

Australasian Recycling Label program processes – Under Review

This document outlines the process for materials or formats to be classified as 'Under Review' in the Australasian Recycling Label (ARL) program.

1. Defining Under Review

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 it is expected an extended review timeline is needed 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 Waste Export Bans of Australia and the Kerbside Collection harmonisation of New Zealand.*
- **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 such time as 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 at all. For ARLs already in market related to the Under Review format/material, an internal risk assessment will be made 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 a public position statement from APCO that cites the areas of recovery that require further investigation.

2. Roles and Responsibilities

2.1. Applicant

The Applicant is responsible for:

- Meeting their responsibilities as per the [Submissions Process](#).
- Sharing new information, as it emerges, to support the continued review of the item once 'Under Review'.

2.2. ARL team and Packaging Transformation team

The ARL team / Packaging Transformation team are responsible for:

- Meeting their responsibilities as per the Submissions Process.
- Determining and engaging relevant stakeholders to escalate the review once 'Under Review'.
- Maintaining and updating the information available for public comment throughout the 'Under Review' process.
- Collating the evidence required to determine recyclability.
- Identifying system changes that could impact the recyclability decisions of the ARL program.
- Providing a public position statement on the material or format outlining the recovery challenges.

2.3. Material Stewardship Committees (MSCs) & the Aotearoa ARL Advisory Group (AAAG)

The Material Stewardship Committees (MSCs) and Aotearoa ARL Advisory Group (AAAG) are responsible for:

- Meeting their responsibilities as per the Submissions Process.
- Identifying the evidence gaps required to determine recyclability, with recommendations for relevant stakeholders to engage with.
- Providing information on upcoming and potential changes to the resource recovery sector, including shifts in recyclability of packaging items and materials.
- Meeting their responsibilities, as outlined in the Terms of Reference (AAAG)

2.4. Internal Review Committee (IRC)

The IRC is responsible for:

- Meeting their responsibilities as per the Submissions Process.

2.5. Independent Review Panel

The IRP is responsible for:

- Meeting their responsibilities as per the Submissions Process.

3. Who may raise items to be Under Review

Any stakeholder of the ARL program. This includes, but is not limited to a:

- Brand owner
- Manufacturer
- APCO
- MSC's
- AAAG
- Reprocessor
- MRFs
- Industry association
- Consumer
- Non-government organisation
- Government

A submission may be made at any time via the APCO Member Centre or by contacting the ARL team, arl@apco.org.au. The relevant documentation and review process is outlined via the Submissions Process.

4. Determining 'Under Review'

The Under-Review process is undertaken where gaps have been identified within the recovery value chain that have led to a lack of consensus among relevant stakeholders regarding recyclability outcomes. This lack of consensus may be the result of missing key information that could not be established through consultation through the MSCs, AAAG, IRC, relevant industry sectors, or public consultation. The Under-Review process may also be undertaken if the recommendations provided to APCO through the consultation process are inconclusive and/or contradictory.

All knowledge gaps and/or conflicting advice should be captured based on where these gaps exist within the recovery process criteria (see Figure X). This feedback should be provided to stakeholders throughout the public consultation period.

APCO will make best efforts to address the evidence gaps within 12 months for Under-review items. Where this is not possible, APCO may convene an industry working group to address this issue, which may result in product stewardship, consumer awareness campaigns, data collection and/or investment in recovery infrastructure.

Please refer to the table in Section 7 of the [ARL program manual](#) which outlines the framework that the ARL program uses to determine recyclability of packaging assessed through PREP and refers to the data source or basis for each of the criteria and their associated thresholds.

5. Public Consultation

All ARL Program submissions and proposed threshold changes are listed on the [Priority Areas page](#) of the ARL website. The status is changed to "Open for public comment" when all relevant and redacted (if necessary) documentation is collated for the proposal. This status will remain in place for a minimum of 30 days, and public feedback will be invited on the proposal.

The information received as part of the consultation process is provided to the IRC for consideration and response. Following the re-review of information, if a recyclability determination is still not possible and has been approved to be 'Under Review' by the IRC, the status is changed to "Under Review" on the website, with the recyclability classification of the material/format listed as 'Under Review' in PREP (where applicable).

6. Communication of outcomes

Where the IRC has approved the recommendation to place a material or format 'Under Review', this decision shall be communicated to the relevant committees. The ARL team shall circulate the outcome to the appropriate committees following the approval of the minutes from the relevant IRC meeting. The outcome communication shall include the completed document(s) as attachments with all relevant, deidentified feedback and responses.

The ARL team shall communicate with the impacted parties the next steps required to bring the item out of 'Under Review' and the timelines for potential decisions, where these can be estimated.

These outcomes shall also be communicated within PREP for new or existing materials where relevant. Where an existing material is already within PREP with a recyclability classification (Recyclable, Recyclable with Lost value, Conditionally Recyclable or Not Recyclable), the

classification shall be updated to ‘Under Review’. These changes shall be communicated per the communication processes for program changes outlined in the [ARL program manual](#).

7. No longer Under Review

Once the IRC can determine the item's recyclability outcome, it shall be removed from Under Review, and PREP will be updated if necessary to reflect the relevant recyclability outcomes.

8. Document Control

Version	Date	Changes	Authorised by:
1	Sep 2024	Original	ARL Program Manager