APCO Australasian Recycling Label Program User Guide March 2023





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- Document history

What's new in this version:

- · Updated useability and readability based on Member feedback
- · Redirected guidance for alternative destinations via external document
- Updated style guide requirements, including new processes for Micro ARL and Combined Micro ARL use
- Options for embossing the ARL
- · Updated information on compliance processes
- Addition of FAQs
- · Added resources included in Appendix

For full version history and document control, refer to the final page of this document.

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Introduction to PREP and the ARL

The Australasian Recycling Label Program is a labelling program that provides designers and Brand Owners with the tools to inform responsible packaging design and helps consumers to understand how to correctly dispose of packaging, across both Australia and New Zealand. Led by the Australian Packaging Covenant Organisation (APCO), in collaboration with Planet Ark and PREP Design, the Program aims to increase recycling and recovery rates and contribute to cleaner recycling streams. APCO Members receive exclusive and free access to the two elements of the Program: the Packaging Recyclability Evaluation Portal (PREP) and the Australasian Recycling Label (ARL). Together these two elements work harmoniously to assess the recyclability of packaging and inform on-pack recyclability labelling.

Packaging Recyclability Evaluation Portal (PREP)

PREP is an online tool that provides a way for Brand Owners, packaging designers and manufacturers to assess whether an item of packaging could be classified as 'recyclable at kerbside' in Australia and New Zealand for consumer packaging. PREP takes into account how widespread the collection services are for the item, how the item will behave at the Materials Recovery Facility (MRF) and subsequently at processing facilities, such as paper mills and aluminium smelters.

PREP produces a Recyclability Evaluation Report for each 'project' that is assessed and will list the recyclability classification for each 'separable component'.

Australasian Recycling Label (ARL)

The ARL is an evidence-based, standardised labelling system that provides clear and consistent on-pack recycling information to inform consumers of the correct disposal method at kerbside. The ARL must be used in conjunction with PREP, which informs the User of the recyclability outcome and on-pack ARL artwork for each 'separable component' of packaging. The label is underpinned by recyclability information for both Australian and New Zealand markets.

Organisations are able to use the ARL on their own-Brand packaging, destined for consumption at home where packaging will be disposed of at household kerbside bins. The application of the ARL must be completed by the Brand Owner, as the responsibility and liability for labelling, tracking, and reporting with the ARL lies with the Brand Owner.

The ARL is not applicable to business-to-business (B2B) packaging, or any packaging destined for disposal outside of household kerbside bins.

Packaging Manufacturers are only able to label their own-Branded packaging going onto the market with the ARL if they are not subsequently selling it to customers who will re-Brand these items. However, Packaging Manufacturers can support their customers by completing and sharing their PREP assessments.

Key steps of the

Australasian Recycling Label Program

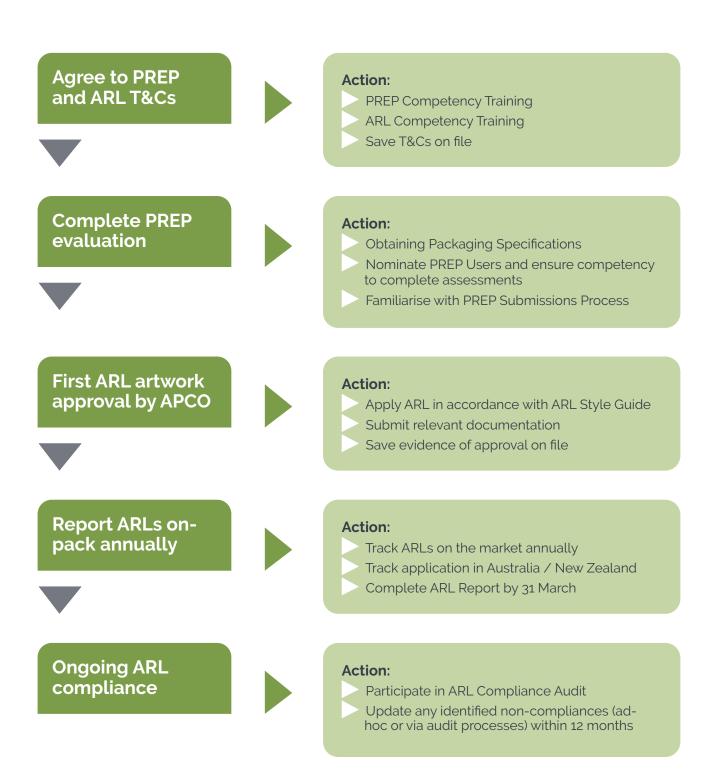


Figure 1. Australasian Recycling Label Program steps

Glossary

Please refer to the below definitions of terms referenced throughout this User Guide.

APCO:

Australian Packaging Covenant Organisation.

ARL:

Australasian Recycling Label.

ARL Artwork:

Refers to the grouping of symbols representing the separable components in a package. The artwork also encompasses individual symbols where packaging consists of one component. See example below.



Classification:

The recyclability outcome of the separable packaging component e.g. Recyclable, Not Recyclable or Conditionally Recyclable.

Competent User:

An individual who has completed the online PREP Competency Course to be considered a proficient and capable User to undertake a PREP evaluation. The PREP Competency Course can be accessed via the APCO Member Centre

First ARL on-pack design:

The Brand Owner's first packaging design using the ARL in accordance with this User Guide and ARL Style Guide requirements. The design as well as the relevant PREP report, is submitted to APCO for approval prior to print, as a proof of compliance with the ARL requirements.

Member:

Refers to organisations that are APCO Members unless otherwise stated.

PREP:

Packaging Recyclability Evaluation Portal.

Recyclability Evaluation Report:

The report that is produced and saved as part of the PREP evaluation.

Secondary Material:

Includes any materials that are not separated from the components by consumers to access or consume products, such as labels or coatings.

Separable Component:

Includes the main packaging item, such as a bottle, and any items that will be separated by the consumer to access or consume the product such as a lid. Each separable component must have an ARL symbol.

User:

An individual of an organisation that has an account within PREP and is completing evaluations.

ARL Compliance Audit:

Official examination and verification of accounts and records to determine compliance with the Australasian Recycling Label Program.

Section 1 Packaging Recyclability Evaluation Portal (PREP)

Introduction to PREP

The Packaging Recyclability Evaluation Portal (PREP) is the first element of the ARL Program and aims to address the confusion surrounding whether an item is recyclable in Australia or New Zealand, or not. Providing validated information on the recyclability of specific packaging formats in Australia and New Zealand, PREP provides designers, brand owners and manufacturers the ability to be confident in their recyclability determinations.

PREP combines two forms of evaluation in assessing recyclability:

- Technical recyclability how the materials are sorted, processed and recovered based on their dimensions and parameters, with data provided through consultations with Material Recovery Facilities (MRFs), and recycling facilities.
- Kerbside status the proportion of the population with access to kerbside recycling of the item. Data
 is collected annually in collaboration with local councils and authorities in Australia (Planet Ark)
 and New Zealand (WasteMINZ).

Agreement to the Terms and Conditions

Members of the Australian Packaging Covenant Organisation (APCO) are given exclusive access to PREP as part of their Membership benefits. To gain, and retain, access to PREP, Members must:

- Be compliant APCO Members by meeting all Signatory obligations or Covenant Supporter obligations, including the timely payment of Membership Fees.
- Agree to the PREP Terms and Conditions.
- Nominate PREP Users, who will hold individual login access to PREP, through the APCO Member Centre.
- Ensure all nominated PREP Users complete the PREP Competency Course, available through the Interactive Learning tab of the APCO Member Centre.

Members are allocated a maximum number of Users under their APCO Membership. Additional Users are available at an additional cost. Please contact APCO for more information.

PREP Training Module

1.1 Website navigation overview

The below is a brief navigation summary of the PREP website, available at www.prep.org.au. Once logged in, a PREP User will see the below tabs at the top of their screen:

Home My Projects ▼ My Account Support ▼ About ▼ Log out

Home

My Projects ▼

Current Projects

Archived projects

Dashboard

Product categories

Home provides general information on PREP and the ARL.

Current Projects includes all current PREP projects an organisation is working on and where a new project can be started.

Archived projects includes any projects that have been archived by an organisation. Examples include test projects, or projects that are no longer on the market.

Dashboard provides a summary of current evaluated components classified as Recyclable, Recyclable with Lost Value, Not Recyclable and Conditionally Recyclable within Australia and New Zealand. This summary can also be selected specific to the product categories set by an organisation.

Product categories One User per organisation will be able to set the Product Categories they would like to use to group their projects. The product category types are free form and there is no limit to how many can be set.

My Account

My Account allows Users to update their details and change their password, as necessary.

Support ▼

Information and Updates

Glossary

PREP Express

Feedback

Soft Plastics

Videos

Information and Updates contains Frequently Asked Questions and supporting information about PREP.

