL On-Pack Labels

The recyclability of each separable packaging component is considered within the ARL Program. In addition to the criteria above, the Program also considers:

- Sortation Efficiency: Whether the packaging can be accurately identified and sorted by Material Recovery Facilities (MRFs) or other recovery systems.
- Reprocessing Viability: Whether the packaging can be effectively processed into a usable new product.

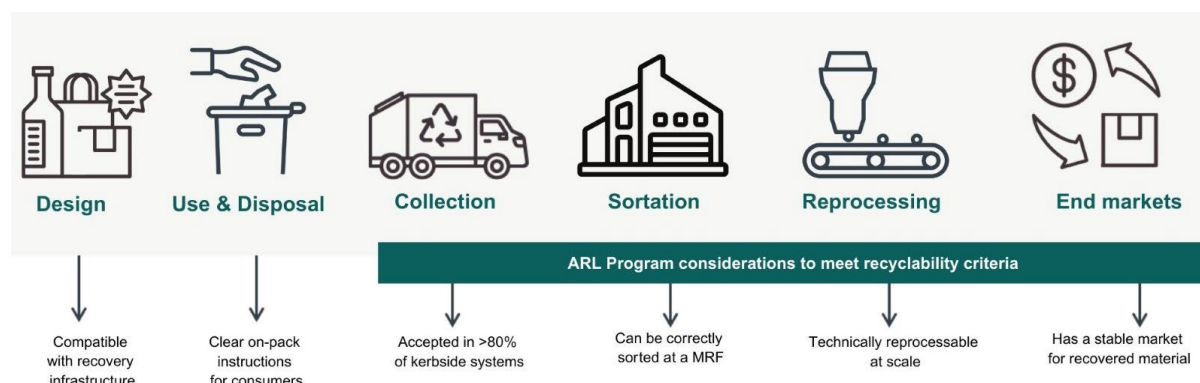- Market Demand: Whether a viable and sustainable market exists for the recovered material.

Figure 3. ARL Program Considerations to Meet Recyclability Criteria.

3.3. Recyclability Thresholds in the ARL Program

Recyclability thresholds are set by major material type, ensuring consistency across different packaging formats. The ARL Program defines five primary material categories:
- Rigid Plastics
- Flexible Plastics
- Fibre (Paper & Cardboard)
- Metals
- Glass

Within each primary material type, sub-category thresholds are established based on specific material properties, including:
- Polymer types (for plastics)
- Size, shape, and weight (impacting sorting and processing)
- Inks, adhesives, and coatings (which may affect recyclability)
- Secondary materials such as labels, seals, or caps that could influence recovery outcomes

3.4. Framework for Recyclability Assessment

Table 1 outlines the criteria used to determine recyclability in the ARL Program, referencing the data sources and methodology used to validate each threshold. These thresholds are reviewed regularly to ensure they reflect current collection, sortation, and reprocessing capabilities.

Table 1. The ARL Program Framework Used to Determine Recyclability.

Recovery process criteria	Threshold type	Threshold	Threshold basis
End-markets – economic viability to recover the materials	Technical	• Do the recovered materials have available local or export markets? • Can the material be turned into a new product desired by the market? Materials must have local or export markets that accept the materials as baled from reprocessors.	Recovered materials must have available end markets to be considered recyclable, as with no market, these materials may be stockpiled or lost to landfill. Demand, scale, value, and time are considered. Careful consideration is given to available local and export markets, considering Australia's waste export bans.
Collection – Council Collection Status	Collection	• Is the material collected in kerbside recycling either widely or less widely accepted? Refer to Table 3 for collection thresholds for Australia and New Zealand.	Packaging must be widely accepted to be labelled 'Recyclable'. In Australia the Program determines recyclability through stakeholder consultation, gathering insights from Material Recovery Facilities (MRFs). For New Zealand, following the announcement of kerbside harmonisation legislation, the guidance for territorial authorities dictates what is accepted in household kerbside recycling.
Sortation – Sorting through a Material Recovery Facility (MRF)	Technical	• Will the item be sorted to the correct stream for recovery? • If no, will it be recovered in secondary sorting at the reprocessors? • Do any secondary materials change the sortation of the item? Thresholds and parameters are set to simulate how specific formats will move through a Material Recovery Facility (MRF) to be accurately or	After collection, accurate sorting of co-mingled materials occurs at a Material Recovery Facility (MRF). PREP simulates how this works based on size, shape, colour, and weight. This is necessary to ensure that the materials are accurately separated into the designated material stream (e.g., paper, plastic, glass, and metals) so they can be sent to a dedicated reprocessor. APCO is conducting a project to revalidate this data in early 2025 to confirm the infrastructure

