

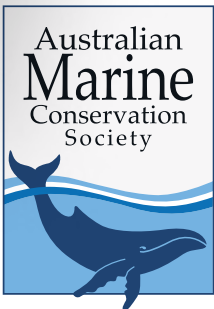


**RE-
THINK
PLASTIC**

~~*PLASTIC*~~
~~*EXPIRED*~~

UNWRAPPED
2024 Audit
Plastic Use In Australian Supermarkets

2024 Audit Report



About the Australian Marine Conservation Society (AMCS)

The Australian Marine Conservation Society is Australia's leading ocean conservation organisation. AMCS is an independent charity staffed by a committed group of scientists, educators and passionate advocates who have defended Australia's oceans since 1965. Our paid and volunteer staff work every day to advance evidence-based solutions for threats to our marine wildlife.

AMCS projects such as the GoodFish Guide have become powerful drivers for change, equipping customers with independent information on seafood sustainability so that they can make informed decisions about what they buy. Our work extends across all the major threats to marine wildlife, including reducing ocean plastic pollution, protecting critical ocean ecosystems such as Ningaloo and the Great Barrier Reef, preventing destructive practices such as whaling and supertrawlers from harming our endangered species, and stopping new offshore oil and gas.

amcs@amcs.org.au

www.marineconservation.org.au

About the Boomerang Alliance

The Boomerang Alliance was formed in 2003 with the aim of a zero waste society. We are a community-based 'peak organisation' representing 55 environment and community organisation members. Our primary focus is on government and stakeholder engagement to establish effective policies and practices that reduce waste and litter. Our extensive supporter base provides a community voice.

Our focus on plastic litter and waste has led to successful plastic bag bans, container deposit schemes and more recently the implementation of single-use plastic bans. As the organisation behind the influential Plastic Free Places program, we are well equipped to support supermarkets to reduce plastic thanks to our extensive experience working with cafes and food outlets to reduce problem takeaway plastics.

info@boomerangalliance.org.au

www.boomerangalliance.org.au

Acknowledgements

AMCS and the Boomerang Alliance would like to acknowledge the Environmental Investigation Agency (EIA) UK, WWF-Australia and Clean Up Australia for their advice and support in the development of this audit framework.

The Australian Marine Conservation Society and the Boomerang Alliance acknowledge the Traditional Custodians of this land and sea Country, and pay our respects to their Elders past and present. We acknowledge that this land and sea Country was, and always will be, Aboriginal land and sea.

Executive Summary	3
Key Findings	4
Methodology	10
Results	12
— Key Findings	14
— Transparency	22
— Plastic Reduction	26
— Reusables	34
— Recycling	38
— Policy, Planning, Governance	46
Deep dives – the Highs and the Lows	50
— Extended Producer Responsibility for Packaging	51
— The Role of Packaging	53
Recommendations	56
— Recommendations for Supermarkets	57
— Recommendations for Government	60
Glossary	63
Endnotes	66



Executive Summary

‘Unwrapped 2024 - Plastic Use in Australian Supermarkets’ reveals that Australia’s four main supermarkets continue to promote plastic-wrapped products, while avoiding environmental accountability.

For the second year, the Australian Marine Conservation Society (AMCS) and the Boomerang Alliance have audited the four major supermarkets in Australia for their plastic usage, highlighting both the positive changes and the antiquated ‘take, make, dispose’ attitudes that supermarkets continue to demonstrate.

Woolworths ranked first in the 2024 audit with an overall score of 38%, a marked improvement from its 2023 score of 10%. Metcash has also improved significantly, taking second spot with 23% after receiving 3% last year. Coles was third with 20% (15% in 2023), while Aldi plummeted from top spot in 2023 (with 20%) to last place in 2024 as it was unable to receive an overall score due to a lack of data and delayed reporting.

Supermarket engagement improved in 2024, but transparency is still lacking. None of the four supermarkets disclose how much single-use plastic packaging they use, making it impossible to determine if their efforts are reducing their overall plastic packaging footprint.

The most startling finding is that plastic-wrapped fruit and vegetables are cheaper than loose produce 73% of the time.[^] Shopper surveys found that loose potatoes are over 50% more expensive than the same quantity wrapped in plastic. This provides a perverse incentive for supermarket customers to take home more needless single-use plastic packaging, and to buy in set amounts that may lead to unnecessary food waste.

Plastic pollution is a global crisis that urgently needs domestic and international solutions. The pace of policy is slow moving, whilst the impacts of plastic pollution grow by the day. Recent research shows that as plastic production

increases, so too does plastic pollution.¹ Looking at the projected increase in demand for plastic in the coming years, this is a devastating blow for marine wildlife, ecosystems, and coastal communities already struggling with the constant stream of plastic pollution impacting their lives daily.²

‘Unwrapped 2024 - Plastic Use in Australian Supermarkets’ is a snapshot of the supermarket industry, and allows comparison to the 2023 benchmark data. Australia’s \$131.7 billion supermarket industry is dominated by four main players – Woolworths Group, Coles Group, Aldi Australia, and Metcash (e.g. IGA, Foodland). Each supermarket was invited to participate in the 2024 audit by providing data on generation of plastic packaging, and what (if any) actions they have implemented to reduce it.

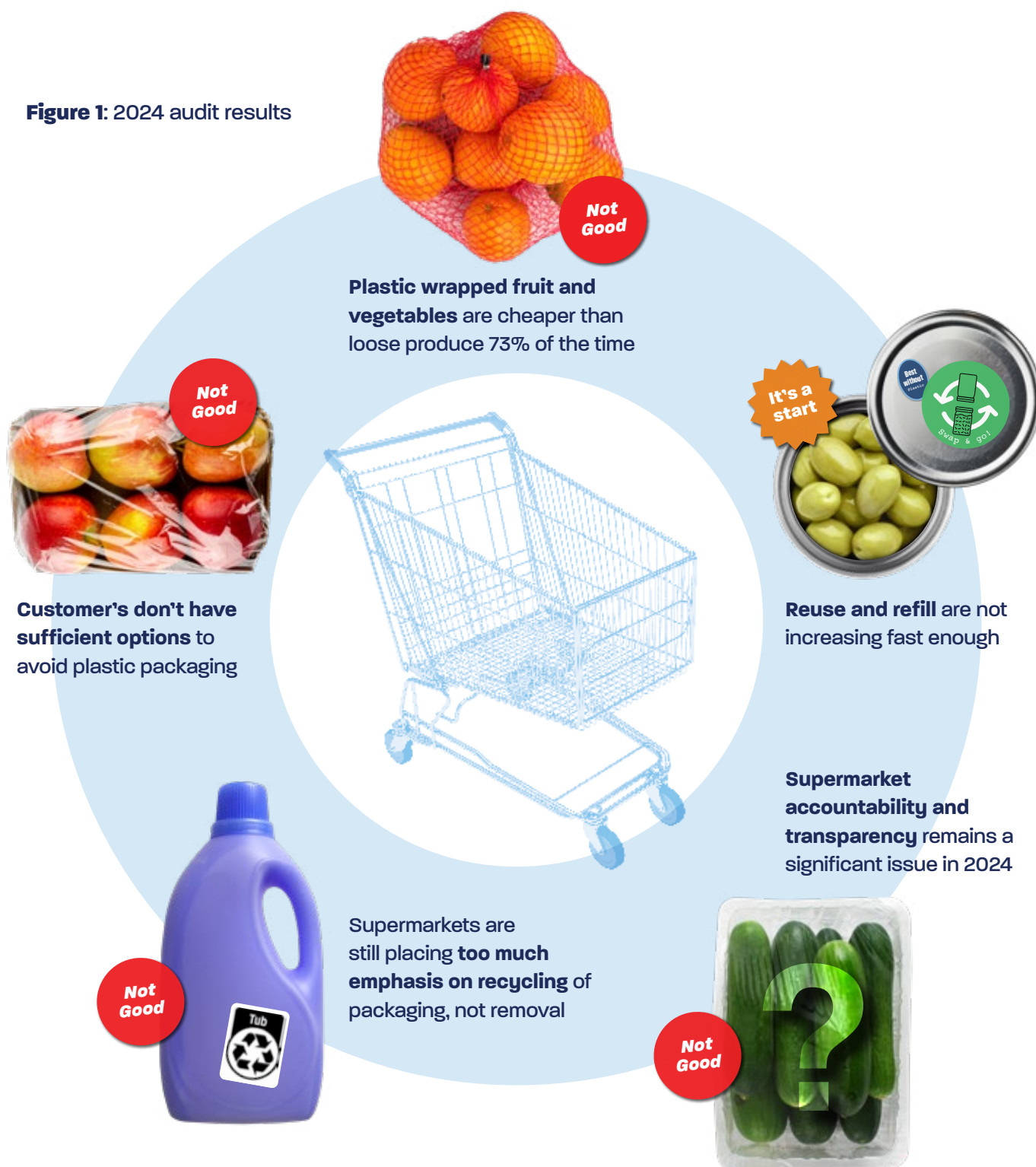
This report demonstrates that while public awareness of the link between plastic packaging and ocean plastic pollution is increasing, those responsible for producing and selling it are not enacting the solutions at the required pace. While we are pleased to highlight some improvements from 2023, the information provided on these pages tells a story of shifting blame and responsibility, false solutions, and incremental progress.

[^] Shopper surveys conducted across Woolworths, Coles and Aldi



Key Findings

Figure 1: 2024 audit results



See page 14 for detailed Key Findings

Environmental impacts of plastic pollution

The environmental impacts of plastic pollution are extensive and devastating. The effects on marine ecosystems and wildlife are significant – whether by ingestion, entanglement, smothering, risk of disease, or emissions driving climate change. Globally, plastic production and waste management generates 1.8 billion tonnes of greenhouse gas emissions annually – that’s more than aviation and shipping industries combined.³ At current rates, by 2040 plastic production is projected to double and plastic pollution to triple.⁴ The problem of plastic pollution is rapidly increasing, risking widespread devastation of precious marine ecosystems globally.

In Australia, we use 3.5 million tonnes of plastic each year.⁵ Approximately 145,000 tonnes of this leaks into the environment.⁶ Managing plastic packaging is largely focused on disposal measures, such as recycling, despite the waste hierarchy prioritising prevention, reduction, and reuse opportunities (see Figure 3 on page 10). This focus on recycling and resource recovery does not reduce how much disposable packaging is used, and fails to address plastic pollution at the source. Taking a circular economy approach that prioritises avoidance, reduction and reuse ahead of product recovery, would significantly reduce the impact of plastics on our environment.

“There is no longer time for excuses. Microplastics have been found in every corner of the globe, in every ecosystem, in the bodies of wildlife and humans. They are almost impossible to remove and the effects are unequivocally harmful to the health of humanity and the health of the planet.”

Dr Karen Raubenheimer⁷



Photographer: Javier Murcia

The Australian supermarket sector

In 2024, Australia's food and grocery sector is valued at \$131.7 billion.⁸ Woolworths, Coles, Aldi and Metcash control a combined 82% market share. All four major retailers maintained last financial year's percentage market share, with market leader Woolworths Group at 37%, followed by Coles (28%), Aldi (10%) and Metcash (7%). Metcash is the largest grocery wholesaler in the country and operates several retail brands such as IGA, SupaG (supermarkets), IGA X-press (convenience stores), IGA Fresh, Foodland and Friendly Grocer. Beyond these major players, there are a large number of independent operators, each accounting for less than 1% market share.

Woolworths Group's earnings have risen over 3% to \$1.7 billion for the 2023-24 financial year.⁹ Coles posted a 10.5% earnings gain totalling \$1.1 billion.¹⁰ Supermarkets have been under scrutiny in 2024 for ongoing record profit gains and market dominance while Australians face a cost of living crisis. A Senate Inquiry was initiated in December 2023 to assess supermarket power and price gouging practices. The resulting report released in May 2024 noted poor price transmission to customers, supermarkets exercising power over farmers and other suppliers, insufficient market competition and low transparency on prices down the supply chain.¹¹

Domestic policy and infrastructure

Despite growing urgency for action to reduce plastic pollution, progress has been slow. In June 2023, Australia's Environment Ministers announced they will move to regulate plastic packaging use by 2025.¹² The Federal Department of Climate Change, Energy, the Environment, and Water (DCCEEW) conducted public consultation on the new laws in September-October 2024 (see 'Overall plastic reduction vs virgin plastic reduction' on page 32).

In an attempt to reduce plastic pollution, most Australian states and territories are forging ahead with single-use plastic bans and container deposit scheme (CDS) expansions. These bans are making some progress in reducing needless single-use plastics, but alone do not significantly reduce the volume of plastic packaging used in Australia. Meanwhile, plastic packaging consumption in Australia continues to grow, is projected to keep increasing, and marine wildlife continues to pay the price¹³ (see 'Recommendations for Government' on page 60).

Recycling continues to dominate the narrative in Australia, despite evidence pointing to the inefficiencies of recycling, and the danger of relying on recycling to solve our waste crisis. Recycling rates for plastic packaging is woeful – just 20% of plastic packaging was recovered in 2021-22.¹⁴

Individual mandatory targets for reduction, reuse, recycling and recycled content are critical to make significant advances towards a circular economy. This, in conjunction with fees for producers to manage their packaging, could provide funding for the significant expansion required for redesign, collection, sorting and reprocessing that will change the market's lifecycle impacts.



Figure 2. State and Territory single-use plastic bans relevant to Australian supermarkets

Plastics (single-use) banned as of 1 September 2024	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
Bread tags		2025 PROPOSED			✓	PROPOSED		
Coffee cups <i>(non-compostable)</i>					✓	PROPOSED		✓
Cotton bud sticks	✓	✓		✓	✓	PROPOSED	✓	✓
Cutlery & drink stirrers	✓	✓	2025 PROPOSED	✓	✓	PROPOSED	✓	✓
EPS food trays <i>(Expanded Polystyrene)</i>	✓	2025 PROPOSED			✓	PROPOSED		✓
Fruit & veg produce bags <i>(non-compostable)</i>		2025 PROPOSED			✓	PROPOSED		✓
Fruit & veg stickers <i>(non-compostable)</i>		2025 PROPOSED			2025	PROPOSED		
Heavyweight carry bags	✓	2025 PROPOSED	2025 PROPOSED	✓	✓	PROPOSED		✓
Microbeads <i>in rinse-off personal care products</i>	✓	✓	2025 PROPOSED	✓		PROPOSED		✓
Straws	✓	✓	2025 PROPOSED	✓	✓	PROPOSED	✓	✓

KEY: Banned Ban yet to commence Proposed (not confirmed)

International Policy

In March 2022, the United Nations (UN) Environment Assembly adopted a historic resolution to develop an international legally binding instrument on plastic pollution, including in the marine environment. This is known as the Global Plastics Treaty.

