



**Animal
Medicines**
Australia

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Waste Policy

Transport Canberra and City Services Directorate
PO Box 158
CANBERRA ACT 2601

By email only: singleuseplastics@act.gov.au

Dear Sir/Madam,

Re: Submission to Single-use plastics ban: Tranche 3

Thank you for the opportunity to provide comment on the ACT Government's proposal to ban certain single-use plastic products under section 7 of the *Plastic Reduction Act 2021*, as outlined in the *Phasing out single use plastics' Next Steps Policy* document (the Policy).

Animal Medicines Australia (AMA) is the peak industry association representing the registrants and approval holders of veterinary medicines and animal health products in Australia. They are the local divisions of global innovators, manufacturers, formulators and registrants that supply essential veterinary medicines and animal health products that are critical to supporting Australia's \$34 billion livestock industry and the \$33 billion pet industry. Our members represent more than 90% of registered veterinary medicine sales in Australia.

Animal Medicines Australia commends the ACT Government's commitment to addressing the impacts of single-use and disposable plastics.

AMA member companies play a vital role in Australia's food production, agricultural trade and biosecurity preparedness, as well as ensuring the health and wellbeing of our pets, wildlife and competition animals. AMA members develop, register and supply innovative new medicines including vaccines and anti-infection medicines to prevent and control outbreaks of animal disease, as well as medicines and treatments that enable good health and wellbeing, and the production of food and fibre products that are safe for human consumption and use. Healthy animals are much less susceptible to disease and infection, and good animal health is essential to good animal welfare.

Australia is in a unique position because many of the world's most devastating and debilitating animal diseases are not present here. Our strict biosecurity measures and systems help maintain this disease-free status, protecting animal health and welfare, public health, environmental health, food quality and safety, and give Australia a competitive advantage in global markets. An outbreak of animal disease could have severe ramifications for the entire agricultural sector, as well as domestic animal health, food safety, public health and our environment.

As the producers of medicines that prevent, control and treat animal diseases across the livestock, equine and companion animal sectors, AMA members assist veterinarians, farmers, pet owners and others in keeping our animals healthy and preventing and managing disease outbreaks, including zoonoses such as Hendra virus. Ensuring access to animal health products and maintaining their viability and efficacy during transport across Australia in our unique and often extreme environmental

conditions is vital to maintaining not only the health and wellbeing of the animals in our care, but also Australia's rigorous biosecurity systems, public health and access to safe, nutritious, affordable food.

The animal health sector is keen to engage and work collaboratively to address the risks associated with single-use and problematic plastics.

Animal Medicines Australia is pleased to provide the following comments on the proposed single-use plastic ban for consideration by the ACT Government.

[Expanded polystyrene \(EPS\)](#)

Animal Medicines Australia and our members are committed to reducing the use of unnecessary plastic packaging throughout the animal health product supply chain. The unique requirements for safe transport of veterinary medicines, however, necessitate careful consideration of all potential options for replacement of specific packaging types. In particular, the requirements for shipping fragile, temperature- and light-sensitive veterinary medicines around Australia under variable environmental conditions mean that, in some cases, the continued use of moulded Expanded Polystyrene (EPS) packaging is necessary.

Moulded EPS packaging (e.g. esky boxes) is essential for controlling shipment temperatures to ensure the viability and efficacy of animal health products throughout the entire supply chain. This includes both business-to-business shipping (from animal health companies to wholesalers, farmers, veterinarians etc.), as well as business-to-consumer shipping (from veterinarians, online pharmacies and online pet stores to individual animal owners including owners of dogs, cats, horses, livestock species etc.).

Currently, there are no suitable alternatives for transporting fragile and temperature-sensitive animal health products that adequately control cold-chain shipment requirements and ensure product viability and integrity in Australia's varied and often extreme environmental conditions. While options for replacing moulded EPS are available in Australia, they have not been validated at temperatures sufficiently high for Australia's environmental conditions and can be cost-prohibitive. Animal health products are required to remain within 2 and 8 degrees Celsius for the duration of shipment, which could be up to 72 hours. Current alternatives to moulded EPS are not able to maintain this degree of precision in shipping temperature for 72 hours in environmental temperatures likely to be experienced when transporting animal health products to regional and remote areas.

