

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

NOTE: this is Version 2 of this document, which was initially released 1 February, 2024. There have been changes made to both Section 1 and Section 2, 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 on-pack labelling through the ARL aligns with the advice provided by the MfE.

While the corresponding PREP updates are being implemented, there will be cases where the PREP assessment outcomes are different to the guidance of the kerbside standardisation. This includes areas where PREP has not yet been updated to reflect the gazette *and* 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).

This document is divided into three sections:

- Section 1 will detail the cases for which the PREP outcome for NZ assessments **CANNOT** be followed to inform the application of the ARL on-pack. For these cases, Users must refer to the [Standard materials for kerbside collections: Guidance for territorial authorities](#) document to guide the correct application of the ARL.
- Section 2 will detail the cases for which the PREP outcome for NZ assessments **CAN** be followed to inform the application of the ARL on-pack.
- Section 3 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.

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. This ensures that when PREP is updated to reflect the full suite of changes, Users will be able to return to the original PREP report and update to receive an accurate outcome as evidence of the application of the ARL.

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.

Section 1 – NZ assessments where PREP outcomes CANNOT be used to inform on-pack ARL application

Material	Sub-category	Outcome in PREP	Correct on-pack ARL based on MfE guidance	Examples
Oversized items	Glass, plastic, steel and aluminium containers more than 4L	PREP currently assesses the dimensions of packaging in length, width and depth, rather than volume. The 231x231mm threshold for large plastics largely captures plastic items more than 4L), however, this threshold does not exist for glass, steel and aluminium	Not Recyclable	Large plastic jerry cans, steel and aluminium drums
Glass bottles and jars	Any glass packaging not intended for use for food and beverage products	Not called out in the current definitions for glass in PREP, so not able to be assessed. Recommend to assess using the primary material 'Other glass', which will be updated to include the types of glass commonly used in non-food and beverage glass packaging – e.g. tempered, heat-treated or reinforced glass	Not Recyclable	Perfume bottles, pharmaceutical bottles
Rigid plastics	Rigid plastic plant pots (including those made of PP)	Depending on how they are assessed, may return a Recyclable or Recyclable with Lost Value outcome	Not Recyclable	Rigid plastic plant pots of all colours and polymer types

Section 2 – 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
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 (excluding lids of steel cans)	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	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	Lids, caps and tops 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 this scheme should they meet the requirements of the ARL program.

		they meet all other thresholds for recyclability are permitted to be modified to be Conditionally Recyclable with instructions to 'Leave Attached'	they meet all other thresholds for recyclability are permitted to be modified to be Conditionally Recyclable with instructions to 'Leave Attached'	
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	Not Recyclable when user selects 'Aluminium Foil'	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 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 via double-sided lamination	Not Recyclable	Not Recyclable	Cold food or beverage formats laminated with polymer, some plastic-lined meat trays, some paper beverage cups.

	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.
Liquid paperboard (LPB)	Aseptic (foil-lined) and gable-top cartons	Not Recyclable	Not Recyclable OR Check Locally/Drop off only if you are a member of the Food and Beverage Carton	Long-life milk and juice cartons

			Stewardship Scheme	
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

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
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Section 3 – 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 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	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 only
Check locally OR Return to store OR Store drop off	Applicable for soft plastics that have been assessed as eligible against the NZSPRS scheme (organisation must be a NZSPRS partner)	Yes

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

ARL program compliance for NZ assessments

The advised combination of 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 until all requirements are clarified by the MfE and reflected in PREP accordingly.

For the purposes of auditing and compliance, provided that a PREP assessment has still 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 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 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:

- When NZ kerbside standardisation updates are live in PREP. NOTE: This may be staged or as one large update.
- 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 1 st March, 2024 including updates packaging with aluminium or steel as the primary material; outcomes for lids/caps/closures; outcomes for undersized 2D items