

## Soft Plastic Stewardship Australia response to submissions from interested parties after pre-decision conference on application for authorisation AA1000695

### 1 Introduction

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- 1 SPSA has considered the submissions made by interested parties since the pre-decision conference on 19 September 2025. Most matters raised in the submissions have already been addressed by SPSA in detail, including in its application,<sup>1</sup> response to submissions from interested parties before the draft determination,<sup>2</sup> responses to the ACCC's requests for information,<sup>3</sup> response to the ACCC's draft determination<sup>4</sup> and response to submissions from interested parties after the draft determination.<sup>5</sup> Accordingly, the primary focus of this submission is to direct the ACCC to where SPSA has previously addressed these matters. In addition, this submission addresses a small number of other matters raised following the pre-decision conference. SPSA welcomes the opportunity to further clarify key aspects of the proposed Scheme.
- 2 As an overarching comment, a number of the submissions following the pre-decision conference appear to assess the counterfactual as being a perfect, all-inclusive solution (and in some cases a regulated, mandatory scheme) rather than the **status quo, which SPSA estimates is less than 1% of household soft plastics being recycled in Australia**. These submissions also do not account for the fact that without the SPSA Scheme:
- (a) it is unlikely the existing measures for business-to-consumer soft plastics recycling will be expanded, and it is possible that these measures may ultimately be wound back or ceased given these arrangements were only intended to provide an interim solution prior to the commencement of a broader scheme;<sup>6</sup> and
  - (b) it is unlikely that Scheme Participants would unilaterally establish widely available 'own brand' recycling systems for consumers to return business-to-consumer soft plastics, or engage with processors and service providers for this purpose.

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<sup>1</sup> SPSA, Application to the Australian Competition and Consumer Commission for interim and final authorisation (11 April 2025) (**Application**). Available at: [https://www.accc.gov.au/system/files/public-registers/documents/Application%20Received%20-%2018.03.25%20-%20PR%20VERSION%20-%20SPSA\\_0.pdf?ref=0&download=y](https://www.accc.gov.au/system/files/public-registers/documents/Application%20Received%20-%2018.03.25%20-%20PR%20VERSION%20-%20SPSA_0.pdf?ref=0&download=y).

<sup>2</sup> SPSA, Response to submissions from interested parties on application for authorisation AA1000695 (12 June 2025) (**SPSA First Response to Interested Party Submissions**). Available at: <https://www.accc.gov.au/system/files/public-registers/documents/Applicant%E2%80%99s%20response%20to%20interested%20party%20submissions%20-%2012.06.25%20-%20PR%20-%20AA1000695%20Soft%20Plastics.pdf?ref=0&download=y>.

<sup>3</sup> SPSA, Response to ACCC request for information dated 29 May 2025 (20 June 2025) (**SPSA Response to 29 May RFI**). Available at: <https://www.accc.gov.au/system/files/public-registers/documents/Applicant%E2%80%99s%20response%20to%20ACCC%20request%20for%20further%20information%20-%2020.06.25%20-%20PR%20VERSION%20-%20AA1000695%20Soft%20Plastics.pdf?ref=0&download=y>; SPSA response to ACCC request for information dated 15 July 2025 available at: <https://www.accc.gov.au/system/files/public-registers/documents/Applicant%E2%80%99s%20response%20to%20ACCC%20request%20for%20further%20information%20-%2021.07.25%20-%20PR%20-%20AA1000695%20Soft%20Plastics.pdf?ref=0&download=y>.

<sup>4</sup> SPSA, Response to ACCC draft determination (26 August 2025) (**SPSA Response to Draft Determination**). Available at: <https://www.accc.gov.au/system/files/public-registers/documents/Applicant%E2%80%99s%20response%20to%20draft%20determination%20-%2026.08.25%20-%20PR%20-%20AA1000695%20Soft%20Plastics.pdf?ref=0&download=y>.

<sup>5</sup> SPSA, Response to submissions from interested parties on application for authorisation AA1000695 following draft determination (4 September 2025) (**SPSA Second Response to Interested Party Submissions**). Available at: <https://www.accc.gov.au/system/files/public-registers/documents/Applicant%E2%80%99s%20response%20to%20interested%20party%20submissions%20-%2004.09.25%20-%20PR%20-%20AA1000695%20Soft%20Plastics.pdf?ref=0&download=y>.

