

Australasian Recycling Label Program Processes – Fibre Submissions for Australia

This document has been created to support organisations seeking to make a submission regarding the recyclability outcome for materials in Australia that do not meet the [updated thresholds for fibre-based packaging](#) in PREP.

Table of Contents

1. Definitions	2
2. Roles and Responsibilities	2
3. Who may make a submission?.....	3
4. Eligibility for a Fibre Submission.....	3
5. Review of a Fibre Submission	3
6. Required Documentation & Confidentiality	6
7. Ongoing Fibre Submissions compliance obligations	6
7.1 Longevity of Approved Submission	6
7.2 Communication of Submission Outcomes	7

List of Figures

Figure 1: Fibre Submission Review Process Flow Chart

1. Definitions

Fibre-based packaging thresholds for Australia ('the thresholds'): The limits and guidelines set for fibre-based packaging materials in Australia. These thresholds are based on and aim to promote industry best practice for packaging design while reflecting collection and reprocessing capabilities.

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).

Fibre submission: An application made by an ARL Program stakeholder to appeal or confirm the recyclability of fibre-based packaging materials/formats, as informed by following this Fibre Submissions process.

Applicant: The organisation or individual making a submission.

- **Packaging Manufacturer and/or Packaging Supplier/Converter**: organisation that provides and/or produces packaging or packaging material under its own name or trademark.
- **Brand Owner**: A person who is the owner or licensee in Australia of a trademark under which a product is sold or otherwise distributed in Australia, whether the trademark is registered or not; or a person who is the franchisee in Australia of a business arrangement which allows an individual, partnership or company to operate under the name of an already established business.

Packaging Recyclability Evaluation Portal (PREP): The platform that is used by ARL Program Users to assess their packaging, informing their application of the ARL on-pack.

2. Roles and Responsibilities

Applicant

- 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.

ARL Team

- 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 review of the Fibre Submission, including all relevant evidence and supporting information to determine whether a 'Recyclable' ARL is applicable for the material/format being submitted for review.

Fibre Material Stewardship Committee (MSC)

- Where necessary, providing technical insights from across the value chain on submissions for the Australian market.
- Recommendations may be made subject to further research or information from the Applicant.

3. Who may make a submission?

A submission may be made by any stakeholder of the ARL Program, including brand owners & packaging manufacturers, suppliers or converters. A submission may be made by contacting the [ARL Team](#).

4. Eligibility for a Fibre Submission

To encourage industry best practice for fibre-based packaging design, and improve the quality of fibre recycle, not all fibre-based packaging formats will be eligible for a Fibre Submission.

Submissions will only proceed to review if the material/format only marginally deviates from the 'thresholds' and will not be likely to greatly contaminate the fibre recycling stream – i.e. meet Criteria 1 & 2 of the [Fibre Submissions Criteria Form](#).

For more significant deviations from the 'thresholds', Applicants must provide evidence to demonstrate investigation of redesign.

- For example, evidence demonstrating a review of their packaging against the [Sustainable Packaging Guidelines](#) or comparative studies indicating that the material/format won't be fit for purpose if redesigned/alternatives are not possible.

Submissions are to be assessed against the following criteria:

- Material Composition
- Design for Recyclability
- Material/Format passes the relevant testing protocol.
- Reprocessing of materials

For further guidance, please refer to the [Fibre Submissions Criteria Form](#), which will be used to review the submissions.

The ARL and Packaging Transformation Teams will be available for a pre-submission meeting with the potential Applicant to provide guidance as to whether a material/format is eligible to proceed with a Submission, and to support next steps (refer to Section 6 for further information).

5. Review of a Fibre Submission

The following steps have been provided to outline the review process for Fibre Submissions. These steps are also summarised in Figure 1.

1. Applicant to assess the packaging material or format in PREP against the Australian thresholds for fibre packaging.
 - a. **If the packaging material or format returns a 'Recyclable' or 'Recyclable with lost value' result:** apply the 'Recyclable' ARL in accordance with the ARL Program User Guide to direct consumers to relevant recycling information. No further action required.
 - b. **If the packaging material or format returns a 'Not recyclable' result:** proceed to Step 2.
2. Applicant to explore possible redesign of packaging material/format against the Sustainable Packaging Guidelines and work to align with Australian fibre thresholds for recyclability.
 - a. If redesign has been explored but is not possible, or if recyclability thresholds cannot be met through redesign - label as 'Not recyclable'
 - b. If material/format meets the requirements outlined in Section 4 - review [Fibre Submissions Criteria Form](#) to determine if pulpability testing and Fibre Submission may proceed.
3. Applicant to complete testing via Australian Standard AS 1301.220:2024 Test for Pulpability or CEPI Recyclability Test Method Version 2.

