



Packaging Reform Taskforce

Department of Climate Change, Energy, the Environment and Water
GPO Box 3090
Canberra ACT 2601

October 2024

RE: Reform of Packaging Regulation Consultation Paper

Dear Packaging Reform Taskforce,

The Australian Meat Industry Council (AMIC) appreciates the opportunity to provide feedback on the Reform of Packaging Regulation Consultation Paper.

AMIC is the peak industry body representing the post-farm gate meat industry. AMIC members include businesses processing livestock for domestic and export consumption, smallgoods manufacturers, boning rooms, cold stores, wholesalers and distributors through to exporters and independent local butchers. Across all these membership streams, safe and effective packaging plays a critical role in the processing, storage, transport and sale of meat and meat products, with vital attributes to combat food waste and maintain food quality and safety.

The Australian meat supply chain makes a substantial contribution to the national economy each year. In 2022–23, Australia's red meat and livestock industry turnover was \$81.7 billion. Australia supplies raw, cooked, cured, fermented or dried meat products that are chilled or frozen to over 100 markets around the world via both sea freight and airfreight. Australia has distinct advantages in delivering high quality meat to global markets. This includes world-leading hygienic production and shelf-life performance underpinning an expanding chilled and frozen meat trade which is all reliant on the effective barrier properties of a restricted set of packaging options.

The meat industry is committed to creating more sustainable packaging that balances both environmental goals and the critical role of our sector in providing a safe, high quality and nutritious food product. Packaging is crucial to our industry as it protects meat from contamination, moisture and oxygen, extending shelf life, limiting microbial activity and ensuring food safety and quality and minimising food waste.

While we have seen notable progress to increased use of biodegradable and recycled packaging in the meat industry, especially in smallgoods, there are limited products where this is possible. As an industry, we have invested in, and pursued greater packaging circularity, with initiatives such as the MLA Red Meat Packaging Stewardship exploring the use of packaging and pathways to greater sustainability. Industry has heavily invested in research and development in packaging, shelf life and product & process with at least \$18.5 million invested over the last 15 years.

Alongside this, there is significant international investment and regulatory reform focussed on increasing the use of recyclable packaging and greater recycling content within packaging.

Despite significant investments, our industry faces enduring practical barriers to adopting more sustainable packaging types across many products, such as:

- Utilising more recyclable polymers, such as EVOH vs PVdC, can reduce the food safety and shelf life of meat,¹ with much accepted industry science based on PVdC packaging.
- Replacing multi-layer packaging materials with mono material do not provide the level of barrier protection required and reduces the food safety and shelf life of meat.²
- High recycled plastic content can reduce the performance levels of the moisture and oxygen barriers and package strength, reducing shelf life and food safety.
- Concerns around the contamination of meat from food contact materials (FCMs) that use recycled plastics, creating concerns around food safety.³

A practical example of this is the recent flagship industry-government achievement of gaining the acceptance of the superior shelf life of Australian chilled meat exported to the Middle East. The increase in allowed shelf life of Australian beef and lamb exported to key markets in the Middle East, is based upon years of industry scientific research and validation using PVdC packaging as its basis. It is estimated that the shelf-life extensions generates in excess of \$100 million annually in additional returns to the Australian meat industry. These types of market access gains are an example of a foundational requirement needed assist the Government mandated transition away from live sheep exports to domestic processing.

Despite substantial research and investment, much of our packaging needs have limited suitable and verified substitutes that can also maintain our current high food safety and shelf-life standards.

At its core, the fact is that while the meat supply chain is investing heavily in adapting to more circular packaging options, we are faced with real practical issues that must be worked through. While this work is underway, it will take time and in the context of proposed significant changes to regulatory regimes relating to packaging, we urge the government to work closely with industry to facilitate change without unintended significant impacts on the availability of safe food and significant hits to the affordability of protein.

Using blunt regulatory instruments to prohibit certain packaging types, could inadvertently increase meat spoilage and food waste – swapping one sustainability issue with another. For instance, it's estimated that packaging represents 0.35% of the total GHG per kg of beef but losses' account for 14.5%⁴, making packaging that maintains shelf life a key priority to reduce emissions.

¹ [Gavara, Catalá, et al. \(2016\). Use of EVOH for Food Packaging Applications.](#)

² [Alias, A. R., Wan, M. K., & Sarbon, N. M. \(2022\). Emerging materials and technologies of multi-layer film for food packaging application: A review. *Food Control*, 136, 108875.](#)

³ [SAFE-Report-on-Recycled-plastic-in-FCMs-2020.pdf \(safefoodadvocacy.eu\)](#)

⁴ [Poore, J., & Nemecek, T. \(2018\). Reducing food's environmental impacts through producers and consumers. *Science*, 360\(6392\), 987-992.](#)

Moreover, without viable alternatives, fees or levies on the use of certain packaging types will only add costs to the supply chain without addressing or supporting transition processes to change. This will ultimately add to food price inflation at each point of the supply chain, including meat processors, smallgoods manufacturers and retail butchers without driving any actual progress towards increased circularity. These increases in costs will threaten our domestic and international competitiveness.

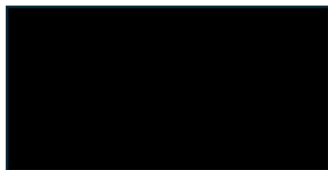
Given these challenges, we request that any reforms to packaging regulations consider the availability of suitable substitutes and be implemented gradually with appropriate allowances made for food-contact materials and high-barrier packaging.

It is critical that we preserve food safety, reduce food waste, and maintain Australia's competitive position in global markets as we pursue a more circular economy.

Thank you for considering our response to the consultation draft. We look forward to continuing to work together towards a more circular economy.

If you would value any additional feedback from AMIC in relation to this matter, please don't hesitate to contact Lachie Turley, Manager – Sustainability and Industry Standards, at lturley@amic.org.au.

Yours sincerely,



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