<sup>6</sup> See, eg, Coles Group Limited, Woolworths Group Limited and ALDI Stores, Submission dated 9 July 2025. Available at: <https://www.accc.gov.au/system/files/public-registers/documents/Submission%20by%20Coles%20Group%20Limited%20and%20Woolworths%20Group%20Limited%20and%20ALDI%20Stores%20-%2009.07.25%20-%20PR%20-%20AA1000695%20Soft%20Plastics.pdf?ref=0&download=y>.

- 3 Similarly, a number of the issues raised in the submissions following the pre-decision conference mischaracterise SPSA's role within Australia's national packaging framework. SPSA's ambition is to be an effective producer responsibility organisation, which is distinct from a regulator, co-regulator, legislator, local government or processor.<sup>7</sup> Nonetheless, SPSA is positioned to align with and support these other functions. SPSA is confident, and the ACCC has acknowledged in its draft determination, that the Scheme will create environmental benefit that outweighs any potential detriment.

## 2 Previously addressed matters

- 4 The table below sets out where SPSA has previously responded to the main themes raised in the submissions since the pre-decision conference.

Theme	Previously addressed
Does not address the full life cycle view of plastics	<ul style="list-style-type: none"> <li>Sections 4.3 and 6.2 of SPSA's response to submissions from interested parties before the draft determination.</li> <li>Section 8 of SPSA's response to submissions from interested parties after the draft determination.</li> <li>This is addressed in further detail at section 3.1 below.</li> </ul>
Greenwashing	<ul style="list-style-type: none"> <li>Response to question 7 of ACCC request for information dated 29 May 2025.</li> <li>Section 6 of SPSA's response to submissions from interested parties after the draft determination.</li> </ul>
Polluter pays principle / cost pass through	<ul style="list-style-type: none"> <li>Section 4.4 of SPSA's response to submissions from interested parties before the draft determination.</li> <li>Section 4 of SPSA's response to submissions from interested parties after the draft determination.</li> </ul>
Proposed contribution to the REDcycle stockpile remediation	<ul style="list-style-type: none"> <li>Section 4.5 of SPSA's response to submissions from interested parties before the draft determination.</li> <li>Section 3 of SPSA's response to submissions from interested parties after the draft determination.</li> <li>Further, Zero Waste Victoria states that this arrangement '<i>does not reimburse SPSA's expenses, as these are costs of the supermarkets that were incurred before SPSA existed</i>'. However, this fails to acknowledge: <ul style="list-style-type: none"> <li>that the stockpiles contained soft plastics from a wide range of sources and the majority of the packaging contained in the stockpiles were not from retailer-owned brands;</li> </ul> </li> </ul>

<sup>7</sup> As stated by SPSA at the pre-decision conference held on 19 September 2025. See: ACCC, Pre-decision Conference Record (19 September 2025), pp 6–7 (**Pre-decision Conference Record**). Available at: <https://www.accc.gov.au/system/files/public-registers/documents/Pre-decision%20Conference%20record%20-%202019.09.25%20-%20PR%20-%20AA1000695%20Soft%20Plastics.pdf?ref=0&download=y>.

Theme	Previously addressed
	<ul style="list-style-type: none"> <li>that remediation of the stockpiles is ongoing and has been required to be undertaken simultaneous to the establishment of the SPSA Scheme, with Coles and Woolworths paying for both costs;</li> <li>the role that the stockpiles have had as foundation feedstock for the Scheme and by providing an initial level of investment confidence to processors and recyclers; and</li> <li>the knowledge and expertise acquired by the Taskforce in managing and processing the stockpiles which will benefit SPSA.</li> </ul> <ul style="list-style-type: none"> <li>This is addressed in further detail at section 3.4 below.</li> </ul>
Governance: conflicts of interest and insufficient independence	<ul style="list-style-type: none"> <li>Section 3 of SPSA's response to submissions from interested parties before the draft determination.</li> <li>Section 5 of SPSA's response to submissions from interested parties after the draft determination.</li> </ul>
Eight-year term	<ul style="list-style-type: none"> <li>Section 5.3 of SPSA's application.</li> <li>Section 5.3 of SPSA's response to submissions from interested parties before the draft determination.</li> <li>Response to question 15 of ACCC request for information dated 29 May 2025 and associated Schedule 3 .</li> </ul>
Mandatory scheme	<ul style="list-style-type: none"> <li>Section 6.1 of SPSA's response to submissions from interested parties before the draft determination.</li> <li>Section 8 of SPSA's response to submissions from interested parties after the draft determination.</li> </ul>

### 3 Additional matters

5 SPSA sets out below its response to a small number of additional matters raised by interested parties following the pre-decision conference. SPSA has not sought to address all of the matters raised, many of which have already been dealt with. To the extent SPSA has not responded to a matter raised in the interested party submissions, this should not be taken as SPSA's acceptance of the position asserted. SPSA would be happy to provide additional information to the ACCC on any of the matters raised at the pre-decision conference and the submissions since.

