NZ kerbside implementation guide for the Australasian Recycling Label (ARL) program

NOTE: this is Version 3 of this document, which was initially released 1 February 2024. There have been changes made to all sections, given the further updates that have been made in PREP and further clarifications on the details of the gazette from the New Zealand Ministry for the Environment (MfE).

To support ARL program users assessing and labelling packaging via the ARL program for the New Zealand market, APCO have provided this guide which complements information in the September 2023 *Gazette notice* and associated *Standard materials for kerbside collections: Guidance for territorial authorities* document, released by the NZ MfE.

The purpose of this guide is to provide advice to ARL program users operating in or selling product/packaging into New Zealand to ensure that the assessment and corresponding on-pack labelling through the ARL aligns with the advice provided by the MfE.

As of 3rd September 2024, PREP has been updated to align with the gazette. This includes areas where the ARL program currently deems the material/format as Not Recyclable based on evidence gathered in developing thresholds for the program, and is maintaining this classification despite this not being explicitly called out in the gazette (e.g. rigid plastics using Carbon Black and opaque PET; wet strength board).

Users are now encouraged to return to their previously assessed projects and re-assess their packaging for the NZ market to the complete suite of PREP updates.

This document is divided into three sections:

- **Section 1** details the cases for which the PREP outcome for NZ assessments **CAN** be followed to inform the application of the ARL on-pack - this is now the case for all items listed in the gazette.
- **Section 2** outlines the consumer instructions in the Conditionally Recyclable ARL that are / are not applicable for packaging assessed and labelled in New Zealand, based on guidance from the MfE.
- **Section 3** is NEW, and outlines best practice guidance for labelling items that are not detailed in the gazette, including containers with untethered lids and fibre items with potentially separable plastic elements (e.g. windows).

PLEASE NOTE: whilst the guidance in this document can be used to inform on-pack application of the ARL in New Zealand, an accompanying PREP assessment MUST be conducted regardless of whether the outcome currently provided in PREP aligns with the MfE's guidance or not.

Regarding thresholds for fibre-based packaging in NZ: in addition to the guidance provided in this document, the thresholds for fibre-based packaging in NZ are currently under review, pending discussions with recyclers and industry regarding fibre bale composition. PREP and this guidance document will be updated at the conclusion of these investigations.

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Section 1 – NZ assessments where PREP outcomes CAN be used to inform on-pack ARL application

The table below outlines cases for which the PREP outcome for NZ assessments **CAN** be followed to inform the application of the ARL on-pack.

Material	Sub-category	Outcome in PREP	Correct on-pack ARL based on MfE guidance	Examples
Oversized items (NEW in v3)	Glass, plastic, steel and aluminium containers more than 4L	Not Recyclable - the evaluation of 'oversize' will be based on the current large item threshold in PREP for rigid plastics, which is 231 x 231 mm. All glass, plastic, steel and aluminium packaging that exceeds 231 x 231mm will be assessed as Not Recyclable in New Zealand.	**Not Recyclable**	Large plastic jerry cans, steel and aluminium drums
Glass bottles and jars (NEW in v3)	Glass not intended for packaging, or for use in medical/laboratory applications	Glass categories and associated glossary entries have been updated to further define 'Glass' (Recyclable) and 'Other glass' (Not Recyclable). 'Other glass' has now been updated to include borosilicate glass as Not Recyclable for both AUS and NZ. Borosilicate glass has been identified as being typically used in medical/lab applications and is a known contaminant in the glass recycling process.	**Not Recyclable**	Laboratory vials, glass bottles and jars used for medicines
Rigid plastics	Rigid plastic plant pots (including those made of PP)	Users should assess plant pots as containing hazardous contents, which will render the plant pot Not Recyclable.	**Not Recyclable**	Rigid plastic plant pots of all colours and polymer types

