

FY26-27 BUSINESS PLAN AND STATEMENT OF INTENT



DESIGNED WITH INDUSTRY. DELIVERING FOR AUSTRALIA.

Member insight, strong advocacy and practical tools.

DECEMBER 2025

ACKNOWLEDGEMENT OF COUNTRY

We acknowledge the Traditional Owners of Country throughout Australia and recognise their enduring connection to land, skies, waters, and communities. We pay our respects to their Elders past and present and honour the cultural, spiritual, and educational practices of Aboriginal and Torres Strait Islander peoples.

For over 65,000 years, First Nations peoples have been the Custodians of this land, guided by a deep understanding of its ecosystems and natural resources. Their knowledge of sustainable living, land care, and stewardship is invaluable as we work towards creating a circular economy in Australia. We recognise that Indigenous Knowledge systems — built on caring for country, understanding seasonal patterns, and maintaining balance between people and nature — are essential to our collective journey towards a more sustainable future.



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THE IMPERATIVE FOR ACTION

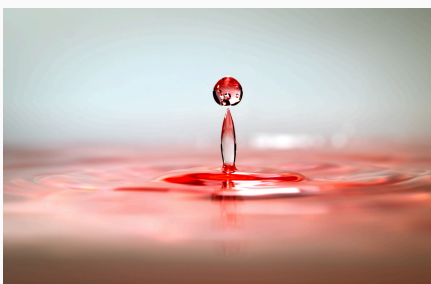


Reform Momentum Creates Opportunity

APCO's 2030 Strategic Plan put EPR for packaging firmly on the national agenda. Governments, industry and the community are aligned on the need for clear rules, strong stewardship and nationally consistent approaches. While the timing remains uncertain, reform is underway and industry has a real opportunity to shape what comes next.

APCO's role, requested by ministers, is to help members to be ready for new regulation while continuing to work towards the National Packaging Targets. Over the next 36 months, APCO will provide the guidance, tools and resources that members need to prepare with confidence, while ensuring governments understand industry's need for certainty and continuity.

This ensures members are not waiting for reform - they are influencing it and preparing for it.



Collaboration Across Governments is Key to Alignment

States and territories are active and engaged partners in shaping Australia's packaging future. Their involvement presents a valuable opportunity to share insights, support alignment and work toward approaches that benefit industry, governments and the community.

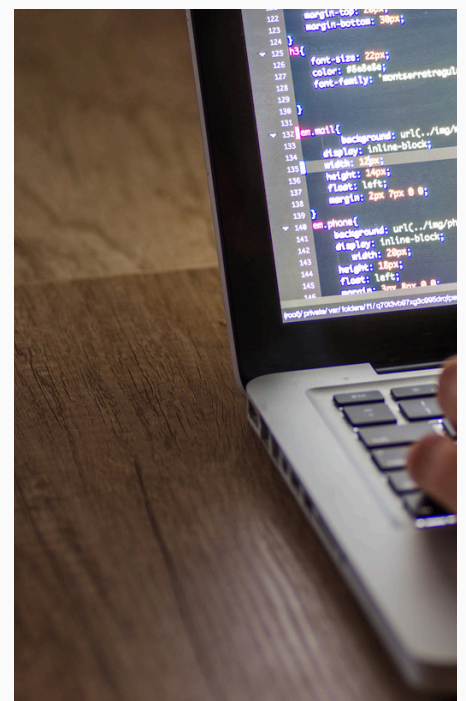
Through constructive engagement and open collaboration, APCO will continue to promote national consistency, contribute expertise and give members a clear line of sight to emerging expectations. This supports coordinated progress rather than fragmented effort.



Stronger Data Systems Will Unlock Better Decisions

Across Australia and globally, packaging regulation is shifting to rely on verified, comparable and auditable data. Businesses will increasingly need high-quality information to make decisions, model cost impacts, demonstrate readiness and participate in stewardship systems.

The next 36 months are about simplifying reporting where possible, improving accuracy and strengthening the national dataset so members can make decisions with confidence, not uncertainty.



THE IMPERATIVE FOR ACTION

International Momentum Signals the Direction of Travel

Globally, there is growing emphasis on packaging design standards, mandatory stewardship, recyclability requirements and clear labelling frameworks. Regions such as the European Union, the United Kingdom, Canada and Japan are advancing Extended Producer Responsibility models and strengthening expectations around data, claims and recycled content.