The Global Plastics Treaty aims to end plastic pollution. It is a unique opportunity for critical and urgent global action needed to address the full life cycle of plastics, including production, use and disposal. The treaty is likely to include provisions on chemicals of concern, design elements and financing mechanisms for implementation.

Since 2022, member states have met at four intergovernmental negotiating committee meetings (INCs). The committee is expected to complete negotiations for the treaty text by the end of 2024 at INC-5.

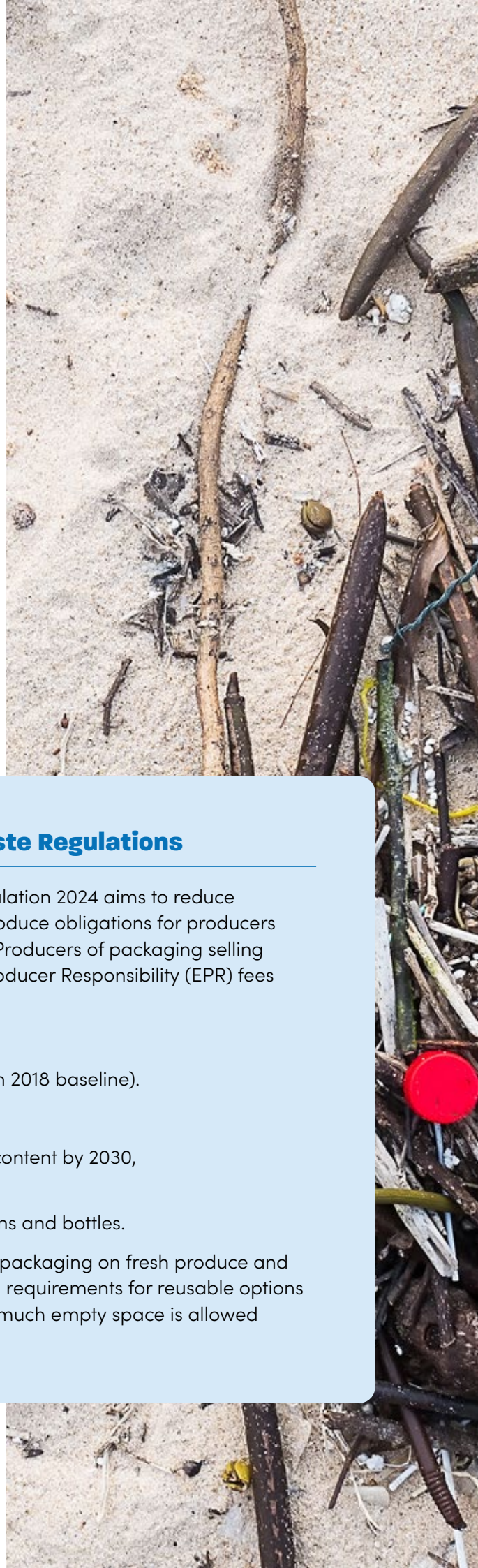
Snapshot of European Union Packaging Waste Regulations

The European Union's Packaging and Packaging Waste Regulation 2024 aims to reduce packaging waste across member states. The regulations introduce obligations for producers to take responsibility for the full life cycle of their packaging. Producers of packaging selling into the European Union will be required to pay Extended Producer Responsibility (EPR) fees to offset waste management costs by 2028.

Other key measures include:

- Progressive packaging reduction targets (15% by 2040 from 2018 baseline).
- All packaging must be recyclable or reusable by 2030.
- Plastic packaging must contain between 10–35% recycled content by 2030, and 25–65% by 2040 (depending on type).
- All States must introduce container deposit schemes for cans and bottles.

Businesses must abide by new rules, such as bans on plastic packaging on fresh produce and plastic packaging used to group individually-wrapped items, requirements for reusable options in takeaway food and beverage products, and limits to how much empty space is allowed in packaging.



Update on 2025 National Packaging Targets

Australia is drastically off track and will not meet the 2025 National Packaging Targets, voluntary targets developed by the Australian Packaging Covenant Organisation (APCO) and supported by supermarkets. Australia's plastic consumption far outweighs recycling capacity – just 20% of packaging was recovered for recycling or composting in 2021-22 – substantially lower than the target of 70% by 2025.¹⁵ Despite this gap between recycling capacity and production, supermarkets continue to pump out plastic-wrapped products; with the prospect of new recycling facilities to support their packaging choices, there is little incentive for supermarket action on reducing plastics.

For more information on resource recovery of plastic packaging, see 'What is recyclable packaging?' on page 41.



Methodology

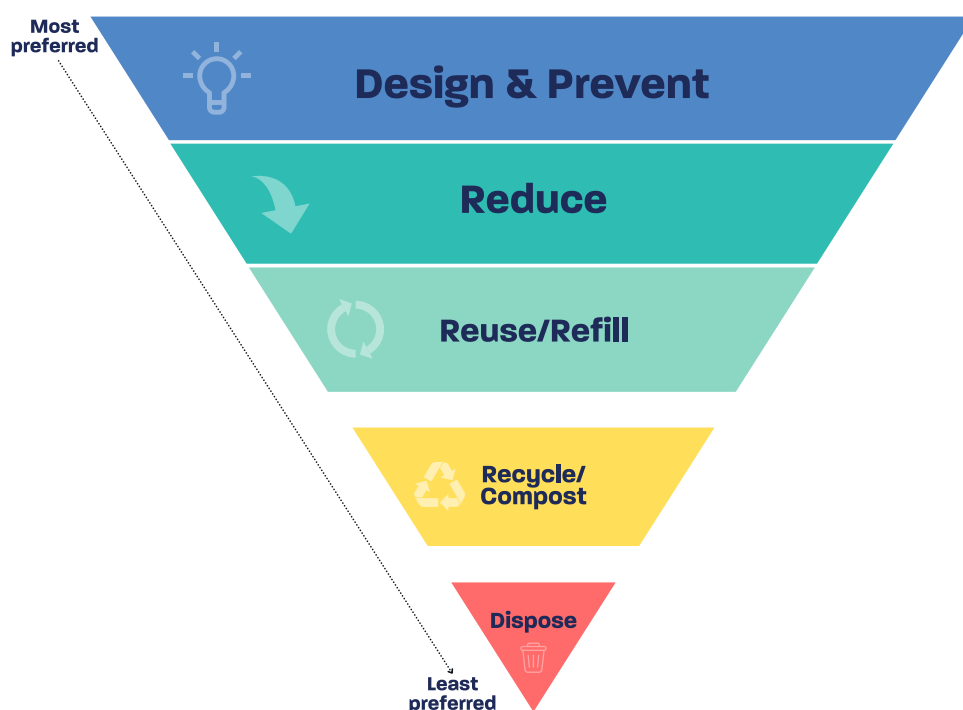
To ensure data is comparable, the audit methodology is largely unchanged from 2023. In response to feedback in 2023, minor amendments were made to the survey and the way that data was collected for the 2024 audit.

In June 2024, the survey gathering data for the 2024 audit report was sent to all four supermarkets. Supermarkets were provided with three months to complete the survey. Woolworths, Coles, and Metcash were responsive during this period, and provided data in time for inclusion in this report. In addition to this data, desktop research was conducted to ensure all relevant data was considered in this assessment. Despite strong engagement in 2023 and multiple opportunities to provide information, Aldi provided minimal data for the 2024 assessment. All other data used to assess Aldi in this report has been gathered by AMCS project staff from publicly available information.

Supermarkets were assessed against the same five categories as in 2023, developed with consideration of the policies and actions most likely to reduce plastic pollution - in line with the waste hierarchy. Supermarket results against these criteria are discussed from page 12 to page 49. For more information on our recommendations for supermarkets, see page 57.

Metcash stores (such as IGA or Foodland) are independently owned and run stores, therefore some questions do not apply to Metcash and their operating structure. For this reason, the maximum score in some sections may differ depending on the supermarket. This ensures all supermarkets are assessed fairly.

Figure 3. Waste hierarchy

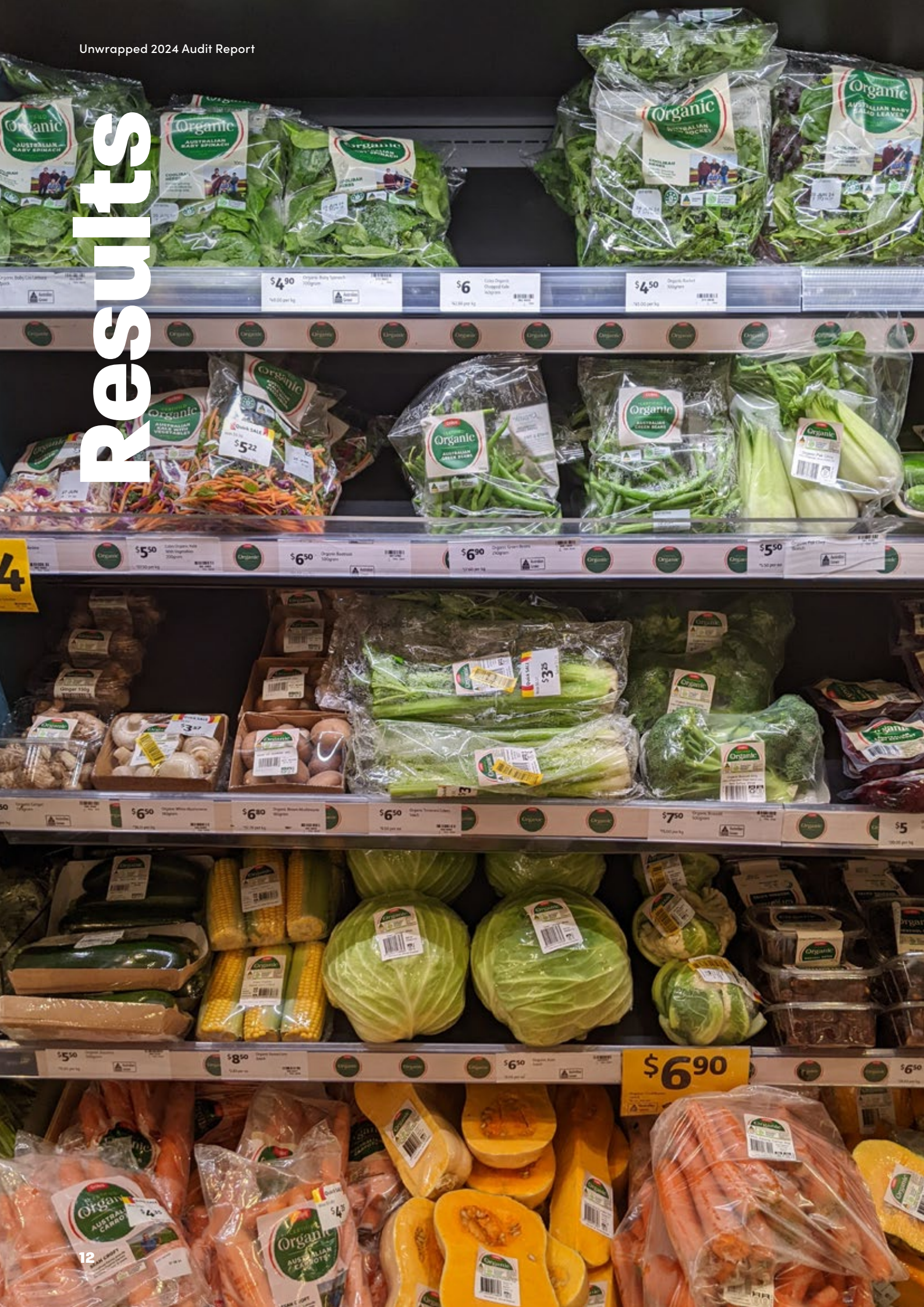


Adapted from *CSIRO Standards Mapping*.

Table 1. Audit categories and associated weighting

Category	Max. Points Available	Weighting
1. Transparency Assesses supermarkets' willingness to publish and provide open and transparent access to data on their plastic footprint. For shoppers, transparency is essential to accurately understand which supermarkets are serious about reducing plastic packaging. Points were awarded for each published dataset, including information on mass and units of plastic packaging and the supermarket's ability to show independently quantifiable evidence of plastic reduction.	15	10%
2. Plastic footprint reduction Compares the total amount of plastic packaging on Australian supermarket shelves, and how much supermarkets have reduced. Results here inform shoppers which supermarkets can prove the most evidence of reduction. It examines plastic use by unit and by tonnage, in line with the level of data reported by leading supermarkets in other parts of the world (see 'Case Study: Transparent reporting on plastic footprint' on Page 25).	30	40%
3. Reusables Reusable and refillable packaging is a critical component of a circular economy by reducing our reliance on disposable items. Studies suggest that every kilogram of reusable packaging can reduce single-use packaging by an average of 16 kg. ¹⁶ This section assesses which supermarkets provide the most access to reusable or plastic free alternatives.	16	20%
4. Recycling and recycled content Setting clear recycled content targets for packaging and procuring recycled content is a critical driver to increase market investment in recycling infrastructure. This section informs shoppers which supermarkets have made demonstrable progress in increasing recycled content and recyclability of packaging, and also assesses the availability of on-site recycling and waste separation.	25	20%
5. Policy, planning and governance Assesses the robustness of supermarket strategies and policies relating to plastic packaging. Integrating plastic reduction into all aspects of the business model signals its importance to all staff members and sets the business up for success in achieving their targets. Scores are based on how embedded sustainability is within the business and its operations, including purchasing policies, packaging standards, and staff capacity and training.	31	10%

Results



Summary of Results

Table 2. Detailed supermarket performance in 2024

	Transparency	Plastic Reduction	Reuse	Recycling	Policy, Planning & Governance	Total Weighted Score
Supermarket	Weighting: 10% of final score	Weighting: 40% of final score	Weighting: 20% of final score	Weighting: 20% of final score	Weighting: 10% of final score	
 Woolworths	53%	33%	36%	21%	76%	38%
	*	30%	23%	13%	39%	23%
	*	27%	22%	8%	32%	20%
	*	21%+	9%	13%	35%	*

Key:



It's a start

Good

* Insufficient data provided or publicly available to assess performance

+ Result subject to change with publication of 2023 sustainability report

Stronger engagement by supermarkets and increased data provision in 2024 has improved some scores, but there is insufficient evidence of overall plastic reduction across the four major supermarkets.

