# Australasian Recycling Label Program Processes – Recyclability Evaluation Submission

This document has been created by APCO to outline the process for recyclability evaluation submissions to the ARL program, including making a submission, criteria for review, the review process and submission outcomes.

The purpose of this resource is to provide further information to support ARL program stakeholders in making a recyclability evaluation submission to APCO. Potential Applicants shall be familiar with this process and the associated appendices, as well as the *Australasian Recycling Label Program Submissions Process.*

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**CONTACT:**
**A:** Suite 1402, Level 14, 55 Clarence Street, Sydney, NSW, 2000
**E:** apco@apco.org.au
**P:** (02) 8381 3700

## 1. Recyclability Evaluation Submissions

A recyclability evaluation submission may be made where an organisation (the 'Applicant') disagrees with the recyclability results generated by the Packaging Recyclability Evaluation Portal (PREP) for a particular packaging item or material or requests a new packaging type or material to be recognised under the ARL program.

There are 4 key criteria for recyclability under the ARL program. These are:

a. 80% of the population has convenient access to a service that collects the packaging.

b. The item can be recovered and sorted in a stream where at least 70% of its weight can be recycled into another product, excluding energy.

c. The item can be accurately sorted through a Material Recovery Facility.

d. There is a valuable end-market for the reprocessed material and product.

Criteria A and B are defined in the Sustainable Packaging Guidelines and are therefore not able to be exempted through the ARL program. Submissions may be made where packaging is considered Not Recyclable due to potential sortation and end-market issues. The organisation will need to demonstrate that criteria A, B, C and D are met through the submission process.

The criteria against which a recyclability evaluation submission is assessed are outlined in *Appendix 1. Criteria for recyclability in the ARL program*. These criteria are summarised in the decision tree in Figure 1.

In order to be approved, a recyclability submission must be deemed by the IRC to satisfy all criteria outlined in Appendix 1.



**CONTACT:**
**A:** Suite 1402, Level 14, 55 Clarence Street, Sydney, NSW, 2000
**E:** apco@apco.org.au
**P:** (02) 8381 3700