This international progression provides valuable insight for Australia. It reinforces the importance of credible standards, reliable data systems and coordinated stewardship pathways. It also highlights an opportunity for Australian businesses to prepare early, align with global expectations and strengthen competitiveness in international markets.

For members, investing now in design improvement, capability building, enhanced reporting and stewardship engagement will better position your organisation to manage future regulatory impacts.

Soft Plastics Require Coordinated Industry Leadership

Soft plastic remains a national priority, and members want clear, credible pathways to take part in stewardship solutions with confidence.

APCO will partner with Soft Plastic Stewardship Australia (SPSA) to support an industry-led EPR approach for soft plastics. APCO is also developing a Stewardship Assurance Framework that strengthens trust in the credibility and readiness of Producer Responsibility Organisations (PROs) and stewardship schemes. The framework will provide transparent governance, clear participation expectations and consistent assurance settings.

This work gives members the confidence to engage and supports a scalable, nationally aligned and future-ready pathway. APCO will continue working with SPSA, government and industry partners to ensure soft plastic solutions are practical, credible and deliver long-term value.

WHAT WE HEARD

Member feedback highlighted three clear priorities for APCO's focus:

1. A clear pathway to an industry-led EPR approach

Members want coordinated leadership on EPR, especially for soft plastics, and a practical pathway that supports confident participation.

2. Simpler, stronger design, labelling and compliance

Businesses are seeking clearer guidance and streamlined tools that reduce duplication and make compliance easier.

3. Greater confidence and trust across industry and government

Members value consistent engagement, national alignment and strong advocacy to support a stable, predictable policy environment.

CONSULTATION INSIGHTS REPORT





PACKAGING IN 2025: A SYSTEM IN MOTION

Brand Owners Are Investing in Better Packaging Outcomes

The need for soft plastic solutions and evolving regulations has pushed industry to rethink packaging systems:

- SPSA authorised by the ACCC – enabling a coordinated, industry-led soft plastics recovery pathway.
- Major retailers and organisations are investing in collection trials, infrastructure partnerships and packaging redesign, especially to move away from problematic formats.
- Brands are focusing on recycled content, traceability, reuse pilots and recyclability standards, driven by risk, customer expectation and future-proofing.

State Governments Are Accelerating Packaging Regulation

States are now regulating a wider range of plastics than ever before, including many packaging items, and are forcing changes to packaging design, material choice and end-of-life pathways. Recent actions go beyond single-use bans to encompass packaging design and system-level approaches.

- NSW – Plastics Plan 2.0: Phasing out unnecessary and hard-to-recycle plastics, as well as requiring tethered caps on beverage containers by 2030, labelling of away-from-home packaging, and the development of a stewardship solution for takeaway cups and food containers.
- WA – Expanded bans: New restrictions on moulded expanded-plastic packaging, building on earlier bans of cutlery, plates, bowls and cups.
- SA – 2025 ban: World-first removal of small pre-filled containers like fish-shaped soy-sauce bottles, alongside EPS foodware and other items.

While state policy can drive significant positive outcomes, inconsistent regulation creates a more complex and costly compliance environment for members. This highlights the need for urgent national reform and engagement of members in policy advocacy at all levels of government.

Commonwealth Action Aims to Consolidate the National Approach

The Federal Government is signalling stronger national expectations through:

- Packaging regulation reform under DCCEEW, including proposed recyclability grading, mandatory design requirements and clearer rules for claims and labelling.
- Ongoing coordination across jurisdictions to bring consistency to EPR-style approaches, including soft plastics.
- Increased scrutiny on greenwashing and unverifiable claims.

National alignment is poised to strengthen. Businesses should prepare for clearer, firmer, and more measurable obligations.

REGULATORY UNCERTAINTY CREATES THE OPPORTUNITY FOR INDUSTRY LEADERSHIP.