Lack of transparency is still a significant issue in 2024. None of the supermarkets disclose their overall use of single-use plastic packaging, nor do they reveal sufficient data to calculate reductions in their overall plastic footprint.

Key Findings

1

Supermarkets continue to charge more for loose fresh produce

In July 2024, supermarket shoppers across Australia conducted hundreds of surveys comparing the price per kilogram of fresh produce items sold either loose or pre-packaged. In 73% of cases, shoppers found it is more expensive to buy produce loose than pre-packaged. Price differences ranged from a few cents, up to \$1.48 per kilogram difference. This is especially bad news for shoppers who regularly purchase carrots, onions, oranges and potatoes; these are some of the items most likely to be more expensive loose compared to pre-packed.

This price difference penalises shoppers for purchasing smaller quantities or buying just what their household needs, or are forced into buying plastic wrapped produce to secure the lower price point (see 'Case Study: Shoppers regularly penalised for avoiding plastic in fresh produce' on page 30).

2

Transparency is lacking, and reporting is still fragmented

This year saw marked improvements in supermarket-provided data, but despite these improvements, data is still fragmented and does not tell the whole story. Australian supermarkets do not disclose their overall plastic packaging footprint.

In the UK, supermarket chain Tesco has been reporting on its plastic packaging footprint since 2018, showing total tonnage of packaging placed on market for both own-brand and branded products, as well as a breakdown of plastic packaging placed on market and recycled content in own-brand packaging. Supermarkets in Australia report to the Australian Packaging Covenant Organisation (APCO), which aggregates data across all members, and does not publicly report on progress for individual companies or across the industry.

"It doesn't actually make any real logical sense for a loose item to cost almost double in price/kg compared to the same item packaged in plastic. To secure the lower price you're forced to potentially buy more than you might actually need quantity wise due to it being packaged as a kilo of apples. Which is likely a huge contributing factor to food waste, just another blight on the struggling planet being exacerbated by giant conglomerates."

Supermarket shopper survey responses

3 **Reuse and refill systems have made minimal improvement**

There remains a lack of opportunity for customers to choose reusable packaging in Australian supermarkets. Globally, there are calls for an urgent transition to reuse – but that message has not translated to change in Australian supermarkets. While there have been some promising developments in concentrated dissolvable tablets for cleaning products (drastically reducing packaging and the need to transport water), there are many opportunities for reuse in the supermarket space which have not yet been explored.

Packaging throughout the supply chain can generate significant amounts of waste. All four supermarkets are improving their reuse of packaging for back-of-house and transport operations, such as reusable produce crates – removing the need for single-use cardboard boxes – and reusable pallets.

4 **Supermarkets are still placing too much emphasis on recycling of packaging, not removal**

All four supermarkets state they are working towards the National Packaging Target for all packaging to be recyclable, reusable or compostable by 2025 – a target set by APCO that places the same emphasis on reduction as resource recovery, despite different prioritisations in the waste hierarchy (see Figure 3 on page 10).

Woolworths has set a clear and time-bound target for reducing plastic packaging made from virgin materials by 50% by 2025. This target is in addition to the National Packaging Targets, and is a positive step. However, as this target applies to virgin plastic, as opposed to overall plastic reduction, it does not go far enough to reduce the impact of plastic pollution. See 'Overall plastic reduction vs virgin plastic reduction' on page 32 for more details.

5 **Customers do not have sufficient options to avoid plastic packaging**

Surveys conducted by supermarket shoppers in July 2024 demonstrate a lack of choice for customers who are trying to avoid plastic packaging. In an assessment of five common household items, on average the majority of products available on the shelf are either entirely packaged in plastic, or comprise of mixed packaging formats – a combination of two or more materials, such as plastic, cardboard and foil. Supermarkets have ample opportunities to minimise or improve packaging, giving customers more choice. To read more about these results, see 'Case Study: Lack of transparent data an issue for future policy' on page 45.

“All of them are packaged in plastic.”

“All rice is packaged in plastic, exception Arborio and Japanese Rice which are in cardboard but plastic inside.”

Supermarket shopper survey responses

Since the release of the 2023 audit report, progress toward implementing the recommended 'quick wins' for supermarkets has been slow.

1. Eliminate single-use plastic produce bags and plastic produce stickers

Coles and Woolworths have replaced single-use plastic produce bags with compostable produce bags ahead of state bans on plastic produce bags in South Australia and Western Australia (see Figure 2 on page 7). At this stage there are no plans to make this swap in other jurisdictions, due in part to a lack of collection and processing options for commercially compostable packaging and legislation requiring them to do so. South Australia is banning plastic produce stickers (with exemptions for compostable stickers) in 2025, and other jurisdictions are considering this change as part of their next steps. Metcash stated they “comply with all state and territory laws”. Aldi did not comment.

2. Introduce reusable containers for deli items and delivery

Coles has expanded bring your own (BYO) container trials to all stores in South Australia, allowing customers to use their own containers for some deli items. Woolworths previously conducted trials, but has not progressed this initiative, stating a lack of customer demand is preventing a continuation or expansion of this trial. Metcash has not provided any evidence of reusable containers at delis in supermarkets, or guidelines encouraging independent retailers to do so. Aldi does not have deli counters in any stores.



3. Phase out pre-packaged plastic straws and cutlery

Woolworths has phased out single-use plastic straws on own-brand juice boxes, and single-use plastic cutlery in salads and noodle cups as a result of regulations in some states and territories. Due to incoming state and territory bans, Woolworths has instructed suppliers of branded products to remove pre-packaged single-use plastic straws and cutlery in all products. Metcash brands still contain single-use plastic straws in pre-packaged products. Coles has stated that these items are being phased out, but this reduction has not been quantified.

4. Reduce or phase out individually wrapped small serving sizes

The four supermarkets made no comments on removing individually wrapped small serving sizes. These small packaging formats are often littered and difficult to collect and sort for recycling. Some supermarkets have stated that health organisations encourage these items for portion control. Examples of items still readily available on supermarket shelves include individually-wrapped cheese slices, multi-pack instant noodles, packs of fresh noodles, lunchbox items such as chips, and bakery items such as banana bread. In the European Union, plastic packaging to contain multiple plastic-wrapped items will soon be banned.

5. Require loose fresh produce to be cost-competitive against packaged produce

Woolworths told us it does not have a policy in place to ensure unpackaged fresh produce is cost-competitive. Metcash, Aldi, and Coles made no comment on policies requiring unpackaged fresh produce being cost-competitive. In 2024, results from shopper surveys showed that this has not improved, with the majority of items still more expensive when sold loose (see ‘Case Study: Shoppers regularly penalised for avoiding plastic in fresh produce’ on pg 30).

Brand Performance

Table 3. Overall supermarket performance in 2024

Rank	Supermarket	Overall weighted score	2023 result
1	Woolworths	38%	10% (3rd)
2	Metcash	23%	3% (4th)
3	Coles	20%	15% (2nd)
4	Aldi	*	20% (1st)

* Insufficient data provided or publicly available to assess performance





1st Place - Woolworths

Woolworths Highlights:

1. Leading the way on problematic plastics

Woolworths set and achieved a more ambitious timeline to eliminate problematic plastics than those outlined by APCO.

APCO set targets for certain problematic plastics to be phased out by 2025, but Woolworths set its own target – to eliminate specific items by 2024. Aldi lost the top spot to Woolworths in 2024, who was able to provide evidence of reducing certain single-use items.

2. Concentrated dissolvable tablets helping reduce packaging in cleaning products

In order to reduce disposable packaging for cleaning products, Woolworths developed a range of own-brand dissolvables. These are concentrated tablets which customers place inside existing packaging (such as a spray bottle), fill with water, and use as normal. In addition to their own-brand products, Woolworths also stock other brands, and have developed a display in selected stores to highlight these products with customers.

3. Plastic reduction target (but only for virgin plastics)

Woolworths has set a target to reduce its virgin plastics by 50% by 2025. This target has seen significant strides in using more recycled content in own-brand packaging. Woolworths made good progress towards this target in 2022-23 (32% achieved).

Woolworths Lowlights:

1. Not enough movement on reuse

As the largest supermarket by market share, Woolworths has opportunities to lead the way on upscaling reusable packaging formats, helping to normalise these systems and behaviours. Despite examples of reuse and refill already occurring in other retail stores and smaller independently owned supermarkets, Woolworths has not progressed new reuse trials. We identify areas of operation where reuse should be strongly considered for adoption as early as possible – see 'Recommendations for supermarkets' on page 57 for more.

2. Not enough plastic reduction in fresh produce

In both 2023 and 2024, supermarket shopper-conducted surveys have shown that loose fresh produce is consistently more expensive than pre-packaged produce. Woolworths has stated it has no policy that requires fresh produce to be cost-competitive; this penalises shoppers who live in smaller households, or are actively trying to avoid plastic packaging.

Across all four supermarkets, packaged fresh produce was cheaper than loose produce in 73% of cases. Shoppers who conducted the survey in Woolworths supermarkets found that the packaged option was cheaper in 77% of cases.



2nd Place - Metcash

Metcash Highlights:

1. 'Waste Guidelines for grocery stores' document provides prioritised advice

Metcash has developed guidelines for grocery stores in an attempt to share best practice sustainability advice on waste management for independent grocery stores. These guidelines, structured to follow the waste hierarchy (see Figure 3 on page 10), provide information to store owners and managers on reduction of waste, waste diversion opportunities, and food waste minimisation. It also highlights the potential benefits to the business owners, mainly around reduced operating costs and minimising stock that cannot be sold. Metcash is unable to put policies in place for independently owned stores, so these guidelines are a good start to support store owners to improve their waste outcomes.

2. Sustainable packaging guidelines for suppliers ensures new product packaging is compliant

Last year we recommended that Metcash make their sustainable packaging guidelines public, as the other three supermarkets had. Since the 2023 audit, Metcash has made these guidelines publicly available. While the guidelines are not strictly enforced, Metcash states that they are used to ensure new own-brand product packaging is compliant and in line with APCO recommendations.

3. Reusable produce crates in trial

Metcash was awarded points for reusing pallets, and for trialling reusable produce crates in one distribution centre. Reusable produce crates are quickly becoming commonplace in supermarkets and fresh food markets, and we encourage Metcash to implement reusable produce crates at all distribution centres.

Metcash Lowlights:

1. Minimal progress on phasing out unnecessary and problematic single-use plastic items

Beyond the items which have been regulated in some states and territories, Metcash has not yet demonstrated adequate progression towards phasing out priority items (as identified by APCO) by 2025. While Metcash states it has removed some items (fragmentable plastics, expanded polystyrene (EPS) in food and beverage, and EPS loose-fill packaging), it did not provide an update on the other items on the list.

2. Lack of innovation and leadership to achieve packaging reductions

While the other supermarkets have demonstrated innovation in packaging design and trials to assist in reducing packaging, Metcash appears to rely the most heavily on legislation. Metcash has not publicly demonstrated innovation or leadership to reduce or improve own-brand packaging.

3. Missed opportunity to learn from independent store owners

Examples of sustainable packaging initiatives in independently owned IGA stores are available, but Metcash is failing to learn from these stores. There are examples of IGA stores with extensive reuse and refill sections, as well as systems for returning some reusable packaging for cleaning products, but there is little evidence of Metcash taking inspiration from these initiatives for own-brand packaging or store guidelines.



3rd Place - Coles

Coles Highlights:

1. Reuse at South Australian deli counters

Coles continues to allow South Australian shoppers to bring their own containers when shopping at the deli counter. Coles has some rules around what containers they will accept (no glass due to risk of breakages and potential contamination as a result), finding a way to navigate safety concerns while allowing customers choice to reduce disposable plastic packaging without financial penalty. This shows significant leadership.

2. Trialling reuse in home delivery

During the 2023-24 financial year, Coles expanded its swap-a-box trial, allowing customers to have their grocery home deliveries and collect orders delivered in a reusable crate made from recycled plastic. However, this trial has recently concluded, and Coles has not yet provided further information on the future of the initiative.

3. Some packaging changes in fresh produce remove unrecyclable plastic packaging

This year Coles unveiled new packaging formats for imperial mandarins, swapping an unrecyclable plastic net bag for a kerbside recyclable paper net bag. Removing packaging entirely should be the focus of the supermarket's efforts, and material substitutions in packaging can have unintended consequences; however this swap is a small step in the right direction in reducing the disposable plastic packaging on shelves, and providing customers with more opportunities to avoid single-use plastic packaging.

Coles Lowlights:

1. Little evidence of plastic reduction overall

Coles states it has eliminated some problematic and unnecessary single-use plastic items, yet little progress has been made on items beyond state and territory bans (see Figure 2 on page 7). Coles did not provide sufficient evidence of reduction across all problematic and unnecessary single-use plastic items as defined by APCO, but states it has reduced use of some items such as EPS for food and beverage, and rigid PVC.

2. Trailing behind in transparency

Coles did not disclose enough data to quantify the scale of plastic packaging used through its operations. Citing commercial sensitivity, Coles has avoided providing any data demonstrating tonnage or units of plastic packaging, either placed on market, or even reduced through changes to packaging or removal of packaging. This lack of transparency two years in a row is a concerning trend for the second-largest supermarket by market share. In comparison, Coles' closest competitor Woolworths provided a higher level of data in 2024.

