Submission No 46

INQUIRY INTO WASTE AVOIDANCE AND RESOURCE RECOVERY AMENDMENT (PLASTICS REDUCTION) BILL 2021

Organisation: Australian Fresh Produce Alliance

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Waste Avoidance and Resource Recovery Amendment (Plastics Reduction) Bill 2021

Portfolio Committee No. 7 - Planning and Environment

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Australian Fresh Produce Alliance
Growing a healthier Australia

About the Australian Fresh Produce Alliance

The Australian Fresh Produce Alliance (AFPA) is made up of Australia's key fresh produce growers and suppliers. The members include:

- Costa Group
- Perfection Fresh
- Montague
- One Harvest
- Pinata Farms
- Fresh Select
- Mackay's Banana Marketing
- Driscoll's
- 2PH Farms
- LaManna Premier Group
- Rugby Farming
- Freshmax
- Fresh Produce Group.

These businesses represent:

- half the industry turnover of the Australian fresh produce (fruit and vegetables) sector - $4.5 billion of the $9.1 billion total
- a quarter of the volume of fresh produce grown in Australia - 1 million of the 3.9 million tonne total
- more than a third of fresh produce exports - $410 million of the $1.2 billion export total
- more than 1,000 growers through commercial arrangements, and
- more than 15,000 direct employees through peak harvest, and up to 25,000 employees in the grower network.

The key issues the AFPA is focusing on include:

- packaging and the role it plays in product shelf life and reducing food waste landfill,
- labour and the need for both a permanent and temporary supply of workers,
- market access to key export markets for Australian produce,
- product integrity both within and outside of the supply chain,
- pollination and research into alternative sources, and
- water security, including clear direction as to the allocation and trading of water rights.

The AFPA's aim therefore is to become the first-choice fresh produce group that retailers and government go to for discussion and outcomes on issues involving the growing and supply of fresh produce.

Products grown by AFPA Member companies include:

Apples	Blueberries	Cherries	Nectarines	Raspberries
Apricots	Broccoli	Fioretto	Onions	Salad leaf
Asparagus	Broccolini	Green Beans	Oranges	Spinach
Avocado	Brussel Sprouts	Herbs	Peaches	Strawberries
Baby Broccoli	Butternut	Lemons	Pears	Sweet Corn
Baby Corn	Pumpkin	Lettuce	Pineapples	Table grapes
Bananas	Cabbage	Mandarins	Plums	Tomatoes
Beetroot	Cauliflower	Mango	Potatoes	Water Cress
Blackberries	Celery	Mushrooms	Cucumber	Wombok

Summary

The AFPA acknowledges and supports initiatives to reduce the environmental impact of plastics and packaging, however the proposed removal of plastic fruit and vegetable packaging 6 months after the introduction of this Part as outlined in the current First Print of the Waste Avoidance and Resource Recovery Amendment (Plastics Reduction) Bill 2021 would have an adverse impact on the environment, fruit and vegetable producers, and consumers, due to a significant increase in food waste.

As outlined in this paper and a formal report prepared by RMIT University, packaging is critical in the reduction of food waste. The use of appropriate types and levels of packaging enable Australian consumers to access fresh fruit and vegetables. Packaging prolongs shelf life and protects produce in transit enabling better quality produce to reach consumers. This is of particular importance when considering regional and remote communities in NSW, which may have poorer access to fresh fruit and vegetables due to distance from central markets and distribution centres.

Australian consumers are concerned about the impact of plastics, from all sources, on the environment and the relative impact of their different of purchasing decisions. For fresh produce, packaging plays animportant role in the integrity and protection of food as it travels through supply chains from farm to plate. Critically, product protection should be the primary goal of packaging as food waste generally accounts for a larger proportion of the life-cycle environmental impacts of the food-packaging system.

In order to meet the public policy objectives of supporting Australians and increasing our overall sustainability, governments can work with industry on:

- developing environmentally friendly packaging solutions,
- encouraging the reduction of non-essential packaging, and
- supporting the collection, processing, recycling and reuse of packaging materials.