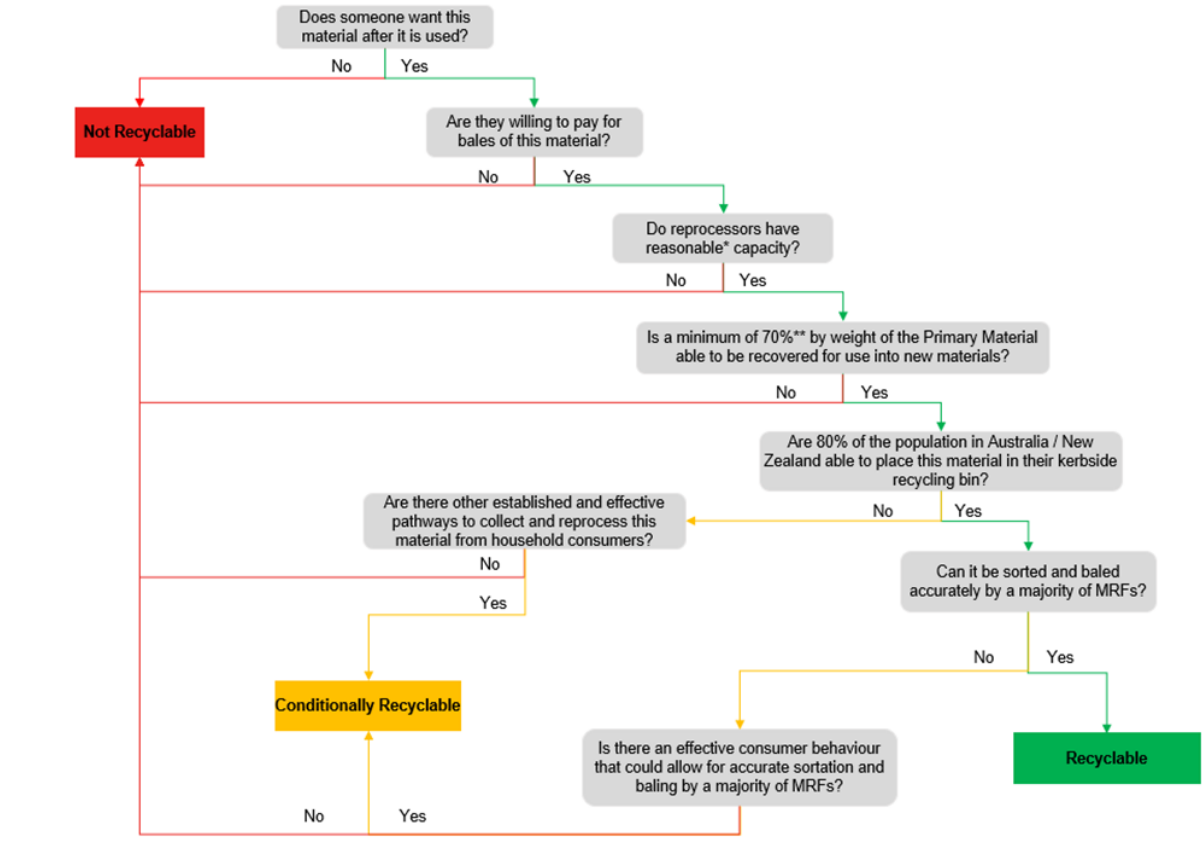


*Figure 1: Decision tree outlining how recyclability is determined in the ARL Program*

** Reasonable capacity relates to: the ability for reprocessors to recover the intended material in their recycling process (e.g. PET in a PET plastics reprocessor), with limited to no impact to the material they are recovering for, limited to or including no-impact to the equipment and machinery they utilise, and limited to no impact to the reprocessed material to be utilised in new packaging or products.*

***a minimum of 70% by weight is a baseline adopted by APCO to support best-design for recovery and the reduction of lost materials in the recycling process. It is also the definition outlined in the Sustainable Packaging Guidelines.*
**** If these collection pathways or consumer behaviours are not recognised by the ARL Program, this may necessitate an Alternative Destination or Consumer Behaviour Submission.*

## 2. Definitions

**Submission:** An application made by an ARL program stakeholder to dispute a recyclability outcome, or to propose a change to the ARL program (e.g., suggest a new consumer behaviour or alternative destination).

**Applicant:** The organisation or individual making a submission – may be a:
- Packaging Manufacturer
- Packaging Supplier/Converter
- Brand Owner

**Recyclability Evaluation:** the outcome of a PREP assessment, completed by a PREP User.

**Internal Review Committee (IRC):** A governance body established by APCO and made up of internal stakeholders to make decisions on the ARL program, including the assessment of submissions.



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**Packaging Recyclability Evaluation Portal (PREP):** The platform that shall be used by ARL program users to assess their packaging, informing the application of the ARL on-pack.

## 3. Roles and responsibilities

**Applicant:** The Applicant is responsible for:

- Providing complete and accurate information to APCO regarding their submission
- Where further information is requested through the submission process, the Applicant is responsible for providing this information.
- Meet the ongoing recyclability submissions compliance obligations outlined in *Section 8*.

**ARL team:** The ARL team is responsible for:

- The timely communication to the Applicant regarding the progress and outcome of the submission, with acknowledgement of request within 48 hours.
- Collating the industry research that is associated with a submission.
- Supporting the Applicant to understand feedback associated with the review of submitted information to ensure the response is adequate for submission.

**Packaging Transformation team:** The Packaging Transformation team is responsible for:

- The review of the recyclability submission, including all relevant evidence and supporting information to make a recommendation about whether a 'Recyclable ARL is applicable for the material/format being submitted for review.

**Material Stewardship Committee:** The Material Stewardship Committees (MSCs) are responsible for:

- Providing technical insights from across the value chain on relevant submissions for the Australian market.
- These recommendations from the MSCs may be made subject to further research or information from the Applicant to support their submission



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**P:** (02) 8381 3700

## 4. Review Process

Recyclability evaluation submissions shall be reviewed as per the ARL program submissions process.
A general submission review process is shown below in Figure 2.