3. Not enough plastic reduction in fresh produce

Coles continues to charge more for loose fresh produce and does not give customers adequate opportunities to choose plastic free without being financially penalised. In Coles supermarkets, pre-packaged fresh produce was cheaper than loose produce in 72% of cases.



4th Place - Aldi

Aldi Highlights:

1. The Australasian Recycling Label (ARL) is displayed on the majority own-brand products

Included in the small amount of data provided by Aldi is the updated figures for display of the ARL on own-brand products. Aldi now has the ARL on 85.8% of own-brand products, an increase from 78% in 2023.

2. Better price equity in fresh produce for customers

In surveys conducted by shoppers, packaged fresh produce was found to be cheaper than loose fresh produce in 73% of cases. Surveys conducted in Aldi stores showed better price equity for customers, with packaged fresh produce found to be cheaper than loose fresh produce in 53% of cases.

Aldi Lowlights:

1. Significant delays in reporting period

Aldi is placed last for the 2024 audit, as despite its reporting period ending 31 December, as at 14 November 2024, Aldi has still not published its 2023 sustainability results. In contrast, the other three supermarkets all reported on their results within three months of the end of their reporting period (financial year). Aldi had been leading the pack on transparency in 2023, but with limited data publicly available, Aldi has not been able to receive any further scores for this audit.



Transparency



Transparency

Key criteria

- Provision of data on volume of packaging by polymer (*mass and unit*)
- Provision of data for own-brand and branded packaging
- Provision of data on compostable packaging usage (*mass and unit*)
- Provision of data on problematic single-use plastics (*i.e. EPS, plastic bags, carbon black plastics*)
- Provision of data on secondary / tertiary packaging (*i.e. promotional displays, packaging for shipping*)

Table 4. Supermarket results for transparency section

Ranking	Supermarket	Points	2024 Score	2023 Score
1	Woolworths	7/15	53%	5% ^
*	Aldi	*/15	*	33% ^
*	Coles	*/15	*	10% ^
*	Metcash	*/14	*	5% ^

* Insufficient data provided or publicly available to assess performance
^ Change to scoring criteria in 2024: results not directly comparable - see below

Woolworths, the largest supermarket by market share, has taken out the top spot for transparency in this year’s audit. Showing significant improvement from the baseline assessment, Woolworths provided a greater breakdown of the overall reduction of problematic and unnecessary single-use plastic as defined by APCO, as well as providing tonnage reduction of virgin plastic (towards its target of reducing virgin plastic by 50%). Our 2023 audit uncovered a shocking lack of transparency across the top four supermarkets in Australia. Improvement on this metric by the largest supermarket by market share is a welcome change.

Supermarkets have very few reporting requirements when it comes to their plastic packaging footprint, making it difficult to understand the piecemeal and cherry-picked statistics used in media releases and sustainability reports. In some cases, there have been significant improvements to plastic reductions and transparency, but the sector still has a long way to go.

In our 2023 audit, Aldi led the pack in this section, largely due to more detailed reporting on plastic packaging. However, Aldi’s sustainability report has not yet been published as at 14 November 2024, therefore minimal data has been provided for this assessment. This is an 11 month delay in reporting from the end of their reporting period, in comparison to the other three supermarkets which have published sustainability reports within three months.

Aldi, Coles, and Metcash have all gone backwards in this category since 2023, mainly due to changes in scoring of one critical question: *Is your company committed to transparently reporting annually on its plastic footprint?* ^ In 2023, partial scores were awarded for the publication of annual sustainability reports and provision of some data to indicate plastic reductions. For 2024, supermarkets were able to obtain 1 point for this question for publishing total plastic packaging placed on market by tonnage (0.5) and number of units (0.5). None of the supermarkets scored any points for this question in 2024.

Woolworths is alone at the front, with all other supermarkets scoring poorly. This once again highlights the need for increased pressure for reporting on plastic packaging. International examples have shown that it is possible for supermarkets to report on their plastic packaging footprint (see 'Case Study: Transparent reporting on plastic footprint' on page 25), but the supermarkets assessed in Australia cite 'commercial sensitivity'.

Metcash, IGA, Foodland: same-same but different?

This audit investigates the four main supermarket brands by market share – Woolworths, Coles, Aldi, and Metcash. Metcash has a different business and operating structure to the other three supermarkets assessed in this report, in that it doesn't own or run its supermarket retail stores. Instead, stores (such as IGA, Foodworks and Foodland) are independently owned and managed.

Because of this different structure, Metcash cannot direct store owners to adhere to policies beyond legislation, and therefore some questions do not apply to Metcash and their operating structure. For this reason, the maximum score in some sections may differ depending on the supermarket. This ensures all supermarkets are assessed fairly. For example, some IGA stores may offer delivery, but it is not organised and run by Metcash. Similarly, Aldi does not offer home delivery. The questions relating to home delivery have been removed from these supermarkets' overall available points.

Metcash has been included in this audit because it sells own-brand products to its stores, and therefore needs to take responsibility for the products and packaging it produces. While Metcash cannot direct stores to implement policies, they can develop guidelines for stores, communicating best practice guidance on waste minimisation, procurement, resource recovery, and other sustainability elements.

Own-brand vs branded products

When asked the proportion of own-brand products versus other branded products on supermarket shelves, Woolworths, Coles, and Metcash stated that the majority of products on their shelves were not own-brand products. So whose responsibility is it? And what can supermarkets do about it?

Supermarkets have a voluntary code of conduct which dictates how relationships between supermarkets and suppliers should be conducted. As a result, supermarkets claim they cannot demand packaging changes from suppliers, unless regulated by at least one state or territory in an area where they operate. This code of conduct attempts to ensure suppliers are treated fairly by supermarkets who hold significant market share in Australia, but this also lets supermarkets off the hook for the impact of products and packaging they profit from by stocking in their stores.



Case Study: Transparent reporting on plastic footprint

In 2023 we reported on UK retailer TESCO and its transparent reporting. Tesco continues to report on overall packaging footprint for own-brand and branded products, tonnage data for plastic packaging in own-brand, and detail on progress towards incorporating recycled content in their plastic packaging. But Australian supermarkets have not followed suit.

Supermarkets in Australia have cited commercial sensitivity as a reason for not disclosing this information, but without it we cannot adequately assess progress on overall plastic reduction (or lack thereof). All supermarkets record overall tonnage of plastic packaging placed on market and report this directly to APCO – but when APCO releases its report on packaging in Australia, all data is aggregated so it is impossible to tell who is driving progress,

and who is hindering it. In 2023 and 2024, we asked supermarkets for details on the volume of plastic packaging placed on market (both by tonnage and number of units) for each common polymer type – in both years, we were told supermarkets do not collect this level of data.

In its 2024 APCO report, Coles identified additional reporting opportunities including “recording of packaging data to enable accurate reporting”.¹⁷ This detail will be critical in the coming years, and should be mandatory reporting for Australian businesses.

Plastic Reduction

Plastic Reduction

Key criteria:

- Demonstrated plastic reductions overall, and by polymer
- Demonstrated engagement with suppliers relating to plastic reduction outcomes
- Detailed break-down of single-use plastic items and problematic plastic items, including mass and units distributed
- Proportion of fresh produce sold loose versus pre-packed, and evidence of plastic reduction targets for fresh produce
- Evidence of policies which aim to reduce plastic pollution associated with ghost gear and agri-plastic

Table 5. Supermarket performance for plastic reduction section

Ranking	Supermarket	Points	2024 Score	2023 Score
1	Woolworths	10/30	33%	16%
2	Metcash	7.5/25	30%	0%
3	Coles	8/30	27%	13%
4	Aldi	6/28 ⁺	21% ⁺	28%

+ Result subject to change with publication of 2023 sustainability report

“A reduction of plastic production - through elimination, the expansion of consumer reuse options, or new delivery models - is the most attractive solution from environmental, economic, and social perspectives. It offers the biggest reduction in plastic pollution, often represents a net savings, and provides the highest mitigation opportunity in GHG emissions.”

The Pew Charitable Trust and SYSTEMIQ¹⁸

Supermarkets have provided evidence of progressing towards removing problematic and unnecessary single-use plastic items, as identified by APCO. According to data provided by Woolworths, it is leading the way on removing problematic and unnecessary single-use plastic by setting more ambitious deadlines than those set by APCO. Woolworths set and achieved a December 2023 deadline for the removal of items such as EPS, and difficult-to-recycle coloured plastics in own-brand packaging. According to its data in mid-2024, Woolworths has removed a significant proportion of problematic plastics as defined by APCO, and has a relatively small amount remaining – well ahead of the 2025 National Packaging Targets.¹⁹

In its 2022 sustainability report, Aldi announced a 77.3% reduction of these items. However, due to significant delays in its reporting, Aldi was not able to be assessed against its 2023 data. Coles state some reductions across these items, but was not able to provide progress on all items, nor was it able to quantify the reductions in tonnage. Metcash confirmed some items had been successfully phased out in 2023, two years ahead of the 2025 target, but was not able to provide an update on all items.

According to supermarket reports, the removal of single-use plastic produce bags in South Australia and Western Australia in response to new state regulations has had a positive impact on the reduction of plastic packaging in supermarkets - as did the removal of lightweight plastic carry bags in 2018, and the removal of heavyweight plastic shopping bags in 2023. However, these examples highlight the strategy of swapping from one disposable plastic item to another. Additionally, without transparent reporting, it is impossible to know whether plastic produce bags are being replaced with pre-packaged produce - potentially nullifying any progress made through eliminating the bags in store. Supermarkets should be focusing on the most critical elements - the removal of packaging in the first instance.



APCO priorities

The Australian Packaging Covenant Organisation (APCO) is the organisation currently in charge of setting and managing the 2025 National Packaging Targets, and providing advice to businesses to help them reduce packaging waste.

All four supermarkets assessed in this report are members of APCO – meaning they are required to report certain information about their packaging and products to APCO. APCO aggregates the data and reports on Australia’s progress as a whole.

In 2020 APCO identified nine priority items to be phased out by 2025. These “problematic and unnecessary single-use plastic packaging” items are identified below. While this list takes a great step towards decreasing some highly littered and unrecoverable plastic items, it detracts from the fact that all disposable packaging has the potential to be problematic, and many other forms of packaging are unnecessary.

- 1. Lightweight plastic shopping bags
- 2. Fragmentable plastics
- 3. Expanded polystyrene (EPS) packaging for food and beverage service and retail fresh produce
- 4. EPS loose fill packaging
- 5. Moulded EPS packaging for white/brown goods and electronics
- 6. Rigid polyvinyl chloride (PVC) packaging
- 7. Rigid polystyrene (PS) packaging
- 8. Opaque polyethylene terephthalate (PET) bottles
- 9. Rigid plastic packaging with carbon black

Table 6. Supermarket progress towards phase-out of problematic and unnecessary items

	Woolworths	Coles	Aldi	Metcash
Progress	7 items eliminated	1 item eliminated Limited data provided for remaining items.	1 item eliminated Limited data provided for remaining items.	4 items eliminated Limited data provided for remaining items.

All four supermarkets have made progress towards phasing out these items – but examples remain on some supermarket shelves.



Case Study: Shoppers regularly penalised for avoiding plastic in fresh produce

In 2024, shoppers are still being penalised for purchasing loose fresh produce, as the price disparity between loose and pre-packaged fresh produce continues. For items assessed in Woolworths, Coles, and Aldi, 73% were more expensive to buy loose than pre-packaged. Price differences ranged from a few cents up to \$1.48 per kilogram. Metcash was not assessed as it does not run individual stores.

In 2023 when faced with minimal data and engagement from supermarkets, we developed a survey for supermarket shoppers to conduct when carrying out their regular grocery shop – and the results were incredible. More than 2,000 people conducted surveys about supermarket packaging, and through this uncovered a shocking price difference between loose and packaged fresh produce. In 2024, our plastics investigators were once again out in force, looking at prices in the fresh produce section of their local supermarket.

Shoppers were provided the link to an online survey to be conducted in the supermarket. This survey asked shoppers to select a fresh produce item that was available for purchase both loose and pre-packaged. Shoppers then told us the cost of each item, snapped a photo, and provided feedback about plastic packaging in supermarkets. All data has been verified to ensure the products are comparable (for example, loose granny smith apples are compared with pre-packaged granny smith apples) and the prices recorded are correct.

Potatoes were found to be 53% more expensive loose, compared to pre-packaged, followed by oranges and carrots in price differences. The only item found to be consistently cheaper loose compared to pre-packaged was tomatoes.

It is unclear why unpackaged products are not cost-competitive. The environmental impact of pre-packaged produce is not only plastic waste – households may be encouraged to buy a surplus to save money per kilogram, which can lead to excess food waste at home. In order to minimise food waste at the household level, UK supermarkets have been recommended to sell produce loose unless they can prove their packaging decreases food waste.²⁰

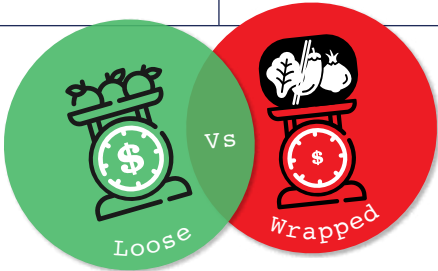
Plastics investigators expressed frustration with these price discrepancies when completing surveys. Additionally, it was noted that 'imperfect' produce and organic produce was often only available packaged in plastic, meaning customers often had to choose whether to shop organic / low waste or plastic-free.

Pre-portioned alternatives without single-use plastic do exist; examples such as reusable buckets for customers to put directly into reusable produce bags could be implemented in fresh produce sections across Australia, as well as ensuring scales are available for customers to weight fresh produce before reaching the checkout.



Table 7. Price difference of loose and pre-packaged fresh produce in all supermarkets

	Av. Price/kg packaged	Av. Price/kg loose	Price difference packaged vs loose	Price difference packaged vs loose (%)
Potatoes	\$2.78	\$4.26	+\$1.48 / kg	+53%
Oranges	\$2.63	\$3.70	+\$1.07 / kg	+41%
Carrots	\$1.90	\$2.61	+\$0.72 / kg	+38%
Onions	\$2.96	\$3.76	+\$0.81 / kg	+27%
Apples	\$4.70	\$5.07	+\$0.37 / kg	+8%
Tomatoes	\$8.44	\$7.25	-\$1.18 / kg	-14% (cheaper loose)



“The price difference between packaged and unpackaged food is ridiculous.”

