



Global agreement on marine plastic litter and plastic pollution

Feedback on consultation paper

October 2021

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. Australia's current National Waste Policy and National Plastics Plan should be the cornerstone of Australia's position on a new global agreement on marine plastic litter and plastic pollution.

While the fresh produce industry is a relatively low user of plastics and packaging, it is a highly visible user. Important to understand is that the use of packaging in the fresh produce industry is critical to both reducing food waste and enabling consumers, both in Australia and overseas, to access fresh fruit and vegetables at affordable prices. Packaging prolongs shelf life and protects produce in transit enabling better quality produce to reach consumers.

Australian consumers are concerned about the impact of plastics, from all sources, on the environment and the relative impact of their different purchasing decisions. 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.

The principles outlined in the consultation paper align with industry's sustainability objectives; that is to focus on circular economy solutions, opportunities for better product/packaging design, material selection and importantly consider a life cycle approach. Further, the scope of the global instrument also identifies that addressing plastic pollution more broadly would assist in reducing marine plastic pollution and that a full range of solutions to plastic pollution should be considered. In terms of fresh produce packaging, this is a critical component of any potential scope as there needs to be an increased focus on managing both material selection and material end of life management to best address both marine and general plastic pollution.

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 and not lead to perverse consequences, including increased volume of food waste to landfill.

Industry Background

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 major empirical research undertaken by RMIT University on the role that packaging plays in the fresh produce supply chain. This report outlines that packaging assists in reducing food waste as it protects product through the supply chain, increases the shelf life of fresh produce¹ and creates opportunities to supply produce which would otherwise be considered uneconomical to harvest and sell as individual items and end up as waste to landfill.

Members of the AFPA recognise that they must, where practical and economically viable, work to reduce packaging where possible and most importantly must work with stakeholders, including packaging suppliers, to identify and develop forms of packaging 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 Selector² and Materials Guide³ 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

¹ [The role of packaging for Australian fresh produce 2019](#), RMIT University

² [Materials Selector for Fresh Produce](#)

³ [Materials Guide for Fresh Produce](#)



of consideration given to the barrier characteristics of materials, i.e. what is the purpose of the packaging. Eliminating a specific 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.

The goal outlined in the consultation paper is to “establish a new global instrument to reduce marine plastic litter and plastic pollution to a level approaching the long-term elimination of discharge into the environment”, in order to do this successfully, consideration must be given to the overall or net impact of our decisions rather than individual issues in isolation.

For example, in fresh produce there are conversations about changing material types to reduce use of single use plastics, but the replacement material may have a more significant environmental impact. The AFPA encourages all supply chain participants and governments to consider holistic solutions to plastic reduction challenges including investment in material end of life management including increased domestic recycling capability.

Feedback on the consultation paper

Principles

The principles outlined in the consultation paper; specifically focusing on circular economy solutions, the waste hierarchy and a life cycle approach are vital in guiding the development of the agreement.

As highlighted in the paper, critical to the success of agreement and any associated actions will be a focus on “upstream activities” like material selection but importantly this is complimented with material end of life management in order to minimise the potential for plastic pollution.

Scope

The scope outlined in the consultation is broad, however, acknowledging that an overall reduction in plastic pollution on land will reduce marine plastic pollution (or other specific pollution types such as airborne micro and nano-plastic particles in the atmosphere). Acknowledging that a broad scope captures the main cause of marine plastic pollution, as work on an agreement progresses a narrowing of the scope to key problems will produce better actions and associated outcomes in terms of the desired goal.

Implications for industry

The AFPA and industry more broadly are supportive of measures to improve sustainability in packaging and plastics in the fresh produce sector and economy more broadly.

Packaging plays a key role in the fresh produce supply chain both in terms of access to produce and reducing food waste. The removal of packaging from produce in any instances can reduce product shelf life and limit ability for product to reach the intended market, all of which lead to increased food waste to landfill. 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 packaging.

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 and does not lead to perverse consequences, including increased food waste to landfill and greater carbon emissions, and reduced opportunities for Australian consumers to access fresh quality produce.