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Undersized items	Three-dimensional items smaller than 50mm at their widest point	Not Recyclable	**Not Recyclable**	Small caps and lids *APCO is aware of a product stewardship scheme currently in development. The Drop off only logo may become available for members of this scheme should they meet the requirements of the ARL program.
Undersized items	Two-dimensional items smaller than 100mm by 140mm	Not Recyclable	**Not Recyclable**	Cardboard swing tags
Rigid plastics, flexible plastics, metal (i.e. excludes fibre and glass lids that meet all other thresholds for recyclability)	Lids, caps, and tops (including pumps and triggers)	Not Recyclable. This excludes glass and fibre lids that meet all other thresholds for recyclability). It also excludes steel lids on cans (ring pull or those opened with can openers only), which provided they meet all other thresholds for recyclability are permitted to be modified at the artwork design stage to be Conditionally Recyclable with instructions to 'Leave Attached'. NOTE: it will not be possible to modify the Not Recyclable outcome for steel lids in the PREP report, this will need to be done by your team when designing the artwork.	**Not Recyclable.** This excludes glass and fibre lids that meet all other thresholds for recyclability). It also excludes steel lids on cans (ring pull or those opened with can openers only), which provided they meet all other thresholds for recyclability are permitted to be modified at the artwork design stage to be Conditionally	Lids, caps, and tops (including pumps and triggers) of all types of containers - e.g. bottle caps, jar lids, etc (except steel lids on cans and glass and fibre lids that meet all other thresholds) *APCO is aware of a product stewardship scheme currently in development. The Drop off only logo may become available for members of

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			Recyclable with instructions to 'Leave Attached'.	this scheme should they meet the requirements of the ARL program.
Aluminium and steel	Aluminium and steel cans and tins	Recyclable when User selects 'Aluminium – Rigid or 'Steel'. Note, aluminium lids are not recyclable. Exception for steel lids as per above.	**Recyclable**	Aluminium beverage and steel food cans
	Aluminium and steel aerosol cans	Not Recyclable when User selects 'Aluminium – aerosol can' or 'Steel – aerosol can' as the primary material in an assessment.	**Not Recyclable**	Aluminium and steel aerosol cans *Regarding aerosol cans, advice from the MfE is for consumers to check with their local council for disposal guidance – refer to MfE guidance here.
Aluminium foil and trays	Aluminium foil and trays	Not Recyclable when user selects 'Aluminium Foil (trays & tubes)'	**Not Recyclable**	Aluminium foil - e.g. confectionary wrappers and aluminium trays - e.g. pie and ready-meal trays *NZFGC advise that in partnership with the

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				Association of Metal Recyclers and The Packaging Forum is working to find alternative solutions for metal packaging and will report back on this soon
Hazardous substance containers	Hazardous substance containers (e.g. those containing pesticides, motor coolant or automotive oil)	Not Recyclable and not able to be modified to be Conditionally Recyclable with instructions to 'Empty to recycle'	**Not Recyclable**	Hazardous substance containers (e.g. those containing pesticides, motor coolant or automotive oil)
Rigid LDPE (resin identification code 4)	Rigid LDPE bottles, trays and containers	Not Recyclable	**Not Recyclable**	Rigid LDPE containers
Paper and cardboard	Paper or cardboard that is plastic lined (single- or double-sided), including formats where any polymer type (including compostable plastics) has been selected in PREP as a secondary material, bonded	Not Recyclable	**Not Recyclable**	Cold food or beverage formats laminated with polymer, some plastic-lined meat trays, some paper beverage cups.

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	via double-sided lamination			
	Paper or cardboard that is foil lined, including formats that use aluminium as a secondary material bonded by lamination, vacuum metallisation or foiling	Not Recyclable	**Not Recyclable**	Foil-lined fibre boxes for cold food storage
	Packaging made from wet strength board	Not Recyclable	**Not Recyclable** (not specifically called out in gazette, but maintained as per ARL program thresholds)	Some cold beverage packaging - e.g. 6-pack carriers
	Packaging made from waxed paper or board	Not Recyclable	**Not Recyclable** (not specifically called out in gazette, but maintained as per ARL program thresholds)	Some deli paper, bakery bags, etc.
	Paper beverage cups	Not Recyclable	**Not Recyclable**	Hot and cold beverage cups with a polymer layer bonded via either single- or double-sided lamination.

