



**Animal
Medicines**
Australia

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18 November 2022

Single-Use Plastics Team

Department of Water and Environmental Regulation
Locked Bag 10
JOONDALUP WA 6919

By email only: pastic-action@dwer.wa.gov.au

Dear Sir/Madam,

Re: Submission to Stage 2 of Western Australia's Plan for Plastics: Implementing a phase-out of single-use plastics

Thank you for the opportunity to provide comment on Stage 2 of Western Australia's Plan for Plastics (the Plan).

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 \$30 billion pet industry. Our members represent more than 90% of registered veterinary medicine sales in Australia.

Animal Medicines Australia commends the Western Australian 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 Western Australian 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 EPS packaging is necessary.

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 and can be cost-prohibitive. Animal health products are required to remain within 2 and 8 degrees Celsius for 72 hours during shipping. 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.

Animal Medicines Australia notes that the proposal to phase out the use of Expanded Polystyrene (EPS) in loose-fill and moulded forms applies only to packaging applications from business-to-consumer products. The majority of AMA member companies' use of moulded EPS packaging for fragile and temperature-sensitive products (e.g. animal vaccines) is for business-to-business applications and is, therefore, exempt from the proposed ban. Moulded EPS packaging (e.g. esky boxes) is, however, 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.).

Therefore, in considering the entirety of the animal health product supply chain, AMA does not support the introduction of a ban for moulded EPS business-to-consumer veterinary pharmaceutical packaging.

Animal Medicines Australia understands that the Australian Packaging Covenant Organisation is currently developing definitions for the terms "fragile and precision" products. AMA proposes that, due to the nature of veterinary pharmaceuticals and transport and shipping conditions associated with providing veterinary pharmaceuticals to regions across Australia with variable environmental conditions, veterinary pharmaceuticals should be included in the definition of "fragile and precision" products and, as such, be exempt from the proposed EPS ban relating to business-to-consumer shipping. 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 does, however, support the proposed ban on moulded EPS for protective goods packaging for products weighing under 45kg that are not fragile or do not require to be shipped under specific chilled conditions. The proposed 18-month timeframe 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 discussion paper makes reference to “significant costs or benefits outside WA.” Any cost or benefit related to the phase-out of relevant single-use plastic items used in the veterinary pharmaceutical supply chain in Western Australia 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 Western Australia – 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.

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 discussion paper refers to the targets outlined in APCO’s *Plan for Problematic and Unnecessary Single-Use Plastic Packaging* and states that the proposed EPS ban is “aligned with APCO’s targets.” While both the proposed ban and APCO targets specifically exclude business-to-business applications, the discussion paper does not specify an exemption for specialist applications for business-to-consumer pharmaceuticals, as is contained in APCO’s Plan. AMA notes that APCO are currently developing a definition for “fragile and precision products” and recommends the inclusion of veterinary pharmaceutical products in this definition.

In Summary:

Animal Medicines Australia commends the Western Australian Government’s commitment to addressing the impacts of single-use and disposable plastics.

AMA proposes that that veterinary pharmaceuticals should be included in the definition of “fragile and precision” products and, as such, be exempt from the proposed EPS ban relating to 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 business-to-consumer veterinary pharmaceutical packaging.

AMA supports

- AMA supports the proposal to exempt business-to-business products from the proposed ban on moulded EPS.
- AMA supports the proposed ban on moulded EPS for protective goods packaging for products weighing under 45kg that are not fragile or do not require to be shipped under specific chilled conditions. The proposed 18-month timeframe 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 horizontal line extending to the right.

Dr Katie Asplin
Director, Animal Health Stewardship