Glossary provides definitions of the terms used throughout the PREP evaluation. These are also accessible via hyperlinks when completing a PREP evaluation. Members are responsible for ensuring Users are familiar with these definitions.

PREP Express is a quick recyclability reference table for single material items. PREP Express cannot be used to evidence recyclability – a PREP report must be completed for all packaging sought to be labelled with the ARL.

Feedback can be completed should a User have any feedback about PREP or questions they require assistance with.

Soft plastics Provides the relevant threshold tables used in the assessment of soft plastics acceptable for collection in Australia and New Zealand. See Section 1.3.c for further detail.

Videos contain the tutorial videos for PREP. Users are required to view these videos prior to beginning an initial PREP evaluation.

About ▼

About PREP

Change Log

About PREP provides further detail about the Packaging Recyclability Evaluation Portal. **Change Log** includes details on the versions of PREP, the updates implemented under each version and the reasoning behind updates.

Logging into PREP

If any issues arise with logging in, the User should ensure their email address is entered correctly and in lowercase, and attempt to reset their password. When setting the password, please note that PREP cannot accept symbol characters such as '!@#\$%^&*()' and if the password is not accepted, the page will refresh. If the User is still having difficulties, they should contact APCO.

1.2 Prior to completing a PREP evaluation

1.2.a Competence

Note: Members will need to nominate individuals to be given a PREP User login. Please speak to your organisation's Primary Contact to organise access.

Only those competent in the use of PREP with their own login should complete PREP evaluations. The Member determines this competency to reduce the risk of false or misleading statements of recyclability via the ARL after incorrect PREP evaluations. Members underpin the integrity of the ARL by avoiding any false and misleading claims.

Interactive Learning: To support accurate and efficient use of both PREP and the ARL, APCO have developed online interactive training courses – the PREP Competency Course and the ARL Competency Course. These courses take around 30 minutes each and are accessible via the APCO Member Centre. All new and existing PREP Users are required to complete the PREP Competency Course prior to using PREP and applying the ARL on-pack.

Organisations should save their completion certificate for the PREP Competency Course on file for auditing purposes – see section 3.2.

Additionally, at a minimum, a PREP User should utilize the following resources available on the PREP website a www.prep.org.au:

- · PREP walk-through videos
- Frequently Asked Questions (FAQ)
- Glossary; and

1.2.b Obtaining and verifying packaging specifications

To complete a PREP evaluation, evidence of packaging dimensions, materials, inks & glues and polymer types are required. Members may need to contact suppliers for this information, and are responsible for the verification of this data. See *Appendix 3* for PREP Evaluation Questions.

1.3 Completing a PREP evaluation

Once training is completed and packaging specifications obtained, the User can then begin completing PREP evaluations. A 'new project' should be created for the item that is to undergo the PREP evaluation under the *My Projects* tab. Please ensure 'projects' are labelled clearly to ensure they are easily identifiable and can be easily tracked by the Member organisation. Once a User has logged into PREP, they will see the following pages at the top of their screen.

Overview Items Draft Report Modify ARL Final Report Saved Reports

There are two main sections to complete, the *Overview* and the *Items*. Complete all sections thoroughly, using the information gathered as per *Appendix 3*. When a 'new project' is created, any input information will be automatically saved. This means Members do not have to complete the evaluation in one sitting: they can begin an evaluation and return to complete it at another time.

Overview Items Draft Report Modify ARL Final Report Saved Reports

In the **Overview** page of PREP, Users provide all the details for the project including a name and description for internal tracking, whether it is sold into Australia, New Zealand or both markets and the separable items the project has. When adding separable components, Users will select the material and fitting separable component name. This is important in generating the ARL through the Modify ARL process (detailed in section 1.3.b)

Remember, packaging should be assessed in the state it would be after consumption. To determine what a separable component is, Users should ask 'Does the consumer have to remove this from the main item for the product to be consumed?' If yes, this is a separable component. If no, it is a secondary material.

Please note: PREP assumes that packaging is clean and empty at the time of disposal. Contents of packaging, and associated residue, may cause contamination and hygiene issues during the recycling process. Any contents remaining within the packaging could impact the recyclability outcome.

Overview Items Draft Report Modify ARL Final Report Saved Reports

Once the separable components have been nominated, click into the **Items** page where data for each of the items highlighted in the overview page should be entered. Data will include the material type, dimensions, weight, inks used, and any secondary materials that remain attached to the main packaging item when products are consumed, such as labels, tamper-evident seals, coatings and laminates.

1.3.a Draft Report

Overview Items Draft Report Modify ARL Final Report Saved Reports

Once all information is entered correctly for the PREP evaluation, a Recyclability Evaluation Report can be previewed in the **Draft Report** tab. This function allows Members to promptly identify the recyclability outcomes of their PREP evaluation. PREP will classify the item in one of the following ways within the **Draft Report**:

Classification	Meaning
Recyclable	Recyclable at kerbside. The assessed packaging item is both technically recyclable and widely accepted at kerbside.
	The Recyclable "opaque" Mobius communicates to consumers that this item should be placed in their kerbside recycling.
Recyclable with Lost Value	Recyclable at kerbside. The assessed packaging item is both technically recyclable and widely accepted at kerbside, however there is an element of lost value. 'Lost Value' is intended to be feedback for the designer to identify that the highest value of recovery is not being accomplished here or the item causes some contamination. Refer to the Recyclability Evaluation Report 'Issues' section for more detail.
	The Recyclable "opaque" Mobius communicates to consumers that this item should be placed in their kerbside recycling. The Recyclable ARL may be applied on-pack for both Recyclable and Recyclable with Lost Value classifications.
Conditionally	Conditionally recyclable – Less Widely accepted at kerbside.
Recyclable	The assessed packaging item is recyclable only if the instruction on-pack is followed. Otherwise, this packaging is not recyclable.
Check	This also applies to packaging that is less widely accepted at kerbside. The council collection status for these materials falls within the Less Widely Accepted thresholds, where between 60% - 80% of the kerbside population has access to a council service. Consumers will need to Check Locally with their local council to determine if these materials are accepted in their kerbside recycling bin.
Pa	Conditionally recyclable – Accepted at an alternative destination.
	The assessed packaging item is technically recyclable, is not accepted at kerbside but meets the requirements to be accepted at a recognised alternative destination to kerbside recycling.
Return to	Consumers will need to return these items to drop off points. Only organisations that are partners to recognised alternative destination programs
Ketuli i	will be able to message for conditional recyclability.
Not recyclable Control	Not recyclable at kerbside. The assessed packaging item is not recyclable at kerbside and will have to be placed in their general waste bin.
	The bin symbol communicates to consumers to dispose of their non-recyclable packaging thoughtfully in the general waste bin.
	NOTE: The item may be recyclable when consumers complete an action that changes the technical recyclability of an item. In this case, the Conditionally Recyclable "transparent" Mobius may be used with consumer instructions (see Section 1.3.b).
Incomplete / invalid	Not recyclable at kerbside. PREP is unable to classify recyclability due to insufficient input of information in the PREP evaluation. Please return to the Items pages within PREP and complete the evaluation with all required information.
Under review - no ARL	Under Review. The assessed packaging item is a material or format that is currently under review in the ARL Program.
applicable Und	Items under review cannot be labelled with the ARL, other than the Not Recyclable
	Whilst this review process is underway, the PREP assessment result will say 'Under Review', which will be changed once the review is completed and a decision has been made.

The Recyclability Evaluation Report will also provide further detail on why the item has received the recyclability outcome(s). An example of a PREP Recyclability Evaluation Report preview is shown in Figure 2.

1.3.b Modify ARL



Please note: This functionality is only applicable to those organisations using the Australasian Recycling Label. If you are not using the ARL, and have not agreed to the ARL Terms & Conditions, you cannot use the modify ARL functionality - please proceed directly to your final report from the draft report.

The Modify ARL tab provides those organisations that have signed up to the ARL the ability to selfnominate not recyclable items as conditionally recyclable, as outlined in section 2.2.c.

If an item is determined to be not recyclable, organisations are encouraged to see if the item is recyclable through an approved consumer instruction (Approved Conditional Recyclability instructions are provided in section 2.2.c). An item can then be added to the PREP report that assesses the packaging item as if that direction or behaviour has been followed. If it is determined to be recyclable following this second assessment, the Modify ARL tab will allow an organisation to override the initial not recyclable result and be selected as conditionally recyclable.

Please note, if these items are determined to remain as not recyclable following a consumer behaviour, conditional recyclability is not applicable and organisations must label using the not-recyclable ARL.

