



**AFPA Submission to:**

***SA Proposed Single-use and  
Other Plastic Products  
Amendment Regulations – 2024  
and 2025 items***

February 2024

## About the Australian Fresh Produce Alliance

The Australian Fresh Produce Alliance (AFPA) is made up of Australia's key fresh produce growers and suppliers. The members include:

- Costa Group
- Perfection Fresh
- Montague
- Pinata Farms
- Fresh Select
- Mackay's Marketing
- Driscoll's
- Australian Produce Partners
- Premier Fresh Australia
- Rugby Farming
- Fresh Produce Group.

These businesses represent:

- half the industry turnover of the Australian fresh produce (fruit and vegetables) sector - \$10 billion total
- a quarter of the volume of fresh produce grown in Australia - 1 million of the 3.9 million tonne total
- more than a third of fresh produce exports - \$410 million of the \$1.2 billion export total
- more than 1,000 growers through commercial arrangements, and
- more than 15,000 direct employees through peak harvest, and up to 25,000 employees in the grower network.

The key issues the AFPA is focusing on include:

- packaging and the role it plays in product shelf life and reducing food waste landfill,
- labour and the need for both a permanent and temporary supply of workers,
- market access to key export markets for Australian produce,
- product integrity both within and outside of the supply chain,
- pollination and research into alternative sources, and
- water security, including clear direction as to the allocation and trading of water rights.

The AFPA's aim therefore is to become the first-choice fresh produce group that retailers and government go to for discussion and outcomes on issues involving the growing and supply of fresh produce.

Products grown by AFPA Member companies include:

Apples	Blueberries	Cherries	Nectarines	Raspberries
Apricots	Broccoli	Fioretto	Onions	Salad leaf
Asparagus	Broccolini	Green Beans	Oranges	Spinach
Avocado	Brussel Sprouts	Herbs	Peaches	Strawberries
Baby Broccoli	Butternut	Lemons	Pears	Sweet Corn
Baby Corn	Pumpkin	Lettuce	Pineapples	Table grapes
Bananas	Cabbage	Mandarins	Plums	Tomatoes
Beetroot	Cauliflower	Mango	Potatoes	Water Cress
Blackberries	Celery	Mushrooms	Cucumber	Wombok

## Summary

Packaging plays an important role in the integrity and protection of fresh food as it travels through supply chains – reducing food waste, informing consumer decision-making, supporting efficient purchasing, and ensuring that traceability, food safety standards, and other requirements and regulations can be met.

The Australian Fresh Produce Alliance (AFPA) supports initiatives to reduce the environmental impact of plastics and packaging. Australian consumers are concerned about the impact of plastics on the environment, from all sources, and while the fresh produce industry is a relatively low user of plastics and packaging, it is a highly visible user, making it a regular target for discussion and action. It is therefore imperative to understand that the use of packaging in the fresh produce industry is to reduce food waste and enable consumers, both in Australia and overseas, to access fresh, safe fruit and vegetables at affordable prices.

As outlined in this paper, and a formal report prepared by RMIT University, packaging is critical in the reduction of food waste. Functional packaging prolongs shelf life and protects produce in transit enabling better quality produce to reach consumers. This is of particular importance when considering regional and remote communities in South Australia (SA), which may have poorer access to fresh fruit and vegetables due to distance from central markets and distribution centres; without functional packaging, many types of produce would be unable to reach these consumers.

The environmental impact of food waste, and social impact of access to safe, nutritional, and affordable fruit and vegetables must be carefully weighed against the impact of the removal of functional packaging and labels. In the case of fruit stickers, the SA Government is the first jurisdiction to indicate a timeframe for a ban on plastic fruit stickers. The SA Government must carefully consider this position, and the national implications that this will have on the fresh produce industry, particularly at a time of low farm gate returns, and high food inflation. It is vital that any changes are considered holistically, and nationally, particularly with regard to any implementation date to ensure the ban delivers on its intended outcome and has minimal unforeseen consequences.