		incorrectly sorted. This helps guide better design and ensure accurate sortation.	available in Australia to support the Australian sortation thresholds.
Reprocessing – ability for the materials to be reprocessed, with little to no impact on the end-materials or processes.	Technical	- Will at least 70% of the primary material be recovered? - Is the material able to be reprocessed into a new product? - Do any secondary materials cause contamination issues that deem the material Not Recyclable? - If yes, is there a maximum acceptance threshold? Threshold and parameters are set to simulate how specific formats will behave when reprocessed. Factors like compatibility, contamination and losses are considered. These align with the definitions for recyclability, as per the National Packaging Targets and SPGs. This helps guide better deign to ensure practical recovery at a scale.	The ability for the material or format to be recycled is then assessed per dedicated material reprocessor, such as a paper mill or a PET reprocessor. This is informed by recycling operators, industry experts, and international best-practice guidance. Majority of the material must be recovered (70% by weight) to ensure losses are kept to a practical minimum. There may be stricter thresholds for specific materials. Common sense, the SPGs, and the waste hierarchy principles are also a consideration. Once finalised, the DCCEEW framework may influence ARL Program criteria.

Table 2. Collection Thresholds in the ARL Program.

Region	Widely Accepted (Recyclable)	Less Widely Accepted (Check Locally)	Not Widely Accepted (Not Recyclable)
Australia	100% – 80% of the population has access to a council service.	79% - 60% of the population has access to a council service.	59% - 0% of the population has access to a council service.
New Zealand	For New Zealand, following the announcement of kerbside harmonisation legislation, what is accepted in household kerbside recycling is dictated by the [guidance for territorial authorities](#).		

CONTACT:
A: Suite 2, Level 14, 55 Clarence Street, Sydney, NSW, 2000
E: apco@apco.org.au
P: (02) 8381 3700

3.5. Under Review Threshold Process

The recyclability of packaging material or format within the ARL Program shall be determined to be 'Under Review', where further research and evidence are required to determine recyclability outcomes. This overrides previous recyclability outcomes (where these existed within the Program) and will be listed in an organisation's PREP assessment.

Review of items may arise via:

- An Applicant Submission: A submission could include the review of a new Primary Material not currently captured within the Program, where an extended review timeline is expected to gather evidence for recyclability.
- System Changes to the Resource Recovery Sector: A system change is a planned or unplanned change to the resource recovery sector that impacts the ability to recycle kerbside-collected packaging in Australia and/or New Zealand. This includes the Australian waste Export Bans and the New Zealand kerbside Collection harmonisation.
- Feedback from the Resource Recovery Sector: The ARL Program receives new information that impacts the recovery of materials or formats. For example, there is no national consensus on whether the material/format can be accurately sorted or reprocessed or if there are viable end markets.

Where items are classified as Under Review in the ARL Program, they are only permitted to be labelled with the Not Recyclable ARL until a confirmed recyclability classification has been decided. Alternatively, ARL Program members who receive an Under Review outcome for packaging assessed through PREP can elect not to apply the ARL on-pack. For ARLs already in the market related to the Under Review format/material, APCO will conduct an internal risk assessment on whether updates to these artworks are required. Where it is determined that no changes are necessary, a subsequent evaluation will be undertaken every 12 months.

Items currently under review are listed on the ARL governance website, along with communication to program members on justification from APCO that cites the areas of recovery that require further investigation.

3.6. Process for Setting and Updating Thresholds

The recycling context for packaging materials is always evolving. To reflect this, the Program's recyclability thresholds, including technical and collection thresholds, are reviewed regularly to ensure outcomes and on-pack labelling remain accurate. Data collection to set and update thresholds involves Materials Recovery Facilities (MRF) surveys and public and industry consultation.

- **Research and Threshold Update Proposal:** APCO may identify new or updated thresholds for proposal based on industry or stakeholder feedback, infrastructure developments or changes, or emerging innovations. Proposed updates are further evidenced by research into international best practice, including design guidance from Recyclass, Association of Plastic Recyclers (APR) and CEFLEX, as well as from industry standards such as the ISRI Specifications for international export.
- **Stakeholder and Public Consultation:** All proposed threshold updates are taken through a consultation period with targeted industry stakeholders and a 30-day public consultation period. All proposed threshold updates are listed on the ARL website for public comment, and stakeholder consultation is conducted via the outlined pathways in Figure 2. The ARL

team will provide an outline of what feedback was provided via the ARL Program newsletters**.**

- **Internal Review Committee decision:** The ARL Team collates the feedback from the consultation period into a paper to be presented for decision at the next closest IRC. The IRC's decision is then communicated via the ARL website, along with expected timelines for implementation in PREP and associated timelines for artwork updates.