[NSW facility takes on large-scale recycling of Australian household soft plastics](#)

[Sustainable Packaging Trends Report](#)

[Nation-first ban on fish-shaped plastic soy sauce containers begins in SA](#)

[Tassie: Why are we yet to ban single-use plastics?](#)

[Industry welcomes new Environment Minister, calls for immediate action on key reforms](#)

[Soft plastics stewardship scheme given go-ahead](#)

[Filled-on-site plastic 'cans' banned \(WA\)](#)

[2025 National Packaging Targets – is it enough?](#)

[Packaging up a sustainable future for Australian business](#)

[Rethinking packaging with tethered cap and paper blueberry punnet](#)

[NSW takes action to phase out single use plastics and harmful chemicals](#)

["In an Australian first, chip company recycles leftover cooking oil into packaging to reduce emissions"](#)

CEO MESSAGE

Australia's packaging system is evolving, and across the country our members are leading that change. Businesses are redesigning packaging, improving recyclability, and strengthening data systems. These efforts set the pace for the wider system.

On behalf of our members, APCO published its 2030 Strategic Plan in 2024 and consulted widely on its implementation throughout 2025. The 2030 Strategic Plan set out an ambitious pathway for an industry-led extended producer responsibility (EPR) approach for packaging. Members were clear in their feedback: they support EPR, but it must be backed by stronger regulation that provides clear rules, stronger alignment across the system, and confidence that early action will be recognised and protected.

This Business Plan responds to that feedback and sets out APCO's work program for the next three years. It strengthens our advocacy, seeks greater regulatory certainty, supports and protects industry leadership through this transition and serves as APCO's Statement of Intent for implementing the Strategic Plan.

FY26 focuses on strengthening the foundations members need to act with confidence. This includes clearer design guidance, strengthening ARL governance and align with global best practice, foundational work to enhance the reporting experience and improve data governance and the design of a stewardship assurance framework. These improvements reduce duplication, increase confidence and support the substantial work members are already undertaking to improve packaging outcomes.

FY27 builds capability and alignment. As governments continue to outline their expectations, APCO will support members to embed updated frameworks, prepare internal systems for future EPR requirements and work collaboratively with governments so reforms enhance, not complicate, the good-faith efforts businesses are making.

By FY28, industry will be ready to operate under a regulated EPR framework. This includes accurate and verifiable data, clear improvements in packaging design and an ARL program with strengthened credibility and integrity, supported by national consumer awareness campaigns that drive behaviour change. Boosting consumer understanding of the ARL remains one of the most effective levers to translate member commitments into real recycling outcomes.



Across this period, APCO is stepping into a more active and connected role to protect and uplift our members' investment in packaging. We will:

- advocate directly for practical national regulatory reform that supports industry leadership, including the development of workable industry-led EPR options for government consideration.
- continue working directly with states and territories where national harmonisation is still needed.
- design and deliver a stewardship assurance framework and EPR fee methodology, that recognises, protects and supports member progress.
- provide the tools, evidence and foresight members need to make informed decisions about packaging design, data and labelling.

Our members are doing the right things by investing in better design, improving recyclability, and driving more sustainable outcomes. This plan backs those efforts, supports early action, and strengthens the system, so industry leadership is recognised and protected.

Thank you to all our members and partners who bring commitment, insight, and ambition to this work. Together, we are shaping a packaging system that is practical, nationally aligned and future ready, built on the leadership and investment members bring every day.

Chris Foley
Chief Executive Officer | APCO

A handwritten signature of Chris Foley in black ink, written in a cursive style.



Strengthening Australia's Packaging System

Clear, practical delivery for the next 36 months

PURPOSE

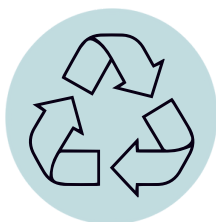
To equip members with the standards, tools and pathways needed to improve packaging outcomes and prepare confidently for a more mature regulatory environment.

FIVE KEY FOCUS AREAS



Packaging Standards & Design

Practical guidance to support clear decision-making.



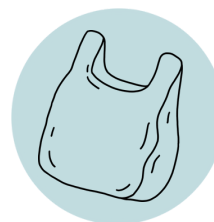
Australasian Recycling Label (ARL)

Greater confidence, consistency and usability.



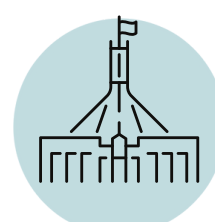
Reporting & Packaging Data

Simpler, more accurate reporting and data capture.



EPR & Soft plastic Stewardship

Development of APCOs Stewardship Assurance Framework and industry-led pathway with SPSPA.



Government Relations

Stronger engagement to support national alignment.