- **Note:** For alternative fibre submissions, pulpability reports must include handsheet evaluations (e.g., burst and tensile strength testing) to address limited industry data on alternative fibres and their impact on board quality.
4. Applicant to submit pulpability test report alongside all relevant documents outlined in Section 6 of this document to the [ARL Team](#).
 5. ARL Team to review submission and confirm if sufficient evidence has been supplied for review.
 6. Packaging Transformation Team review submission and supporting evidence to provide technical recommendation for the outcome of the submission to the ARL Team.
 7. Where further technical recommendation is required for review, the submission will be presented to the Fibre MSC:
 - If further information is required to support submission review, ARL Team to contact Applicant.
 - Packaging Transformation Team re-review submission incorporating Fibre MSC feedback and provide technical recommendation for approval / denial of the submission to the ARL Team
 8. Fibre Submission approval granted by ARL Team via a letter of approval sent to Applicant.
 9. Approval granted for fibre material/format to carry the Recyclable ARL, provided that all other recyclability thresholds are met.
 10. Applicant to continue to meet compliance obligations as set out in Section 7 of this document.

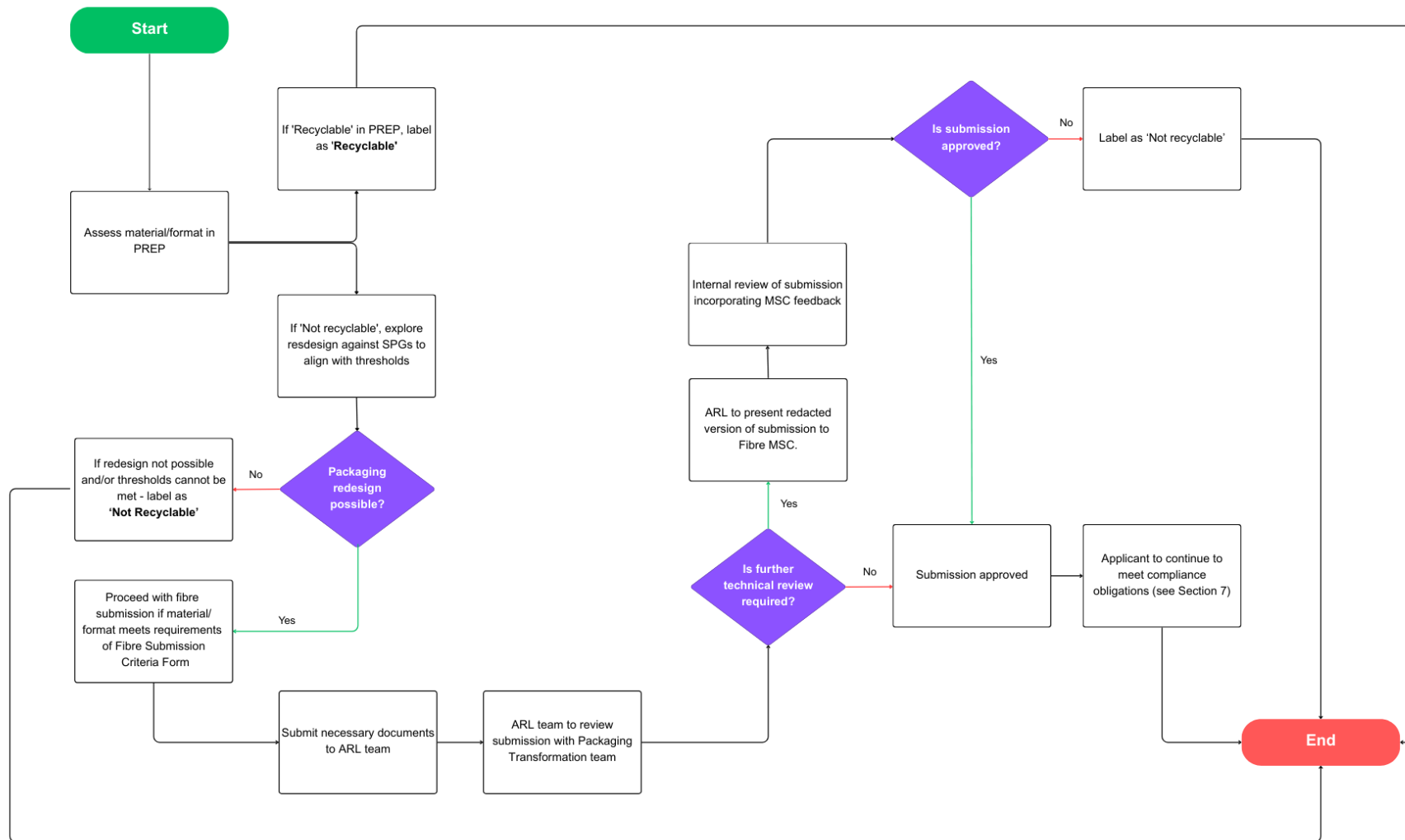


Figure 1 Fibre Submission Review Process Flow Chart

6. Required Documentation & Confidentiality

Submissions can be made to APCO by submitting the following documentation to the [ARL Team](#):

- The PREP report for the packaging item (only applicable if submission is format-specific)
- Detailed packaging specifications, including material composition, layer structure, bonding types, and any coatings or additives used
 - We understand that some of this information may be commercially sensitive or subject to intellectual property protections. If certain details cannot be shared, the team can work through an alternative approach.
- Test report completed in accordance with Australian Standard AS 1301.220:2024 Test for Pulpability or Capi Recyclability Test Method Version 2
 - **Note:** For alternative fibre submissions, pulpability reports must include handsheet evaluations (e.g., burst and tensile strength testing) to address limited industry data on alternative fibres and their impact on board quality.
- [Fibre Submission Criteria Form](#)
- [Fibre Submission Form](#)
- Any additional information to support your submission.

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

- Upon receipt of submission, APCO will undertake an initial review of the information and evidence to understand the best next steps to support the Applicant.
- Should clarification on the information or evidence be required, APCO will engage with the Applicant. This is to ensure the robust evidence required to make a decision is available. A meeting may be offered to the Applicant to ensure the review process is understood and all questions prior to review are answered.