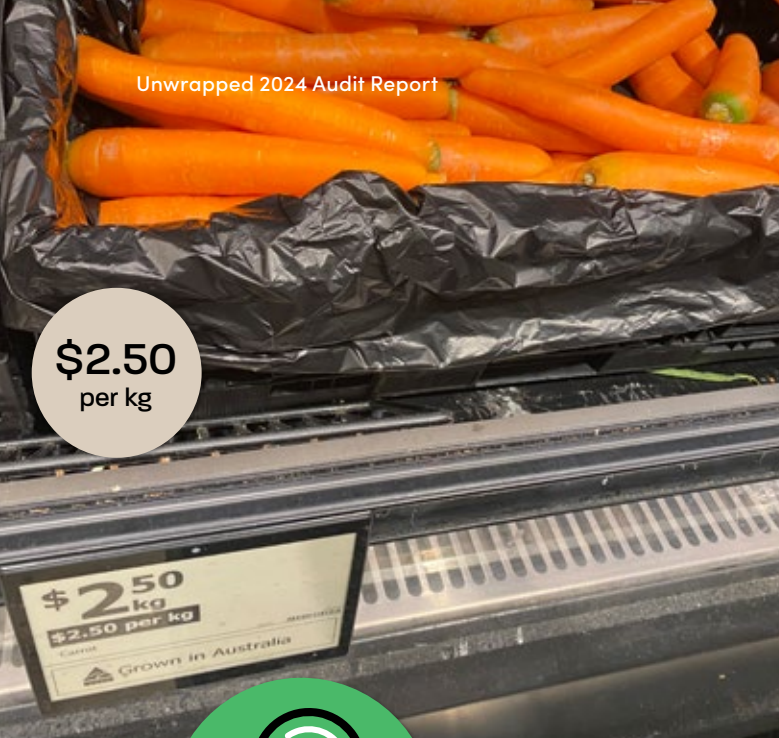
Supermarket shopper survey response

How much does this cost households?

Using available data from growers associations and other sources, we estimate that a household of four pays approximately \$2.98 more per week by shopping just three items loose, compared to pre-packaged (data available for apples, potatoes, and onions).^{21 22 23} Over the course of a year this equates to around \$155, nearly the cost of an average spend at the supermarket in 2024 (\$168).²⁴ **In the middle of a cost-of-living crisis, this price discrepancy means supermarkets are potentially penalising those who wish to avoid plastic packaging, and those who want to reduce food waste by only purchasing what they need.**

Table 8. Price difference of loose and pre-packaged fresh produce by supermarket

Supermarket	Pre-packaged item cheaper	Loose item cheaper	Same price
Aldi	56%	13%	31%
Coles	72%	17%	11%
Woolworths	77%	15%	8%



\$2.50
per kg



Photos taken by supermarket shoppers
in July and August 2024



\$1.50
per kg



\$3.99
per kg



\$2.00
per kg



\$3.50
per kg



\$1.97
per kg

Overall Plastic Reduction vs Virgin Plastic Reduction

Calls for a plastic reduction target have been amplified during the Global Plastics Treaty negotiation process.

In 2024, the AMSC, the Boomerang Alliance and Sea Shepherd Australia handed a petition to Federal Environment Minister Tanya Plibersek, with over 20,000 signatures calling for a mandatory plastic reduction target. Plastic pollution and plastic production are directly linked – as plastic production increases, so too does plastic pollution.²⁵ As plastic pollution occurs throughout the plastics lifecycle – production, use and disposal – recycling alone will not end plastic pollution.

Woolworths has a target to reduce the use of virgin plastic 50% by 2025, and has achieved a reduction of 32%. This has largely been achieved by swapping virgin plastic for recycled plastic in own-brand packaging. While the shift from virgin to recycled plastic supports a more circular economy and provides some environmental benefits, it does not address the root of the issue – over-consumption of and over-reliance on disposable plastics, and the need to reduce plastic use overall.

“Many companies meeting their virgin reduction goals are concurrently using more plastic overall. Rather than narrow focus on reducing virgin plastic use, companies must reduce their plastic intensity - the amount of plastic used for each dollar of revenue.”

Plastic Promises Scorecard²⁶



Reusables



Reusables

Key criteria:

- Evidence of policies to increase items sold through reuse/refill systems
- Evidence of reuse and refill options in-store, and their availability to a wide range of customers
- Standards specifying minimum number of uses for reusable picnicware

Table 9. Supermarket performance for reusables

Ranking	Supermarket	Points	2024 Score	2023 Score
1	Woolworths	5.75/16	36%	6%
2	Metcash	3/13	23%	7%
3	Coles	3.5/16	22%	19%
4	Aldi	1/11	9%	9%

“...returnable plastic packaging outperforms single-use plastic packaging on the three environmental metrics we studied: material use (and related waste generation), greenhouse gas (GHG) emissions, and water use... When scale, collaboration, and return rates increase, the related environmental benefits grow - reaching up to 75% reduction in material use, GHG emissions, and water use.”

Ellen Macarthur Foundation (2023)²⁷

Examples of reuse and refill options in Australian supermarkets are limited. Despite the need for swift transitions to reusable and refillable packaging, Australia’s progress has been slow.²⁸ In 2021, just 4% of plastic packaging put on market by Australian, New Zealand and Pacific Islands Plastics Pact (ANZPAC) members (which includes Coles and Aldi) was reusable.²⁹ Estimates by the United Nations Environment Programme predict that at least 20% of plastics from short-lived products are avoidable and can be reduced or replaced by reusable packaging.³⁰

Woolworths has taken the top spot in this category; examples of reuse exceeds those of competitors, with Woolworths stating they use reusable crates for fresh produce, red meat, bread, and some soft drinks. Woolworths also provided evidence of reusable criteria for picnicware marketed as reusable – but only for their own-brand products.

Coles has again received points for its policy allowing customers in South Australian stores to bring their own containers for some deli items. During the audit period, Coles was also still running a swap-a-box trial for home delivery – although this has now concluded.

Metcash has begun trialling reusable produce crates in one distribution centre, and Aldi has previously stated it uses reusable produce crates in stores as well.

The results in this section demonstrate a need for more reusable and refillable packaging in Australia's supermarkets. Packaging designed for reuse only works if there are systems in place to support it. This could include convenient return locations for packaging that doesn't belong to the customer (for example, a bottle designed to be washed, returned, and refilled with soft drink, water, or milk), and standards for reusability.

In Queensland, a standard was developed to ensure plastic bags sold as reusable were fit for purpose. This standard requires that a plastic bag is able to withstand a minimum of 125 cycles (e.g. trips to the supermarket), and can carry 10kg. Standards like this help ensure that products sold as reusable are actually designed with reuse in mind, and gives customers assurance that the product will be durable enough for its intended purpose.

Case Study: We've been using reusable packaging for decades

Australian households have readily embraced swap-and-go systems for decades. Gas canisters, commonly used for soda water makers and barbecues, are designed and manufactured for multiple uses, and are complemented by a system that enables convenient exchange.

Canisters are typically filled with carbon dioxide (CO₂) for soda water machines or propane for barbecues, are purchased full and used within the household. Once empty, the canister is returned to an exchange point, and swapped for a full canister. In these systems, the packaging is refilled by the business and is used time and time again.

Supermarkets have the opportunity to implement this system for other household products- such as cleaning supplies, personal care items, and food packaging, to reduce our reliance on disposable packaging.



Case Study: Ocado and refill coalition help scale-up reusables

Online grocery shopping has surged in popularity since the COVID-19 pandemic,³¹ and is an ideal opportunity to introduce reuse for commonly ordered items. In August 2024, UK online grocer, Ocado Retail began trialling reusable and returnable packaging for online orders. Beginning with own-brand 2 kg basmati rice and penne pasta, customers who order these products will have their pantry goods delivered in a reusable container. The container is returned empty to the next delivery driver, washed, and filled again for the next customer. These containers are designed to withstand over 60 cycles, and Ocado's offering will soon expand to include laundry detergent and fabric conditioner.

Online shopping provides an excellent opportunity for reuse – customers who order groceries online have an account, enabling tracking of containers/bottles. It is also convenient for customers to return empty containers – by handing them to their delivery driver there is reduced barrier to entry for forgetting to bring containers to the store, or unexpected grocery store visits.

Here in Australia, reuse for online customers of the major supermarkets is almost non-existent. While Coles and Woolworths have bagless options for grocery collection (where customers can opt to pack groceries into their own bags directly from a crate), home deliveries still require the use of paper shopping bags.



Recycling



Recycling

Key criteria:

- At least 80% of own-brand and branded products display the Australasian Recycling Label (ARL) – a target set by APCO to boost resource recovery
- Demonstrate proportion of recycled content in plastic packaging by polymer
- Evidence of recovery streams available to customers for difficult-to-recycle plastics (*i.e. soft plastics, EPS, PVC*)
- Widespread resource recovery options for back-of-house operations (*i.e. pallet wrap, EPS*)

Table 10. Supermarket performance for recycling

Ranking	Supermarket	Points	2024 Score	2023 Score
1	Woolworths	5/24	21%	*
2	Aldi	3/24	13%	5%
2	Metcash	3/24	13%	5%
3	Coles	2/25	8%	9%

* Insufficient data provided or publicly available to assess performance

Recycling supports the retainment of materials in a circular economy, but has limitations and should be used to support actions that address waste at the source (see Figure 3 on page 10)

According to data provided by the supermarkets, all have improved in this category when compared to the 2023 results, with Woolworths jumping ahead at 21%. Woolworths has the Australasian Recycling Label (ARL) on 100% of own-brand products, and has achieved an average of 28% recycled content in own-brand plastic packaging. Woolworths has been working towards a target to reduce virgin plastic by 50%, and using recycled plastic in packaging has helped it keep on-track. Woolworths has also gained points for offering some customers a soft plastics collection service, as well as collecting and recycling pallet wrap through their back-of-house operations.

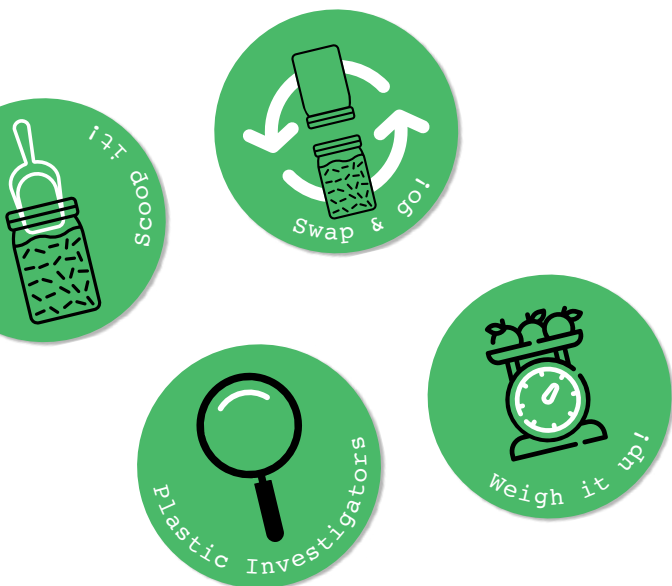
Metcash has come in equal second place, mainly due to its separation and collection of materials such as pallet wrap and commingled recycling at distribution centres. However, Metcash was unable to provide evidence that it is increasing use of recycled content in own-brand packaging. Metcash now has the ARL on 100% of own-brand packaging within its food items. However, it should be noted that the company as a whole has only applied the label to 47% of products Metcash sells other own-brand products, such as hardware, through other businesses they own including Mitre 10. Since some of these products may be stocked on supermarket shelves, it is difficult to determine the proportion of products stocked in supermarkets that display the ARL.

Aldi has achieved a slight increase in score from 2023 – attributable to the start of the soft plastics collection trial and displaying the ARL on 85.8% of own-brand products. Aldi also uses recycled pallet wrap in reusable plastic shopping bags, but was not able to provide data on the resource recovery options available to stores and distribution centres. Aldi states its own-brand plastic packaging contains an average of 10% recycled content – below its target of 30%.

Coles achieved two points in this section – one for reaching 100% of own-brand products displaying the ARL, and one for offering some customers a soft plastic collection service. Coles missed out on points for not demonstrating the recycled content of plastics in packaging. In its 2023 Annual Sustainability Report, Coles reported being off-track for achieving 25% recycled content in plastic packaging by 2025, but has not disclosed the proportion of plastic packaging made from recycled content.³² Coles also did not provide details on resource recovery streams available to back-of-house operations in stores and distribution centres.

As part of the National Packaging Targets, supermarkets are working towards 100% of their packaging being reusable, recyclable, or compostable by 2025. For the purposes of this audit, supermarkets are not scored on the proportion of packaging that is considered recyclable, primarily because this metric does little to remove or reduce packaging. Some supermarkets have reported on this figure in annual sustainability reports; Woolworths state 94% recyclability including soft plastics, and 85% recyclability excluding soft plastics. Coles state 84% recyclable packaging excluding soft plastics in 2022-23, compared to 95% in 2021-22 when REDcycle was still running. Aldi states 81.4% of its packaging is recyclable, compostable, or reusable – a decrease from its 2022 result of 83%. Metcash did not provide an update on how it is tracking towards this National Packaging Target.

The reporting of recyclable packaging including and excluding soft plastics by Coles and Woolworths is an example of transparent reporting, as it acknowledges that soft plastics are not currently recyclable at scale in Australia. However, it also indicates supermarkets intent to simply wait until wide-scale soft plastic collection and recycling is available in Australia, rather than working to remove this packaging in the first instance – another example of supermarkets prioritising recycling above avoidance.



What is Recyclable Packaging?

