

Australian Packaging Covenant Organisation Ltd.
ACN 614 026 58
L14, 55 Clarence Street
SYDNEY NSW 2000

4th November

Pac Food Pty Ltd
PO Box 598
Nambour QLD 4560

Dear Harald,

Australasian Recycling Label Program Fibre Submission Approval Letter

Submission details (Australia only)

Applicant: Pac Food Australia Limited

Review Committee: Australasian Recycling Label (ARL) & Packaging Transformation Teams

Date approval submitted: 12/07/2024

Date approval granted: 4/11/2024

Date of approval expiry: 4/11/2026

Applicable to (list of SKUs/materials/formats): Pac Food's PP/EVOH lined sugarcane pulp tray

Conditions of approval: This exemption expires on 4th November 2026. From this date, Pac Food may seek re-approval for the submission.

Background

In April 2024, Pac Food Pty Ltd (Pac Food) presented a Fibre Submission to the Australian Packaging Covenant Organisation (APCO) to review the recyclability of their sugarcane pulp tray.

Pac Food provided evidence that was reviewed by APCO's ARL and Packaging Transformation Teams, including repulpability assessments completed by BioPria (Monash University) to APCO's Standardised Test Method for Repulpability. The testing demonstrated a fibre yield of 83%.

ARL/APCO Decision

Based on the evidence provided, APCO came to a decision in October 2024 to approve the submission for Pac Food's sachet with water dispersion coating to be classified as Recyclable with lost value.

The ability to share the letter and therefore use the 'Recyclable' ARL for the approved format is only afforded to customers of Pac Food's, who are ARL program members.

Brand owners who receive a Fibre Submission letter from Pac Food are responsible for subsequently accurately assessing the entire packaging format or SKU in the Packaging Recyclability Evaluation Portal (PREP), including accurate dimensions, weight and any additional separable components or secondary materials. Where the format or SKU no longer meets the recyclability thresholds due to dimensions, weight, secondary materials or components, the 'Recyclable' ARL is no longer applicable.

An approved Fibre Submission is valid until the date of expiry indicated on the letter of approval OR until updated thresholds for fibre recyclability arise, unless otherwise stated. Pac Food may re-submit at the expiry date for a further period of approval.

Additionally, Pac Food shall notify APCO of any material changes to the packaging, market or local reprocessing capacity that may materially impact the format's ability to satisfy the criteria of the fibre submission previously approved, within 5 business days.

APCO reserves the right to rescind a submission at any time, should new information arise. In this instance, APCO will endeavour to work with Pac Food and APCO Members to transition the material appropriately.

For audit purposes, Pac Food must keep this letter as evidence that approval has been provided for the sachet with water dispersion coated material only. This letter does not provide approval for any other packaging materials manufactured for or by Pac Food.

Please refer to Appendix A: Implementation Process, for the appropriate steps to be undertaken by Pac Food and any brand owners who purchase these specific packaging formats.

Kind Regards,

Anneliese Syder

Anneliese Syder
ARL Program Manager
Australian Packaging Covenant Organisation

Appendix A: Implementation process

In addition to the current processes governed by the PREP and ARL Terms and Conditions:

Brand owners must complete their own PREP assessments of the composite fibre packaging. In particular, the Brand Owner must include in this PREP assessment accurate dimensions, weight and any additional separable components or secondary materials that are added to the fibre packaging when being sold to a consumer. Should the final PREP report, with any new separable components or secondary materials, render a 'Not Recyclable' result, the brand owner must follow that final PREP report to inform ARL application. ***This letter does not allow a blanket Recyclable with lost value result for the specified fibre packaging.***