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NSW Environment Protection Authority
Locked Bag 5022
Parramatta NSW 2124

By email only: plasticsconsultation@epa.nsw.gov.au

Dear Sir/Madam,

Re: Submission to *NSW Plastics: The Way Forward* Discussion Paper

Thank you for the opportunity to provide comment on the NSW EPA's *NSW Plastics: The Way Forward* discussion paper (the Discussion paper).

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.

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.

Ensuring access to animal health products and maintaining their viability and efficacy during transport, storage and use 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.

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

The animal health sector is keen to engage and work collaboratively to address the risks associated with these plastics. Animal Medicines Australia is pleased to provide the following comments on the Discussion paper for consideration by the NSW EPA.

Moulded polystyrene packaging

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.

The Australian Packaging Covenant Organisation (APCO) Plan for Problematic and Unnecessary Single-Use Plastic Packaging specifically excludes specialist applications for pharmaceuticals.

AMA notes that the NSW Government proposes to adopt the approach recently implemented by the West Australian government relating to the phase-out of EPS, which includes exemptions for defined industries and products. These exemptions include specialist packaging for medical or scientific applications and packaging sent between businesses. AMA supports the inclusion of exemptions for specialist packaging for medical or scientific applications, as outlined in the Discussion paper.

The proposed exemptions would allow the animal health sector to consider alternatives and determine the appropriateness of those potential alternatives without compromising the integrity, stability and supply of these crucial animal health products.

National harmonisation of single-use plastic phase-outs

AMA and our members are committed to reducing the use of unnecessary plastic packaging where possible throughout the animal health product supply chain. The unique requirements for safe transport of veterinary medicines, especially, necessitates careful consideration of all potential options for replacement of specific packaging types.

The Discussion paper highlights the NSW Government's intention to address problematic and single-use plastics via a series of phase-outs, while aligning with phase-outs in other jurisdictions, where appropriate. AMA supports the NSW Government's proposal to ensure, where appropriate, national consistency regarding the phasing out of plastic packaging.

In the case of veterinary pharmaceutical products, national consistency is essential for ensuring rapid, reliable transport nation-wide to address animal health and welfare concerns and ensure that food safety and biosecurity threats can be appropriately managed.

Changes to the use of plastics in the veterinary pharmaceutical supply chain in a single jurisdiction, such as NSW, could have detrimental impacts on the national supply chain as veterinary medicines are regulated at the federal level and distributed across state and territory borders. Products may become unavailable if new regulations are imposed in one jurisdiction and not others, posing significant risks to animal health and welfare, agricultural production, biosecurity, human health and food safety. To ensure the costs and benefits associated with any new regulations on plastics are shared across the Australian marketplace and do not result in unintended negative consequences, regulations that affect the pharmaceutical supply chain must be consistent nationwide and informed by significant industry consultation.

AMA recommends consideration of recommendations by APCO when developing plans to phase out certain plastics. The APCO guidance generally considers different commodity sectors, including the pharmaceutical sector, and makes recommendations regarding exemptions or timeframes for phase-outs in consultation with affected industries.

In Summary:

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

AMA supports:

- AMA supports the proposed exemptions for specialist packaging for medical or scientific applications and packaging sent between businesses from the proposed phase-out of EPS packaging.
- AMA supports the national harmonisation of single-use plastic replacements and phase-outs to ensure unintended adverse consequences are avoided.

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', with a horizontal line extending to the right.

Dr Katie Asplin

Director, Animal Health Policy and Engagement