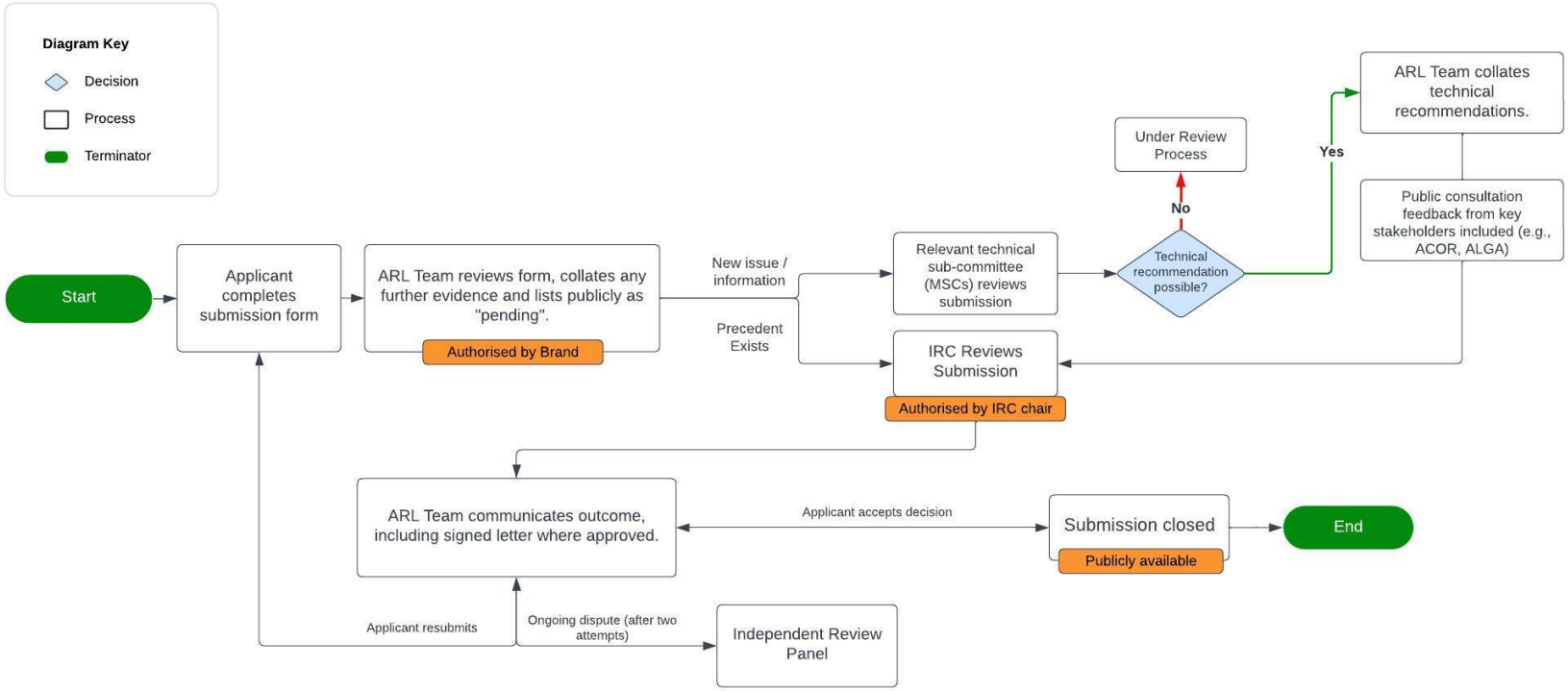


*Figure 2: ARL program submission process for Australia and New Zealand*

## 5. General timeline for review

1. ARL team confirm receipt of received submissions within **2 business days of receipt of submission.**
2. ARL team to confirm if any further information is needed to complete the submission within **2 weeks of receipt of submission.**
3. ARL team to open public consultation on the submission for 30 days and where required conduct targeted industry consultation, within **1 week of receiving a final submission.**
4. ARL team to provide the submission at the next relevant committee meeting/s, within **2 months of receipt of the submission.**
5. ARL team to provide the technical recommendation of the relevant committee/s and the public consultation outcomes to the IRC, at the next available meeting, within **2 months of the relevant committee meeting/s.**
6. ARL team to provide the Applicant with the submission outcomes, **2 weeks after the IRC meeting.**
7. If the submission is approved, additional steps will be actioned – *see Section 7. Approvals Process below.*

## 6. Required documentation & confidentiality

To make a recyclability submission, the Applicant shall submit a completed Recyclability evaluation submission form along with the required documentation outlined in **Section 7**, to the ARL team.

If necessary to review the submission through the Material Stewardship Committees which are comprised of external stakeholders, Applicant information is anonymised to ensure integrity in the review.

All submission documents, including supporting evidence for the review, are saved in APCO's files, alongside all correspondence with the Applicant.

Upon receipt of submission, the ARL team will undertake an initial review of the documentation to ensure that sufficient evidence to support a review has been provided.