The AFPA does not support the elimination of fruit and vegetable packaging as outlined (48D) in the Plastics Reduction Bill as it will lead to a significant increase in food waste and be an overall detrimental outcome for the environment. The AFPA asks all parties to ensure that any action to ‘improve’ current practices fully considers the complexity of current arrangements and ensures that the proposed action is of overall environmental benefit over the long term.

Introduction

Australians have a strong track record in addressing litter through initiatives such as *‘Keep Australia Beautiful’*. Australian consumers are concerned about the impact of plastics, from all sources, on the environment and the relative impact of their different of purchasing decisions. Fresh produce packaginghas been a focus in the public discourse however unlike many other products, fresh produce has a relatively short shelf life and product packaging helps to maintain shelf life and reduce food waste.

For fresh produce, packaging plays an important role in the integrity and protection of food as it travels through supply chains from farm to plate. Critically, product protection should be the primary goal of packaging as food waste generally accounts for a larger proportion of the life-cycle environmental impacts of the food-packaging system.

Industry Approach

The Australian Fresh Produce Alliance (AFPA) recognises there is concern about the level and type of packaging that is used for fresh produce and has prioritised packaging as one of the six key issues to address for the future of the fresh produce industry. Individual member companies have been working through their packaging options for more than 3

years to increase recyclability and reduce non-essential packaging.

In 2019, the AFPA commissioned and released research undertaken by RMIT on the role that packagingplays in the fresh produce supply chain. This report outlines that packaging assists in reducing food waste as it protects product through the supply chain and increases the shelf life of fresh produce[1].

This research is also vital when considering regional communities, such as those in regional NSW where much of the fresh produce that is not grown locally needs to be transported an extensive distance to reach consumers. Packaging plays a vital role in ensuring that families in regional communities have access to fresh fruit and vegetables.

Members of the AFPA recognise that they must work to reduce packaging where possible and most importantly must work with stakeholders, including packaging suppliers, to identify and develop forms ofpackaging which provide a greater opportunity for recycling or more effective end of life management. To that end, the AFPA have also funded the development of a Materials Selector[2] and Materials Guide[3] to assist the fresh produce industry in selecting the most appropriate packaging formats for their products.

Important in understanding the selection and use of packaging materials in the fresh produce industry is the level of consideration given to the barrier characteristics of materials; i.e. what is the purpose of the packaging. An example of this in fresh produce is the use of polystyrene cartons in the transport (both domestic and export) of products such as grapes and broccoli. This material is preferred due to the insulation properties provided. This both protects the product in transit while ensuring greater temperature control and management of product quality. The use of this material enables greater transport distances and better product quality for consumers. There is not currently a scaled, commercially available material that replicates the barrier characteristic of polystyrene that is available to industry to replace polystyrene containers.

This example demonstrates why a holistic approach to packaging reduction in industry is necessary. Eliminating a material may lead to adverse outcomes such as increase in food waste. Solutions that address material selection and end of life management in concert with research into alternative materials and broader recycling infrastructure are critical to addressing packaging reduction and broader sustainability targets.

The AFPA promotes sustainable packaging design within the fresh produce industry to maximise the benefits of packaging (product protection, transport, extension of shelf life and reduction of food waste),while attempting to minimise the environmental impacts through appropriate materials selection.

Food Waste

The unintended consequence of removing or restricting required packaging in the fresh produce industry is a significant increase in food waste; which actually has a greater environmental impact than the packaging itself. When considering recycling and waste management, the disposal of organic waste must also be included. With reference to The Waste Hierarchy[4], ideally waste generation should be avoided in the first instance; in order to understand how to reduce the generation of food waste the AFPA commissioned a consumer research report to identify strategies to reduce food waste.

The relationship between fresh produce packaging, food waste and recycling in the home[5] report identifies three key findings that can assist in helping Australian families reduce food waste:

- Planning: opportunities to increase meal planning to reduce food waste
- Convenience: further opportunity to understand portion size and product format

[1] *The role of packaging for Australian fresh produce 2019, RMIT University*
[2] Materials Selector for Fresh Produce
[3] Materials Guide for Fresh Produce
[4] *The Waste Hierarchy*, https://www.epa.nsw.gov.au/your-environment/recycling-and-reuse/warr-strategy/the-waste-hierarchy
[5] *The relationship between fresh produce packaging, food waste and recycling in the home, AFPA 2020*

- Storage & Use: better communicate to consumers ideal product storage conditions to manage product quality

This research outlines practical strategies that the fresh produce supply chain can implement to work with Australian consumers to reduce the financial and environmental burden of food waste, while importantly ensuring Australian's are able to access healthy, fresh food.