Recyclable packaging is packaging that has a readily available collection or drop off facility to collect the packaging for processing into new materials. Businesses use a tool called the Packaging Recyclability Evaluation Portal (PREP), which determines which labels apply to that packaging. According to the ARL webpage, PREP considers the availability of collection services by assessing how many people can recycle a piece of packaging through their council kerbside collection, as well as other packaging properties such as size, shape, inks, and adhesives. Planet Ark provides data from local councils to determine whether a piece of packaging is:

- Widely accepted: over 80% of the population with kerbside recycling can recycle the item.
- Less Widely Accepted: 60–80% of the population has access, customers are encouraged to make informed disposal decisions based on local collection availability.
- Not-Recyclable: less than 60% of the population with kerbside recycling can recycle the item.

Recycling Near You claims “the ARL removes recycling confusion”. However, inconsistent labelling of soft plastic has only added to customer confusion (see REDcycle update on page 42).

In its consultation paper ‘Reform of Packaging Regulation’, the Department of Climate Change, the Environment, Energy and Water (DCCEEW) state that interventions led by the Australian federal, and state and territory governments will complement the federal packaging reforms.

These include “the harmonisation of kerbside recycling collections, including actions to remove soft plastics from landfill and recycle them at scale”.³³ Australia-wide, around 98% of households have access to a kerbside recycling collection service. In the Northern Territory, this figure drops to 49%.³⁴

“It says it’s recyclable but not sure exactly what that means.”

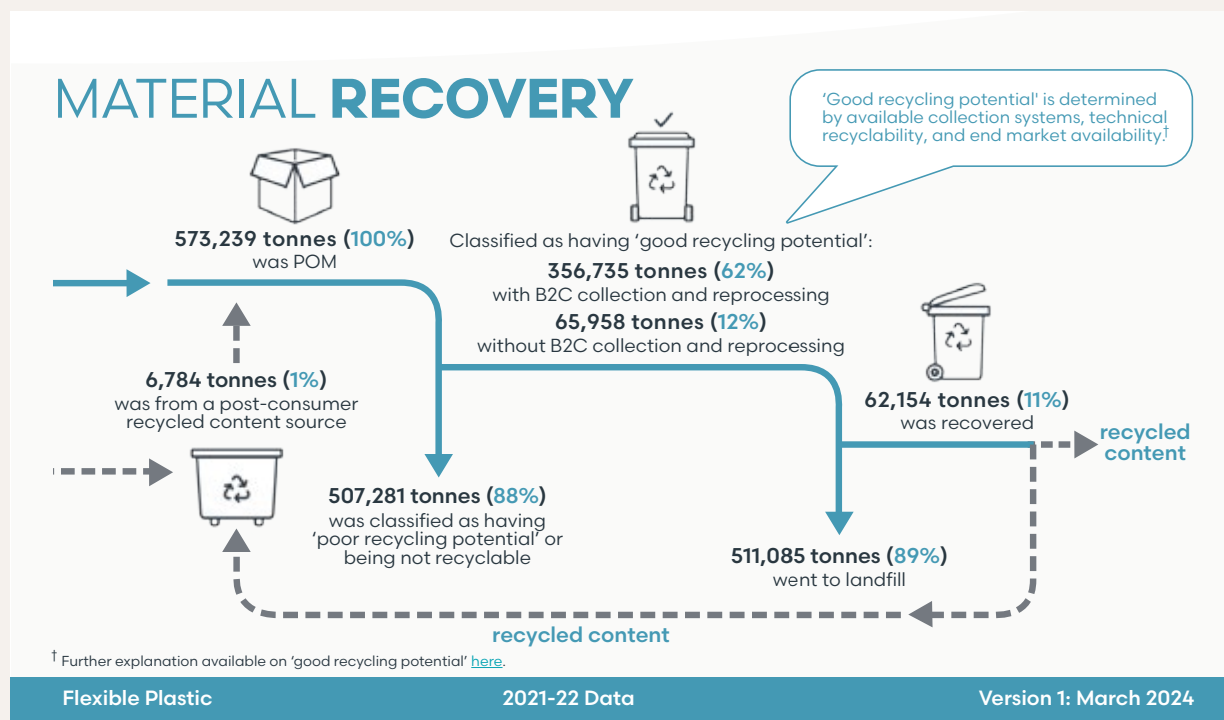
Supermarket shopper survey responses

In addition to the varying recovery options across Australia, different council areas accept different materials through their kerbside recycling bin. In June 2023, Environment Ministers committed to improving harmonisation of kerbside collections across Australia, with updates on progress due at the next meeting in late 2024.³⁵ Without adequate collection and processing systems in place, such as those available through a kerbside system, the recycling label does not paint the whole picture of what is being recovered in Australia.

As an example, rigid plastic packaging, which has a higher resource recovery rate than soft plastics, has a significant gap between what is recyclable and what is recycled. In 2021–22, 66% of rigid plastic packaging placed on the market was considered to have ‘good recycling potential’, yet only 28% was recovered (see Figure 4 on page 42). Additionally, this resource recovery figure does not tell us what was actually recycled into new products – only what has been collected.

“Designing packaging for recycling does not mean it will be recycled. Brand owners have a role to play in overcoming challenges in managing their packaging in the downstream system.”

APCO³⁶

Figure 4. Resource recovery of rigid plastics, 2021-22

Source: APCO Flexible plastic consumption and recovery – 2021-22 fact sheet

POM – Placed on Market, B2C – Business to Consumer

REDcycle update

In November 2022, the collapse of REDcycle, a soft plastic collection scheme at supermarkets, left customers disappointed and confused. REDcycle was an example of a voluntary product stewardship initiative (see 'Deep Dive: Extended Producer Responsibility for Packaging' on page 51 for more). Woolworths and Coles were contributing to the soft plastic collection service, taking some financial responsibility for difficult-to-recycle soft plastics sold through their business. The subsequent collapse of REDcycle exposed the fact that only a small proportion of those plastics were getting collected for recycling – REDcycle collected about 7,000 tonnes of an estimated 150,000 tonnes used by households.

After the collapse of REDcycle, Woolworths, Coles, and Aldi formed a taskforce to process

the stockpiled backlog of soft plastics collected through the scheme, and get collections and processing underway again. Two years on and soft plastics collections have resumed – albeit at a much smaller scale. Earlier in 2024, a trial began in selected Melbourne stores – five Woolworths stores, five Coles stores, and two Aldi stores. The trial was intended to run for a limited time, but has continued, and even expanded – Woolworths has extended the trial to include 26 stores in NSW. In September 2024, the Queensland Government announced collections would begin soon in Brisbane, Sunshine Coast, Goondiwindi, and Cairns. The trial includes kerbside collection through the existing commingled recycling bin system, as well as return to store, council drop-off locations, and other central locations.

Prior to REDcycle's collapse, own-brand packaging from Coles and Woolworths proudly touted REDcycle labels and claims of 100% recyclability, alongside the 'return to store' ARL. Supermarkets have been slow to update the ARL on their packaging: a 'check locally' label was developed in response to updated guidelines for the recyclability of soft plastic packaging, but supermarkets needed reminding by APCO in May 2024 that still displaying the REDcycle logo and the 'return to store' ARL was 'misleading' for customers. Currently, and confusingly for shoppers, soft plastic packaging across supermarkets displays three different labels for recommended disposal, and examples of the misleading 'return to store' labels on supermarket own-brand packaging continues.

The false solution of soft plastic recycling

It's widely understood that recycling is not the solution to our waste crisis, yet there has been significant time, money and energy spent on upscaling soft plastics recycling in Australia. The National Plastics Recycling Scheme (NPRS), led by the Australian Food and Grocery Council (which represents major brand-owners in Australia), has trialled kerbside collection of household soft plastics using existing infrastructure – the yellow-lidded household recycling bin. Governments have invested in decades of education aimed at residents advising that soft plastic does not belong in their kerbside comingled recycling bin. This education to shift household behaviours has not been successful, and soft plastics continue to contaminate recycling bins across Australia. Now, the NPRS plans to extend its trial, which relies on specific disposal behaviours – including placing soft plastics inside easily-recognisable bags, for workers at their local Materials Recovery Facility (MRF) to collect. Investing in a system which relies upon changed disposal behaviour that contradicts decades of national waste education seems far too aspirational. This collection scheme, along with return to store soft plastic collections, do nothing to reduce single-use plastic items or our reliance on plastic generally, and has the potential to contaminate the recycling stream.





Case Study: Lack of transparent data an issue for future policy

It is not mandatory for Australian businesses to collect and report data detailing the volume and type of plastic packaging used through its operations – making it difficult to assess the plastic footprint of businesses. In the case of the incoming regulations in the European Union, brands must pay fees based upon the recyclability of products and packaging. This is important because not all materials are easily recycled. For example, in Australia bioplastic (1.2%) and PVC (1.9%) both have low recovery rates when compared to PET (27%) or HDPE (17.9%) – and it may therefore cost more to manage these materials at end-of-life (see Deep Dive: Extended Producer Responsibility for Packaging on pg 51 for more on EPR).³⁷

We asked all four supermarkets to provide the volume of plastic packaging placed on market by both mass and number of units, for each of the most commonly used plastic polymer types. Most supermarkets told us they don't collect this data, and that they would not disclose it if they did. So in July 2024, we asked supermarket shoppers to investigate the packaging types on five grocery staples: white sugar, dry fettuccine, jasmine rice, rolled oats, and washing powder. These items were chosen because they are commonly purchased items, and they all have examples of multiple packaging formats. Supermarket shoppers chose an item from the list above, then recorded:

- The total number of different products available on the shelf
- How many were entirely packaged in plastic
- How many were packaged in mixed materials (more than one packaging material)

Products packaged entirely in plastic ranged from 37% of all products on the shelf (washing powder), to 88% (jasmine rice). Mixed packaging (two or more packaging materials used, for example, a cardboard box with a plastic bag inside or a plastic window) accounted for between 3% (white sugar) and 22% (fettuccini and rolled oats). Many customers also told us they were unsure about what the packaging was made of, with the worst results found in rolled oats (9% of shoppers unsure what the packaging was made of). A common example is that customers cannot tell without opening the packet if there is a plastic bag inside of a cardboard box, or if the materials looks like paper or cardboard, but could contain a plastic lining/coating.

“The product appears to be paper however there is a hidden plastic lining component which becomes obvious when you try to compost the ‘paper’ packaging.”

Supermarket shopper survey response

The recent public consultation on packaging reform in Australia outlined an option for using eco-modulated EPR fees to drive innovation towards more sustainable packaging design. However, with supermarkets not tracking the volume and type of plastic packaging on their shelves, models and projections as well as potential future reporting requirements, pose challenges.



Policy, Planning, Governance

Policy, Planning, Governance

Key criteria:

- Evidence of a sustainability team, with staff dedicated to reducing plastic packaging
- Ongoing, formalised staff training for optimising resource recovery, source separation, and plastic reduction
- Active promotion of plastic-free options available in stores
- Evidence of active support for policies to reduce plastic production and pollution
- Time-bound and specific plastic reduction targets across all areas of business operations

Table 11. Supermarket performance for plastic policy, planning, governance section

Ranking	Supermarket	Points	2024 Score	2023 Score
1	Woolworths	23.5/31	76%	18%
2	Metcash	10.8/27.8	39%	6%
3	Aldi	10.1/28.6	35%	33%
4	Coles	10/31	32%	29%

This category was the highest performing category for all supermarkets in 2023, and the trend continues in 2024.

Woolworths has taken the top spot for its staff training, ongoing assessment of customer feedback relating to packaging and plastics, and support of binding plastic reduction targets, mandatory Extended Producer Responsibility (EPR) schemes, and national standards for reusability. It also has policies in place regarding the use of problematic chemicals in packaging, and targets to reduce plastic across many areas of operation.

Metcash’s score improved in 2024, thanks to the publication of the packaging guidelines and it’s sustainability team. Metcash states it provides staff training on resource recovery and waste minimisation.

Due to lack of available data, Aldi was unable to maintain its top spot. Data used to assess Aldi’s performance primarily came from its Suppliers Guide to Sustainable Packaging, dated March 2023.

Coles’ score also improved incrementally, due to the provision of more information on store policies and training. Staff training is in place at Coles to increase resource recovery and minimise waste. Coles was also able to demonstrate that it promotes plastic-free or low-plastic items to customers.

All supermarkets have evidence that they collect and report on customer feedback relating to packaging and sustainability.



Case Study: MSC certification, and ghost gear

Did you know? Woolworths, Coles, Aldi and Metcash all have policies to give preferential procurement to responsibly sourced seafood. But what does this mean in practice?

This is most commonly shown by certification of a product from a third party, such as the Marine Stewardship Council (MSC). The MSC certification applies to a fishery targeting wild-caught seafood (farmed seafood can be certified by the Aquaculture Stewardship Council or ASC), and applies to the fishery that the product came from. Fisheries seeking certification are assessed against the MSC standard. This standard, which was updated in July 2024, now considers ghost gear – otherwise known as abandoned, lost or otherwise discarded fishing gear (ALDFG) – during a fisheries assessment.³⁸ Ghost gear is problematic for a number of reasons; the most significant of which is that they continue to indiscriminately trap and entangle marine wildlife as they float in the ocean.

When asked whether supermarkets have procurement policies that aim to address and minimise the impact of ghost gear, Woolworths, Coles and Metcash pointed to the MSC certification as their action. However, in order to gain certification under this new

standard, fisheries only need to indicate that a strategy, partial strategy, or measures are in place to minimise ghost gear and its impact on endangered, threatened and protected species or out-of-scope species. In ‘Summary of amendments version 3.1’, MSC states that amendments were made because the “presence of management measures to reduce gear loss [were confused] with the efficacy of those measures”. MSC now states that assessors should focus on whether management measures to reduce gear loss are in place – not how effective those measures are.

Despite the new standard being published in July 2024, existing fisheries have until 1 November 2030 to be assessed under the new standards, and “the deadlines may be extended”. New fisheries don’t even need to be assessed under the most current version of the standard – they can have their initial assessment undertaken against version 2 until 1 July 2026. All supermarkets received part points for either requiring wild-caught seafood to be MSC certified, or giving preferential procurement to MSC certified seafood – but all missed out on full points, as this certification does not adequately address the risk of ALDFG, which continues to put our marine wildlife at risk.