3.7. Implementation, Transition Period and Communication of Changes

Implementation: Once approved, technical recyclability thresholds are updated in PREP via the following process:

a) The ARL Team outlines the requirements for PREP update according to the new or updated threshold in a standard template and raises it to PREP for action.
b) PREP Design scopes the update and provides an estimated time of completion to the ARL Team.
c) PREP Design implements change in PREP staging environment.
d) PREP Design conducts testing in the staging environment and notifies ARL Team upon completion.
e) ARL Team conducts testing in the staging environment and notifies PREP when complete.
f) The update pushed to PREP production environment and accessible to PREP users.
g) The ARL Team monitors and tests the update in the production environment to ensure stability.
h) PREP Users and all ARL stakeholders are notified of the update via the next-closest ARL newsletter. The notification includes guidance on updating affected PREP reports and artworks.

Transition period: APCO supports ARL Program members in navigating agreed updates by providing a timeline to ensure PREP reports and artworks are transitioned in compliance with the Program requirements. As part of this transition process, the ARL Team will notify all PREP users of the specific PREP update via the next-closest ARL newsletter, including guidance on updating affected PREP reports and artworks.

If the PREP update changes recyclability classifications, organisations must update their on-pack artwork. The standard timeline for artwork updates is 12 months from the PREP update date. If justified, APCO may extend the 12-month artwork update timeline, providing an alternate transition period.

3.8. PREP's 'Upcoming Region' Functionality

Where threshold updates are being phased in over a longer period (e.g., 12 months or greater), PREP has the functionality to introduce an 'Upcoming Region', which includes the incoming change/s. This allows the packaging to be evaluated against future thresholds. Organisations are encouraged to reassess their packaging during this time to ensure that recyclability outcomes align with the upcoming thresholds.

3.9. Communication of Changes

- **ARL Program Changes** will be communicated via the next-closest ARL newsletter and listed on the [ARL website](#).
- **PREP Updates** and associated timelines will be communicated via the next-closest ARL newsletter. They will also be listed in the Change Log of PREP, available under the 'Support' Tab on the [PREP website](#).

4. ARL Program Submissions

This section outlines the submission process in the Australasian Recycling Label (ARL) Program. Submissions can be made by any stakeholder of the ARL Program who disagrees with or has concerns about the recyclability results generated by the Packaging Recyclability Evaluation Portal (PREP). This includes:

- Disagreement with a recyclability result in PREP.
- Issues with PREP's underlying assumptions.

Any stakeholder of the Australasian Recycling Label (ARL) Program, such as brand owners, manufacturers, industry associations, and government entities, can make a submission by completing the appropriate forms. There are five key submission types: Recyclability Evaluation, Consumer Behaviour, Alternative Destination, Soft Plastics, and Fibre Submissions.

Each submission must address specific recyclability criteria, including accessible collection services, effective recovery and sorting, and a viable end-market for reprocessed materials, with some criteria being non-exempt due to the Sustainable Packaging Guidelines.

The ARL submission process defines clear roles and responsibilities for all involved parties. Applicants are required to provide thorough, accurate information and support necessary testing and research while the ARL Team facilitates communication, collates industry research, and manages the review process. Technical insights and consultation pathways noted in the governance structure are used to collate information that will be used to make final decisions.

In cases of unresolved disputes, an Independent Third-Party Review can be engaged. The outcome, along with any compliance measures, is then formally communicated to the applicant, ensuring transparency and due diligence throughout the process.

For detailed guidelines and required documentation, refer to:

- [ARL Program Recyclability Evaluation Submission Process.](#)
- [ARL Program Consumer Behaviour Submission Process.](#)
- [ARL Program Alternative Destination Submission Process](#).
- [ARL Program Soft Plastics Submission Process.](#)
- [ARL Program Fibre Submission Process](#).

5. ARL Program Compliance

The ARL Program has a structured system for compliance, linked [HERE](#). This process details the requirements and the methods for identifying non-compliance. Organisations, including APCO Members, ARL Marketplace Users, and International Affiliates, must adhere to strict guidelines such as agreeing to the Packaging Assessment Tool and ARL Terms & Conditions, submitting approved ARL artwork, completing necessary training courses, and filing annual reports. Non-

compliances are identified through various channels, including stakeholder inquiries, annual audits, and self-reporting, and are categorised into account-level issues (such as using the ARL logo without proper agreements or approved artwork) and SKU-level issues (such as incorrect application of the ARL).