Australia's fresh-produce industry and its associated supply chains operate at a national level to support year-round supply of local fresh produce, i.e. when stone fruit is in season in Victoria, it is processed and packed for distribution to every and any state and territory. Bans that cause significant disruption in the national supply-chain without adequate time for industry to adapt must be avoided, otherwise it may become unviable for some suppliers to provide product to that jurisdiction or do so at great cost to the consumer.

To that end, the proposed ban of plastic produce stickers in September 2025, risks causing such a disruption that could impact produce supply and prices in SA. Produce stickers play a vital role in meeting retail and regulatory requirements, supporting informed consumer decision making, inventory management and more. While industry recognises there is a desire to move to compostable stickers or other alternatives will enable the current functions of plastic stickers to remain, these alternatives are not readily available, as economical or, in some cases, holistically more environmentally friendly. Furthermore, development of an appropriate compostable adhesive to support a compostable label, is still underway meaning that implementing a change now would not result in the desired outcome or meet community expectations of a fully compostable sticker.

The AFPA recommend that the SA Government review this timeframe and give greater consideration to the current availability of compostable labels, development of compostable adhesive, and the transitional period required by industry. The AFPA would support a transition to fully compostable stickers by September 2028.

## Recommendations

The SA Government:

- 1. Wholistically consider the role of functional packaging in fresh produce**
  - Recognise the multifaceted benefits of packaging, including reducing food waste, ensuring product safety, and enabling affordability for consumers.
  - Commit to collaborating with industry stakeholders nationally to comprehensively evaluate the impact of any relevant packaging and labelling bans on the entire supply chain and address potential disruptions.
  
- 2. Extend the timeframe for banning plastic produce stickers to September 2028**
  - Recognise that produce stickers play a vital role in providing consumer information, enabling traceability, supporting inventory management, and other benefits as well as ensuring the requirements of Government and retailers can be met.
  - Revise the timeframe to better align with the development of compostable adhesive, allow for increased commercial availability of fully compostable stickers and provide an appropriate transitional period to rundown stock, adjust processes and make any required capital investments.
  
- 3. Support sustainable material selection and research**
  - Encourage the adoption of sustainable packaging design that balances functionality, product protection, and environmental impact.
  - Partner with industry to invest in research and development initiatives for commercially viable, environmentally friendly alternatives to plastic.
  
- 4. Identify and invest in infrastructure for a Circular Economy**
  - Collaborate with industry, other governments, retailers, and stakeholders to develop and implement a circular economy approach to packaging; this includes investing in and enhancing SA recycling capabilities (infrastructure).
  
- 5. Engage in ongoing dialogue nationally**
  - Maintain open communication with industry, retailers, and consumers to address concerns, share progress, and collectively work towards sustainable packaging solutions. Ongoing dialogue will help navigate challenges and foster a collaborative approach to achieving environmental goals without compromising the integrity of the fresh produce supply chain
  - Support dialogue across State, Territory and Federal agencies to ensure that policies are aligned where there is national impact.

## The role of packaging for Australian fresh produce

The AFPA recognises concerns exist about the level and type of packaging that is used for fresh produce and has prioritised packaging as one of its key issues to address for the future of the fresh produce industry. Individual member companies have been working through their packaging options for several years to increase recyclability and reduce non-essential packaging.

In 2019, the AFPA commissioned and released research undertaken by RMIT University on the role that packaging plays in the fresh produce supply chain. *The role of packaging for Australian fresh produce*<sup>1</sup> report's main findings and recommendations are listed below, in summary it outlines that packaging assists in reducing food waste as it protects product through the supply chain, increases the shelf life of fresh produce and creates opportunities to supply produce which would otherwise be considered uneconomical to harvest and sell as individual items and end up as waste to landfill.

Key findings include:

- Packaging of fresh produce does help to avoid and reduce food waste, by protecting the integrity of the product in the supply chain;
- Packaging increases and extends produce shelf life from farm to plate compared to having no packaging at all;
- Packaging material and packaging formats should work synergistically to provide product protection and shelf life as it travels through the supply chain; and
- Packaging reduces the chances of product bruising or damage through reducing direct touching and handling.