#### 3.1 Plastic packaging reduction

6 Zero Waste Victoria's submission after the pre-decision conference states that '*[t]he most efficient form of single-use plastic is the one never produced*', arguing that the Scheme ignores upstream impacts and therefore risks presenting a partial solution.<sup>8</sup> Similar sentiment has been expressed

<sup>8</sup> Zero Waste Victoria, Submission dated 29 September 2025, pp 5-6 (**ZWV Post-conference Response**). Available at: [https://www.accc.gov.au/system/files/public-registers/documents/Submission%20by%20Zero%20Waste%20Victoria%20-%2029.09.25%20-%20PR%20-%20AA1000695%20Soft%20Plastics\\_0.pdf?ref=0&download=y](https://www.accc.gov.au/system/files/public-registers/documents/Submission%20by%20Zero%20Waste%20Victoria%20-%2029.09.25%20-%20PR%20-%20AA1000695%20Soft%20Plastics_0.pdf?ref=0&download=y).

in the submissions by the Australian Marine Conservation Society (**AMCS**) and Ballina Shire Council.<sup>9</sup>

- 7 Despite these submissions, soft plastic packaging plays an important role in Australia, particularly in relation to the storing, preservation, and transportation of consumer goods. Its unique barrier properties preserve product quality, extend shelf life and ensure non-contamination, which reduces unnecessary food waste and ensures consumer safety. These characteristics were outlined by Kellanova at the pre-decision conference, in which it noted that '*[w]hile there is a desire to have plastics completely gone from products, this approach is not viable from a food company perspective – as plastics are a good material to prolong shelf life and food quality.*'<sup>10</sup>
- 8 While SPSA agrees that problematic and unnecessary single use plastics should be reduced, SPSA considers that the regulation of single-use plastic is a matter for government, and SPSA has previously expressed its support for the introduction of mandatory packaging standards and recycling systems by government that reflect APCO's Sustainable Packaging Design guidelines and the global CEFLEX soft plastic design guidelines.<sup>11</sup> At this point in time, when government is considering mandatory design standards as part of national packaging reform, SPSA considers that government is best placed to implement packaging design standards and introduce aligned recycling system standards to promote consistency across industry and improve circularity. This does not preclude SPSA from considering other ways to incentivise sustainable packaging design (including through eco-modulation) and support emerging packaging regulation.
- 9 As outlined by SPSA at the pre-decision conference, many members already undertake their own initiatives to sustainably design packaging for circularity. **Schedule 1** provides a summary of the plastic (both soft and rigid) reduction initiatives undertaken by initial Scheme Participants as well as their broader sustainable packaging strategies. Participation in the Scheme does not disincentivise or otherwise impede the ability of members to continue and expand these initiatives. This was affirmed by Kellanova at the pre-decision conference, when it described its participation in the Scheme being an 'and' on top of its existing sustainability initiatives, and stated that it continues to explore alternatives to plastic packaging as part of its own sustainability strategy.
- 10 Further, the structure of the Scheme Levy also incentivises participants to reduce their use of soft plastics. This is because the Scheme Levy is calculated based upon a participant's packaging placed on market, meaning the less soft plastic packaging a Scheme Participant produces, the lower its Scheme Levy obligation.

### 3.2 Greenwashing by omission

- 11 Zero Waste Victoria argues that '*SPSA's framing of the Scheme around recycling, while excluding upstream and B2B streams creates a risk of greenwashing by omission*'.<sup>12</sup>
- 12 Any suggestion that the Scheme's framing creates a greenwashing risk by omission is unfounded. SPSA has been transparent in relation to the scope of the Scheme. SPSA's application makes clear that the initial focus of the Scheme will be on recycling post-consumer soft plastic packaging but that the Scheme may ultimately expand to include other plastic