Once a non-compliance is detected, APCO contacts the affected organisation within two weeks to clarify the issue and outline the required rectification steps, typically allowing up to 12 months for updates, with tighter timelines for more critical issues. Organisations must confirm details such as affected SKUs, timelines for removal or correction, and preventive measures for future compliance. Should an organisation fail to meet these corrective measures within the stipulated grace periods, they risk losing access to the Packaging Recyclability Evaluation Portal (PREP) and the ability to use the ARL. Further actions, including cease-and-desist notices, may be taken to protect the integrity of the label and the Program.

6. ARL Program Complaints Procedure and Dispute Resolution Policy

The ARL Team has an established framework for complaints to be raised and addressed to ensure that the concerns of program stakeholders can be handled fairly, consistently, and, where possible, resolved to the complainant's satisfaction.

This policy ensures that all issues are raised, recorded, and investigated in a fair and timely manner, with a strong emphasis on transparency, accountability, and continuous improvement. Complaints can be submitted through multiple channels - via the ARL or APCO websites, email, or letter - and must include detailed information such as dates, evidence, and the names of involved parties. The initial process involves prompt acknowledgment, a detailed investigation, and active collaboration between the ARL Team and relevant organisations to determine the root cause and implement corrective actions.

If internal resolution does not resolve the issue, the policy provides for escalation to an Independent Third-Party Review, ensuring that impartial experts assess the case and offer recommendations.

This policy also outlines procedures for managing both planned and unplanned deviations from standard practice and enforces strict conflict-of-interest measures to preserve the integrity of the process. All updates and revisions are carefully documented to maintain a clear record of changes.

For complete details, please refer to the ARL Program Complaints Procedure and Dispute Resolution Policy.

CONTACT:
A: Suite 2, Level 14, 55 Clarence Street, Sydney, NSW, 2000
E: apco@apco.org.au
P: (02) 8381 3700

7. ARL Program Continuous Improvement

Continuous improvement is the cornerstone of the ARL Program's success. The ARL remains adaptive and responsive by relentlessly refining our processes based on real-time data, stakeholder feedback, and evolving industry standards. This commitment ensures the Program criteria and processes stay relevant and builds greater trust among industry partners and consumers. Continuous improvement empowers the ARL to drive meaningful impact and build community trust in an on-pack disposal label.

7.1. Consumer Awareness

Consumer awareness plays a critical role in the effectiveness of the ARL. The more consumers understand and trust the ARL, the more likely they are to use the label correctly when making recycling decisions. Consumer engagement with the ARL supports broader recovery goals, including reducing contamination in recycling streams and improving public confidence in recycling systems.

Measurement Process: Consumer awareness of the ARL is measured through structured annual consumer surveys, which track public understanding and recognition of the Program. The annual survey process is as follows:

- Each year, ARL conducts national surveys to assess awareness levels and consumer understanding of the ARL in guiding recycling behaviour.
- Surveys are designed to capture insights into consumer habits, including whether the ARL is influencing their recycling decisions.
- Some years, surveys focus on a particular area of consumer awareness, such as understanding of the 'Check Locally' logo or awareness of specific packaging materials. These targeted insights help refine ARL messaging and improve the clarity of information provided to consumers.

Strategic Importance: By continuously monitoring consumer awareness and refining outreach strategies, the ARL ensures that it remains an effective and trusted tool for improving recycling outcomes across Australia and New Zealand. Data from surveys can be used for:

- Refining consumer-facing communications to align with recycling capabilities and industry standards.
- Improving the clarity and usability of the ARL by informing adjustments to its presentation on packaging.

7.2. Program Growth

Program growth is a key indicator of the success and reach of the ARL. By tracking adoption rates, industry participation, and overall program reach, the ARL Team ensures that the Program remains relevant, scalable, and effective in driving improved recyclability outcomes. Program growth data also informs decision-making, allowing for targeted engagement strategies that support businesses in implementing the ARL.

Measurement Process

The primary method for measuring ARL Program growth in Australia and New Zealand is through annual member reporting:

- Reporting is conducted by the end of March each year, with finalised numbers available around June.
- Members submit data on the number of SKUs featuring the ARL, which provides a quantitative measure of adoption.