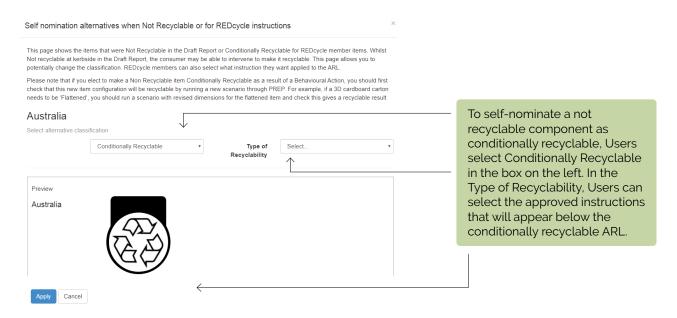
Within the Modify ARL tab, you can click on the pencil icon at the bottom of the page to nominate a notrecyclable item as conditionally recyclable.

Click here to self-nominate as Conditionally Recyclable for items classified as Not Recyclable in the Draft Report i.e. at kerbside 🗸



Organisations will be able to self-nominate the recyclability of a packaging item by selecting 'Conditionally Recyclable' and the approved consumer instructions for that material.

The Modify ARL tab will also allow an organisation to deselect any assessed items that are not necessary to their report, such as those items that have been tested to ensure conditional recyclability is applicable.



1.3.c Final Report

Modify ARL **Final Report** Overview **Items Draft Report Saved Reports**

In the Final Report Tab you will see artwork updated from the Modify ARL Tab, or as they appear in the Draft Report if an organisation is not also using the ARL.

PET Bottle with lid

Figure 2. A preview of the output of a PREP evaluation - the Recyclability Evaluation Report.

Recyclability Evaluation Report

Organisation: Example Organisation

Prepared by: Test User 1







Not Recyclable

Project

Name: PET Bottle with lid

Description: PET bottle with lid

Reference: 1.0

This package will not contain hazardous materials

PREP evaluation 'recyclability at kerbside' outcome. These symbols directly inform the use of the ARL artworks - see Section 2. for more detail. As seen in this example, the PET bottle has been identified as recyclable at kerbside, while the bottle cap is not recyclable at kerbside, if disposed separately from the bottle.

Recyclability Outcome - depicts the

PET bottle

Location

Technical Recyclability

Kerbside Status

Overall Result



Primary Material: Plastic - PET (1)

Issues

Australia

No technical recyclability issues

New Zealand

No technical recyclability issues

recyclable. This is broken down into: Location

2 Component - provides detail on

Technical Recyclability

why the packaging item is or is not

Kerbside Status

Overall result

Location

Technical Recyclability
Not Technically Recyclable New Zealand Not Technically Recyclable Kerbside Status Widely Accepted Widely Accepted Overall Result Not Recyclable Not Recyclable

Primary Material: Plastic - PP (5)

Recyclable with Lost Value - Polypropylene will be recycled with the Mixed Plastics stream and some value will be lost.

Not Recyclable - Small plastic items less than 50 mm in three directions will be screened into the fines stream, which will be directed to glass and then rejected as waste.

Recyclable with Lost Value - Polypropylene will be recycled with the Mixed Plastics stream and some value will be lost.

Not Recyclable - Small plastic items less than 50 mm in three directions will be screened into the fines stream, which will be directed to glass and then rejected as waste.

Issues - provides the reasoning behind non-recyclable outcomes. For example, the bottle cap is not technically recyclable, as it is too small to be correctly sorted at a MRF.

Council Collection status legend

- Widely Accepted = more than 80% of the kerbside population has access to a council service
 Less Widely Accepted = between 60% and 80% of the kerbside population has access to a council
- Not accepted = less than 60% of the kerbside population has access to a council service

- Widely Accepted = more than 80% of the kerbside population has access to a council service

 Less Widely Accepted = between 50% and 80% of the kerbside population has access to a council
- Not accepted = less than 50% of the kerbside population has access to a council service



Council Collection Status Legend clearly states the recycling thresholds at councils for the Member's reference.

1.3.d Design for recyclability feedback loop

One of the unique features of PREP is its ability to provide packaging designers or Brand Owners with the tools required to evaluate packaging for recyclability to inform responsible packaging design. When completing a PREP evaluation, designers are able to alter materials, dimensions and other characteristics that influence the recyclability of a project. This enables a streamlined feedback loop between designers and end-of-life outcomes in Australian and New Zealand recycling facilities.

1.3.e Optional: Secondary Evaluations

In addition to the standard PREP 'project' evaluation, PREP gives Members the ability to complete a secondary evaluation of their packaging to determine if it meets alternative recycling destination parameters. This is only applicable to certain packaging materials, as outlined below.

PREP Soft Plastics Module

Soft Plastics may be recoverable through alternative collection systems if available in both Australia and New Zealand.

How to complete a soft plastic evaluation:

- 1. Within the Item tab of a PREP project, add the primary and any secondary materials detail to the data fields that arise when the plastic is selected as 'soft'. The first data field is for the primary material, with up to 3 secondary materials able to be added.
- 2. PREP will then assess the soft plastics against the relevant thresholds for Australia or New Zealand. These threshold tables are available under the Support tab in PREP.
- 3. If the packaging meets the thresholds, it will be classified as Conditionally Recyclable within the Draft Report tab.
- 4. Within the Modify ARL page you will be able to select the corresponding consumer instruction text you would like for on-pack application.
- 5. Please refer to Section 2.2.b to determine the use of the corresponding Conditionally Recyclable ARL symbol.

Please note: The data fields within PREP for soft plastic assessment will only be available to organisations who are partners with relevant alternative destination programs. If you are a partner but these fields are not visible, please contact APCO.

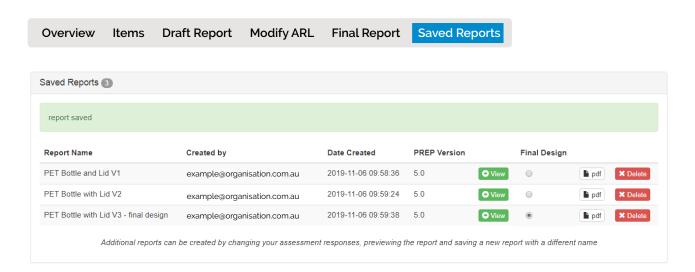
To ensure your materials are accepted by an alternative destination partner, you can assess these materials by referencing the thresholds table included in the soft plastics page of the Support tab within PREP.

1.4 Saving a Recyclability Evaluation Report

Once a project is complete, the Recyclability Evaluation Report must be saved. This can be completed by clicking the 'Save Report' button (as shown below), located at the top of the PREP Recyclability Evaluation Report.



Variations to original packaging designs can be assessed in the same project, allowing multiple reports to be generated and saved under the project before selecting the final report version. These reports are located under the 'Saved Reports' tab within a project. Reports can be viewed, downloaded as a PDF or deleted here, and if multiple report variations exist, a final report version can be selected. The Member is responsible for the adequate identification and storage of documented PREP evaluations and corresponding packaging data to provide evidence of their recyclability claims should they choose to progress with the ARL.



1.5 Duplicating a Project

Alongside the Save Report button in PREP is the 'Duplicate Project' button. When you click the Duplicate Project button, a new Project will open with the same Project title and '_Copy', with all data entered as per the original PREP assessment. This can be useful in assessing similar SKUs where small differences exist between the packaging specifications.

Duplicate Project

1.6 PREP Updates

The data and thresholds included in PREP are under constant review. APCO will provide notice in advance as well as a transition period for any major changes to material recyclability outcomes, i.e. if there is the need to change a material that may have previously been considered Recyclable, to Not Recyclable.

APCO will advise all PREP and ARL users when the exact date of changes will occur and will provide support to those who have artwork changes that need to be made. Any changes to ARL on-pack artwork from these changes in recyclability are expected to be phased-in by Brand Owners as soon as possible, within a maximum 12 month period.

All changes will be communicated via email. They will also be listed on the APCO Member Centre, the PREP Updates Log and the Change Log of PREP, available under the 'Support' Tab of www.prep.org.au.

Updates announced in 2022

- PREP 8.0 (June 2022) launched, which included multiple functional and technical updates to PREP. These updates are detailed in full in the PREP Updates Log
- · REDcycle Program suspended as an alternative destination partner following soft plastics collection pause. As a result, the soft plastic module in PREP was switched off for all ARL Members who were partners to REDcycle.
- Changes to fibre-based packaging thresholds from 2023 and introduction of the APCO Pulpability Test Method. Affected packaging will need to be updated by December 2024. The Quickstart Guide to Designing for Recyclability - Fibre-based Packaging is available on the APCO website.

PREP has added a new region for selection in PREP assessments. This enables Members to assess their packaging against new thresholds that are announced, before going live as per the timelines for updates.

Section 2 Australasian Recycling Label (ARL)

Introduction to the ARI

The second element of APCO's Packaging Recycling Label Program is the Australasian Recycling Label (ARL). The ARL is an evidence-based system that provides clear and consistent on-pack recycling information to inform consumers of the correct disposal method for packaging. The ARL removes confusion, educates consumers, and reduces waste.