WHAT WE WILL DELIVER

- Updated and strengthened Sustainable Packaging Guidelines (SPGs)
- ARL strengthening and uplift
- Simplified annual reporting and better data tools
- Support soft plastic stewardship through SPSPA
- A Stewardship Assurance Framework
- EPR fee methodology
- Enhanced digital systems and member experience
- Website and brand refresh
- Expanded engagement with states and territories

OUTCOMES FOR MEMBERS

- Make clearer design decisions using strengthened standards and guidance
- Apply the ARL with greater confidence and consistency
- Complete reporting more easily and accurately
- Engage in credible stewardship pathways
- Plan with better visibility of national expectations and system direction

THE BUSINESS PLAN AT A GLANCE

This Business Plan delivers the first phase of APCO's 2030 Strategic Plan, building a stronger, more aligned and future-ready packaging system.



PROGRESS, PATHWAYS AND PARTICIPATION

APCO has already begun activating key elements of this Business Plan. Projects are underway across packaging standards, labelling, reporting, soft plastic stewardship and government engagement, reflecting early delivery against member priorities and building momentum for the next 36 months.

We have also strengthened our internal capability through recent organisational design changes, ensuring APCO is better equipped, resourced and structured to respond to member needs with greater clarity, speed and support.

This update provides visibility of what's been completed since consultation, what's in progress, and what's upcoming. This creates space for members to ask questions, offer input and get involved. It is an opportunity to stay connected to the work, shape its direction and engage meaningfully in the activation of the plan.

Members are invited to connect, participate and partner with us as this work continues.



1. Packaging Standards & Design

We are strengthening the standards and guidance that sit behind better packaging decisions, with APCO's Material Stewardship Committees (MSCs) as the engine room for this work.

Material Stewardship Committees (MSCs) (technical working groups)

APCO's MSCs meet regularly to guide the Packaging Guidelines. MSCs are used to support the work by APCO on PFAS, compostability and other material and format policy issues.

These forums are where system data, real-world experience and emerging policy signals are brought together to shape practical, implementable guidance.

Members have been invited to participate in MSCs and working groups, nominate representatives, and contribute data, case studies and technical feedback.

Packaging Guidelines (SPGs refresh)

APCO's Packaging Technology team is leading the update of the SPGs into Packaging Guidelines to make them more practical, easier to apply and better able to underpin future national design standards. Drafts will be tested and refined through APCO's MSCs, which will act as a technical sounding board, before being circulated more broadly for feedback. Members will be invited to trial the guidelines on real packaging portfolios and provide structured input.

Compostability strategy and related documents

A Compostability Strategy and associated packaging or product guidance are being developed to clarify when compostable solutions are appropriate and how they should be labelled and managed in the system.

Members will be invited to review draft documents, provide examples of successful and unsuccessful compostable applications, and help refine the strategy through targeted consultations.



1. Packaging Standards & Design (continued)

Design guidance and case studies

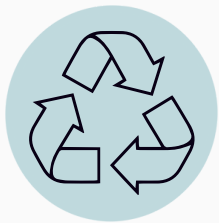
New design resources and case studies are being created from MSC and member input to show what “good” looks like across key materials and sectors.

Members can volunteer case studies, participate in pilots and use the guidance to brief internal design, procurement and sustainability teams.

PFAS and emerging chemicals (discussion paper and guidance)

A PFAS discussion paper (for December publication) and supporting guidance on PFAS in plastic packaging are in development, informed by MSC advice and regulatory signals.

Members will be consulted on the discussion paper, asked to share sector-specific challenges, and supported through webinars and Q&A sessions to understand implications for packaging specifications.



2. Australasian Recycling Label (ARL)

We are undertaking a comprehensive ARL program review to ensure the scheme remains robust, evidence-based and aligned with future regulatory settings, cementing its position as Australia’s most recognisable national recycling label. This work brings together multiple projects within APCO’s business-as-usual stewardship of the scheme.

Members will be engaged through consultations, working groups and targeted testing of proposed changes, with clear opportunities to provide feedback before any updates are finalised.

2. Australasian Recycling Label (ARL) - (continued)

Kantar consumer and brand study

APCO has completed a major study with Kantar on ARL iconography, brand guidelines, consumer sentiment and adoption. The findings confirm the ARL’s high recognition and trust, and highlight opportunities to refine how the label is presented and explained.