<sup>9</sup> Australian Marine Conservation Society, Submission dated 26 September 2025, p 4-5 (**AMCS Submission**). Available at: <https://www.accc.gov.au/system/files/public-registers/documents/Submission%20by%20Australian%20Marine%20Conservation%20Society%20-%202026.09.25%20-%20PR%20-%20AA1000695%20Soft%20Plastics.pdf?ref=0&download=y>; Ballina Shire Council, Submission dated 24 September 2024, p 1-4 (**Ballina Council Submission**). Available at: [https://www.accc.gov.au/system/files/public-registers/documents/Submission%20by%20Ballina%20Shire%20Council%20-%202026.09.25%20-%20PR%20-%20AA1000695%20Soft%20Plastics\\_0.pdf?ref=0&download=y](https://www.accc.gov.au/system/files/public-registers/documents/Submission%20by%20Ballina%20Shire%20Council%20-%202026.09.25%20-%20PR%20-%20AA1000695%20Soft%20Plastics_0.pdf?ref=0&download=y).

<sup>10</sup> Pre-decision Conference Record, p 14.

<sup>11</sup> See: SPSA First Response to Interested Party Submissions, section 6.2; SPSA Second Response to Interested Party Submissions, section 8.

<sup>12</sup> ZWV Post-conference Response, p 7.

materials over time,<sup>13</sup> and that the Scheme provides a pathway (such as through eco-modulation) to increase recyclability and recycled content of packaging by preparing industry for any mandatory regulation of packaging design.<sup>14</sup>

13 As SPSA has previously outlined, it has chosen to focus on post-consumer soft plastic packaging because this sector presents the greatest opportunity to correct market failure through improving recycling rates. Business-to-business soft plastics, on the other hand, are already being collected and recycled by manufacturers, retailers and other sectors. Including them in the Scheme could significantly increase the costs of a voluntary scheme and risk reducing voluntary Scheme participation in early years.<sup>15</sup>

14 In addition, submissions by the AMCS and Ballina Shire Council are to the effect that the Scheme could '*greenwash [consumers] into thinking recycling is a higher impact action than it is*'.<sup>16</sup> SPSA has not made, nor does it intend to make, statements suggesting that recycling is the most impactful or sole solution to plastic waste. That being said, soft plastics recycling is a vital part of the overall solution and SPSA stands behind the importance of its actions to increase soft plastics recycling in Australia, including through educating consumers on how to recycle soft plastics and the environmental benefits of soft plastics recycling.

15 Further, preliminary survey results from recent kerbside collection pilots indicate a high level of community support for soft plastic collection and recycling. In a survey conducted by SPSA in September 2025 of households and local governments in nine council areas participating in the trials, 98% of respondents who are current participants in kerbside recycling pilots indicated they were 'extremely likely' to participate in future. Respondents who do not currently participate in the pilots expressed similar sentiment, with 81% indicating they were 'extremely likely' to participate in future.<sup>17</sup>

### 3.3 Transparency regarding how the Scheme Levy is applied

16 Zero Waste Victoria's submission expresses concern regarding the transparency of levy setting and public communication, writing that SPSA has committed '*only to accountability to Scheme Participants, not consumers*'.<sup>18</sup> SPSA has committed to public reporting obligations which ensure accountability not only to Scheme Participants, but also the broader public and consumers. These reporting obligations include stating the average Scheme Levy for the previous year – an obligation which SPSA has committed to as a condition of authorisation.<sup>19</sup>

17 Further, SPSA has been transparent about how and when it will determine the Scheme Levy, including in its application and response to submissions from interested parties before the draft determination.<sup>20</sup> SPSA has also been transparent about the potential impact of the Scheme Levy on individual food and grocery products if members choose to pass the cost on, having included preliminary forecasting in its application for both FY25 and FY29.<sup>21</sup> This forecasting shows that the potential levy impact is minimal under the initial Scheme Levy, being less than 1 cent for a number of common household items that use soft plastic packaging.

18 SPSA considers that transparency is best achieved through its centralised public reporting. Requiring consumer-level disclosures, such as on packaging or at point-of-sale, would be

<sup>13</sup> Application p 11.

<sup>14</sup> Application, p 31.

<sup>15</sup> SPSA Response to 29 May RFI, section 6.

<sup>16</sup> Ballina Council Submission, p 2; AMCS Submission, p 2-3.

<sup>17</sup> Full results will be published in coming months.

<sup>18</sup> ZWV Post-conference Response, p 8.

<sup>19</sup> SPSA, Response to Draft Determination (26 August 2025), p 2. Available at: <https://www.accc.gov.au/system/files/public-registers/documents/Applicant%E2%80%99s%20response%20to%20draft%20determination%20-%2026.08.25%20-%20PR%20-%20AA1000695%20Soft%20Plastics.pdf?ref=0&download=y>.