AMA notes that the Australian Packaging Covenant Organisation (APCO) *Plan for Problematic and Unnecessary Single-Use Plastic Packaging* specifically excludes specialist applications for pharmaceuticals.¹

Animal Medicines Australia notes that the ACT Government will consider exemptions from the proposed EPS ban.² AMA does not support the introduction of a ban for moulded EPS veterinary pharmaceutical packaging and proposes that pharmaceutical products with specific cold-chain transport requirements be exempt from the proposed EPS ban, on the basis that suitable alternatives are not currently available. An exemption would allow the animal health sector to consider

¹ APCO Plan for Problematic and Unnecessary Single-Use Plastic Packaging:
<https://documents.packagingcovenant.org.au/public-documents/Action%20Plan%20for%20Problematic%20and%20Unnecessary%20Single-Use%20Plastic%20Packaging>

² ACT Government Your Say: Expanded polystyrene products and packaging:
<https://yoursayconversations.act.gov.au/single-use-plastics/expanded-polystyrene-products-and-packaging>

alternatives and determine the appropriateness of those potential alternatives without compromising the integrity, stability and supply of these crucial animal health products.

AMA does, however, support the proposed ban on moulded EPS for protective goods packaging for non-fragile products that do not require to be shipped under specific chilled conditions. The proposed commencement date of 1 July 2023 appears appropriate for the implementation of this proposal.

AMA and our members agree that there are sufficient alternatives for loose-fill EPS and support the proposed ban.

National Impacts

The Policy refers to the ACT Government's aim to "harmonise its laws with other jurisdictions where possible", to assist businesses operating at a national scale during the transition phase. National consistency regarding the use or otherwise of various packaging types should be prioritised. In the case of veterinary pharmaceutical products, national consistency is essential for ensuring rapid, reliable transport nation-wide, to ensure animal health and welfare concerns, as well as biosecurity threats, can be appropriately managed. Further consideration should be given to ensuring the proposed ban is aligned with regulations in other jurisdictions.

The proposal to ban the use of moulded EPS with no exemption for pharmaceutical products is not currently aligned with other jurisdictions within Australia, particularly as relates to business-to-business applications.

Any cost or benefit related to the phase-out of relevant single-use plastic items used in the veterinary pharmaceutical supply chain in the ACT would have impacts on the national supply chain. Animal health products are distributed nationwide and across state and territory borders. Manufacturers and distributors of animal health products are unlikely to adopt a new SKU to accommodate one jurisdiction – instead, the likelihood is that any amendment to packaging within the supply chain would be adopted nationwide. Hence, the costs and benefits associated with the proposed phase-out should be appropriately extrapolated to represent the entire Australian market.

In Summary:

Animal Medicines Australia commends the ACT Government's commitment to addressing the impacts of single-use and disposable plastics.

AMA proposes that veterinary pharmaceuticals be exempt from the proposed EPS ban relating to both business-to-business and business-to-consumer shipping. Currently, there are no suitable alternatives for transporting fragile and temperature-sensitive animal health products that adequately control cold-chain shipment requirements and ensure product viability and integrity in Australia's varied and often extreme environmental conditions. An exemption would provide the animal health sector with sufficient time to consider alternatives and determine the appropriateness of those potential alternatives without compromising the integrity and stability of these crucial animal health products.

AMA opposes

- AMA does not support the introduction of a ban for moulded EPS with specific cold-chain transport requirements for business-to-business or business-to-consumer veterinary pharmaceutical packaging.

AMA supports

- AMA supports the proposed ban on moulded EPS for protective goods packaging for products that are not fragile or do not require to be shipped under specific chilled conditions. The proposed commencement date of 1 July 2023 appears appropriate for the implementation of this proposal.
- AMA and our members agree that there are sufficient alternatives for loose-fill EPS and support the proposed ban.

If we can provide further information at any time, please do not hesitate to contact me.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Katie Asplin', with a long horizontal line extending to the right.

Dr Katie Asplin

Director, Animal Health Stewardship