Key recommendations of the Report focused on further work, including:

- Gaining a better understanding of food waste that occurs in the home post retail purchase;
- Educating consumers on the role of packaging and why it is used for certain types of fresh produce;
- Focusing on a 'circular economy' approach to packaging, involving producers, retailers and government coming together to identify ways in which to reduce packaging waste and improve recycling and reuse;
- Further work on clarifying the value of packaging in product safety, with an emphasis on 'ready to eat' fresh produce; and
- The extent to which packaging plays a role in maintaining and enhancing sensory aspects of fresh produce, such as look, taste and smell.

Members of the AFPA recognise that they must, where practical and viable, work to reduce packaging and, most importantly, must work with stakeholders, including packaging suppliers, to identify and develop forms of packaging that provide a greater opportunity for recycling or more effective end of life management. To that end, more than 75% of AFPA members' current retail packaging (by volume) is recyclable, compostable or reusable.

Further, the AFPA have also funded the development of a [Materials Selector](#) and [Materials Guide](#) to assist the fresh produce industry in selecting the most appropriate packaging formats for their products, supporting improved outcomes towards 2025 packaging targets.

Important in understanding the selection and use of packaging materials in the fresh produce industry is the level of consideration given to the barrier characteristics of materials, i.e. what is the purpose of the packaging. Eliminating a specific material may lead to adverse outcomes such as increase in food waste. Solutions that

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<sup>1</sup> *The role of packaging for Australian fresh produce*, RMIT University, <http://freshproduce.org.au/resources>

address material selection and end of life management in concert with research into alternative materials and broader recycling infrastructure are critical to addressing packaging reduction and broader sustainability targets.

The AFPA promotes sustainable packaging design within the fresh produce industry to maximise the benefits of packaging (product protection, transport, extension of shelf life and reduction of food waste), while attempting to minimise the environmental impacts through appropriate materials selection.

The AFPA encourages all supply chain participants and governments to consider wholistic solutions to plastic reduction challenges including investment in material end of life management including increased domestic recycling capability.

As a whole, industry continues to strongly advocate for the use of functional packaging for fresh produce, while working with governments, suppliers, recyclers, and retailers, to research and implement sustainable product and packaging combinations that are fit for purpose, support the ongoing supply of fresh produce and help to prevent food waste. This includes research into appropriate packaging alternatives and advocating for improved recycling infrastructure nationally.

## Produce stickers remain essential

As part of South Australia's Proposed Single-use and Other Plastic Products Amendment Regulations is a ban of plastic produce stickers by 1 September 2025. Industry does not support a ban on plastic fruit stickers until a suitable alternative is commercially available, at scale. To that end, the timeline proposed for the phase out of plastic fruit stickers must be extended to September 2028.

Produce, fruit or PLU stickers serve several essential purposes within the fresh produce supply chain and for consumers. These stickers provide valuable information about origin, variety, and price, enabling consumers to make informed choices and retailers to offer a variety of produce. Additionally, they play a vital role in inventory management, traceability, reducing food waste and quality control for both producers and retailers.

Produce stickers are the best device for delivering information to customers and meeting Government and Supermarket requirements with the least amount of packaging. If stickers were outright banned, more produce would be sold in film wrapped cardboard containers. This kind of packaging requires more resources to produce, is still transported in large boxes, similar to those that carry loose fruit with stickers, and would require improved infrastructure and services to support the recycling of film wrap. Produce stickers are the most environmentally friendly option currently available that is commercially viable. Due to this reason and the benefits of produce stickers listed below, transitioning to compostable produce stickers is preferable to an outright ban of produce stickers.

### Benefits provided by produce stickers

1. *Consumer and Retailer Information:* Produce stickers are a convenient and effective means of conveying essential information to consumers and for retailer use. They include details such as the products variety (e.g. a Pink Lady or Jazz apple) and country of origin, aiding consumers in making educated decisions about the products they purchase. Most produce stickers also include barcodes that enable swift product identification and accurate pricing at checkout, among other functions.