Deep Dives



Deep Dives – The Highs and the Lows

Deep Dive 1: Extended Producer Responsibility for Packaging

Extended Producer Responsibility (EPR) is a strategy based upon the ‘polluter pays’ principle. In the case of packaging, its practice means that those who bring packaging into a market (for example, into Australia for sale) must assume full responsibility for that packaging across its entire life-cycle – not just the design and use of their packaging.

Why do we need an EPR?

Mandatory EPRs hold businesses accountable for the products they place on the market. Industry has essentially been self-regulating packaging rules in Australia. Currently, Australian businesses that use packaging are required to demonstrate they are working towards the National Packaging Targets, but there are no penalties for non-compliance.

Countries with well-established EPR schemes typically achieve high recycling rates and maintain efficient waste management systems.³⁹ When supported by mandatory requirements and financial incentives, EPR schemes discourage the use of problematic and unnecessary plastics.⁴⁰

Where is producer responsibility already in place?

In Europe, and now in Australia, producer responsibility has emerged as an effective practice to address packaging waste.

EPR regulations will soon come into effect in the European Union, with eco-modulated fees depending on recyclability of the packaging.

Packaging will be assessed for recyclability using three grades – A, B and C – and fees will be set accordingly. This is important, as not all plastic types are as easily recycled as others. Additionally, some plastic types contain more chemicals of concern or shed micro and nanoplastics at different rates, and could potentially pose a greater threat to human and animal health.⁴¹

In the European Union, new regulations resulting from the amendment of packaging laws will begin soon. The latest amendment aims to prevent waste. This is demonstrated by the inclusion of prevention targets, starting at 5% by 2030, 10% by 2035, and 15% by 2040. This is measured against baseline waste generation data from 2018. Additionally, businesses must ensure that a proportion of their packaging is reusable, and the targets vary depending on the type of packaging – for example, 10% of grouped packaging such as those delivered to supermarkets to be stocked on shelves must be reusable by 2030, and 10% of beverages must be sold in reusable packaging. These measures demonstrate action in line with priorities to drive down plastic production and increase reusable packaging.

In September 2024, DCCEEW released its consultation paper outlining options for Australia’s packaging regulations, including an EPR option, to address Australia’s growing waste crisis.⁴² The Australian Government is planning to implement the new packaging laws from 2026.

Explainer: Product stewardship

Product Stewardship is where the manufacturer or producer, along with other stakeholders such as suppliers, retailers and customers, aim to reduce negative impacts of their product. Product stewardship schemes can be mandatory or voluntary. Extended Producer Responsibility is a type of product stewardship that makes producers responsible for their products along the entire lifecycle including design, production, use, and end-of-life waste management.

In most states and territories in Australia, a common example of product stewardship is the container deposit schemes (CDS). In these schemes, the beverage producers are responsible for the collection and recycling of cans and bottles, and do so through a 10 cent deposit placed on each eligible container.



Deep Dive 2: The Role of Packaging



Packaging plays an important role – it enables transportation and provides protection of items, such as food. Some packaging can extend the shelf life of a product by preventing it from being damaged in transport, or providing an airtight seal to preserve the product. Packaging dictates the amount or portion you can purchase, and can ensure food remains safe for consumption.

But another role of packaging is marketing. Customers tend to rely heavily on visual aspects such as the colour and design of packaging when making purchasing decisions. In a time of supermarkets boasting billion dollar revenues, it's worth interrogating why customers are having to pay more for over-packaged fresh produce wrapped in marketing.

Removing disposable packaging or using reusable packaging may present some new challenges, but it also presents new opportunities. Utilising technology such as QR codes for marketing and food information

can help communicate more (or different) information to customers, such as notifying of upcoming expiry dates, providing recipe ideas to use up leftovers, and assisting brand loyalty through loyalty program sign-ups. A pilot study utilising ZeroTag, an app that allows customers to scan labels and link products for information and re-ordering, suggested that customers found the tags easy and convenient, as they could scan and read the information at a convenient time. This also resulted in staff spending less time explaining product specifications to customers.⁴³

Reuse also invites creativity and innovation to market products in new ways. Refill brands such as The Dirt Co and Zero Co have created a strong brand identity on their reusable packaging using colours, displays, and technology – showing that disposable packaging may not be the pinnacle of marketing in the future.

Packaging and food waste

Whenever there is talk of removing or reducing disposable plastic packaging on food products, the food waste argument is never far behind. And for good reason – In Australia we waste 7.6 million tonnes – or 312 kg per person – of food each year, and 70% of this food is edible. Of this, 298 kg per capita is wasted at the household level.⁴⁴ According to OzHarvest, Woolworths’ food rescue partner, the top five waste food items in households are fresh vegetables, fresh fruit, bread, bagged salad, and leftovers.⁴⁵ OzHarvest suggests the following tips for helping reduce food waste at home:

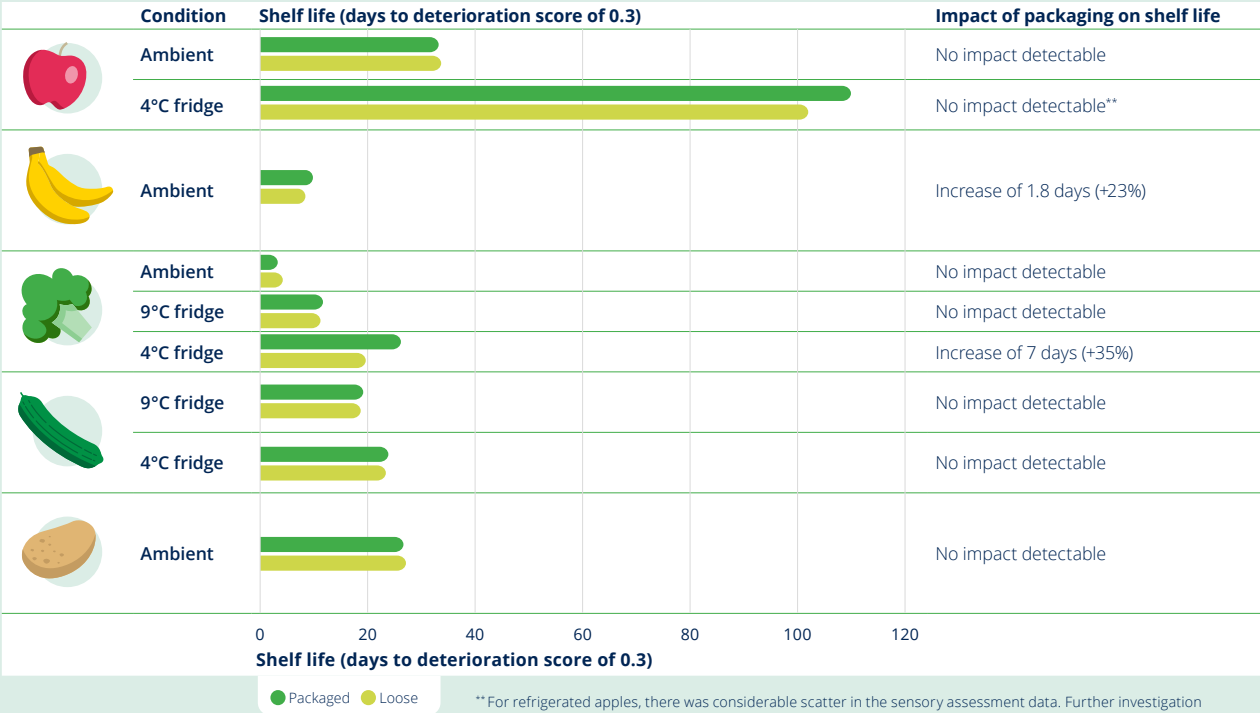
- Buy only what you need
- Avoid specials and 2 for 1 offers
- Don’t go shopping when you’re hungry
- Buy loose fruit and vegetables so you can choose the right amount – look for wonky ones if you can!
– [OzHarvest.org/look-buy-store-cook](https://ozharvest.org/look-buy-store-cook)

These tips are at odds with what supermarkets are providing in their fresh produce sections. Customers wanting to purchase smaller quantities or only what they need are financially penalised.

In the United Kingdom, charity Waste and Resources Action Programme (WRAP) investigated the role of packaging on five fresh produce items frequently wasted in the home: apples, bananas, broccoli, cucumber, and potatoes (see Figure 5 below). Their advice to retailers consisted of three recommended actions:

1. Sell loose unless it can be shown that plastic packaging reduces overall food waste
2. Remove date labels from uncut fresh produce unless it can be shown that a best before date reduces overall food waste
3. Provide Best Practice guidance on storage⁴⁶

Figure 5. Comparison of packaged and loose life



<https://www.wrap.ngo/sites/default/files/2022-02/WRAP-Reducing-household-food-waste-and-plastic-packaging-Full-report.pdf>

In two of these recommendations, WRAP places the responsibility of proving that packaging reduces food waste onto the retailers. WRAPs research showed packaging had “no or little meaningful effect on extending the life of fresh produce”. Currently, supermarkets tell us that their packaging is designed to reduce food waste – but with the exception of Metcash, none of the supermarkets pointed us towards any research used to substantiate their claims, and none provided us with their own research.

It's all down to you (or, so they say)

Significant work has been done to reduce food waste through the supply chain, but the majority of food waste occurs at the household level. So what's the problem?

For one, the 2024 audit found that it still often costs more to buy fresh produce loose compared to pre-packaged produce. Fresh fruit and vegetables, some of the most wasted food items, are not equitable, and those households who require smaller quantities, or want to avoid plastic packaging, are financially penalised for buying just what they need. This cost difference may push customers towards buying more than they need to save money – and if that food isn't eaten, it will be wasted at the household level. Demanding equitable access to loose fresh produce (in price, availability and quality) could help reduce this.

Many shoppers expressed their frustration at the packaging on 'wonky' fresh produce. It's an opportunity to help reduce food waste caused by the cosmetic standards pushed onto us over the years by retailers, but it's almost completely inaccessible for those wanting to reduce their plastic packaging consumption. It's a similar story for organic produce – those wanting to purchase organic produce free from pesticides and herbicides are often forced into plastic wrapped produce.

“The smaller and ‘ugly’, or ‘odd’, products are always packaged in plastic. These are the ones I want to purchase as they help alleviate food waste and are the size (usually smaller) that I want. I never buy them though because then I have to buy plastic. I wish these were loose like the ‘perfect’ fruit and vegetables.”

“I hate that the ‘odd bunch’ or ‘Im-perfect’ veggies are always packed in plastic. Obviously I think we should buy produce that doesn't have to be perfectly sized/shaped to reduce food waste, but I always feel guilty about the plastic.”

“I find the organic section particularly frustrating - very hard to buy without plastic covering in the supermarket.”

Supermarket shopper survey responses



Recommendations



Recommendations for Supermarkets

This year we continue to recommend that supermarkets take the important first steps to reduce plastic packaging.

Recommendation 1:

Stop charging more for loose fresh produce



For two years in a row, supermarkets have been found to be charging more for loose fresh produce – in 73% of assessed cases, loose fresh produce was more expensive than the pre-packaged alternative. For customers to have the genuine opportunity to avoid plastic, loose products must be cost competitive. Both WRAP and OzHarvest have investigated the role of packaging on food waste at the household level – and both recommend selling loose is best. However, simply providing loose options is not enough – for customers to have the genuine opportunity to avoid plastic, the products must be cost-competitive. Thoroughly investigating supply chains, packaging processes, and pricing will help to develop and implement a policy for cheaper loose produce.

Recommendation 2:

Remove unnecessary plastic in fresh produce – prove packaging reduces food waste



In 2024, Coles, Woolworths and Aldi did not provide any research to justify their excessive use of plastic packaging in reducing food waste. WRAP UK recommends uncut fresh produce be sold loose unless retailers can prove the packaging reduces food waste. Increasing shelf life and reducing food waste may not be the same – for example, purchasing policies and strategies may need to be altered to ensure procurement meets demand, rather than buying in far larger quantities and extended shelf life.

Removing plastic packaging does not necessarily mean an inability to sell pre-set quantities of produce – introducing reusable solutions, for example reusable tubs/buckets and/or reusable produce bags could be a solution to help customers quickly grab pre-set quantities, without single-use plastic packaging.

Recommendation 3:**Prioritise reuse for home delivery**

Increasing reusable packaging requires systems change, but there are opportunities to start the transition, such as home delivery. Customers could be provided with reusable crates for groceries to be packed into, removing the need for disposable bags. Reusable containers could be utilised for dry goods, deli items, and cleaning products – customers could leave their containers inside the crate for collection by the delivery driver when their next order is delivered. Slight alterations to existing technology can help customers remember to leave these items out, for example, using text messages or app push notifications when they place a new order, and on the day of delivery. There are existing examples of brand-owned packaging designed for refill and reuse, and by offering this to online delivery customers first, this will help to normalise reuse behaviours, and reduces the risk of packaging not being returned.

Recommendation 4:**Phase-out individually wrapped items packaged in plastic**

While there have been some improvements in packaging design, there are still many examples in supermarkets of excessive packaging. One such example is individually-wrapped items which are then wrapped in a plastic outer package. Redesigning the inner individually wrapped packaging, the outer packaging, or both, will cut down on small, difficult-to-recycle plastic packaging that has a high potential for becoming litter. Examples include mints, dishwashing tablets, teabags, cheese slices and multi-pack noodles.

Recommendation 5:**Report on overall plastic footprint**

Australian supermarkets do not report their overall plastic footprint – the amount of plastic generated through its operations – meaning shoppers do not get a clear picture of which supermarkets are working hard to reduce their overall plastic packaging. International examples show clear and transparent reporting on the amount of plastic packaging through own-brand products and branded products; supermarkets in Australia refuse to publish this data, stating ‘commercial sensitivity’. Instead, some plastic reductions are reported in annual sustainability reports – but we have no way of knowing whether those reductions are negated by increasing plastic use elsewhere in the organisation.