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

7. Ongoing Fibre Submissions compliance obligations

Where Fibre Submissions are approved, and the packaging material or format is deemed to be eligible to carry a 'Recyclable' ARL, the ARL Team will provide the Applicant with a letter of approval. This letter will confirm:

- The material and/or SKUs approved via the submission.
- The length of time and conditions of approval that apply (see Section 7.1)
- That the ability to share the letter and therefore apply a 'Recyclable' ARL to the approved material/format is only afforded to customers of the Applicant who are ARL Program Users.
- Brand owners who receive a letter of approval from a successful Applicant are responsible for assessing the entire packaging format or SKU in PREP to ensure all other recyclability thresholds are met. This is to ensure other aspects of the packaging format such as dimensions, weight and secondary materials (e.g., labels).
 - Where the format or SKU no longer meets the fibre recyclability thresholds due to secondary materials or additional components, the 'Recyclable' ARL is no longer applicable. The letter of approval can no longer 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.

7.1 Longevity of Approved Submission

An approved Fibre Submission is valid until the date of expiry indicated on the letter of approval OR until updated thresholds for fibre packaging 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.

7.2 Communication of Submission Outcomes

Where fibre submissions are approved, the APCO will list these packaging materials or formats on APCO's [Australasian Recycling Label page](#). This listing will provide the supplier's name and necessary contact details, a basic description of the approved material as well as the date of approval and date of expiry, as indicated in the letter of approval.

Document control

Version	Date	Changes	Authorised by:
1	August 2023	First published	Sarah Sannen
2	December 2023	<ul style="list-style-type: none"> Replaced references to Pulpability Screening Questions with Fibre Submissions Criteria Form. Clarified the eligibility criteria for Fibre Submissions. Minor language and formatting adjustments for clarity. 	Song-Hee Warrell
3	September 2024	<ul style="list-style-type: none"> Added CEPI Recyclability Test Method Version 2 as an allowable test method. Fixed inconsistent contact address usage. Minor language and formatting adjustments for clarity. 	Anneliese Syder
4	July 2025	<ul style="list-style-type: none"> Replaced APCO's Standardised Test Method for Repulpability Assessment with Australian Standard AS 1301.220:2024 Test for Pulpability as an allowable test method. Removed step 4 noting a pre-meeting with the ARL and Packaging Transformation team Additional clarity in Section 5 and updated Figure 1 Included note in Section 5 and 6, detailing that handsheet evaluations are required for alternative fibre submissions Update to Section 6, added request for packaging specs. 	APCO's Internal Review Committee