A reminder the ARL is not applicable to business-to-business (B2B) packaging, which includes any packaging destined for disposal outside of household kerbside bins, for example in hospitals, schools, warehouses, or food service environments.

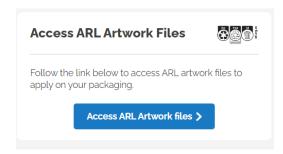
All compliant APCO Members are granted free and exclusive access to the ARL once they have agreed to the ARL Terms & Conditions. One contact from the organisation will also need to complete the ARL Competency Course, available through the Interactive Learning section of the APCO Member Centre

Agreement to the Terms and Conditions

To gain access to the ARL, the following steps must be actioned by the APCO Member:

- The ARL is designed to be used in conjunction with PREP, meaning Members must have agreed to the PREP Terms and Conditions and have completed a PREP evaluation of the packaging before applying the ARL artwork on-pack.
- Members must also have agreed to the ARL Terms and Conditions to gain access to the artwork and corresponding resources. Please note that these Terms and Conditions are legally binding documents. As per the ARL Terms and Conditions, should the Member breach the regulations outlined in this User Guide, APCO has the right to remove the Member from the Program.
- One contact from the organisation must complete the ARL Competency Course, available through the Interactive Learning section of the APCO Member Centre.
- Refer to this User Guide for the use and application of the ARL on-pack, to ensure use is aligned with the ARL Terms and Conditions and ARL artwork specifications.

Following the PREP evaluation of a packaging item, the Recyclability Evaluation Report will inform the use of the corresponding ARL artwork on-pack. Organisations are required to follow the below guidance in then applying these artworks on-pack. The graphics provided within PREP are of low quality, and Members will need to download high quality artwork templates available via the APCO Member Centre.



2.1 Approval of First ARL Artwork On-pack Design

When a Member designs their first packaging using the ARL, they are required to send the first final on-pack design to APCO for approval. This will ensure that the Member has proved their competency in using PREP and the ARL, as well as their ability to follow the requirements needed to display the ARL, as required in the ARL Terms and Conditions.

The Member is to send their first final ARL on-pack design and corresponding PREP Recyclability Evaluation Report to APCO via the Member Centre - First ARL Design Approval form.

Once an initial final design has been approved by APCO, any designs thereafter are to be approved at the discretion of the Member. Internal approval processes need to be in place to ensure compliance with the Competition and Consumer Act 2010 (previously the Trade Practices Act).

2.1.a Final Design Timeline

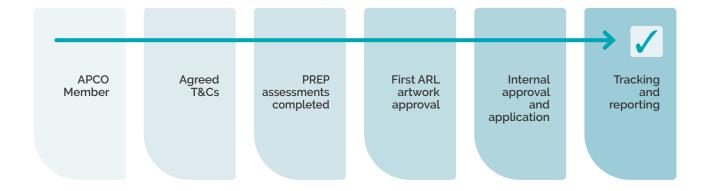
Members are to send their first on-pack ARL designs to APCO via the First ARL Design Approval form, allowing for a review time of at least 2 weeks for approval. This will ensure sufficient time for APCO to fairly assess the label and support any updates needed to progress to the review and approval of the artwork.

Should a Member proceed to market with their first on-pack ARL design without obtaining approval from APCO, this is considered a breach of their Terms and Conditions and can result in removal from the Program.

2.1.b Internal approval - checklist

APCO has created a summary checklist for Members to use internally to ensure they have applied the ARL artwork on-pack correctly, as per the User Guide specifications. Please refer to the Checklist for ARL Approval in the Appendix 6 and ensure ARL artwork use is compliant with the User Guide internally before any final packaging designs are sent to APCO for approval. This checklist can be used on an ongoing basis for continued monitoring of ARL compliance.

Please note: APCO cannot provide consultative support for Members in regards to on-pack claims.



2.2 ARL Artwork Composition

This section of the User Guide provides detail on the specific ARL artwork aspects and the corresponding definitions to guide the ARL artwork application. The following figure depicts the three differing ARL symbols and the three elements within each ARL symbol.

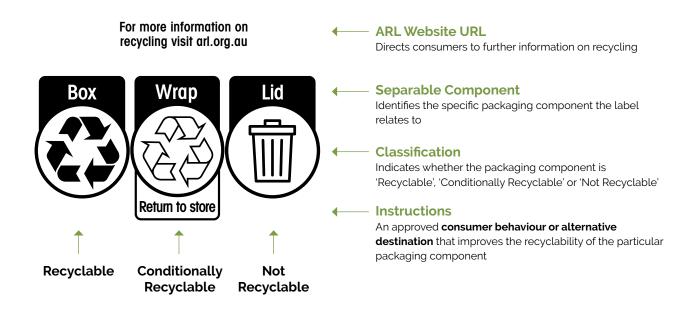


Figure 3. Diagram of the ARL Artwork Composition

For example, this ARL artwork communicates to a consumer how to dispose of each separable packaging component:

- 1. The Box is recyclable at kerbside;
- 2. 1. The Wrap is *conditionally recyclable*, with the instructions directing consumers to "Return to Store" to recycle;
- 3. The Lid is not recyclable at kerbside, and should be placed in the general waste bin.

2.2.a Approved ARL Component Names

The packaging component names within the ARL must be selected from the Approved Separable Component name list. Standardised component names are helpful for consumers to correctly identify separable components. Refer to Appendix 5. to guide the selection of a *Separable Component* name.

The following two questions are used as the guiding principle for identification of the most applicable Separable Component name:

- By what name do consumers know this separable component? OR
- Can a consumer readily identify the separable component by this name?

Please note: Appendix 5. is dynamic and will be updated as additional types of packaging adopt the ARL. If you cannot identify an applicable Separable Component Name, please contact APCO or follow this link to access the Separable Component Name Appeal form.

2.2.b Approved Alternative Destinations

For current information regarding alternative destination partners in the ARL Program, please refer to the Alternative Destination document found HERE (Appendix 11), created to provide dynamic and up to date information regarding APCO's alternative destination partners, or reach out to the ARL Team directly at arl@apco.org.au

Refer to Section 3.3.a for information on submitting a new alternative destination.

2.2.c Approved Consumer Behaviours

If the PREP Recyclability Evaluation Report determines that an item is Not Recyclable, the Member is able to investigate alternative recycling options to determine if the Conditional Recyclability symbol can be used.

'Conditional Recyclability' is applicable when:

- There is another destination that allows recycling. Refer to Section 2.2.b.
- Consumer behaviours are available, that will improve recyclability of end of life packaging. The current list of Approved Consumer Behaviours are presented in Table 6.
- The item is 'Less Widely Accepted' by Councils and so 'Check Locally' needs to be applied

The Member must keep evidence to support their use of the Conditionally Recyclable ARL symbol. This can include completion of the soft plastics secondary evaluation available in the APCO Member Centre, or PREP reports of a packaging item after an action has been complete.

For example, for an aluminium foil item deemed not recyclable, an organisation is able to complete a revised PREP report where the aluminium has been scrunched into a ball and selected as a rigid item, with dimensions entered as if scrunched into a ball. If this revised PREP assessment provides a recyclable result, the Member can then message for foil recyclability using the conditionally recyclable ARL and approved instruction text 'Scrunch into Ball'.

There are several **Approved Consumer Behaviours** supported by APCO and PREP that will increase the recyclability of an item. The common items that require consumer behaviours to be recycled are advised with the PREP Recyclability Evaluation Report, or are listed below in Table 6. To date, APCO only supports these behaviours to be used in correspondence with the ARL.

The instructional text, when placed on-pack, can be wrapped to fit across a maximum of three (3) lines.