For a complete review to be made, APCO will require Applicants to provide the full testing report, PREP report and composition of the material/s for which approval is being sought. It is understood that this may be considered IP in some instances. APCO may enter into an NDA with Applicants if required for the accurate assessment of the material.

## 7. Criteria & Required Documentation for Review

*Appendix 1. Criteria for recyclability in the ARL program* outlines the four criteria that Applicants must demonstrate evidence of meeting in a recyclability evaluation submission:

1. End markets,
2. Collection,



**CONTACT:**
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3. Sortation, and
4. Reprocessing.

These criteria were developed by APCO and its Internal Review Committee to determine a consistent methodology for reviewing recyclability submissions against the PREP thresholds.

To demonstrate how the submission meets these criteria for review, Applicants must complete the recyclability submission criteria form (*Appendix 2*), and submit this to the ARL team via the *Recyclability evaluation submission form*, along with all other requested supporting documentation, including:

- PREP Recyclability Evaluation Report
- Packaging specifications for the material or format being submitted for review.
- A completed Recyclability evaluation submission criteria form
- Any other supporting documents, including evidence to support responses provided in the relevant submission criteria form.

PLEASE NOTE: for Criteria 2 – Sortation, Applicants are required to evidence that the material / format they are submitting for review can be successfully identified and sorted at a MRF. The recommended approach for evidencing accurate sortation is through a series of MRF trials.

APCO are currently undertaking a project to establish a consistent MRF trial methodology and associated recommended categories of facility to conduct testing at to ensure representative outcomes.

In lieu of an APCO MRF Trial methodology, it is recommended for Applicants to consider the following when conducting their own MRF trials:

- Consider the resources necessary for a trial, such as consultants who are experienced in the waste and recycling sector who can support in this process.
- Ensure that testing is representative and replicable – test the format / material as it will be disposed of by consumers (e.g., opened, crushed, etc.)
- Provide confidence in sample size – a minimum of 100 items per sample is recommended to provide confidence in data and replication of results.
- It is recommended that at least two MRFs, owned by different entities and with different equipment to show broad application of results – confirm selected facilities with APCO prior to testing. Selected MRFs must have the following characteristics:
    - PREP does not account for manual sorting, so a suitable MRF for trials must include mechanical technologies which sort packaging materials.
    - Must accept recyclables from kerbside household recycling collection and is the primary sorting facility for these.
- Ensure MRF involved are aware of the purpose of the trial and the results of the trial are communicated to the participating organisation.

## 8. Ongoing Recyclability Submissions Compliance Obligations

Figure 3 outlines the process once a recyclability evaluation submission is approved.



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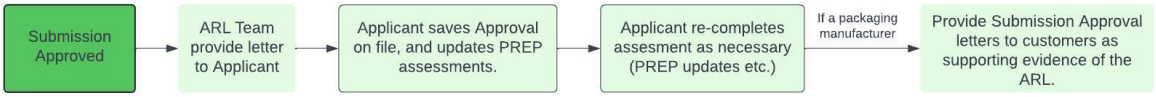


*Figure 3: Process for Recyclability Evaluation Submissions once approved in the ARL Program*

Where recyclability submissions are approved, and the respective packaging material or format is deemed to be eligible to carry a 'Recyclable' ARL, the ARL team will provide the Applicant with an approval letter. This letter will confirm:

- The material and/or SKUs approved through the submission.
- The length of time and conditions of approval that apply (*see Section 8.1 Longevity of approved submission*)
- That the ability to share the letter and therefore use the 'Recyclable' ARL for the approved format is only afforded to customers of the Applicant who are ARL program members.
- That brand owners who receive a recyclability submission letter from a successful Applicant are responsible for subsequently accurately assessing the entire packaging format or SKU in PREP, including labels.
    - Where the format or SKU no longer meets the recyclability thresholds due to secondary materials or components, the 'Recyclable ARL is no longer applicable, i.e., the letter of approval is no longer able to be used to evidence the application of the 'Recyclable' ARL, and the packaging / format must carry a Not Recyclable ARL or have no ARL at all.

## 8.1 Longevity of approved submission

An approved recyclability submission is valid until the date of expiry indicated on the letter of approval, usually 24 months, OR until updated thresholds for soft plastic recyclability arise, unless otherwise stated. The Applicant may re-submit at the expiry date for a further period of approval.

