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FRAMEWORK TO IDENTIFY PROBLEMATIC AND/OR UNNECESSARY SINGLE-USE PLASTIC PACKAGING

Introduction

The Australian Packaging Covenant Organisation (APCO) is working to develop a coordinated, whole-of-supply chain approach to support the achievement of the 2025 National Packaging Targets (2025 Targets). These are:

1) 100% of all Australia's packaging will be reusable, recyclable or compostable by 2025 or earlier,
2) 70% of Australia's plastic packaging will be recycled or composted by 2025,
3) 50% average recycled content will be included across all packaging by 2025, and
4) Problematic and unnecessary single-use plastic packaging will be phased out through design, innovation, or introduction of alternatives.

These four targets are interdependent and mutually reinforcing. The goal is to create a new, sustainable pathway for how Australia manages packaging, including a systemic change to the way we create, collect, and recover used packaging.

To support the phase out target, APCO was given responsibility in the National Waste Policy Action Plan (Action 5.4) to identify problematic and unnecessary plastic packaging to provide an evidence base for industry to take co-ordinated action to phase out these materials.

APCO worked with a range of stakeholders to establish a methodology to identify problematic, unnecessary and single-use plastic packaging (SUPs) in 2019. This methodology was used to identify and publish a list of SUPs that should be phased out immediately, and another list of items 'on notice' for future action. These lists can be found in the Action Plan for Problematic and Unnecessary Single-Use Plastic Packaging (Action Plan for SUPs).

The Action Plan for SUPs has since been used to inform the National Plastics Plan and the EPS Roadmap. Additional bans on single-use plastics have been announced by some state and territory governments.

Updated definitions and framework

Based on feedback, APCO has updated the definitions and established a revised framework to support the phase out of SUPs. The framework is intended to help your business to identify any single-use plastic packaging that is unnecessary and/or problematic and therefore requires action to ensure that it meets the 2025 Targets.

The aim is to ensure:

- Any *unnecessary* plastic packaging (avoidable or excessive packaging) is phased out in line with the circular economy principle of reducing waste at source.
- Any *problematic* plastic packaging (non-recyclable or hazardous) is phased out to support achievement of the 2025 Targets.

This approach aligns with those of the Ellen Macarthur Foundation, the UK Plastics Pact and the US Plastics Pact.

CONTACT:
A: Suite 1102, Level 11, 55 Clarence Street, Sydney, NSW, 2000
E: apco@apco.org.au
P: (02) 8381 3700

The list of priority items and items on notice in APCO's Action Plan for SUPs will not change, as they remain consistent within the new framework. Note that additional examples of SUPs have been identified in the table below. These should be self-identified by businesses using the framework and the Sustainable Packaging Guidelines (SPGs).

They include:

- **Packaging with excessive headspace (aligned with the 'optimise material efficiency' Principle of the SPGs).**
- **Packaging made with hazardous chemicals (aligned with the 'eliminate hazardous materials' Principle of the SPGs).**

Definitions

Problematic and/or unnecessary, single-use plastic packaging (SUPs) is either:

- single-use packaging that is unnecessary, or
- single-use packaging that is problematic, or
- single-use packaging that is unnecessary and problematic.

Single-use packaging is routinely disposed of after its contents have been unpacked or exhausted, or is not part of an accessible reuse system where packaging can be used again in the same application for which it was originally designed.

Unnecessary packaging can be reduced or redesigned with a fit-for-purpose alternative without diminishing product integrity, compromising product accessibility, hindering ability to meet health or safety regulations, or causing undesirable environmental outcomes.

Problematic packaging is currently either:

- difficult to collect for effective reuse, recycling or composting, or
- a material that hinders, disrupts or obstructs opportunities to recover other materials or resources including via existing recycling streams, or
- a significant contributor to the litter problem, or
- manufactured with hazardous chemicals or materials (e.g., intentionally added PFAS or BPA) that pose a significant risk to human health or the environment.[1]

  Note: Certain types of packaging may not be considered problematic should emerging technologies result in effective collection/recovery for reuse, recycling or composting purposes and a viable end market for the recovered material.

Phase out means to eliminate the packaging entirely or take action to ensure that it is no longer problematic, unnecessary and single-use through design, innovation, or introduction of alternatives.