Not Recyclable Item (as per PREP Evaluation)	'Instruction' Text (added to label)	Description Notes	Example ARL	
Cardboard items that are 3D after crushing under foot	Flatten to Recycle	Applies to cardboard 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.		
Applied to aluminium foil as 2D foil will travel to the paper stream at a Material Recovery Facility (MRF). Ball must be at least 20mm in two dimensions, when 'scrunched', to be recycled. 'Make' only suitable for items where scrunching is a safety concern.		Foil Scrunch into ball Foil Make into ball		
Aluminium foil	Fold to Recycle	For items that are larger than 231mm in two directions and will be screened out at the cardboard (OCC) stage of a MRF. When folded once, it must have two dimensions <231mm and must retain these dimensions.	Foil Fold to recycle	
Small paper Place in Used the recycling facility and not be Placing them in a used envelop		Small paper items will be blown away at the recycling facility and not be recovered. Placing them in a used envelope will allow the small paper items to be recovered.	Place in used envelope	
Small plastic caps and lids for plastic containers Crush [Bottle] and Replace Cap Crush [Bot		small to be recovered at MRF. *NOTE: If your organisation's packaging is applicable to any state or territory Container Deposit Scheme/Legislation, this messaging should not be applied to avoid	Bottle Cap Crush bottle & replace cap	

Not Recyclable Item (as per PREP Evaluation)	'Instruction' Text (added to label)	Description Notes	Example ARL
Component comprised of 'Other' materials	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.	Bag Handles Remove handles
Some composite materials	Separate to Recycle	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.	Pouch Separate to recycle
Plastic items that are recyclable when selecting 'Combined Disposal' Only applicable for small plastic items combined to a primary plastic component	Leave attached	For small plastic items that are recyclable after selecting 'Combined Disposal'. Small plastic items less than 50 mm in three directions will be screened into the fines stream, which will be directed to glass and then rejected as waste.	Lid Leave affached
Less Widely Accepted packaging items	Check Locally	For items where the council collection status falls within the Less Widely Accepted thresholds (where between 60-80% in Australia, and 50-80% for New Zealand, of the population have access to a kerbside service). Consumers will need to check with their local council to determine if these materials are accepted in their kerbside recycling bin.	Carton Check Locally
Packaging containing hazardous contents or product that consumers should be encouraged to remove	Empty to Recycle	Applicable to all packaging items that contain hazardous contents that can be emptied (e.g. aerosol cans). Please note that this does not include aerosol cans with a Schedule 6 positions rating under the Poisons Standard (or the SUSMP). These items are classified as Not Recyclable. This messaging is also applicable to non-hazardous materials if there is likely to be product or residue inside the packaging that would prevent it from being clean, dry and empty when disposed of.	Can Empty to Recycle

2.2.d Integrated ARL for CDS eligible containers in Australia

To communicate recyclability of eligible formats within Australia via state and territory container deposit/ return schemes, a unique integrated ARL has been created. Organisations seeking to message for the recyclability of their formats through CDS may utilise this option alongside the CDS messaging. Alternatively, organisations can utilise the standard application of the ARL with CDS messaging maintained separately to the ARL.

Members can only utilise this label on eligible containers and can confirm this eligibility through the state and territory scheme operators. The required CDS messaging on-pack, as set by regulations, must accompany the ARL on-pack.

CDS messaging should not be used with ARL consumer behaviours 'Crush bottle & replace cap' and 'Remove sleeve' as these behaviours can inhibit correct identification through CDS.

A PREP report must evidence the use of this label on-pack. Only primary packaging formats (i.e. bottles, cans, jars, cartons etc.) assessed through PREP as Recyclable, Recyclable with Lost Value or Conditionally Recyclable - Check Locally, are able to use the Recyclable or Conditionally Recyclable ARL on-pack to communicate recyclability through kerbside and CDS systems. Separable components will still need to be labelled as evidenced by the PREP report. The below table has been created to guide organisations in using this label.

All design requirements of the ARL, including component names, logo sizing, text sizing and the URL must be met as per this User Guide.

Approved messaging for the ARL

	Approved messaging for Conditionally Recyclable formats			
At home or 10c refund at collection points	Check Locally or 10c refund at collection points			

Using the ARL and CDS messaging

Permitted	Not permitted
REFUND AT COLLECTION DEPOTS/POINTS IN PARTICIPATING STATE/TERRITORY OF PURCHASE At home or 10c refund at collection points	At home or 10c refund at collection points
The ARL and CDS messaging used in full	Only the ARL used on-pack

Format	Recyclability classification and separable components	Label
Aluminium can	An aluminium 'Can' with no separable components, classified as Recyclable or Recyclable with Lost Value through PREP.	TOC DEPOTS POINTS IN PARTICIPATING At home or 10c refund at collection points
Aluminium bottle with aluminium cap	An aluminium 'Can' classified as Recyclable or Recyclable with Lost Value through PREP, with a Recyclable or Recyclable with Lost Value aluminium 'Cap'.	REFUND AT COLLECTION DEPOTISFORMTS IN PARTICIPATING At home or 10c return of collection points
Plastic bottle with a plastic cap	A plastic 'Bottle' classified as Recyclable or Recyclable with Lost Value through PREP, with a plastic 'Cap/'Lid'. An exemption has been provided for CDS eligible containers to utilise one ARL for the Bottle and Cap, as noted by the component name text. This exemption is not applicable to other formats or when not using the integrated CDS ARL.	REFUND AT COLLECTION OF DEPOTS POINTS IN PARTICIPATING At home or 10c refund at collection points
Gable top carton with cap	A gable top 'Carton' classified as Recyclable with Lost Value through PREP with a separable 'Cap'/'Lid' that is Not Recyclable. Plastic Caps and Lids are unable to be messaged to be replaced onto fibre-based packaging as they are not recovered through the paper recycling system and will end up as a contaminant that is directed to landfill.	REFINIO AT COLLECTION 100 BEPOIS POINTS IN PARTICIPATING At home or 10c refund at collection points
Gable top carton without cap	A gable top 'Carton' with no separable components, classified as Recyclable with Lost Value through PREP.	TOC DEPOTS POINTS IN PARTICIPATING At home or 10c refund at collection points
Aseptic carton with cap	An aseptic 'Carton' classified as Conditionally Recyclable – Check Locally, with a 'Cap'/'Lid' that is Not Recyclable. Refer to page 11 for more information on the Check Locally classification. Plastic Caps and Lids are unable to be messaged to be replaced onto fibre-based packaging as they are not recovered through the paper recycling system and will end up as a contaminant that is directed to landfill.	REFIND AT COLLECTION Deposits Points in Nationating Check locally or 10c refund at collection points Check locally or 10c refund at collection points
Aseptic carton without cap	An aseptic 'Carton' with no separable components, classified as Conditionally Recyclable – Check Locally. Refer to page 11 for more information on the Check Locally classification.	REFUND AT COLLECTION OF CHARGE OF PURCHASE Check locally or 10c refund at collection points
Glass bottle with plastic cap	A glass 'Bottle' classified as Recyclable or Recyclable with Lost Value through PREP with a separable 'Cap'/'Lid' that is Not Recyclable. Plastic Caps and Lids are unable to be messaged to be replaced onto glass packaging as they are not recovered through the glass recycling system and will end up as a contaminant that is directed to landfill.	REFIND AT COLLECTION 100 GREPOTS POINTS IN PARTICIPATING At home or 10c return of collection points
Glass bottle with metal (aluminium/ steel) cap	A glass 'Bottle' classified as Recyclable or Recyclable with Lost Value through PREP, with a separable 'Cap'/'Lid' that is Recyclable or Recyclable with Lost Value. Steel and aluminium Lids are able to be recovered from the glass recycling process.	REFIND AT COLLECTION 10C STATE/TERRITORY OF PURCHASE At home or 10c refund of collection points

2.3 ARL Style Guide

The ARL Style Guide defines the design considerations for the standardised application of the ARL artwork on-pack. As per the ARL Terms and Conditions, Members are required to adhere to the design considerations stated in the ARL Style Guide and User Guide. In summary, this includes:

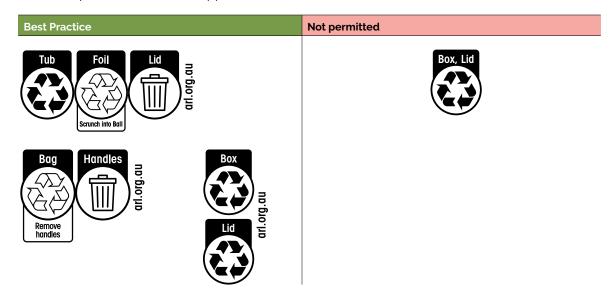
- a. Separable components
- b. URL formatting
- c. Colour
- d. Design
- e. Sizing
- f. Micro ARL style guide
- g. Combined Micro ARL style guide
- h. ARL element sizing by type of ARL
- Use with other logos
- Differences in labelling across countries

Should a Member proceed to market with their first on-pack ARL design without obtaining approval from APCO, this is considered a breach of their Terms and Conditions and can result in removal from the Program. Refer to Section 2.1 for the full process.