Additionally, the Applicant shall notify APCO of any material changes to the packaging, market or local reprocessing capacity that may materially impact the ability to satisfy the criteria within 5 business days.

APCO reserves the right to amend submission criteria based on new information that APCO receives regarding recyclability outcomes. In addition, APCO reserves the right to rescind a Submission at any time should new information arise. In this instance, APCO will work with the applicant and APCO Members to transition the material appropriately.

## 8.2 Communication of submission outcomes

Where recyclability submissions are approved, the ARL team will list these packaging materials or formats on arl.org.au. This listing will include the date of approval, date of expiry as indicated in the approval letter.



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**P:** (02) 8381 3700

## 9. Submissions leading to a change in program thresholds

A submission may trigger a change to the thresholds of the program where:

- The submission is applicable to a product category rather than a specific brand or SKU
- The approval of a submission exclusive to the Applicant would be seen to disadvantage other stakeholders in the sector.
- The submission process finds evidence to support a change in thresholds or a need to place the threshold Under Review – *see Under Review Process for more information.*
- The thresholds have been successfully disputed on similar grounds by at least 2 other applicants (*see Figure 4)*.

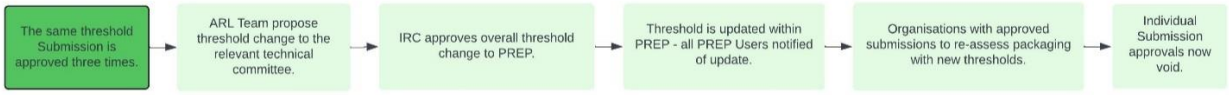


*Figure 4*: *Review process for submissions against the same PREP threshold*

When the IRC have approved a submission for the same recyclability threshold a minimum of three times, the ARL team shall raise this threshold for review and update to the relevant technical committee. The recyclability recommendation shall be provided to the IRC for discussion and decision. Should enough evidence be available to change the threshold within PREP, this change shall be made.

In these cases, overall updates to the PREP thresholds are logged to the PREP website via the About > Change Log page and the ARL website.

Updates are also emailed to an organisation's registered PREP Users, detailing the updates and the need to re-review impacted packaging formats.

APCO shall work with PREP Design to determine the timeline for the threshold in PREP to be updated. These updates will be communicated with all registered PREP Users once available, with details on the threshold change and requirement to re-assess impacted PREP assessments.

As with any PREP threshold change, Applicants who have received approval for a Submission related to this threshold change, will then be required to re-assess their packaging in PREP and save the most up-to-date PREP reports on file.

## 10. Document Control

| Version | Date | Changes | Authorised by: |
|---|---|---|---|
| 1 | 19/05/2023 | Initial draft | Sarah Sannen |



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**A:** Suite 1402, Level 14, 55 Clarence Street, Sydney, NSW, 2000
**E:** apco@apco.org.au
**P:** (02) 8381 3700

# Appendices

## Appendix 1. Criteria for recyclability in the ARL Program

| Recovery process criteria | Threshold | Threshold basis |
|---|---|---|
| **End-markets –** *economic viability to recover the materials* | • Do the recovered materials have available local or export markets?<br>• Can the material be turned into a new product desired by the market?<br><br>Materials must have either 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.<br><br>Careful consideration is given to available local and export markets, considering Australia's waste export bans. |
| **Collection** – *Kerbside Access Levels* | • Is the material collected in kerbside recycling, either widely or less widely accepted?<br><br>Widely accepted materials mean that 80% of the population with kerbside, can put that item in their recycling bin at home in Aus & NZ. Less widely accepted materials have acceptance at 60% and 50% for Aus & NZ respectively. | Annually, each council in Australia and New Zealand reports on the packaging formats or materials they do and do not accept in kerbside recycling bins from households.<br><br>This ensures that if packaging is messaged as 'Recyclable', consumers have access to a collection point to recycle it. |