<sup>20</sup> Application, p 18; SPSA First Response to Interested Party Submissions, p 7.

<sup>21</sup> Application, pp 19–20.

impractical and disproportionately onerous given the minimal potential levy impact, the voluntary nature of any cost pass through, the scale and diversity of products involved and the fact that the amount of the Scheme Levy payable is but one of many inputs into pricing (if considered at all). Further, if Scheme Participants who pass on costs are required to disclose this (eg, on packaging), while others who absorb the costs are not, it may create confusion for consumers about whether a brand is part of the Scheme.

### 3.4 Proposed contribution to remediation of the REDcycle stockpiles

- 19 Zero Waste Victoria raises concerns with the proposed contribution to the REDcycle remediation, including that it attempts to claw back costs that were voluntarily committed at the time and provided reputational benefits to Coles and Woolworths and retroactively shifts costs in a manner inconsistent with genuine producer responsibility.<sup>22</sup>
- 20 SPSA has provided the rationale for the proposed contribution on a number of occasions and does not intend to reproduce those reasons in detail. SPSA does, however, wish to note that Zero Waste Victoria's submission overlooks:
- (a) the context in which the REDcycle stockpile remediation program occurred. The collapse of REDcycle created an immediate need to manage the resulting stockpile of soft plastics. Urgent action was required from industry, with retailers stepping in to manage the issue and temporarily absorb the associated costs, while brands committed to supporting the remediation effort. The stockpiles contained soft plastics from a wide range of sources and the majority of the packaging contained in the stockpiles were not from retailer-owned brands; and
  - (b) the fact that remediation has been ongoing, including while SPSA has been established and taking steps to establish the Scheme, and the stockpiles have acted as foundational feedstock and provided real benefit for the SPSA Scheme, including by accelerating the research, development and commissioning of recycling infrastructure, as set out in further detail in SPSA's previous submissions.<sup>23</sup>
- 21 Separately, in acknowledging the statement by Central Adelaide Waste and Recycling Authority (**CAWRA**) in SPSA's 12 June 2025 submission, SPSA's intention was to reflect that CAWRA had recognised the importance of equitable cost sharing across Scheme Participants. SPSA accepts that the wording could have better captured CAWRA's position, for example by using the words 'is an attempt to align' rather than 'aligns'. Nonetheless, the reference was not intended to imply unqualified support by CAWRA and CAWRA's submission was footnoted for reference.

### 3.5 Governance

- 22 Zero Waste Victoria's submission after the pre-decision conference states that comparisons to European schemes should be treated with caution given those models operate under regulatory frameworks with enforceable governance safeguards<sup>24</sup> and that '*comparison to overseas examples does not address the structural governance risks*' applicable to SPSA, as highlighted by the fact that some plastics recyclers in Europe are on the verge of collapse.<sup>25</sup> As SPSA has previously outlined,<sup>26</sup> the Scheme's governance framework was informed through engagement with European schemes as well as other global and local product stewardship experts including Ecosurety, Valpak, RePak, Helen Lewis Research, RPS consulting and One Planet consulting.

<sup>22</sup> ZWV Post-conference Response, pp 10–11.

<sup>23</sup> See: SPSA First Response to Interested Party Submissions, section 4.5; SPSA Second Response to Interested Party Submissions, section 3.

<sup>24</sup> ZWV Post-conference Response, p 12.

<sup>25</sup> ZWV Post-conference Response, p 12.

<sup>26</sup> See: SPSA First Response to Interested Party Submissions, [17], [111]; SPSA Second Response to Interested Party Submissions, [18(a)].

From this broad engagement, SPSA has taken learnings from several companies operating under different regulatory environments, ensuring both that the Scheme is structured according to international best practice, and that the Scheme can be agile and operate effectively under different regulatory environments. SPSA remains committed to ongoing refinement of the Scheme, both informally and through formal mechanisms such as independent reviews in the third and seventh years of operation, to ensure it continues to reflect international best practice.

- 23 Finally, Zero Waste Victoria's submission also notes SPSA's object to 'ensure confidentiality of Members' commercially sensitive data' and states that information essential to accountability or environmental outcomes could be withheld under the guise of protecting member interests. Zero Waste Victoria's submission fails to acknowledge the importance of protecting the confidentiality of members' data given SPSA is made up of a range of competitors or potential competitors. This object and corresponding rule 57 of the constitution are important to give confidence to members and broader stakeholders that participation in this voluntary stewardship program will not result in the exchange of competitively sensitive information.