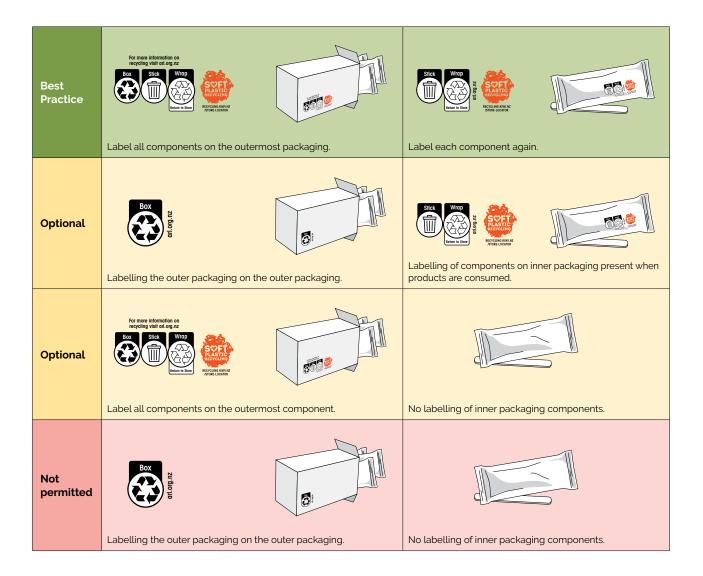
2.3.a Separable components

Every separable packaging component must be clearly labelled. The following specifications are required:

- Only one separable component is to be identified in each ARL Symbol. If the packaging is comprised of more than one separable component with the same classification, you must list multiple ARL Symbols.
- The best practice order of packaging components is with 'Recyclable' components to the left, Conditionally Recyclable components in the middle and Not Recyclable components to the right when horizontal. When vertical, the Recyclable components should be placed at the top, Conditionally Recyclable components in the middle and Not Recyclable Components at the bottom.
- See examples of correct ARL application below:



- Some common separable components that are commonly overlooked, but require their own ARL are kimble ties, seals, lids on steel cans and small clips.
- Placement of the ARL on-pack should reflect how the packaging will be disposed of by consumers. Outer packaging should have the ARL on-pack relevant to all of the packaging components, whilst the inner packaging components should be labelled with their relevant ARL. For example, a box containing ice-creams will have the Box, Wrap and Stick ARL on the box, whilst the wrap is labelled with the ARL for both the Wrap and Stick (as the stick cannot be printed on individually). This ensures relevant recycling information of packaging at the time of packaging disposal - see examples below.



Separable component exemptions

• If packaging labelling real-estate is limited, only **two not recyclable** components can be combined within one standard ARL.



- If you have a packaging format that is composed of multiples of the same component, these components may be labelled with one ARL provided they meet the following conditions:
 - They are made of the same materials (all primary and secondary materials)
 - They have the same recyclability outcome (as they are the same materials),
 - · The components serve the same functionality, and
 - Consumers will identify them as the same component.

For example, you may have multiple 'Dividers' within a larger box – these can be represented by the one, pluralised ARL: 'Dividers'.



Please note, if the components have differing recyclability outcomes, you may still label with the one ARL but will need to label with the lowest recyclability outcome of the two in order to reduce consumer confusion and risk of contamination in the recycling stream.

2.3.b URL formatting

A URL must always be present when using the ARL artwork to direct consumers to further information. Please refer to the below options for the use of the ARL URL (arl.org.au/arl.org.nz) in correlation with the ARL artwork. If you are selling products exclusively into Australia, use the URL 'arl.org.au'. If you are selling exclusively for the New Zealand market, please use the ARL URL 'arl.org.nz'. If products are sold to both markets, it is at the Members' discretion to refer to the most applicable ARL URL and corresponding artwork(s). Organisations are encouraged to utilise the URL reflective of where most of the product will be sold.

There are two URL options:

- 'For more information on recycling visit arl.org.au' and/or arl.org.nz' (best practice)
- 'arl.org.au' and/or 'arl.org.nz'.

The URL size should measure 2mm in height, measured along the 'l' in 'arl.' Refer to section 2.3.h

Either URL can be placed above, below, to the right or left of the ARL. It is preferred that the URL is placed to the top or the right of the ARL artwork as displayed below (Figure 4.1, 4.2, 4.4 and 4.5)

If the Member is unable to display a third party website on-pack, there is the opportunity for the Member's website to be used as an alternative. Please refer to the below specifications if an alternate URL is to be displayed:

- Only the Member's URL is applicable as an alternative, with standardised format e.g. organisation. com.au/recycling
- The label must include text that points the consumer to the URL for further information about recycling;
- The Member's website must have easily accessible and readily available ARL information. This must be kept up to date and provide consumers with a link to the ARL website (arl.org.au/arl.org.nz).
- · Alternate URL use must be approved by APCO,

2.3.c Colour

The ARL symbol may be any one solid colour provided the symbol(s) are clear, legible and compatible with the packaging background. See Figure for 4.4 and 4.5 for examples of the coloured ARL.

The ARL is not permitted to be placed on a busy background. A solid colour background is preferable. See Figures 4.1-4.3 for examples of coloured ARL artworks and various colour backgrounds. Please note: The Recyclable ARL should always have a coloured in/opaque mobius loop, while the Conditionally Recyclable mobius loop remains transparent.

A reversed version has been created for darker backgrounds – see Figure 4.4-4.6. Please refer to the ARL User Graphics Kit and identify the EPS file with 'reverse' at the end of the file name.

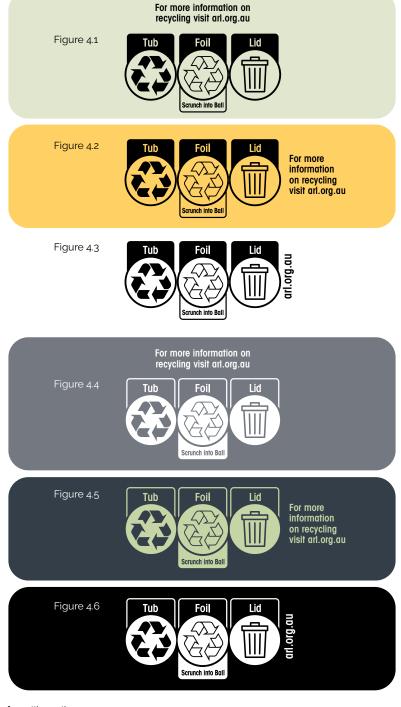
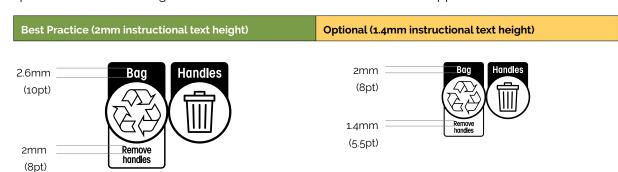


Figure 4. ARL URL and colour formatting options

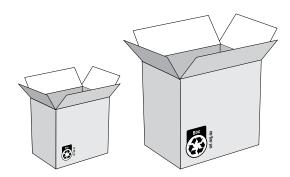
2.3.d Design

The below design considerations must be adhered to when applying the ARL artwork to product packaging.

- Font for the separable component name, URL and any consumer instruction text is required to be ITC Avant Garde Gothic, Demi Condensed. In the instance this font is not available, organisations may use Century Gothic Bold.
- The minimum text size for the component name and URL text is 2mm in height (8pt). For the conditional recyclability instructional text, this can be reduced to a minimum of 1.4mm in height (5.5pt) where space is limited. This height is reflective of the tallest letter in text (i.e. uppercase letters).



- There is no maximum text size requirement. Instruction text can be wrapped to fit across a maximum of 3 lines, but should not exceed 3 lines.
- For larger pack sizes, we recommend that the text size of the ARL be that similar to other text on pack to ensure consumer awareness and legibility.



Members must use the ARL artwork EPS files as they appear when downloaded or as sent by APCO. The ARL designs must not be altered other than when explicitly authorised by this User Guide or APCO. This includes maintaining the Width Depth ratio of the artwork (not including the instructional tab).

Best Practice	Not permitted				
Box an arrong an	Box	Box Box Condition	Box	Box	Box (
Correct font, URL present, no changes to artwork files	Distorted artwork	Conditional recyclability instructions on recyclable or not-recyclable ARLs.	Multi-coloured ARL	Difficult to see colours	Changes to the artwork and incorrect font

Options to emboss the ARL onto packaging

The ARL should only be printed on-pack, however, in some cases it may be possible to emboss the ARL if this is the only option available to label your packaging. Organisations will need to provide a declaration letter and list of applicable SKUs to be labelled using embossing, for approval by APCO. The sizing requirements for the ARL and all text are double that of a standard ARL (refer to section 2.3.e below).

If you believe your packaging can only be labelled using embossing, please reach out to the ARL Team to provide details of the application process.

2.3.e Sizing

The minimum size for the ARL artwork is 12mm high (not including the consumer instructions tab). Component name and URL text is required to be minimum 2mm high.



For small packaging projects, where on-pack labelling area is limited, the Micro ARL may be suitable for use. Please refer to the Micro ARL Style Guide (Section 2.3.f).

2.3.f Micro ARL style guide

For small packaging projects where on-pack labelling area is limited, the Micro ARL may be suitable for use. All User Guide specifications are also applicable to the Micro ARL. The exemption however is that the height of the symbols can be decreased to anywhere between 8-11mm, and the component name and URL text can be reduced to 1.4mm (5.5pt). Consumer instructions on a Conditionally Recyclable ARL must also meet the 1.4mm (5.5pt) text height requirements, as per the requirements of a 12mm ARL.

An organisation may also choose to combine two Not Recyclable components into the one Micro ARL provided text height requirements are met, as is current practice when using a standard ARL.