Banning produce stickers would in many instances reduce consumer ability to identify product variety correctly, and limit the consumers ability to recognise a brand or product origin. Banning stickers would

also create challenges at the point of sale; for example with several kinds of red apples in store, it would become difficult for consumers and retail staff to accurately identify the variety at checkout without some of kind of label attached to the produce.

2. *Traceability*: Produce stickers are integral to the traceability of certain fresh produce within the supply chain. They help identify the source of the product (i.e. on what farm and in what period the product was produced), facilitating quick and efficient tracking in the event of a recall or quality issue. Maintaining traceability is crucial for food safety and regulatory compliance, and a requirement of major retailers.

The importance of product traceability has been highlighted over the past few years through several food safety events, including the example of the needles in strawberries tampering event. The ability to track and trace this tampering event is due to the packaging, and therefore producer identification associated with the packaging on the strawberries. Without being able to isolate the producer of the strawberries, it would have been impossible to address the product tampering. If the same event, or a food safety related event was to occur in a product line currently utilising produce stickers, these stickers would enable the same response – without these stickers, isolating an affected crop or producer would be near impossible.

3. *Inventory Management and Supply-chain efficiency*: For producers, retailers, and distributors, produce stickers play a key role in inventory management and facilitate streamlined processes within the supply chain. The stickers assist in accurate identification, sorting, and categorisation of products, streamlining operations and minimising errors in processing, storage, shipping and at retail stores.

Banning plastic produce stickers without providing industry a more appropriate adjustment period will create supply-chain challenges and likely increase the cost of produce in South Australia. This is because Australia's major fresh produce supply-chains to key retailers are designed to be uniform across the Australia to support the distribution of produce from one State to another. For example, Victoria produces around 75% of Australia's stone fruit (nectarines, peaches, plums, etc). Victorian stone fruit is labelled by growers and supplied to retailer distribution centres for transport to their stores in any state or territory. If SA bans plastic produce stickers without providing industry enough time to adjust nationally, it may create situations where producers cannot supply SA or increase the cost of produce in SA, as the separate treatment of produce destined for SA will reduce supply chain efficiency and create new costs.

### **Alternatives to Plastic Produce Stickers**

Several alternatives to plastic produce stickers exist, including compostable stickers and laser labelling. However, these alternatives are not currently viable, more environmentally friendly, or available at the required national scale to achieve a transition in the timeframe proposed.

#### *Compostable Fruit stickers*

Identifying and sourcing compostable fruit stickers that are effective and economical is a major challenge for industry. Most companies are still in the development stages of producing a fully degradable produce sticker.

Produce sticker labels are currently made from food-grade materials such as polyethylene, paper or a compostable material. Compostable labels made from biodegradable material represent a positive step toward reducing environmental impact, however, challenges persist in relation to the adhesive. Currently



food-grade adhesives are applied to a fruit sticker and enable the labels to securely stick to the skin of the fruit without causing damage or leaving residue when removed, ensuring also that the sticker remains attached to the fruit during transit and in often cold and moist environments like cool rooms.

Currently industry does not have access to a compostable adhesive with the same characteristics at the commercial scale that is required to match the volume of produce produced and consumed in Australia (or SA). Major sticker producers are developing compostable sticker and adhesive solutions for mass production, however industry is informed that these solutions are still years away from being market ready and are likely to be 60% more expensive. Industry is open to the transition to compostable stickers once challenges are resolved and these products are available commercially. To this end, a phase out of plastic stickers must be aligned to commercial timeframes; industry's understanding is that to account for development of a compostable sticker, phase out of existing stock and capital improvements required, September 2028 is the most feasible timeframe.

#### Natural branding and Laser Labelling

Natural branding, achieved through laser removal or alteration of skin pigments, has been successfully applied to some produce items, but its widespread adoption hinges on overcoming issues of consumer acceptance, efficiency and scalability. Shifting to natural branding or laser labelling would also require extensive infrastructure upgrades and other changes across the supply chain.