**PLASTIC IS
FOREVER
FOREVER
FOREVER
FOREVER
FOREVER**



Recommendations for Government

Recommendation 1:

Introduce an EPR for packaging, placing responsibility for packaging on producers

Introduce an Extended Producer Responsibility (EPR) scheme to hold producers of packaging accountable for the products they place on the market. Countries with well-established EPR schemes typically achieve high recycling rates and maintain efficient waste management systems.⁴⁷ When supported by mandatory requirements and financial incentives, EPR schemes discourage the use of problematic and unnecessary virgin plastics.

Recommendation 2:

Set a mandatory target for 20% plastic packaging reduction by 2030

Utilise mandatory reduction targets to support businesses in transitioning away from disposable plastic packaging. The best available information tells us that we cannot continue to increase the volume of plastic packaging produced in Australia without negative environmental and health impacts. To transition to a circular economy, materials need to stay in the system, and this is not possible with the volume of plastic we are generating in Australia. Relying on EPR alone will not drive the required pace of change – mandatory plastic reduction targets must also be set.

Recommendation 3:

Set a mandatory target 40-70% reusable packaging by 2030

Establish industry specific targets for 40-70% of all packaging to be reusable by 2030, in line with ambitious international standards.⁴⁸ The target accounts for different opportunities in business to business packaging, and business to consumer packaging. Reusable packaging systems have the potential to significantly reduce the volume of plastic packaging waste and pollution – but they need to be implemented at scale to be viable for businesses, and convenient and accessible for users of the scheme. To support these targets, design standards backed by lifecycle analysis which include all the costs associated with disposable packaging, including environmental impacts of marine plastic pollution, should be developed to assist manufacturers, brand owners, and retailers to develop the most robust and efficient packaging format possible.



Recommendation 4:

Implement mandatory reporting for plastic footprint

In sustainability reports, supermarkets highlight changes to packaging, reductions in virgin plastics, or reductions through removal of specific items. However, without reporting on their overall plastic use, it is impossible to determine whether their plastic use is reducing overall. We recommend that businesses report on their plastic footprint overall, as well as the recycled content of packaging and products, against a baseline figure to be held accountable for their plastic use.

Recommendation 5:

Improve the ARL and Packaging Recyclability Evaluation Portal (PREP)

While the ARL is designed to reduce confusion for customers, in reality it muddies the waters further. The ARL only advises customers on what is recyclable, not what is actually recycled. The parameters for what is considered recyclable should be carefully revised, ensuring the ARL gives customers peace of mind that packaging labelled as recyclable will be recycled in practice and at scale. The ARL should comply with design standards and include requirements that products marked as recyclable, will be recycled in practice.





Glossary

Australasian Recycling Label (ARL)	A scheme designed to boost recycling rates by providing on-pack instructions to customers advising where components of the packaging materials should be placed – current options are: • Recyclable: dispose in your recycling bin • Conditionally recyclable: provides instructions for recycling (e.g. flatten carton to recycle). If these instructions can be followed, place into recycling bin, otherwise dispose in general waste • Not recyclable: dispose in your general waste bin • Check locally (previously ‘return to store’): the item may be recyclable, visit arl.org.au to check for local recycling options For more information on the ARL and assessment criteria, visit www.apco.org.au/the-australasian-recycling-label
Chemicals of concern	Chemicals of concern are chemicals that are potentially hazardous to humans and/or the environment, including the group of chemicals referred to as PFAS.
Compostable packaging	Compostable packaging is suitable for microbial treatment at end of life (e.g. in a composting environment), and is certified to Australian Standards for commercial (AS 4726-2006) or at-home composting (AS 5810-2010). Due to the limited commercial composting facilities in Australia, many commercially compostable packaging items will end up in landfill, or incorrectly disposed of in co-mingled recycling streams. Currently, about 32% of Australian households have access to a Food Organics Garden Organics (FOGO) service.⁴⁹ There are ongoing discussions surrounding the presence of chemicals of concern in compostable packaging, which make processing difficult for commercial composting facilities.
GHG emissions	Greenhouse Gas emissions
Lightweighting	This common process involves reducing the weight of product packaging through strategies such as creating thinner plastic, replacing rigid plastic with plastic film, and using mono-materials to increase strength while reducing weight. While these strategies do impact overall plastic use, it has little impact on plastic pollution and number of items leaking into the environment.

Extended Producer Responsibility Scheme	In an EPR scheme, the producer of packaging is identified as the steward of that material and is responsible for managing that material throughout its life – including use and disposal.
Per- or Poly- Fluorinated Alkyl Substances (PFAS)	A group of more than 4,700 chemicals used in food packaging for grease and water resistance. Chemicals in the PFAS group are persistent and of health and environmental concern, and are often referred to as ‘forever chemicals’. PFAS chemicals can be found in packaging, in clothes, in furniture and carpets and has been commonly used in fire fighting foams.
Plastic Footprint	The amount of plastic a supermarket generates through its operations. This includes Business-to-Business (B2B) packaging such as pallet wrap, and Business-to-Consumer (B2C) packaging displayed on the shelf.
Polymers	In reference to plastic types. The common plastic polymer types and the associated numerical numbering on packaging are as follows: • PET – Polyethylene terephthalate (Number 1) • HDPE – High density polyethylene (Number 2) • PVC – Polyvinyl chloride (Number 3) • LDPE – Low density polyethylene (Number 4) • PP – Polypropylene (Number 5) • PS – Polystyrene (Number 6). Not expanded, commonly used in takeaway coffee cup lids and sushi containers • EPS – Expanded polystyrene (Number 6). Expanded by adding air into the material while cooling. Commonly used for packing materials. • Other – any plastic polymer that does not fall into the above polymer types. (Number 7). Not acceptable in co-mingled recycling streams in Australia.
Primary packaging	Packaging that contains the final product, also referred to as retail or consumer packaging. This is packaging that contains products purchased at retail stores by customers, as may be reusable or single-use.

Refill

Refillable packaging is reusable. It is designed to be used multiple times, through a dedicated system or reuse where a) the store or brand owns the packaging, accepts returns of packaging for cleaning and refilling and sells it again, or b) the customer owns the packaging and refills their container in store.

- Refill on the go: customer-owned packaging refilled away from home e.g. in-store dispensing system
- Fill-at-home: Packaging that is designed to carry bulk product for the customer to take home and use existing packaging, e.g. a bottle of liquid sold without a pump mechanism, or a pouch designed for customers to fill existing packaging at home.

Reuse

Reusable packaging is designed to be used multiple times, for its originally intended purpose, as part of a dedicated system for reuse. Examples of a reuse system are:

- Purpose-built bottle to be refilled in-store (owned by customer);
- purpose-built bottle which is returned by customer, refilled by manufacturer, and returned to store for sale (company/industry owns container).

Reuse is different to repurposing - using packaging for another purpose - such as using a glass jam jar to store buttons. Whilst this can prolong the life of the packaging by giving it another use, it does not reduce the demand for a new jam jar.

Secondary packaging

Packaging additional to the primary packaging that is used to protect and aggregate individual units during transport, storage and distribution. Examples include packaging made to display multiple primary product units on the shelf and may also be referred to as shelf-ready packaging.

Tertiary packaging

Outer packaging, including pallets, wrap, strapping etc. used for the distribution of goods, also referred to as transport or transit packaging.

Virgin Materials

Materials that have not yet been used. Includes both finite materials (fossil fuels) and renewable resources.

Endnotes

- 1 Cowger, W. *et al* (2024). *Global producer responsibility for plastic pollution*.
- 2 The Pew Charitable Trust and SYSTEMIQ (2020). *Breaking the plastic wave - A comprehensive assessment of pathways towards stopping ocean plastic pollution*
- 3 WWF-Switzerland and Dalberg (2021). *Plastics: The costs to society, the environment and the economy*
- 4 The Pew Charitable Trust and SYSTEMIQ (2020). *Breaking the plastic wave - A comprehensive assessment of pathways towards stopping ocean plastic pollution*
- 5 O'Farrell, K. (2020). *2018-19 Australian Plastics Recycling Survey National Report*. Envisageworks, Melbourne: Australian Government Department of Agriculture, Water and the Environment.
- 6 O'Farrell, K., Harney, F., & Chakma, P. (2021). *Australian Plastics Flows and Fates Study 2019-20 - National Report*. Prepared for the Department of Agriculture, Water and the Environment.
- 7 University of Wollongong (2024). *After 20 years of evidence on plastic pollution, it is now time to act - media release*
- 8 IBISWorld (2024). *Supermarkets and Grocery Stores in Australia - Market research Report (2014-2029)*
- 9 Woolworths Group (2024). *ASX Announcement - Full year results*
- 10 Coles Group (2024). *2024 full year results presentation*
- 11 Parliamentary Committees (2024). *Inquiry into Supermarket pricing - Report No. 1, 57th Parliament Supermarket Pricing Select Committee*
- 12 Environment Ministers Meeting (10 November 2023). *Agreed Communique*
- 13 Blue Environment Pty Ltd (2022). *Australian Plastics Flows and Fates Study 2020-21 - National Report (Version 2)*
- 14 APCO (2024), *Australian Packaging Consumption & Recovery Data 2021-22*
- 15 APCO (2024), *Australian Packaging Consumption & Recovery Data 2021-22*
- 16 APCO (2023), *2025 National Packaging Targets Review - Final Report*
- 17 Coles Supermarkets Australia Pty Ltd and APCO (2024). *Annual report and action plan*. https://apco.org.au/apco-members-signatories/0014a0000078myyAAA/latest_ar_ap
- 18 The Pew Charitable Trust and SYSTEMIQ (2020). *Breaking the plastic wave - A comprehensive assessment of pathways towards stopping ocean plastic pollution*
- 19 Woolworths Group (2024). *Woolworths Group 2024 Sustainability Data Pack 20240827*.
- 20 WRAP (2022). *Helping people to reduce fresh-produce waste: Modelling the impact of selling products loose or in packaging*.
- 21 <https://www.apal.org.au/programs/industry-data/industry-stats/>
- 22 www.agriculture.gov.au/sites/default/files/documents/potatoes-infographic.pdf
- 23 www.onionsaustralia.org.au/about-the-industry/the-industry/#:~:text=Australians%20consume%20approximately%207.8kg,value%20of%20production%20%24135.5%20million.
- 24 Canstar Blue (2024). *What is the average grocery bill?*
- 25 Cowger, W. *et al* (2024). *Global producer responsibility for plastic pollution*.
- 26 As You Sow and Ubuntu (2024). *Plastic promises scorecard - are corporations following through on commitments to clean up their act?*
- 27 Ellen Macarthur Foundation (2023). *Unlocking a reuse revolution: scaling returnable packaging*
- 28 Ellen Macarthur Foundation (2023). *Unlocking a reuse revolution: scaling returnable packaging*
- 29 ANZPAC, 2023. *ANZPAC Plastics Pact Annual Impact Report*.
- 30 UN Environment Programme (2023). *Turning off the tap: How the world can end plastic pollution and create a circular economy*
- 31 IBISWorld (2023). *Online Grocery Sales in Australia industry analysis*
- 32 Coles Group (2024). *2024 Sustainability Report*.

- 33 Department of Climate Change, Energy, the Environment and Water (2024). *Reform of packaging – Consultation paper*
- 34 Blue Environment Pty Ltd (2022). *National waste report 2022*
- 35 Environment Ministers Meeting (June 2023). *Agreed Communiqué*
- 36 APCO (2024). *Strategic Plan July 2024-June 2030*
- 37 Blue Environment Pty Ltd (2022). *Australian Plastic Flows and Fates Study 2020-21 – National Report version 2*
- 38 Marine Stewardship Council (2024). *MSC fisheries standard – Summary of amendments version 3.1.*
- 39 Tumu, K., Vorst, K., & Curtzwiler, G. (2023). *Global plastic waste recycling and extended producer responsibility laws. Journal of Environmental Management, 348, 119242.*
- 40 Sachdeva, A., Araujo, A., Hirschnitz-Garbers, M. (2021). *Extended Producer Responsibility and Eco-modulation of Fees. Rethink Plastic & Break Free from Plastic.*
- 41 Martin Wagner, Laura Monclús, Hans Peter H. Arp, Ksenia J. Groh, Mari E. Løseth, Jane Muncke, Zhanyun Wang, Raoul Wolf, Lisa Zimmermann (2024). *State of the science on plastic chemicals – Identifying and addressing chemicals and polymers of concern*
- 42 Department of Climate Change, Energy, the Environment and Water (2024). *Reform of packaging – Consultation paper*
- 43 www.sustainability.vic.gov.au/circular-economy-and-recycling/in-a-business-2/single-use-plastics-ban-centre/case-studies-reuse-pilot-projects/untwine-encourages-using-reusable-packaging-with-digital-product-label
- 44 The Food and Agribusiness Growth Centre (2021). *The National Food Waste Strategy Feasibility Study – Final Report*
- 45 OzHarvest (2018). *Media Release – OzHarvest urges consumers to fight food waste with new campaign*
- 46 WRAP UK (2022). *Reducing household food waste and plastic packaging – Evidence and insights*
- 47 Tumu, K., Vorst, K., & Curtzwiler, G. (2023). *Global plastic waste recycling and extended producer responsibility laws. Journal of Environmental Management, 348, 119242.*
- 48 World Economic Forum (WEF) (2021). *Future of Reusable Consumption Models: Platform for Shaping the Future of Consumption. WEF.*
- 49 DCCEEW. (2023). *Recovering organic waste*





**AUSTRALIAN MARINE
CONSERVATION SOCIETY**

marineconservation.org.au

amcs@amcs.org.au

+61 7 3846 6777

PO Box 5815, West End QLD 4101

BOOMERANG ALLIANCE

boomerangalliance.org.au

info@boomerangalliance.org.au

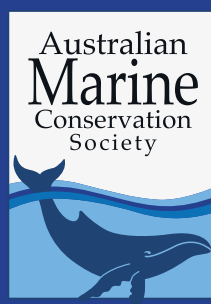
+61 2 9211 5022

PO Box K61, Haymarket NSW 1240



RECYCLED
Paper made from
recycled material
FSC® C102086

Printed on
Ecostar 100%
post-consumer
recycled paper.



**BOOMERANG
ALLIANCE**