



Australasian Recycling Label

ARL PROGRAM COMPLAINTS PROCEDURE AND DISPUTE RESOLUTION POLICY

This document outlines the process for raising, investigating and resolving complaints regarding the ARL Program. It is designed to ensure that all concerns raised by the program stakeholders are handled fairly, consistently, and transparently. In addition to internal resolution steps, an independent third-party review pathway is available when disputes cannot be resolved to the satisfaction of the involved parties.



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1. Objectives

The objectives of this policy are to:

- Ensure that complaints are raised, recorded, and investigated in a fair and timely manner.
- Promote continuous improvement by using feedback to enhance the ARL Program.
- Maintain transparency and accountability throughout the complaint resolution process.
- Provide a clear pathway for escalation, including referral to an independent third-party review panel if internal resolution is not achieved.

2. Making a Formal Complaint

A formal complaint may be made through:

- The APCO or ARL website via the [ARL Feedback form](#).
- Directly to a staff member via email or letter.
- Through an APCO group inbox such as arl@apco.org.au.

A formal complaint shall:

- Be made in writing.
- Contain all relevant information required for APCO to conduct a root cause analysis of the complaint, including:
 - Date of issue arising
 - Supporting evidence, where relevant
 - Names of any APCO staff or program stakeholders involved.
- Be confidential between the complainant and APCO unless otherwise agreed.

3. Complaints Process

The table below outlines the step-by-step process for handling complaints. It integrates the responsibilities of all parties involved, ensuring nothing is overlooked from initial submission through to monitoring and follow-up.

Table 1: ARL Program Complaints Process for All Parties

Party	Complaint Submission & Initial Acknowledgement	Investigation & Responsibilities	Resolution, Follow-Up & Monitoring
Complainant	Submit a formal complaint as detailed in section 2.	Provide a clear, honest, and complete account of the issue. Raise concerns promptly and collaborate with APCO if additional details are requested.	Receive communication on the outcome once the investigation is complete. Feedback is incorporated into program reviews.
APCO/ARL Team	Acknowledge receipt of the complaint in writing within 2 business days.	Develop an investigation plan in collaboration with the identified organisation and engage all relevant	Inform the complainant once the root cause analysis is complete and an action plan is implemented.



	Notify the identified organisation of the complaint.	stakeholders. Conduct a root cause analysis and document all communications and actions in the internal Consumer Relationship Management (CRM) system. Maintain confidentiality and ensure complainant anonymity unless agreed otherwise. Address any non-compliance through the ARL compliance process.	Review and monitor the issue during the annual management review and ARL audits.
Identified Organisation	Acknowledge receipt of APCO notification within 2 business days.	Provide a complete and honest account of the issue to APCO within 5 business days. Assist APCO in the root cause analysis and collaborate on developing a corrective action plan.	Implement the agreed action plan and provide regular updates to APCO. Participate in a subsequent ARL compliance spot-check if non-compliance is determined. Failure to comply may result in removal or escalation to regulatory authorities if an incorrect on-pack claim is determined (ACCC/Commerce Commission).

4. Independent Third-Party Review Process

When internal resolution efforts are exhausted, the complaint may be escalated to an Independent Third-Party Review Panel. This process involves:

- **Referral Submission:** The complainant or APCO may initiate a request for independent review by submitting all relevant documentation and details of the complaint.
- **Panel Composition:** The review panel will consist of impartial experts who have no direct affiliation with APCO, the complainant, or the identified organisation.
- **Review Process:** The panel will conduct an independent assessment of the complaint, including an examination of the investigation, root cause analysis, and action plan.
- **Decision & Recommendations:** The panel's findings, along with any recommendations for further action, will be provided in a written report. This report will be shared with both the complainant and APCO.
- **Finality:** While the panel's decision is advisory, both parties agree to consider the recommendations in good faith and take appropriate action to resolve the dispute.



5. Deviation Process

Planned Deviations

- Any planned deviation from this procedure must be approved by the ARL Program Manager.
- For example, if legal or public relations advice necessitates an alternative response to a complaint, such deviation must be documented in the Consumer Relationship Management (CRM) system with a clear justification.

Unplanned Deviations

- Unplanned deviations (e.g., due to human error or sudden changes in ARL team capacity) must be recorded in the CRM along with an explanation.

These deviations will be reviewed during the annual program review to ensure they align with the principles of continuous improvement and transparency.

6. Conflict of Interest Management

To maintain the integrity of the complaints process, all parties are required to adhere to the following conflict of interest management principles:

- **Disclosure:** All individuals involved in the investigation and resolution of complaints, including APCO/ARL team members and Independent Third-Party Review Panel members, must promptly disclose any potential or perceived conflicts of interest.
- **Impartiality:** Decision-makers must remain unbiased and impartial. If a conflict of interest is identified, the affected individual shall be recused from the process and replaced where necessary.
- **Documentation:** Any disclosures and actions taken to manage conflicts of interest shall be documented in the CRM as part of the complaint record.
- **Independent Review Panel Requirements:** The Independent Third-Party Review Panel must consist exclusively of members with no direct or indirect affiliations that might compromise their impartiality. Any potential conflicts must be declared before participating in the review process.

These measures ensure that all complaints are handled without undue influence, maintaining public trust and the integrity of the ARL Program.

7. Document Control

Version	Date	Changes	Authorised by:
1	February 2023	Initial draft	Sarah Sannen
2	February 2024	Update to reflect program changes	Song-Hee Warrell
3	February 2025	Revised to include Independent Third-Party Review Process and enhanced formatting	Internal Review Committee (IRC)

This updated policy reinforces our commitment to fairness, accountability, and continuous improvement in the ARL Program. For any further queries or assistance regarding this policy, please contact the ARL team at arl@apco.org.au