

Australasian Recycling Label Program Processes – Soft Plastics Submission

This document has been created to support organisations seeking to make a Submission regarding the recyclability outcome for materials or formats that do not meet the revised [soft plastics thresholds for Australia](#).

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1. Definitions

Soft plastics thresholds for Australia (the thresholds): The limits and guidelines set for specific soft plastic materials or combinations of soft plastic materials in packaging in Australia. These thresholds are based on and aim to promote industry best practice and reflect collection and reprocessing capabilities. These thresholds are based on and aim to promote industry best practice and reflect 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).

Applicant: The organisation or individual making a submission – may be a:

- Packaging Manufacturer
- Packaging Supplier/Converter
- Brand Owner

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.

Check Locally: This message applies to packaging that may not be widely accepted in kerbside recycling. It advises consumers to verify local disposal options using the ARL URL (arl.org.au) for drop-off, out-of-home, and kerbside collection services specific to their area. This messaging acts as a reminder that disposal methods may vary across different regions, and helps consumers make informed decisions about packaging disposal that align with the availability of collection services in their local area.

2. Roles & 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 soft plastics submissions compliance obligations outlined in *Section 7*.

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 soft plastics submission, including all relevant evidence and supporting information to determine whether a 'Check Locally' ARL is applicable for the material / format being submitted for review.

Soft Plastics 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.
- The Soft Plastics Material Stewardship Committee will provide technical insights/recommendations on soft plastics submissions where necessary.
- These recommendations from the Soft Plastics MSC may be made subject to further research or information from the Applicant to support their submission.

3. Who may make a Submission?

A Soft Plastics Submission may be made by any stakeholder of the ARL Program, including brand owners & packaging manufacturers/suppliers. A Submission may be made at any time by contacting the ARL Team, arl@apco.org.au.

4. Eligibility for a Soft Plastics Submission

To encourage industry best practice for soft plastic design, and improve the quality of soft plastic recyclate, not all soft plastic formats will be eligible for a Soft Plastics 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 soft plastics stream - i.e., does not include any of the materials listed as not compatible for recycling in the [Quickstart Guide - Designing for Recyclability; Consumer Soft Plastic Packaging](#) – e.g., PVC, PVdC, PET, non-polyolefin bioplastics, PS, paper, aluminium, etc.
- For more significant deviations from the thresholds, Applicants must have provided evidence to demonstrate investigation of redesign – e.g., evidence of aiming to align with SPGs; LCAs demonstrating the format being submitted for review has better environmental outcomes compared to others, 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 [Soft Plastics 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. This is outlined in *Section 5. Review of a Soft Plastics Submission*.

5. Review of a Soft Plastics Submission Process

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

1. Applicant to assess the packaging material or format in PREP against the Australian thresholds for soft plastics.
 - **If the packaging material or format returns a Check Locally result** apply the Check Locally ARL in accordance with the ARL Program User Guide to direct consumers to relevant recycling information. No further action required.
 - **If the packaging material or format DOES NOT return a Check Locally result** review format/material with Supplier - proceed to Step 2.
2. Applicant to explore possible redesign of packaging material/format to align with Australian soft plastic thresholds for recyclability. *Refer to [Soft Plastics Submission Criteria Form – Criterion 2 – Design for Recyclability](#).*
3. If redesign has been explored and is not currently possible, and the material/format meets the requirements outlined in *Section 4. Eligibility for a Soft Plastics Submission*, connect with the ARL & Packaging Transformation Teams for a pre-submission meeting by emailing arl@apco.org.au