For example, the labelling of fruit is typically done in pack-houses or distribution centres, where efficiency is essential to maintain economic production, supply and maximum shelf life, particularly when processing hundreds of tons of individual pieces of produce per day. Current automated produce labelling machines apply stickers at a rate of up to 720 pieces of produce per minute, per processing lane. Companies that offer laser labelling machines, which is commonly referred to as an alternative to stickers, in the majority advertise as being able to apply a label "within a few seconds", which implies a rate of 10-30 per minute.

Currently, a leading laser labelling machine on the market advertises a rate of approximately 0.3 seconds per label, which is equivalent to a rate of up to 200 pieces per minute. This indicates (at maximum capacity) labelling produce with a laser is 3.6 times slower than a fruit sticker, over an eight-hour period that is 249,600 less pieces of produce processed. Processing delays and the reduction of efficiency in the supply chain reduce shelf life, leading to increased food waste, cost and other negative repercussions.

Based on the above processing rates, to maintain the same level of labelling efficiency, a producer/processor would need to invest in four times the number of laser labelling machines, and likely make drastic changes to their processing facility to accommodate additional processing lines. This processing challenge makes industry's adoption of laser labelling very difficult and costly for high volume fruit categories like apples, oranges and mandarins. Adding to adoption challenges is a lack of consumer education that laser labelling is safe on edible skin, despite widespread evidence.

#### Plastic film wrap

In many countries it is common to find individual pieces of produce completely wrapped in plastic film with a traditional produce sticker. While Australia has taken a different approach to packaging produce in the majority, if plastic produce stickers are banned rapidly, producers may need to similarly wrap produce to be able to deliver the same amount of information to consumers and achieve the same level of traceability and efficiency in the supply chain.



As the industry explores these alternatives, the delicate balance between sustainability, efficiency, cost and consumer preferences becomes evident. While a long-term goal of reducing or eliminating plastic produce stickers is understood, it a deadline should not be set while there is no viable or more environmentally friendly alternative.

## A way forward

If we are aiming to reduce the use of single use plastics, reduce the environmental impacts of plastics and increase the overall sustainability of our economy, then we need to consider the overall impact of our decisions rather than individual issues in isolation.

For example, in fresh produce there are conversations about changing material types to address consumer concern, but the replacement material may have a more significant environmental impact. The AFPA encourages all supply chain participants and governments to consider consumer behaviour in the development of new regulation, policy proposals and requirements for consumers.

The AFPA has released two research reports on packaging, food waste and recycling as well as distributed resources to help industry better select materials. Through this work it has become clear that further work is required to understand consumer behaviour, particularly in the home, to better provide consumers with products and services that meet their needs in the most sustainable manner.

In summary of the Recommendations included in this submission, in order to meet the public policy objectives of supporting Australians and increasing our overall sustainability, governments can work with industry on:

- developing environmentally friendly packaging solutions,
- encouraging the reduction of non-essential packaging, and
- supporting the collection, processing, recycling and reuse of packaging materials.

As outlined in this paper and a formal report prepared by RMIT University, packaging is critical in the reduction of food waste. The use of appropriate types and levels of packaging enable Australian consumers to access fresh fruit and vegetables. Packaging prolongs shelf life and protects produce in transit enabling better quality produce to reach consumers. This is of particular importance when considering regional and remote communities in SA, which may have poorer access to fresh fruit and vegetables due to distance from central markets and distribution centres.

The AFPA acknowledges and supports initiatives to reduce the environmental impact of plastics and packaging, however the proposed removal of functional packaging in fresh produce, specifically a hasty ban of plastic produce stickers as outlined would have an adverse impact on the environment, fruit and vegetable producers, and SA consumers.

The AFPA strongly recommends that the SA Government reconsider the September 2025 deadline of the ban of plastic produce stickers and extend this date to better reflect that there is currently no viable alternative available to suppliers and that, for supply to SA to be undistributed, a national transition is required. A phase out of plastic stickers must therefore be aligned to commercial timeframes; industry's understanding is that to account for the development of a completely compostable sticker, phase out of existing stock and capital improvements required, September 2028 is the most feasible timeframe.