There are four conditions associated with the use of the Micro ARL:

- It can only be used when the surface area of the available labelling space is less than 100 cm2 (see note below).
- · The separable component name can have no more than four letters. The Member will need to select the separable component name from the approved components list and if it is longer than 4 letters, adopt the synonym in the table, where available (Appendix 5). The exemption to this requirement is for component name 'Bottle' which may be applied on a Micro ARL.
- The Micro ARL shall be applied as close to 12mm as possible, i.e. up to 11mm but not less than
- The Micro ARL artwork shall have the minimum dimensions as shown in the image below.



Please note: the 'available labelling space' should be considered as the area upon which your organisation applies all non-marketing information related to that SKU.

For guidance or questions regarding the applicability of your packaging for Micro ARL application, please don't hesitate to reach out to the ARL Team.

When an organisation utilises the Micro ARL on-pack, evidence of meeting these requirements needs to be maintained on file in case of an ARL Audit (see section 3.2)

When the label space is greater than 100cm² but the labelling real estate is so limited that the standard ARL cannot fit on-pack, an organisation is able to submit the artwork to APCO to investigate the opportunity for a further exemption. APCO retains the right to approve or deny labelling exemptions on a case-by-case basis, on the grounds of legibility and consistency for the labelling program.

If your organisation is in an industry that is subject to multiple mandatory messages on-pack that make ARL applications challenging, please see process 2.3.g below.

2.3.g Combined Micro ARL style guide

Please note: the following process is currently only applicable to the alcoholic beverages and pharmaceutical industries due to the requirement of multiple regulatory messages on-pack. An approval for this exemption will need to be sought by organisations prior to applying their first Combined Micro ARL to ensure suitability and applicability to continue using the process thereafter.

If your organisation is facing similar challenges, please reach out to the ARL Team.

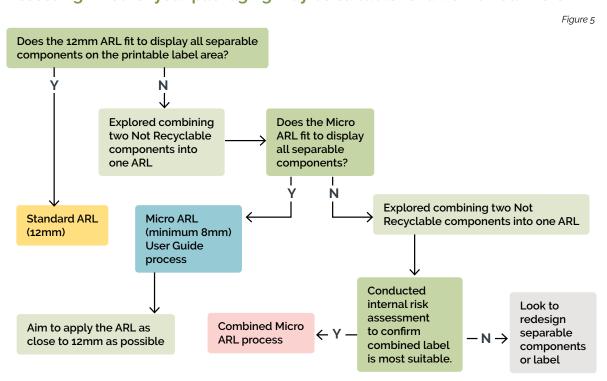
A Combined Micro ARL is an exemption that permits two Recyclable separable components to be combined into one ARL. The following process provides an approach to support organisations in their use of the ARL on-pack where the size of labels is a limitation and multiple regulatory messages further restrict available labelling space. Following this process will ensure the correctly sized ARL logo is used on-pack, maintaining consistency and legibility.

Organisations should conduct an internal risk assessment to confirm that this ARL option is most suitable. When combining two components of different material types, preventing contamination of recycling streams is crucial.

All style guide requirements of a Micro ARL must be met for a Combined Micro ARL, i.e. minimum 1.4mm (5.5pt) text height for component name and URL and minimum 8mm ARL height.



Assessing whether your packaging may be suitable for a Combined Micro ARL



2.3.h ARL element sizing requirements by type of ARL

The below table may be provided to a graphic designer applying the ARLs on-pack, as well as the onepage ARL Style Guide.

Table 8

	Standard ARL	Micro ARL	Combined Micro ARL
Application	Application Always		Alcoholic beverage and pharmaceutical industries only.
		Refer to exemption process in Section 2.3.f.	Refer to decision tree in Section 2.3.g.
Graphic Examples not to scale	2mm Bag Handles By Bo By	1.4mmBox Box Box	1.4mm Bottle & Wire & Foil Dr. Br. Br. Br. Br. Br. Br. Br. Br. Br. B
ARL Height (min.) Top to bottom, excluding instructions (if applicable)		8-11 mm	9 mm (to capture component name text)
Separable 2 mm 8 pt Measured on the capital letter		1.4 mm 5.5 pt	1.4 mm 5.5 pt
URL font height (min.) Measured on the 'l' in 'arl.org.au'	2 mm 8 pt	1.4 mm 5.5 pt	1.4 mm 5.5 pt
Conditionally Recyclable instructions font height (min.)	2 mm or 8 pt, reduced to 1.4 mm or 5.5 pt where space is limited. Text may wrap over 3 lines.	1.4 mm 5.5 pt Text may wrap over 3 lines.	1.4 mm 5.5 pt Text may wrap over 3 lines.

For an embossed application of the ARL, all sizing requirements are doubled. Please reach out to the ARL Team for full details.

2.3.i Use with other logos

The ARL should not be used next to symbols or messaging that may confuse or unnecessarily duplicate the recycling message for consumers, such as littering symbols (e.g. tidy man logo, statements such as 'Please Recycle'), plastic identification codes, or alternative recycling symbols that have not been approved by APCO. See examples below.

Not Permitted









Please note: other symbols can be used on-pack but should not be used in close proximity to the ARL. Where possible, it is recommended that these symbols are not printed on the same face of the packaging to provide the greatest distance between labels.

Currently the only approved additional recycling messages are those of the ARL Program's alternative destination partners. If the Member is a partner of these initiatives, the relevant program logo can be used next to a conditional recyclability logo. Instructions must be clear and adhere to the separable component specifications in Section 2.2.c.

Best Practice Best Practice











Members are able to communicate the compostability of their packaging as certified through the ABA standards for Home or Industrial Composting. As these materials are Not Recyclable through kerbside recycling, the corresponding Not Recyclable ARL is to be applied.

If in doubt as to whether an adjacent logo may be considered 'conflicting' or 'confusing', please refer to:

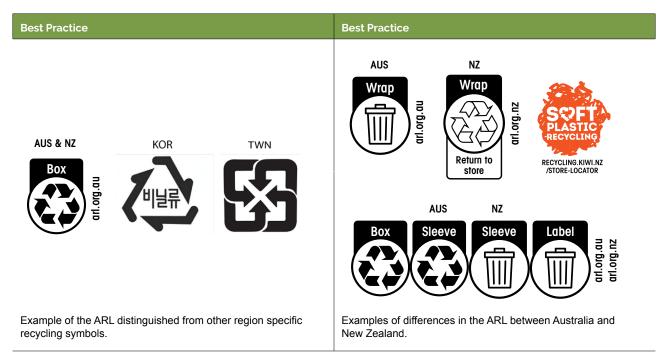
- ISO 1420 Environmental labels and declarations Self-declared environmental claims (Type II environmental labelling)
- ACCC Guide Green marketing and the Australian Consumer Law, or
- Contact APCO

Please note: APCO cannot provide consultative support for Members with regards to on-pack claims.

2.3.h Differences in labelling across countries

In some instances, the results for packaging sold in both Australia and New Zealand may be different. To communicate these differences and to indicate where these labels are applicable, organisations can use the ISO standard naming convention with 'AUS' and 'NZ' above the relevant ARL. This can also be used for those packaging items that may be exported out of Australia and New Zealand where recyclability may differ.

As the ARL is verified by PREP, and PREP contains the recycling data and information for only Australia and New Zealand, the ARL cannot be used as a verified labelling system outside of these markets. Organisations should endeavour to ensure their packaging is labelled appropriately to avoid any potential misleading claims.



CHECKLIST FOR ARL APPROVAL:



Competent User - PREP user has completed the PREP training and is now a competent user.
Packaging Specifications Validity - the Member is confident that packaging specifications input in PREP are valid for the packaging item being evaluated.
PREP Evaluation Completed and Saved - Packaging item has been evaluated in PREP by a competent User. PREP Recyclability Evaluation Report is saved in files with supporting evidence.
Application of ARL - ARL selection for each separable packaging component is in accordance with PREP Recyclability Evaluation Report and this User Guide.
Conditionally Recyclable - Any conditionally recyclable claims have sufficient supporting evidence - i.e. Soft Plastics Module.
ARL Style Guide - ARL artwork application is compliant with all ARL Style Guide specifications, including:
Separable components - all separable components are clearly labelled as per the ARL Approved Component Names and each component is identified in a separate ARL artwork.
URL - contains the ARL URL or approved Member URL
Colour - The ARL is one colour and is clear against the background colour
Design - ARL artwork has not been manipulated from the original EPS files and is clear (not placed on a busy background)
Sizing - the ARL artwork sizing is no smaller than 12mm in height (unless the packaging meets micro-ARL style requirements). In this case, all micro-ARL Style Guide requirements are met.
Use with other logos - the ARL artwork is not placed near conflicting logos. Alternative logo are permitted.
Labelling across countries - Members have communicated the ARL is specific to Australia and New Zealand only. Other recycling labels must be identified for their respective countries.
Internal tracking of ARL use - Members have internal tracking processes to document all packaging items that are released with the ARL on-pack, including which ARL symbol is used.
APCO Approval - First on-pack ARL design created by Member to go to market has been approved by APCO as per Section 3.1.