### **3.6 Other**

- 24 SPSA has had a productive discussion with Rose Read of the Product Stewardship Centre of Excellence (**PSCoE**) to address some of the matters raised in the PSCoE submission.
- 25 SPSA remains committed to engaging collaboratively with interested parties to ensure the Scheme is informed by views across the entire supply chain.

**10 October 2025**

## Schedule 1: Summary of plastic reduction, recycling initiatives and sustainable packaging strategies of initial SPSA members

Set out below is a summary of the plastic reduction, recycling initiatives and sustainable packaging strategies of initial SPSA members. Several other SPSA supporter organisations have implemented similar sustainable packaging initiatives to reduce the use of plastic and increase the circularity of packaging. Participation in the Scheme does not disincentivise or otherwise impede the ability of members to continue and expand these initiatives.

### 1 Coles

- Coles' R<sup>3</sup> Packaging Framework focuses on redesigning, recycling, and reimagining packaging to improve sustainability, particularly for soft plastics. This framework is led by a dedicated in-house sustainable packaging team.
- There are several factors driving plastic reduction initiatives at Coles, including its R<sup>3</sup> Packaging Framework, the development of new innovations and technologies, and meeting legislative requirements. Examples include:
  - removal of plastic opening on Coles Own Brand tissue boxes, which is estimated to remove 13 tonnes of plastic from circulation annually;<sup>27</sup>
  - transition of select Coles Own Brand pre-packed mushroom punnets to incorporate post-consumer recycled plastic, resulting in a 175 tonne reduction of virgin plastics annually;<sup>28</sup>
  - transition of select Coles Own Brand oil bottles to include a minimum of 97% post-consumer recycled plastic, resulting in a 273 tonne reduction of virgin plastics annually;<sup>29</sup>
  - redesign of donut bags used in the Coles in-store bakery, resulting in the avoidance of approximately 147 tonnes of non-recyclable packaging annually;<sup>30</sup> and
  - redesign of Coles Own Brand loose grapes packaging to be kerbside recyclable, which is estimated to avoid the use of 22 million single-use plastic bags annually.<sup>31</sup>
- Since 2021, Coles has removed more than 600 million pieces of conventional packaging from Own Brand products. This includes 36 million plastic induction seals from Coles Own Brand 2 L and 3 L milk bottles in SA, WA, TAS and QLD; and 7.8 million plastic clips across select Coles Own Brand bakery products.<sup>32</sup>
- In FY25, Coles phased out 191 tonnes of single-use plastic packaging across Coles Own Brand and Coles Liquor Own Brand products.<sup>33</sup>
- For more information, see: <https://www.colesgroup.com.au/sustainability/?page=circularity>; <https://www.colesgroup.com.au/sustainability/?page=sustainability-report>.

### 2 Mars

- Mars has implemented a three-pillar strategy to improve the sustainability of its packaging, focusing on eliminating unnecessary materials, redesigning packaging for circularity, and

<sup>27</sup> <https://www.colesgroup.com.au/news/2023/media-releases/?page=coles-decision-to-remove-plastic-opening-from-its-tissue-boxes-is-nothing-to-sneeze-at>.

<sup>28</sup> Coles, Sustainability Report (2025), p37 (**Coles Sustainability Report**). Accessible at: <https://www.colesgroup.com.au/sustainability/?page=sustainability-report>.

<sup>29</sup> Coles Sustainability Report, p 37.

<sup>30</sup> Coles Sustainability Report, p 37.

<sup>31</sup> Coles Sustainability Report, p 37.

<sup>32</sup> Coles Sustainability Report, p 37.

<sup>33</sup> Coles Sustainability Report, p 59.

investing to close the loop. The strategy guides Mars' efforts to reduce its reliance on virgin plastic, transition to mono-materials and paper-based alternatives, and advocate for improved recycling infrastructure globally.

