



January 9th, 2012

Mr Tony Mahar
Australian Food and Grocery Council
Locked Bag 1
Kingston, ACT, 2604

Dear Sir,

Re: AFGC Future of Packaging White Paper Stakeholder Workshop, November 23rd, 2011

On behalf of the Members of the Australasian Bioplastics Association (ABA), I thank you for the opportunity to be part of your recent workshop which I think overall was extremely valuable, well organised and facilitated.

In particular, your initiative to look at all parts of the value chain from raw material suppliers through to resource recovery specialists, was informative and gave the forum the chance to examine scenarios that may not, on first pass, be overly apparent to regular observers of the value chain.

A number of key themes and takeaways were recorded and we hope that this will assist the AFGC in developing key outcomes for its Members. It would be remiss of the ABA to not reinforce some of the points that we tried to make and have recorded for your consideration such that the white paper in its final form is representative of all technologies that are currently available.

During the workshop, the terms degradable, biodegradable and compostable plastics in the context of film and other packaging applications were variously used.

We would submit that the AFGC should adopt internationally recognisable definitions and Australian Standards for various materials and these would be as follows:

Compostable and biodegradable plastics – "Biodegradable plastics suitable for composting and other microbial treatment" (Australian Standard AS 4736-2006) and/or "Biodegradable plastics suitable for home composting" (Australian Standard AS 5810-2010).

All certified compostable plastics are biodegradable by definition.

Mail to: Administration Manager, 14 Gladstone Street, Kew, Victoria, 3101
www.bioplastics.org.au

Degradable should be ignored or discarded in the Bioplastics arena as it is both misleading and inaccurate. The consumer rarely draws a distinction between degradable and biodegradable and the ACCC has been instrumental in taking action against certain companies making claims that may have misled the consumer.

Bioplastics are a family of materials that are biodegradable (compostable), biobased or both. Biodegradable means that the products degrade under specific conditions, depending on the end of life environment.

Biobased means that a large amount of the carbon in the bioplastic product comes from renewable sources, major advantages therefore in the use of these materials being reduction in emissions and the reduced use of fossil resources.

Conventional degradable plastics do not convey these benefits.

In summary, at the design stage of packaging, very serious consideration should be given to the end of life option intended for the packaging and the available recovery methods.

Biodegradable plastics offer reduced system costs for a series of single and / or short term use applications such as organic / food waste collection, in the agricultural and horticulture sectors (mulch films, twines and ties) and in food and grocery packaging.

During the workshop much consideration and discussion surrounding recycling was in evidence.

The ABA would submit that by extending the discussion by referring to recovery options for plastics may return more design flexibility and alternate choice of material based on sustainability grounds.

Various mechanical and chemical recycling technologies exist for traditional petrochemical sourced plastics. These are also possible for bioplastics if the appropriate infrastructure is in place, but additionally bioplastics can be organically recycled along with organic waste, returning the resource to the soil – true recycling.

Thus recovery of resources is more correct and an extension of recycling, which might be more akin to glass and paper.

The 2010 National Plastics Recycling Survey (Hyder Consulting), refers to Recovery Options for plastic products and discusses a number of end of life options for these materials.

Whilst this report discusses inter alia, energy recovery and feedstock recycling, the report also briefly describes biological recycling (composting and anaerobic digestion) as an end of life option, in addition to those already given consideration.

The development of the white paper needs to facilitate decisions and practices that lead to achieving optimal improvements in whole of life sustainability. Short term and perhaps lightweight decisions are not something that, in our view, should be proliferated, where the appropriate end of life option already exists.

We believe that to a large degree this initial workshop achieved some good discussions in this direction and would welcome the opportunity to collaborate further with your stakeholders and members in the future development of this important body of work.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rowan Williams', with a stylized flourish at the end.

Rowan Williams
President,
Australasian Bioplastics Association

CC: Helen Lewis Consulting

CC: ABA Executive and Members