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Aseptic (foil-lined) and gable-top cartons	Aseptic (foil-lined) and gable-top cartons	Not Recyclable OR Check Locally/Drop off only if you are a member of the Food and Beverage Carton Stewardship Scheme *It is also possible to message for the caps of these formats to be Conditionally Recyclable when left attached.	**Not Recyclable OR** Check Locally/Drop off only if you are a member of the Food and Beverage Carton Stewardship Scheme *It is also possible to message for the caps of these formats to be Conditionally Recyclable when left attached.	Long-life milk and juice cartons
Plastics with resin identification codes 3, 6 or 7	Rigid PVC (3), PS (6) or Other plastic (7) packaging	Not Recyclable	**Not Recyclable**	Rigid PVC (3), PS (6) or Other plastic (7) packaging
Rigid PET	Opaque-coloured PET bottles, trays, and containers	Not Recyclable	**Not Recyclable** (stated recyclable in gazette, but maintained as not recyclable as per ARL program thresholds)	Opaque PET bottles, trays, and containers
	Rigid dark-coloured plastic bottles, trays and containers that use Carbon Black	Not Recyclable	**Not Recyclable** (not specifically called out in gazette, but maintained as per ARL program thresholds)	Rigid dark-coloured plastic bottles, trays and containers that use Carbon Black
	Rigid PET-G and pigmented C-PET (variations of PET) bottles, trays and containers	Not Recyclable	**Not Recyclable** (not specifically called out in gazette, but maintained as per ARL program thresholds)	Rigid PET-G and pigmented C-PET bottles, trays and containers

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	Rigid PET trays with water-dissolvable biopolymer laminated via single-side lamination	Recyclable with Lost Value	**Recyclable**	Rigid PET meat tray with water-dissolvable biopolymer layer

Section 2 – Consumer instructions in the Conditionally Recyclable and their applicability for the New Zealand market

Instruction text within Conditionally Recyclable ARL	**Material / format typically applied to**	**Permitted in the NZ market?**
Flatten to recycle	Applies to carboard cartons that may not readily crush in a recycling truck such as those used for the storage of electronic equipment. 3D cardboard may travel to plastics stream	**Yes**
Remove 'component'	Applicable to packaging that has an attachment that does not meet the secondary material thresholds for recycling the main packaging item. For example, paper bag with material handles. 'Component' must also be labelled separately to direct the consumer of that item's disposal method	**Yes**
Separate to recycle	Some composite materials/ Applicable to packaging that has an attachment that does not meet the secondary material thresholds for recyclability of the main packaging item, but both items are easily separable by consumers, and can be classified as Recyclable once separated.	**Yes**
Leave attached	For steel lids on steel cans that are opened with a ring pull or can opener	**Yes – for steel lids that are opened with a ring pull or can opener only**
Check locally OR Return to store	Applicable for soft plastics that have been assessed as eligible against the NZSPRS scheme (organisation must be a NZSPRS partner)	**Yes**

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OR Store drop off		
Drop off only	Applicable for food and beverage cartons accepted for collection and recycling via the Food & Beverage carton recycling scheme. NOTE: in order to use this logo, organisations must be members of the F&B carton recycling scheme	**Yes**
Scrunch into ball / make into ball	2D aluminium foil	**No**
Fold to recycle	Large aluminium foil items such as trays (larger than 231mm in two directions)	**No**
Place in used envelope	Small paper items that don't meet the thresholds for 2D (100x140mm) or 3D items (at least 50mm in 1 dimension) in NZ	**No**
Crush Bottle & Replace Cap	Small plastic lids on recyclable plastic bottles	**No**
Empty to recycle	Applicable to all packaging items that contain hazardous contents that can be emptied (e.g. aerosol cans)	**No**

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Section 3 – Best practice guidance for assessment and labelling for specific formats.