- **If APCO confirm eligibility for a Soft Plastics Submission**, proceed to Step 4.
 - **If APCO deny eligibility for a Soft Plastics Submission**, return to Step 2 or apply the **Not Recyclable ARL**
4. Supplier to undertake testing via APCO's accepted testing protocols (*Appendix 1 Conditional Criteria for structures containing Polyamide (PA); Appendix 2 and 3 for recommended testing protocols for predominantly PE and PP films*).
 5. Applicant to put forward a Soft Plastics Submission Form with required documentation (see *Section 6. Required Documentation & Confidentiality*), to the ARL Team.
 6. ARL Team to review Submission and confirm if sufficient evidence for review.
 7. Packaging Transformation Team review Submission and supporting evidence and provide technical recommendation for approval / denial of the Submission to the ARL Team.
 8. Where further technical recommendation is required for review, the Submission will be presented to the Soft Plastics Material Stewardship Committee.
 - If further information required to support Submission review, ARL Team to contact Applicant.
 - Packaging Transformation Team re-review Submission incorporating Soft Plastics Material Stewardship Committee feedback and provide technical recommendation for approval / denial of the Submission to the ARL Team
 - In cases where a decision requires further review or escalation, the submission will be presented to the Internal Review Committee (IRC).
 9. Soft Plastics Submission approval granted by ARL Team.
 10. ARL Team provide Soft Plastics Submission approval letter to Applicant to share with customers who are ARL Program Members.
 11. Exemption granted for approved soft plastic material / format to carry the Check Locally ARL, provided that all other recyclability thresholds are met.
 12. Applicant to continue to meet compliance obligations as set out in *Section 7. Ongoing Soft Plastics Submissions compliance obligations*.