Plastic packaging contains more plastic by weight than any other substance. Plastic means a polymer material to which additives or substances may have been added.[2]
Note: Although these are outside the scope of packaging, this framework covers single-use plastic cutlery, straws, plates and cups when these are used for food service.

[1] Effort should be made to phase out these substances from all packaging, not just SUPs.
[2] This definition is aligned to the definition by the UK Plastics Pact.

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Framework

The following questions will help you to identify single-use plastic packaging that is unnecessary and/or problematic.

#	Question	If YES	Examples	If NO	Further Information
1	Does the packaging contain more plastic by weight (including additives which form part of the plastic) than any other substance?	The packaging is made from plastic. **Go to Question 2.**	Plastic bottles, tubs, and bags.	The packaging is not plastic.	
2	Is the packaging material identified as part of the 2025 National Packaging Target phase out list **(fragmentable plastic, rigid PVC, rigid PS, EPS, opaque PET, non-detectable carbon black)**?	**The packaging is problematic.** Phase out material. Replace with a fit-for-purpose alternative.		**Go to Question 3.**	Refer to the APCO website for more information on the phase out Target.
3	Has the packaging item been **banned** or is it scheduled to be banned in any Australian state or territory?	**The packaging has been identified by government as problematic.** Phase out the item in line with the regulated timeframe.	Lightweight plastic shopping bags, fragmentable plastics, EPS foodware.	**Go to Question 4.**	Refer to APCO's Government Update or Summary Table for more information.
4	Is the packaging **non-reusable,** i.e., not designed and intended for reuse, and not part of an accessible reuse system where packaging can be used again in the same application for which it was originally designed?	**The packaging is single-use.** Consider whether a reusable alternative is feasible - refer to APCO's Scaling up for Reusable Packaging for guidance. **Go to Question 5.**		**The packaging is reusable.** *Ensure you have not confused repurpose with reuse.*	Refer to APCO's Scaling up for Reusable Packaging for reuse case studies.
5	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?	**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.[3]		**Go to Question 6.**	Refer to APCO's Scaling up for Reusable Packaging for reuse case studies.

[3] Reusable packaging models are not suitable for all applications, e.g., medicine packaging due to the need to control for the stability and efficacy. Dispensing and packaging of therapeutic goods is an activity controlled and licensed by the TGA. Reuse may also not be feasible for medical device packaging.

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#	Question	If YES	Examples	If NO	Further Information
6	Does the packaging have **non-functional slack fill** (i.e., excessive headspace)?	**The packaging is unnecessary**. Redesign to reduce headspace.[4]	Excessive headspace in flexible packaging >30% (refer to CGF testing methodology).	**Go to Question 7.**	
7	Does the packaging material contain **hazardous chemicals** that pose a significant risk to human health or the environment (applying the precautionary principle[5])?	**The packaging is problematic.** Phase out problematic substances. Evaluate alternatives carefully to ensure they are safe.	Packaging with intentionally added PFAS, BPA, or chemicals on the REACH list above permissible threshold, or on DCCEEW's Chemical Management list.	**Go to Question 8.**	Refer to APCO's Action Plan to Phase Out PFAS in Fibre-Based Food Contact Packaging for more information on PFAS.
8	Can the packaging be designed to minimise the number of separate or separable components to reduce the likelihood and potential impacts to litter?	**The packaging may be problematic.** Evaluate further to check if the separate or separable components are unnecessary.[6]		**Go to Question 9.**	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.

[4] Consider regulatory requirements such as for consumer healthcare products to provide compliant labelling, or to distinguish between pack-sizes to avoid confusion.
[5] Precautionary Principle: That where there are threats or potential threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation (UN Global Compact).
[6] Unnecessary packaging can be reduced or redesigned with a fit-for-purpose alternative without diminishing product integrity, compromising product accessibility, hindering ability to meet health or safety regulations, or causing undesirable environmental outcomes.

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#	Question	If YES	Examples	If NO	Further Information
9	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.	**The packaging is problematic.** *If the packaging claims to be compostable go to Question 10.*	Fragmentable plastic packaging (e.g., oxo-degradable plastics), PVC, PVDC, PS, EPS, opaque PET, non-detectable carbon black	**The packaging is not problematic and is not considered as part of the phase out Target.**	
10	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.	**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.	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).	**The packaging is not problematic and is not considered as part of the phase out Target.**	

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Disclaimer

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