Section 3 **ARL Program Compliance**

The First ARL Artwork Approval process underpins the compliance of the ARL Program. Should a Member proceed to market with their first on-pack ARL design without obtaining approval from APCO, this is considered a breach of their Terms and Conditions and can result in removal from the Program. Refer to section 2.1 for the full process.

Following a First ARL Artwork Approval, organisations are required to adhere to the below compliance activities as part of their Terms and Conditions agreement.

3.1 ARL Annual Reporting

As per the ARL Terms and Conditions, all Members are required to annually advise APCO of the number of Stock Keeping Units (SKUs) or equivalent that carried the ARL in the previous calendar year and provide the number of these SKUs that were classified in each of the 3 classifications (Recyclable, Conditionally Recyclable, Not Recyclable). This is included in the Annual Reporting which Members complete each year. ARL Annual Reports are separate to the APCO Annual Report but are due at the same time annually.

3.1.a Internal tracking of ARL use

Please note: Members who did not apply the ARL in the reporting period are still required to complete an ARL Annual Report, in which organisations will report zero SKUs carrying the ARL. .

To accurately report, it is important that Members have a rigorous internal process to ensure they are accurately tracking the number of products they have released with the ARL on-pack, as well as which ARL in particular was used. This data is vital for APCO to analyse the progress of the Program and inform industry and government. Evidence of tracking is also required evidence in an ARL Compliance Audit (refer to section 3.2). An example of how this information could be tracked is provided in the ARL Report Data Template located in the Appendix.

SKU	PREP assessment number	Component name	PREP Result	ARL applied on- pack	Artwork approval date	First Artwork approval from APCO	Artwork print date	Date artwork expected on shelf

3.2 Audit Process

When agreeing to the ARL Terms and Conditions, Members agree that they will permit authorised auditors to inspect their records for the purposes of determining compliance with their obligations under the PREP Terms and Conditions and ARL Terms and Conditions. Auditors will seek to establish whether the Member is able to provide a sufficient level of evidence to support their use of the ARL.

To ensure your organisation is prepared for selection in an ARL Audit, APCO have created The ARL Compliance Audit-Ready Guide that sets out all of the criteria and required evidence.

Complying with audits requires Members, at a minimum, to have evidence to prove compliance with the ARL User Guide specifications for:

- · Preparing for a PREP evaluation
- Completing a PREP evaluation
- · Storing PREP evaluation report findings
- Selecting the label
- Finalising the artwork

3.2.a Failure to comply with audits

Members are deemed to fail to comply with audits if they:

- a. Refuse or fail to permit APCO's authorised auditors to inspect their records, or
- b. Fail to implement any corrective actions identified by the auditors within time required.

Failure to comply with audits constitutes a breach of the ARL Terms and Conditions and will result in termination of the Members use of the ARL.

3.3 Submissions Process

3.3.a Other Alternative Destinations or Consumer Behaviours

Members using other alternative recycling programs who wish to communicate these through the ARL can apply to APCO to have them formally recognised and included on the Approved Alternative Destinations list

Follow this link to access the *Alternative Destination Appeal form*.

Similarly, Members who wish to propose a Consumer Behaviour that is not currently included in Table 6 can apply to APCO to have the Consumer Behaviour recognised and used through the ARL.

Follow this link to access the Consumer Behaviour Appeal form.

3.3.b Recyclability Submissions

If a Member disagrees with or has concerns about the recyclability results generated by PREP for a particular packaging item, or if they believe that any of the underlying assumptions, information used, or thresholds adopted in PREP are inaccurate, they are encouraged to bring this matter to the attention of APCO.

Upon receipt of this information, APCO will review the submission. If necessary, APCO will escalate the submission to APCO's technical sub-committees and further supporting evidence may be requested. Please allow sufficient time for a submission to be adequately processed. Should the information or assessment logic of PREP require modification, APCO reserves the right to modify, update and correct PREP.

3.4.ARL Program Governance structure

APCO have the exclusive rights from PREP Design to sub-license PREP to APCO Members. To ensure the ongoing validity of PREP, APCO and its technical sub-committees will consider and investigate submissions, modifications to improve PREP and the data that underpins PREP.

The Australasian Recycling Label (ARL) is owned by APCO. Planet Ark alongside APCO develop educational content to ensure consumers are engaged and informed about the ARL.

Failure to comply with the ARL User Guide

APCO reserve the right to contact a Member at any time, should it be brought to their attention that the Member is misusing PREP or the ARL on-pack. Failure to comply with the User Guide varies from misleading claims to incorrect formatting of the ARL. As per the ARL Terms and Conditions, APCO will seek for the Member to rectify corrective actions within 12 months unless otherwise agreed.

Where organisations do not respond in a timely manner to APCO's requests for rectifying noncompliance, or do not meet the agreed upon timelines, they will be notified that they are no longer permitted to access and use PREP and the ARL. For full details of the non-compliance escalation process, please reach out to APCO.







Section 4 FAQs

For FAQs specific to the use of PREP, please refer to the PREP Information and Updates page.

1. Where do I find the ARL artwork files?

The ARL artwork files can be located via the Australasian Recycling Label tab of the APCO Member Centre. Click the blue button 'Access ARL artwork files' to download the kit.

2. How can I share the application requirements with my designer?

We recommend sharing the ARL artwork files and the ARL Style Guide (Appendix 7) with your designer. This User Guide should also be shared as Sections 2.2 and 2.3 provide full detail on the ARL artwork style requirements.

3. How do I nominate a PREP user?

To nominate a PREP user, log in to the APCO Member Centre, navigate to the top left column of your screen and click 'Edit Profile & Account'. Scroll down to the 'Members' section on the right-hand side of the page and click 'Edit'. For the team member/s you wish to establish a PREP login account for, check the 'PREP User access' box. Only the Primary Contact or Executive Contact for your organisation will be able to nominate PREP Users.

4. What do I need to submit for a first artwork approval?

Organisations will need to submit relevant documentation via the First ARL Design Approval Form. Requirements for a first artwork approval are detailed in Section 2.1.

5. Where can I find training?

To support accurate and efficient use of both PREP and the ARL, APCO have developed online interactive training courses - accessible via the Interactive Learning tab of the APCO Member Centre. The PREP and ARL Competency Courses take around 30 minutes each and should be completed by anyone in your team involved with the ARL Program.

6. Can I apply a Micro ARL to my packaging?

Small packaging formats may apply a Micro ARL without an exemption when the surface area of the available labelling space is less than 100cm2. For full requirements and application, refer to Section 2.2.f

7. What should I do if I realise that the ARL on my packaging is incorrect?

Please advise the ARL Team as soon as possible if an incorrect ARL has been placed on the market and we will work with you to determine next steps. Incorrect and non-compliant ARLs are required to be updated within 12 months, unless otherwise agreed upon by APCO.

8. Do I have to complete an ARL Annual Report if I am a supplier?

If your organisation agreed to the ARL T&Cs, but did not apply the ARL in the reporting period, you are still required to complete an ARL Annual Report, in which you will report zero SKUs carrying the ARL. Refer to Section 3.1.

Appendix

Click on the below links to view and download the Appendices you require. For your reference, these items are also available via the APCO Member Centre.

- 1. PREP Terms and Conditions
- 2. ARL Terms and Conditions
- 3. PREP Evaluation Questions
- 4. Soft Plastics Module
- 5. ARL Approved Component Names
- 6. Checklist for ARL Approval
- 7. ARL Style Guide
- 8. ARL Report Data Template Download
- 9. ARL Report Support Guide
- 10. ARL Compliance Audit-Ready Guide
- 11. Alternative Destinations in the ARL Program

Click on the below links to locate the Appeal Forms you require. For your reference, these items are also available via the APCO Member Centre.

- **Alternative Destination Submission Form**
- **Consumer Behaviour Submission Form**
- **Separable Component Name Submission Form**
- First ARL Design Approval Form

Document History and Version Control

Version	Date Approved	Approved by	Description
1.0	5/5/2018	APCO	Introduction of APCO Labelling Program
1.1	20/12/2018	APCO, Planet Ark, PREP	Updates based upon Member feedback and PREP version 4.03.
1.2	05/12/2019	APCO, Planet Ark, PREP	Updates based on release of PREP 5.0 and additional ARL application instructions.
1.3	26/04/2021	APCO, Planet Ark, PREP	Updates based on recognition of the New Zealand Soft Plastics Recycling Scheme and additional user support.
1.4	01/12/2021	APCO	Updates for the integrated ARL CDS and example applications.
1.5	1/03/23	ARL Internal Review Committee (IRC)	Updated useability and readability Redirected guidance for alternative destinations via external document Updated style guide requirements for ARL application and new processes Updated information on compliance processes Addition of FAQs Added Appendix documents

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