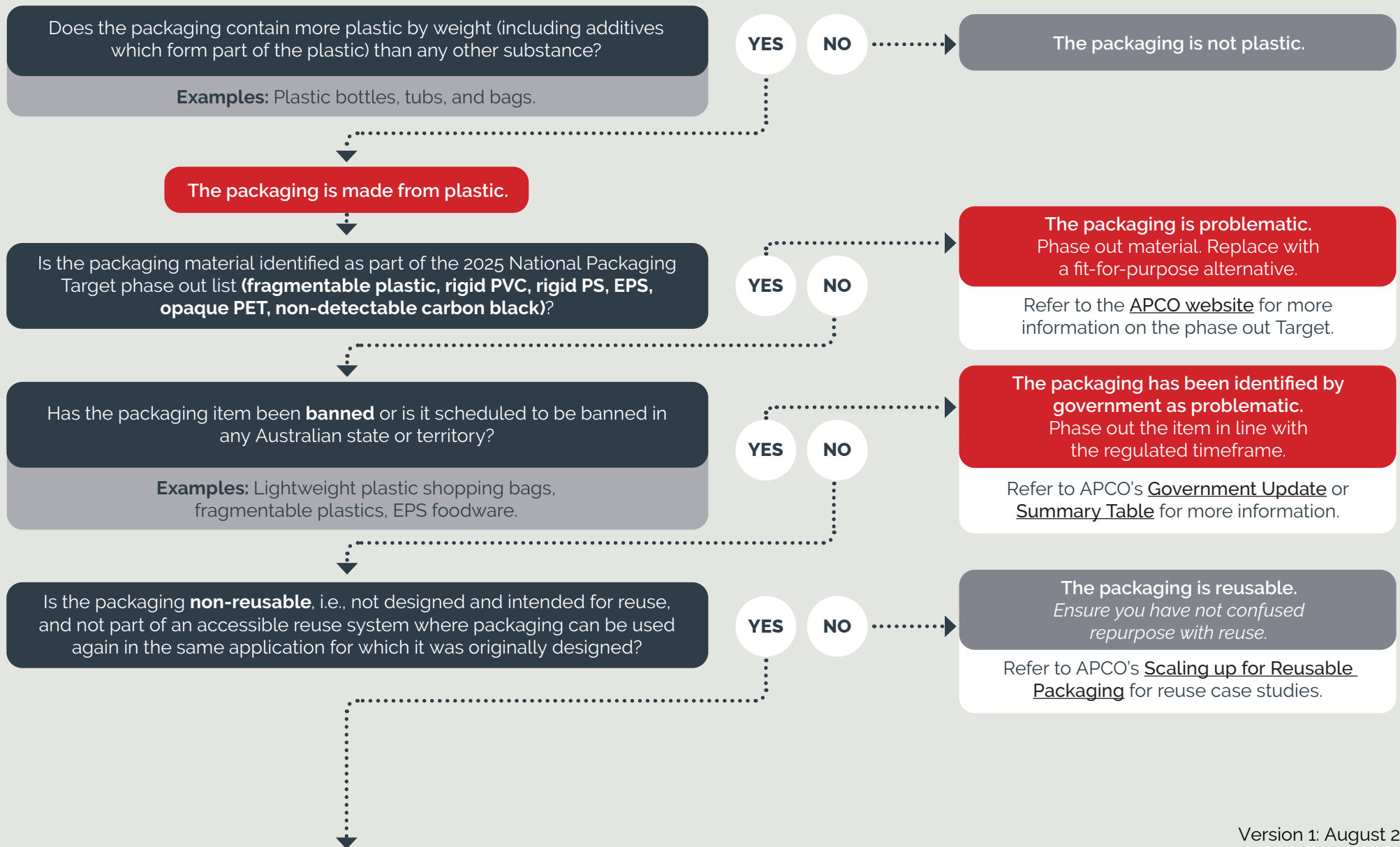


Identifying Problematic and/or Unnecessary Single-Use Plastic Packaging

Use the decision tree below to identify whether your packaging is problematic, unnecessary or single-use plastic packaging.