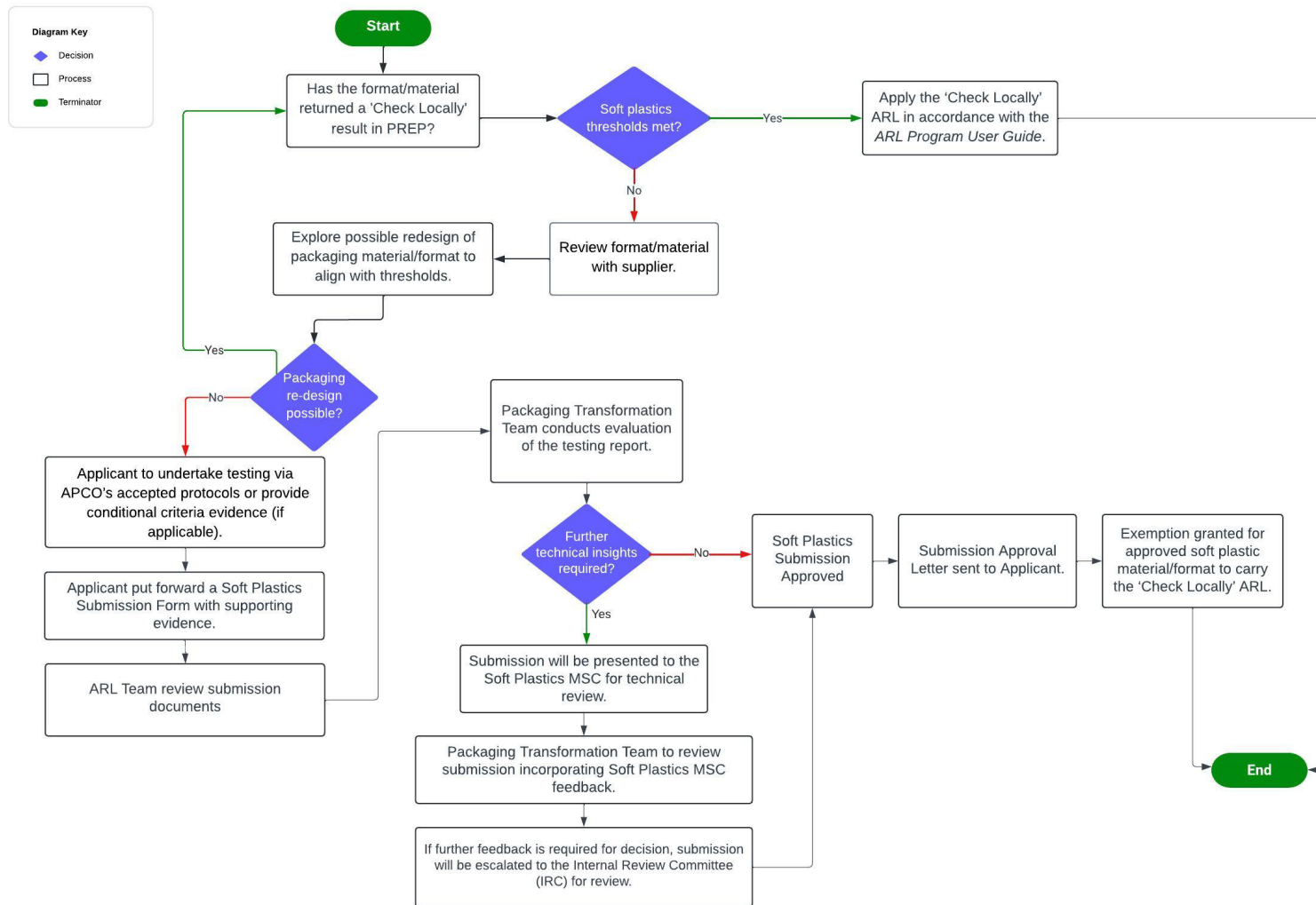


Figure 1: Soft Plastics Submission Review Process Flow Chart

6. Required Documentation & Confidentiality

To make a soft plastics Submission, the Applicant shall submit a completed [Soft Plastics Submission Form](#), along with the required documentation outlined below, to the ARL Team.

The completed Submission form should be accompanied by:

- The relevant PREP evaluation report
- The packaging specifications/information used to complete the PREP evaluation report.
- A complete testing report and any additional supporting documents (e.g., letter of approval from testing organisation) confirming a positive outcome following assessment via the APCO recommended testing protocols or conditional criteria evidence (see *Section 8 and Appendix 2 & 3*)
- For structures containing PA: the completed [Conditional Criteria Submission Form](#), plus supporting technical documents (see *Section 8 and Appendix 1*).
- A completed [Soft Plastics Submission Criteria Form](#), and;
- Any additional information to support your submission.

If necessary to review the Submission through the Soft Plastics Material Stewardship Committee which is 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 by some organisations. APCO may enter into an NDA with Applicants if required for the accurate assessment of the material.

7. Ongoing Soft Plastics Submissions Compliance Obligations

Where Soft Plastics Submissions are approved, and the respective packaging material or format is deemed to be eligible to carry a Check Locally 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 7.1 Longevity of approved Submission*)
- That the ability to share the letter and therefore use the Check Locally ARL for the approved format is only afforded to customers of the Applicant who are ARL Program Members.
- That brand owners who receive a Soft Plastics 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 soft plastic recyclability thresholds due to secondary materials or components, the Check Locally ARL is no longer applicable, i.e., the letter of approval is no longer able to be used to evidence the application of the Check Locally 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 Soft Plastics Submission is valid until the date of expiry indicated on the letter of approval 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.

7.2 Communication of Submission Outcomes

Where Soft Plastics Submissions are approved, the ARL Team will list these packaging materials or formats on arl.org.au. This listing will include the Supplier, date of approval, date of expiry as indicated in the approval letter and Supplier contact details.

8. Soft Plastics Assessment Criteria & Recommended Test Methodologies

8.1 Conditional criteria for structures containing Polyamide (PA)

Where soft plastics do not meet the thresholds due to the Polyamide content of the structure, the applicant can submit supporting evidence in lieu of testing to evidence recyclability of the structure. The conditional criteria apply to:

1. Coextruded Films with a Tie Layer
2. High-barrier Coextruded Films
3. Laminated Films with Adhesives

Refer to *Appendix 1* for further information on the specific requirements for meeting each conditional criterion.

8.2 Approved Testing Methodologies

Where soft plastics do not meet the thresholds, APCO recommends the below testing to be conducted, to demonstrate compatibility with PE/PP recycling in Australia. This range of testing protocols have been selected based on industry best practice and industry consultation.

- APR Critical Guidance
- APR Benchmark
- Recyclclass
- Cyclos-HTP

Refer to the [Soft Plastics Submissions Criteria Form](#) against which Submissions will be reviewed. Refer to *Appendix 2 and 3* for further information on the testing protocols currently recommended by APCO for predominantly PE and PP films, respectively.