- In Australia, plastic reduction initiatives under this strategy include the launch in 2023 of recyclable, paper-based packaging for SNICKERS®, MARS BAR®, and MILKY WAY® bars.<sup>34</sup> A trial is currently underway of paper-based, recyclable squeeze-on sauce packs for MASTERFOODS® tomato sauce, which contain approximately 57% less plastic than the traditional single-use packs.<sup>35</sup>
- Last year, MASTERFOODS® launched new 100% PET squeezable sauce bottles, designed to be fully recyclable and cutting virgin plastic consumption by 12.7 metric tons.<sup>36</sup> Earlier this year, a \$6.5 million investment at the company's chewing gum site in Asquith has allowed Mars to eliminate a further 13 tonnes of soft plastic by replacing secondary packaging trays with a new 100% recyclable format made from recycled cardboard.<sup>37</sup>
- Mars is also focused on increasing recycled content in packaging, such as its Schmackos brand which has switched its 200g and 500g single variety packs of Strapz and Stix to packaging made from 60% recycled plastic, reducing the use of virgin plastic.
- Globally, 64.1% of Mars' consumer-facing packaging is designed to be reusable, recyclable, or compostable. Mars has incorporated over 14,000 metric tons of recycled content into its plastic packaging portfolio, representing 7% of its total packaging by weight.<sup>38</sup>
- To ensure senior accountability for driving change, Mars has tied long-term incentives for its executives to sustainability KPIs through its Mars Compass, which ensures progress is tracked against societal impact as well as financial performance.<sup>39</sup>
- For more information, see: <https://www.mars.com/sustainability-plan/healthy-planet/sustainable-packaging>.

### 3 Woolworths

- Woolworths Group has adopted a packaging sustainability strategy focused on transitioning to a circular economy. This strategy prioritises eliminating unnecessary packaging, increasing recycled content, and making recycling easier for customers and suppliers.
- Since 2018, Woolworths has removed more than 20,000 tonnes of virgin plastic from circulation and phased out lightweight plastic shopping bags, eliminating nearly 17,000 tonnes of plastic.<sup>40</sup> For example, in 2023, Woolworths Supermarkets and Big W stopped selling 15-cent plastic bags, removing approximately 221 million bags annually from circulation.<sup>41</sup>
- Since 2020, Woolworths has reduced plastic across a range of fruit and vegetable products, removing over 1,338 tonnes of plastic.<sup>42</sup>
- In 2022, Woolworths removed single-use plastic picnicware, saving more than 2,800 tonnes of plastic in the intervening period.<sup>43</sup>

<sup>34</sup> <https://www.mars.com/en-au/news-and-stories/articles/mars-wrigley-australia-launches-recyclable-paper-based-packaging-mars>.

<sup>35</sup> <https://www.mars.com/en-au/news-and-stories/press-releases-statements/masterfoods-trial-new-paper-based-squeeze-on-packs>.

<sup>36</sup> <https://www.packagingnews.com.au/food/mars-food-set-to-save-12-7t-plastic-a-year>.

<sup>37</sup> <https://www.packagingnews.com.au/latest/mars-wrigley-cuts-plastic-with-6-5m-upgrade>.

<sup>38</sup> <https://www.mars.com/sustainability-plan/healthy-planet/sustainable-packaging>.

<sup>39</sup> <https://www.mars.com/sustainability-plan/healthy-planet/sustainable-packaging>.

<sup>40</sup> <https://www.woolworthsgroup.com.au/au/en/our-impact/sustainability/Product/sustainable-packaging.html>; Woolworths, Sustainability Report (2025), p 64 (**Woolworths Sustainability Report**). Accessible at:

[https://www.woolworthsgroup.com.au/content/dam/wwg/sustainability/reports/2025\\_WG\\_Sustainability\\_Report\\_Interactive\\_SPREA\\_DS.pdf](https://www.woolworthsgroup.com.au/content/dam/wwg/sustainability/reports/2025_WG_Sustainability_Report_Interactive_SPREA_DS.pdf).

<sup>41</sup> <https://www.woolworths.com.au/shop/discover/sustainability/recycling>.

<sup>42</sup> <https://www.woolworths.com.au/shop/discover/sustainability/recycling>.

<sup>43</sup> Woolworths Sustainability Report, p 64.

- In 2025, 86% of Woolworths' own brand packaging was designed for recyclability, and the average recycled content across its own brand packaging was 52%.<sup>44</sup>
- For more information, see: <https://www.woolworths.com.au/shop/discover/sustainability/recycling>; <https://www.woolworthsgroup.com.au/au/en/our-impact/sustainability.html>.

