



Animal Medicines Australia
ABN 76 116 948 344 | ACN 116 948 344
18 National Circuit
Barton ACT 2600, Australia
P: +61 2 6257 9022
animalmedicinesaustralia.org.au

20 August 2024

Waste Strategy Review
Department of Water and Environmental Regulation
Locked Bag 10
JOONDALUP DC WA 6919

By email only: wastestrategyreview@dwer.wa.gov.au

Dear Sir/Madam,

Re: Waste Strategy Review

Thank you for the opportunity to provide comment on the WA Government's review of the *Waste Avoidance and Resource Recovery Strategy 2030* (the Review).

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 WA Government's commitment to responsible waste management and is pleased to provide the following comments on the review of the *Waste Avoidance and Resource Recovery Strategy 2030* directions paper for consideration by the WA Government.

General comments

AMA and its members have a long-standing commitment to an animal health industry that is responsible and sustainable. Our members' products are essential tools that can help meet economic, environmental and social challenges.

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 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.

Waste strategy priorities

AMA commends the WA government's efforts to support responsible waste management and to engage proactively with industry to develop and support recycling pathways. As highlighted by the discussion paper, this goal requires that collection mechanisms be developed concurrently with processing capacity and markets for recycled products.

Better outcomes for regional and Aboriginal communities

AMA supports the proposal to identify priority regions and develop regional waste and recycling infrastructure plans, to ensure waste infrastructure and services that meet the needs of regional and Aboriginal communities. Access to responsible waste management services in regional and remote areas is a priority of the animal health sector, to facilitate more responsible management of on-farm veterinary pharmaceutical waste.

AMA member companies participate in the drumMUSTER program, delivered by Agsafe Limited, which provides a recycling pathway for eligible empty veterinary chemical containers. Under this stewardship program empty, clean containers displaying the drumMUSTER logo are delivered to one of the 822 collection sites across Australia. More than 42 million containers have been diverted from landfill since the program began in 1999. For product containers not eligible for drumMUSTER, however, convenient, cost-effective alternatives to landfill are required for responsible management of on-farm veterinary pharmaceutical waste. Improved infrastructure in regional and remote areas is key to facilitating responsible on-farm waste management.

Increasing our focus on waste avoidance

AMA supports efforts to avoid the generation of waste and our member companies are investing in innovative solutions to minimising waste and utilising recycled content in packaging.

Packaging materials are, however, considered to be part of the registered product, such that any changes to packaging materials must be assessed by the Australian Pesticides and Veterinary Medicines Authority (APVMA) to ensure the new materials continue to satisfy the registered specifications for safety, quality and efficacy. The incorporation of recycled content would, therefore, require significant product testing to ensure the product remains safe and effective for use and satisfy the regulatory requirements for product stability, quality and safety. In addition, APVMA authorisation is required prior to the introduction of any new packaging for veterinary medicines.

To accommodate these regulatory requirements, as well as production lead times, several years are generally required to introduce new packaging materials for registered veterinary medicines, particularly for low volume product lines.

As highlighted in the Discussion Paper, national consistency regarding the inclusion of recycled content in packaging should be prioritised. In the case of veterinary pharmaceutical products, national consistency is essential for ensuring continued access nation-wide to address animal health and welfare concerns and ensure that biosecurity threats can be appropriately managed, regardless of packaging type.

Similarly, consideration of international supply chains and global packaging and traceability/reporting requirements should be considered. Australian animal health products are commonly sourced from global manufacturing facilities, which are part of complex global supply chains with equally complex requirements regarding packaging requirements for product stability, quality and safety.

Better management of priority materials

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 storage and transport of veterinary medicines, however, necessitate careful consideration of all potential options for replacement of specific packaging types.

Ensuring access to animal health products and maintaining their viability and efficacy during transport, storage and use in Australia's 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. Consequently, the materials used to package animal health products have a functional role in maintaining the stability and efficacy of the product, which go far beyond simple containment. This is particularly relevant for fragile products and those with specific light or cold-chain storage and transport requirements.

Animal health product packaging and disposal pathways are subject to rigorous regulatory requirements, administered by the Australian Pesticides and Veterinary Medicines Authority (APVMA). To ensure the viability of registered products, the APVMA requires that stability data be generated using the same containers (packaging material) and with the same closure system as that proposed in the application for registration of the product. In addition, and in contrast to human pharmaceuticals, animal health products have legislated requirements regarding disposal pathways that are included on the registered label and must be adhered to by law.

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.

National consistency regarding the phase-out of specific plastics 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 WA, 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, 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.

Comprehensive stakeholder consultation is recommended, to ensure that proposals to phase-out particular packaging types do not create negative unintended outcomes for veterinary pharmaceutical product availability and stability.

Realising the economic potential of recycling

AMA supports the WA Government's priority to realise the economic potential of recycling and deliver economic value for Western Australia. In particular, exploring options to support research and innovation that creates new markets and business opportunities for recycled materials is necessary to develop and implement a true circular economy.

As outlined above, AMA supports efforts by the WA Government to increase recycling rates through the development of regional materials recovery facilities and the consolidation and sorting of materials at transfer stations.

Contingency planning and climate resilience

AMA supports efforts to plan and prepare for waste management following emergencies or natural disasters. AMA member companies participate in the drumMUSTER and ChemClear stewardship programs, which are administered by Agsafe Limited and provide responsible disposal pathways for eligible agricultural and veterinary containers and unwanted products. In the event of a natural disaster or emergency scenario, state government assistance for collection of these containers and unwanted chemicals is invaluable in managing potential environmental or OHS risks.

In Summary:

Animal Medicines Australia commends the WA Government's commitment to responsible waste management.

AMA recommends:

- Consideration of the complex regulatory requirements and global supply chains associated with the animal health sector, as well as the importance of national consistency regarding the incorporation of recycled content in packaging.
- Consideration of APCO recommendations and 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,



Dr Katie Asplin

Director, Animal Health Policy & Engagement