9. Appendices

APPENDIX 1. Conditional Criteria for structures containing Polyamide (PA)

Condition 1: Coextruded barrier packaging (with tie layer)

- A. Co-extrusion PE/PA film with up to $\leq 30\%$ polyamide PA6 or PA6/66:
PA is used in combination with a maleic anhydride-grafted PE compatibilizer as a tie layer at $\geq 0.5\text{g}$ per g polyamide. The tie layer must be specified by the manufacturer for use in the coextrusion of PA and PE.
- Outcome 1A: These films are to be considered compatible for the PE film recycling stream for injection moulding and blown film with a recyclability of $\geq 70\%$.
 - Receives a Check Locally ARL outcome.
- B. Meeting Condition 1A, with additional compatibilizer added to the primary film structure in a PE layer that is not directly in contact with the polyamide layer. The compatibilizer (PE-g-MAH with high grafting densities) is added at $\geq 0.15\text{g}$ per g polyamide.
- Outcome 1B: These films are to be considered compatible for the PE film recycling stream for injection moulding and blown film with a recyclability 100%.
 - Receives a Check Locally ARL outcome.

Condition 2: Coextruded high barrier packaging (with tie layer)

- A. Co-extrusion PE/PA film with up to $\leq 30\%$ polyamide PA6 or PA6/66 with a max. 5 wt% EVOH: PA is used in combination with a maleic anhydride-grafted PE compatibilizer as a tie layer at $\geq 0.5\text{g}$ per g of polar polymers (PA+EVOH). The tie layer must be specified by the manufacturer for use in the coextrusion of PA and PE.
- Outcome 2A: These films are to be considered compatible for the PE film recycling stream for injection moulding and blown film with a recyclability of $\geq 70\%$.
 - Receives a Check Locally ARL outcome.
- B. Meeting Condition 2A, with additional compatibilizer added to the primary film structure in a PE layer that is not directly in contact with the polyamide layer. The compatibilizer (PE-g-MAH with high grafting densities) is added at $\geq 0.15\text{g}$ per g polyamide.
- Outcome 2B: These films are to be considered compatible for the PE film recycling stream for injection moulding and blown film with a recyclability 100% minus the % EVOH is the % recyclable.
 - Receives a Check Locally ARL outcome.

Condition 3: Laminated barrier packaging with adhesives

- A. Laminated PE/PA films with up to 23% polyamide 6 or polyamide 6/66 with adhesives proven recyclable if a compatibility promoter based on PE-g-MAH (3.43% wt % of the total film) has been incorporated into the PE layers.
- Outcome 3A: These films are to be considered compatible for the PE film recycling stream for injection moulding and blown film with a recyclability of $\geq 70\%$.
 - Receives a Check Locally ARL outcome.

See [Conditional Criteria Submission Form](#) for required attachments.

APPENDIX 2. Predominantly PE films – APCO-recommended Tests

The following protocols are currently recommended by APCO to test films made predominantly of PE.

- Modified APR Critical Guidance Protocol for PE Film (using a minimum 25% Innovation Concentration).
- Modified APR Benchmark for Blown Film (modified - using a 1.5mil – 2.5mil thickness).

- APR Critical Guidance Protocol (unmodified - using 50% Innovation Concentration).
- Recyclclass RECYCLABILITY EVALUATION PROTOCOL FOR PE FILMS.
- Cyclos-HTP Recycling Application Compatibility Test for PE-based Flexible Packaging (+ Elongation at Yield (TD/MD)).

Each testing protocol will have its own criteria to meet, that will be set out in the testing method documentation. A pass on the CG Protocol, Modified CG Protocol, Modified APR Benchmark Protocol, Recyclclass Protocol and Cyclos-HTP would mean Criteria #3, of the [Soft Plastics Submission Criteria Form](#) 'Material/format passes relevant testing protocol' would be satisfied.

APPENDIX 3. Predominantly PP films – APCO-recommended Tests

The following protocols are currently recommended by APCO to test films made predominantly of PP.

- Recyclclass RECYCLABILITY EVALUATION PROTOCOL FOR PP FILMS

Each testing protocol will have its own criteria to meet, that will be set out in the testing method documentation. A pass on the Recyclclass Protocol would mean Criteria #3, of the Soft Plastics Submission Criteria 'Material/format passes relevant testing protocol' would be satisfied.

10. Document Control

Version	Date	Changes	Authorised by:
1	20/07/2023	Initial draft	Sarah Sannen
2	15/09/2024	Longevity of Approved Submissions	Anneliese Syder
3	21/03/2025	Conditional Criteria for Structures containing Polyamide (PA)	Internal Review Committee
4	10/10/2025	Inclusion of the Conditional Criteria Submission Form	Internal Review Committee