#### 4 Nestlé

- Globally, Nestlé has a five-pillar packaging strategy aimed at reducing and improving packaging and supporting the circular economy through better systems. These five pillars are reduce, reuse & refill, redesign, recycle and rethink behaviours.<sup>45</sup>
- In 2024, Nestlé had reduced its virgin plastic use globally by 21.3% against its 2018 baseline.<sup>46</sup>
- Nestlé has implemented a number of projects to reduce its use of virgin plastic for packaging of products it supplies in Australia. For example:
  - Nestlé redesigned the bags used for its Baker's Choice range and the sachets used for its Nescafé frothy coffee range to reduce the overall amount of plastic used;
  - Maggi noodle cups and Smarties products have transitioned to paper-based packaging; and
  - Nestlé sources recycled plastic (allocated using mass balance) in various percentages for Kit Kat bars and blocks wrappers, Maggi 2 minute noodles wrappers and Nescafé frothy coffee sachets.
- For more information, see: <https://www.nestle.com.au/en/sustainability/waste-reduction>; <https://www.nestle.com/sites/default/files/2025-02/creating-shared-value-nestle-2024.pdf>.

#### 5 McCormick & Company, Inc

- McCormick & Company, Inc's packaging sustainability strategy is aimed at reducing the environmental impact of its plastic packaging. This strategy focuses on decreasing the carbon footprint of packaging, eliminating non-recyclable materials, and transitioning toward circular packaging systems that can be reused, recycled, or repurposed.
- Key initiatives conducted to date include its utilisation of 50% post-consumer recycled content across its everyday herbs and spices (in the United States), and its Gourmet Garden pastes being packaged in recyclable tubes with clear on-pack recycling labels (in Australia).
- For more information, see: <https://www.mccormickcorporation.com/responsibility/planet/reducing-waste/sustainable-packaging>; [https://mccormick.widen.net/s/t9kvtbsssn/plp\\_2024\\_report\\_final](https://mccormick.widen.net/s/t9kvtbsssn/plp_2024_report_final).

#### 6 ALDI

- ALDI Australia's strategy prioritises eliminating problematic single-use plastics, increasing the use of recycled and responsibly sourced materials, and improving recyclability across its product range.
- Key plastic reduction initiatives that ALDI Australia has undertaken include:
  - replacing plastic bowls, plates, cutlery, and cups from its shelves with compostable paper, sugar cane and birchwood alternatives;<sup>47</sup>

<sup>44</sup> Woolworths Sustainability Report, p 64.

<sup>45</sup> <https://www.nestle.com.au/en/our-packaging-strategy>.

<sup>46</sup> <https://www.nestle.com/sites/default/files/2025-02/creating-shared-value-nestle-2024.pdf>.

<sup>47</sup> <https://www.aldi.com.au/sustainability/good-planet/sustainable-packaging>.

- removing all plastic straws from its stores; this has diverted approximately 46 million plastic straws from landfill each year;<sup>48</sup>
- transitioning its battery packaging from plastic to paper, removing approximately 20 tonnes of plastic annually;<sup>49</sup>
- switching cotton bud stems from plastic to paper, eliminating around 280 million plastic stems per year;<sup>50</sup>
- phasing out reusable plastic bags, replacing them with FSC-certified paper bags, removing over 888 tonnes of plastic annually;<sup>51</sup>
- phasing out polystyrene foam noodle cups in favour of recyclable paper-based packaging;<sup>52</sup>
- replacing 500,000 plastic blister packs for toothbrushes with recyclable cardboard boxes;<sup>53</sup>
- downgauging frozen vegetable bags, eliminating around 40 tonnes of plastic each year;<sup>54</sup> and
- removing unnecessary soaker pads from its fresh meat range, eliminating around 64 tonnes of non-recyclable plastic annually.<sup>55</sup>
- In 2023, 84% of ALDI's packaging was recyclable, reusable, or compostable, and the average recycled content across its packaging was 34%.<sup>56</sup>
- For more information, see: <https://www.aldi.com.au/sustainability/good-planet/sustainable-packaging>; <https://www.aldi.com.au/sustainability>.

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<sup>48</sup> <https://www.aldi.com.au/sustainability/good-planet/sustainable-packaging>. Figures based on ALDI's internal modelling.

<sup>49</sup> <https://www.aldi.com.au/sustainability/good-planet/sustainable-packaging>.

<sup>50</sup> <https://www.aldi.com.au/sustainability/good-planet/sustainable-packaging>.

<sup>51</sup> <https://www.aldi.com.au/sustainability/good-planet/sustainable-packaging>.

<sup>52</sup> <https://www.aldi.com.au/sustainability/good-planet/sustainable-packaging>.

<sup>53</sup> Figures based on ALDI's internal modelling.

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<sup>56</sup> <https://www.aldi.com.au/sustainability/good-planet/sustainable-packaging>.