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**P:** (02) 8381 3700

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| **Sortation** – *Sorting through a material recovery facility* | • Will the item be sorted to the correct stream for recovery?<br>• If no, will it be recovered in secondary sorting at the reprocessors?<br>• Do any secondary materials change the sortation of the item?<br><br>Threshold and parameters are set to simulate how specific formats will move through a MRF to be accurately or incorrectly sorted. This helps guide better design to ensure accurate sortation. | After collection, accurate sorting of co-mingled materials occurs at a Material Recovery Facility. PREP simulates how this works based on characteristics such as size, shape, colour and weight.<br><br>This is necessary to ensure that the materials are accurately separated into the designated material stream (i.e. paper types, plastic types, glass and metals) so they can be sent to a dedicated reprocessor. |
| **Reprocessing** – *ability for the materials to be reprocessed, with little to no impact on the end-materials or processes.* | • Will at least 70% of the primary material be recovered?<br>• Is the material able to be reprocessed into a new product?<br>• Do any secondary materials cause contamination issues* that deem the material Not Recyclable?<br>• If yes, is there a maximum acceptance threshold?<br><br>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.<br><br>Majority of the material must be recovered (70% by weight) to ensure losses are kept to a practical minimum.<br><br>Common sense, the SPGs and the waste hierarchy principles are also a consideration. |

**Contamination issues can occur at primary, secondary and/or tertiary orders. Primary contamination is a contamination of the reprocessed material itself (e.g. PVC as a detrimental contaminant in PET recycling); secondary contamination is contamination of the recovered materials in new products/packaging (e.g. metallisation in fibre-based food packaging); tertiary contamination relates to impacts to the recycling system (e.g. increased microbiology in the water of paper mills).*



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## Appendix 2. Recyclability Evaluation Submission Criteria Form

| Question | Threshold | Description | Evidence |
|---|---|---|---|
| **#1 End markets – available local or export markets** | | | |
| Will the material have a viable end-market when recovered? | Yes / No | | *This can include evidence to show that material has an existing viable end-market. Preferably locally, but also recognise overseas markets so long as they take into consideration the export bans. i.e. formal letters from local reprocessors accepting the material, including recovered bale specifications, letter from brokers selling local materials, evidence of end market packaging or products utilising this material or equivalent.* |
| **#2 Collection access in household kerbside recycling** | | | |
| Is the primary material or format collected in kerbside recycling? | Yes / No<br><br>If No, additional consideration will be given to the broader impacts of acceptance, through the IRC review. | | *If the material is already accepted in kerbside collection (e.g. cardboard, steel, HDPE), APCO's annual data for Australia and New Zealand on material and format acceptance by councils per population. However, additional supporting evidence (e.g. letters from MRFs /councils to accept these formats) is also welcome to support the review.* |
| **#3 Sortation at a materials recycling facility (MRF)** | | | |
| Will the format / material be sorted for recovery in a MRF (i.e. PET sorted to the PET stream). | Yes / No | | *Proof that the dimensions, weight, colour, secondary material etc. do not inhibit the ability for the items to be positively sorted at a MRF into the correct* |



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| | | | *material stream i.e. MRF sortation testing, NRI polymer detection testing, etc.*<br>*If appealing the recovery of a material with a specific secondary material, evidence that supports the accurate sortation of these material shall be provided.* |
| **#4 Reprocessing of materials and compatibility of secondary materials** | | | |
| Is the material currently viable to be reprocessed for use in new packaging or products? | Yes / No | | *Evidence is required to show that current reprocessing technologies can accept these materials and secondary materials do not adversely impact the recyclability of the primary material e.g. welded labels do not inhibit the ability for the main polymer of the bottle to be recovered or that the primary material is of desired quality for reprocessing. i.e. lab testing of polymer reprocessing, international research or trials, etc.*<br><br>*Evidence is required to show that the reprocessing technologies are not negatively impacted by the acceptance of these materials (e.g. they do not cause increased damage to machinery or increase downtime for cleaning equipment. Letters or testing from reprocessors are viable points of evidence to submit.*<br><br>*Evidence is required to show that the reprocessed material is able to be turned into a viable new product or packaging and contaminants are minimal or non-existent.* |



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|---|---|---|---|
| Will at least 70% of the primary material be recovered? | Yes / No | | *Evidence is required to show that a minimum of 70% of the primary material is able to be recovered. Specific thresholds for material types will be different – contact APCO if unsure of these exact thresholds.* |
| Has the potential increase in collection volume of these materials been considered for their impact on kerbside recycling. | Yes / No | | *Evidence to understand any potential impacts that greater volumes could have on the technical reprocessing of this format. i.e. forecast of volumes proportionate to the stream, lab testing of polymer reprocessing at varying proportions (e.g. HDPE with 5% PP mix;). This is important as currently the system does not accept these materials, so if they suddenly do start being collected at high volumes, then this could alter recyclability as proportions of contaminates grow with increased recovery.* |



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