- The reporting process helps assess the extent of ARL's implementation across different product categories and industries.

Key Metrics

- **Adoption Rates:** Tracks how many new businesses and brands have implemented the ARL on their packaging.
- **Industry Participation:** Measures engagement across different sectors, identifying trends in program uptake. This includes expansion of the ARL into new product categories.

Strategic Importance and Data-Driven Program Refinement

- By analysing adoption trends, the ARL Team can identify gaps in program uptake and develop targeted initiatives to support members in implementing the label.
- Growth trends can inform future improvements in program delivery, training, and communication.

By tracking trends over multiple years, the ARL Team can assess whether growth is consistent, where challenges exist, and what external factors impact adoption. Additionally, this data provides a robust evidence base for demonstrating the ARL's impact on packaging recyclability in Australia and New Zealand.

7.3. Annual ARL Program Review

The annual ARL Program Review is a structured internal evaluation carried out during the first half of each calendar year, with our inaugural review set for 2025, to rigorously assess our program's performance, progress, and areas for enhancement. This review process culminates in a detailed member-facing report released mid-year.

By conducting this review, we embrace continuous improvement by:

- **Systematic Self-Assessment:** Regularly evaluating our initiatives helps us identify strengths and pinpoint areas needing attention.
- **Feedback Integration:** Gathering insights from internal assessments and member input ensures that our program remains responsive and relevant.
- **Strategic Alignment:** Aligning our operations with long-term goals and industry best practices drives better decision-making.
- **Agility and Adaptation:** Regular reviews enable us to quickly adjust strategies to meet evolving challenges and opportunities.
- **Enhanced Accountability:** A transparent review process reinforces our commitment to excellence and member service.

Overall, this proactive approach drives operational improvements and cultivates a culture of innovation and responsiveness throughout the Program.

8. Data Governance and Integrity

As identified throughout this manual, the ARL Program collects and uses key data from external sources (council data, technical recyclability data) and from members (ARL reporting data). Table 3 provides an outline of key data sources in the ARL Program.

Table 3. Data Sources in the ARL Program.

Data Point	Type	Source	Purpose	Storage	Retention Period
Technical Recyclability Thresholds	Program	Recyclers Reprocessors	Ensure accuracy of ARL Program recyclability outcomes	Within PREP as thresholds APCO's internal shared drive	Standard retention 7 years; data usage in accordance with APCO's privacy policy; per PREP policy
Collection Thresholds	Program	MRFs/government (for instance, MfE)	Ensure accuracy of ARL Program outcomes	Within PREP as thresholds APCO's internal shared drive	Standard retention 7 years; data usage in accordance with APCO's privacy policy; per PREP policy
Evidence for ARL Program Submissions	Program	Applicants Recyclers Reprocessors	Evidence the review and decision of ARL Program submission outcomes	APCO's internal shared drive and Customer Relationship Management (CRM) System	Standard retention 7 years; data usage in accordance with APCO's privacy policy
ARL Reporting Data	Member	ARL Program Members	Measure the annual impact of the ARL and progress of ARL members	APCO's internal shared drive and Customer Relationship Management (CRM) System	Standard retention 7 years; data usage in accordance with APCO's privacy policy
APCO Member Data (first artwork approvals, non-compliances, membership data)	Member	APCO and ARL Program Members	Measure the annual impact of the ARL and progress of ARL members	APCO's internal shared drive and Customer Relationship Management (CRM) System	Standard retention 7 years; data usage in accordance with APCO's privacy policy
PREP User Data (details entered into PREP projects by PREP users)	Member	ARL Program Members	Determine recyclability outcomes for packaging assessed through PREP	Within PREP only	Per PREP policy.

8.1. Publicly Available Information

To support delivery on the ARL Program principle of transparency, all information regarding eligibility for participation, program rules, processes for non-compliance, submissions to the Program and avenues for complaints or feedback are made publicly available to all ARL Program stakeholders.

This information is available via the governance page on the ARL website.

Content on the website is reviewed on a regular basis to ensure the site is delivering information that is as accurate as possible at the time of viewing.

8.2. Records and Document Review

ARL Program policies and processes are subject to review annually. Following this review, any documentation identified for update is refreshed, with changes noted within for document control.

Where changes are made to public-facing documents, this is communicated via upload of the latest version of the resource to the arl.org.au website.

9. Document control

Version	Date	Changes	Authorised by:
1	19/02/2024	Original	Song-Hee Warrell
2	27/05/2025	Updated to reflect refined policies and procedures for the ARL Program	Internal Review Committee (IRC)