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The packaging is single-use.

Consider whether a reusable alternative is feasible - refer to APCO's [Scaling up for Reusable Packaging](#) for guidance.

Can the packaging be **avoided** without diminishing product integrity, compromising product accessibility, hindering ability to meet health or safety regulations, or causing undesirable environmental outcomes such as a higher carbon footprint or increased food waste?

YES

NO

The packaging may be unnecessary.
Evaluate further to check if it is optimised to be fit-for-purpose, and if feasible, consider replacing it with a reusable packaging system.
Refer to APCO's [Scaling up for Reusable Packaging](#) for reuse case studies.

Does the packaging have **non-functional slack fill** (i.e., excessive headspace)?

Examples: Excessive headspace in flexible packaging >30% (refer to [CGF testing methodology](#)).

YES

NO

The packaging is unnecessary.
Redesign to reduce headspace.

Does the packaging material contain **hazardous chemicals** that pose a significant risk to human health or the environment (applying the precautionary principle)?

Examples: Packaging with intentionally added PFAS, BPA, or chemicals on the [REACH](#) list above permissible threshold, or on DCCEEW's [Chemical Management](#) list.

YES

NO

The packaging is problematic.
Phase out problematic substances. Evaluate alternatives carefully to ensure they are safe.
Refer to APCO's [Action Plan to Phase Out PFAS in Fibre-Based Food Contact Packaging](#) for more information on PFAS.

Can the packaging be designed to minimise the number of separate or separable components to reduce the likelihood and potential impacts to litter?

YES

NO

The packaging may be problematic.
Evaluate further to check if the separate or separable components are unnecessary.
Refer to the 'Design to minimise litter' Principle of the [Sustainable Packaging Guidelines \(SPGs\)](#), and to the [Australian Litter Measure \(AusLM\)](#) report for your respective state or territory.

Is the packaging **non-recyclable** (i.e., it does not have a collection, sorting, and recycling system that is proven to work in practice and at scale)?

Recycling services may include: kerbside recycling (check the [Packaging Recyclability Evaluation Portal \(PREP\)](#)), widely available commercial services for B2B packaging, or an industry-run product stewardship scheme.

Examples: Fragmentable plastic packaging (e.g., oxo-degradable plastics), PVC, PVDC, PS, EPS, opaque PET, non-detectable carbon black

YES NO

The packaging is not problematic and is not considered as part of the phase out Target.

The packaging is problematic.
If the packaging claims to be compostable, proceed to next question

Does the packaging claim to be compostable but does not meet the **minimum standards for compostability**?

Compostable packaging must be:

- certified compostable to the [Australian Standard](#), and
- have an accessible and effective system in place to compost it.

Examples: Oxo-degradable plastic packaging, compostable packaging disposed by households where collection is not available (e.g. compostable plastic is banned from food organics and garden organics (FOGO) kerbside collection in NSW).

YES NO

The packaging is problematic.

Check APCO's [Considerations for Compostable Plastic Packaging](#) for appropriate use and design. Consider reuse or material recycling strategies as an alternative to compostability.

The packaging is not problematic and is not considered as part of the phase out Target.

Disclaimer

The Australian Packaging Covenant Organisation Ltd (APCO) and the contributing authors have prepared this document with a high-level of care and thoroughness and recommend that it is read in full. This document is based on generally accepted practices and standards at the time it was prepared. It was prepared in accordance with the scope of work and for the purpose outlined in the project brief. The method adopted, and sources of information used are outlined in this document, except where they were provided on a confidential basis. This document has been prepared for use by APCO, and only other third parties who have been authorised by APCO. APCO and the contributing authors are not liable for any loss or damage that may be occasioned from directly or indirectly using, or relying on, the contents of this publication. This report does not purport to give legal or financial advice. No other warranty, expressed or implied, is made as to the professional advice included in this report.