Fibre items with potentially separable plastic elements (e.g. plastic windows)
MfE guidance to consumers for fibre items with large plastic inserts/windows is to remove these prior to recycling/disposal. To support this messaging, it's recommended that for the NZ market, fibre with removable plastic inserts the following application of the ARL is used:

- E.g. pasta box with plastic window: Box – Conditionally Recyclable with instructions to 'Remove window' or 'Separate to recycle', Window – Not Recyclable.

Containers with untethered lids
MfE guidance is that containers must be recycled without their lids, and all plastic and metal (excluding steel on can-openable or ring-pull cans) are not recyclable. To support this messaging, it's recommended that for the NZ market, containers with untethered lids, the following application of the ARL is used:

- E.g. Squeezy sauce bottle with untethered lid: Bottle – Conditionally Recyclable with instructions to 'Remove lid', Lid – Not Recyclable.

NOTE: the definition of a tethered lid, as per the gazette is: Tethered means that it stays attached to the bottle or container when open and cannot be easily removed.

NOTE: It is not possible to modify a Recyclable or Not Recyclable outcome in PREP to be Conditionally Recyclable with instructions to Remove Component' or for the majority of components, 'Separate to Recycle'. In order to apply the above best practice labelling, users will need to provide this additional guidance to their artwork / design teams, instructing them to use the Conditionally Recyclable ARL with either 'Separate to Recycle' and Not Recyclable, rather than the outcome in the PREP report.

Aluminium foil or trays
Aluminium foil and trays are both classified as Not Recyclable in New Zealand. These formats should be assessed by selecting the primary material Aluminium foil (trays & tubes), which will return a Not Recyclable. No further verifying assessment of the recyclability of the foil when scrunched or folded should be conducted, and the Conditionally Recyclable ARL with instructions to 'Scrunch into ball' or 'Make into ball'.

ARL program compliance for NZ assessments

The guidance in this document, as well as the guidance provided by the documents released by the MfE is intended to inform the application of the ARL for NZ.

For the purposes of auditing and compliance, provided that a PREP assessment has been conducted for each application of the ARL in NZ, APCO will consider Users compliant with the Terms & Conditions of the ARL program if they have applied the ARL in line with the most recently updated, advised guidance until such time as a timeline for required on-pack artwork update is communicated by NZ Government. To ensure accurate records for this process, organisations are encouraged to note in their ARL tracking/reporting systems where the application of the ARL has been applied according to the PREP outcome, or according to this

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guidance. This will assist in identifying when PREP assessments will require updating once all NZ kerbside standardisation requirements have been updated in PREP.

APCO will communicate timelines for the following major changes in line with NZ kerbside standardisation:

- The specific changes to the platform and how this will impact current and existing PREP assessments.
- Timelines for when Users will need to update existing PREP assessments to reflect the implemented updates. Typically, this is 12 months following PREP updates, however APCO will defer to timelines set by NZ government, once available.
- Timelines for when Users will need to update existing on-pack ARL artworks. Typically, this is 12 months following the update of the corresponding PREP report, however APCO will defer to timelines set by NZ government, once available.
- There has not been confirmation from the Ministry for Environment on timelines for updates, however this will be communicated once an update is available.

Document control

Date & version	Written / modified by	Updates
01/02/2024	Song-Hee Warrell	Original
18/03/2024	Song-Hee Warrell	Updated in line with PREP updates made 19th March, 2024 including updates for packaging with aluminium or steel as the primary material; outcomes for lids/caps/closures; outcomes for undersized 2D items
03/09/2024	Song-Hee Warrell	Updated in line with PREP updates made early September, including updates for glass types and classification, oversized items, rigid plastic plant pots and triggers and pumps included in lids categorisation.

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