Health and Nutrition

Despite the known benefits, consumers do not eat sufficient quantities of fruit and vegetables. The latest National Health Survey found that just over half (51.3%) of Australian adults met the guidelines for the recommended minimum 2 daily serves of fruit[6].

If current Australian trends continue, an estimated 83% of men and 75% of women aged over 20 years will be overweight or obese by 2025[7] . Therefore, it is important to utilise strategies which ensure access to food that is nutritious, both for the individual and in addressing broader public health issues.

A primary objective of food production is to ensure a safe and acceptable product to be delivered to market. Packaging may serve to transport fruit and vegetables, safely to consumers all over Australia with minimal waste. If people are to consume more fruit and vegetables and in turn reduce their risk of contracting chronic diseases, it is therefore important to provide consumers with a product which is of a high quality and maximises its shelf life.

A way forward

If we are aiming to reduce the use of single use plastics, reduce the environmental impacts of plastics and increase the overall sustainability of our economy, then we need to consider the overall impact of our decisions rather than individual issues in isolation.

For example, in fresh produce there are conversations about changing material types to address consumer concern but the replacement material may have a more significant environmental impact. The AFPA encourages all supply chain participants and governments to consider consumer behaviour in the development of new regulation, policy proposals and requirements for consumers.

The AFPA has released two research reports on packaging, food waste and recycling as well as distributed resources to help industry better select materials. Through our work it has become clear that further work is required to understand consumer behaviour, particularly in the home, to better provide consumers with products and services that meet their needs in the most sustainable manner.

In order to meet the public policy objectives of supporting Australians and increasing our overall sustainability, governments can work with industry on:

- developing environmentally friendly packaging solutions,
- encouraging the reduction of non-essential packaging, and
- supporting the collection, processing, recycling and reuse of packaging materials.

With regard to the proposed Bill and the outlined elimination targets –

(i) reducing the amount of plastic waste by 90% from 2019 levels by the end of 2022,
(ii) eliminating plastic resin pellets used in industrial processes from matter that is discharged or deposited into the environment by the end of 2022,

[6] Australian Bureau of Statistics, 2019
[7] National Health and Medical Research Council, 2013

(iii) ensuring that, by the end of 2024 all new washing machines are fitted with a lint filter that is capable of trapping microplastics and microfibres that are loosened during the laundering of synthetic fibres
(iv) ensuring that, by the end of 2024, all packaging used in the State is recyclable, compostable or reusable
(v) ensuring that, by the end of 2024, all packaging in the State is comprised of at least 30% recycled plastic,
(vi) eliminating types of plastic waste listed in the table to the proposed section from matter that is discharged or deposited into the environment by the date or period specified.

The AFPA acknowledges and supports initiatives to reduce the environmental impact of plastics and packaging, however the proposed removal of plastic fruit and vegetable packaging 6 months after the introduction of this Part would have an adverse impact on the environment, fruit and vegetable producers, and consumers, due to a significant increase in food waste.

As outlined in this paper and a formal report prepared by RMIT University, packaging is critical in the reduction of food waste. The use of appropriate types and levels of packaging enable Australian consumers to access fresh fruit and vegetables. Packaging prolongs shelf life and protects produce in transit enabling better quality produce to reach consumers. This is of particular importance when considering regional and remote communities in NSW, which may have poorer access to fresh fruit and vegetables due to distance from central markets and distribution centres.

The AFPA does not support the elimination of fruit and vegetable packaging as outlined (48D) in the Plastics Reduction Bill as it will lead to a significant increase in food waste and be an overall detrimental outcome for the environment. The AFPA asks all parties to ensure that any action to 'improve' current practices fully considers the complexity of current arrangements and ensures that the proposed action is of overall environmental benefit over the long term.