Members will receive summaries of the findings and practical guidance on how to apply updated ARL guidelines. There will be opportunities to access briefings, campaign assets and align internal brand use with the refreshed ARL position.

National bin audit

A national bin audit is in progress to understand how ARL-labelled packaging is performing in real-world conditions, including what actually happens at kerbside and in different collection systems. Insights will inform any adjustments to ARL rules and claims.

Findings will be shared with members via reports and webinars. Members will be invited to use the insights to review their own packaging portfolios and participate in conversations about how best to reflect system performance in ARL guidance.

Expanding the ARL for new destinations

APCO is reviewing options to expand the current range of ARL labels to better reflect alternate destinations and away-from-home pathways, including settings flagged in policies such as the NSW Plastics Plan. This includes exploring how to clearly communicate correct disposal for packaging used in public places, workplaces and other non-household contexts.

Members will be engaged in co-design discussions on potential new icons, claims and use cases. Feedback from brands operating in away-from-home channels will be particularly important.

Strengthening consumer awareness

An ARL consumer awareness campaign has been designed to be activated during the festive season, the peak period for household consumption and waste.



3. Reporting, Data & Governance

We are strengthening the clarity, quality and usability of packaging data so members can report with confidence and prepare for future regulation.

2023–24 Consumption & Recovery report and material factsheets

The 2023–24 Consumption & Recovery report and accompanying material factsheets have been published, providing an updated national picture of packaging flows and recovery performance. Work is already underway on the next edition.

Members can use these resources to brief internal teams, inform strategy and support reporting. Feedback will be sought on priority topics, data gaps and improvements to the next version.

Clearer reporting definitions and guidance (including POM)

A project is underway to tighten and clarify key reporting definitions, including “placed on market” (POM) and other core terms, so obligations are easier to interpret and apply consistently. Draft refinements are being tested against real reporting scenarios.

Members will be asked to review and road-test draft definitions, share examples where current wording creates ambiguity, and provide input via consultation sessions and online feedback. Updated guidance will then be built into APCO’s reporting tools, templates and help materials.

Future-ready reporting tools and support

Work is progressing on improved reporting tools, user support and help content to make annual reporting simpler and more intuitive.

Members will be invited to book ‘access an expert’ sessions for direct help completing their member reports, as well as take part in user testing and Communities of Practice focused on reporting, data quality and internal systems. These activities will make it easier to interpret definitions, navigate the portal and submit accurate data.



4. EPR and soft plastic stewardship

We are working with partners to build credible, scalable soft plastic solutions and give members practical pathways into emerging EPR schemes.

Stewardship Assurance Framework

APCO is scoping a Stewardship Assurance Framework to give members confidence in how they invest in recovery initiatives and support stewardship approaches.

APCO will engage with stewardship initiatives on the framework.

EPR impact and fee guidance for business

Tools and analysis are being developed to help members understand likely EPR cost impacts and how different packaging choices affect fees and outcomes over time.

EPR fee methodology

APCO will build on the EPR fee model presented in the consultation program and develop an effective EPR fee methodology that has integrity and can adapt to changing regulatory and target settings.

SPSA Partnership

APCO has signed a Letter of Intent with SPSA to support an industry-led soft plastics stewardship pathway. Work is underway to align data, billing and participation settings so members can choose to participate via APCO.

Members will receive clear guidance on how to opt in, what data is required and how participation links to broader EPR expectations and future regulation.

Polypropylene food pails recovery

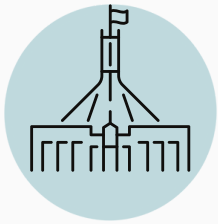
APCO is assessing the viability of a pilot to recover B2B polypropylene food service pails in partnership with industry. Logistics mapping and system investigation are underway to understand the collection pathways and partnerships required.

Members involved with this packaging format will be invited to register their interest in the pilot. Insights will inform future stewardship models and guidance for similar B2B applications.

4. EPR and soft plastic stewardship (continued)

Global Stewardship Playbook webinar series (with SPSA)

The Global Stewardship Playbook is a seven-part webinar series led by SPSA with APCO, One Planet Consulting and The Packaging Forum (NZ), sharing European producer-responsibility experience. Members can register to hear directly from leading European schemes and learn from their stewardship approaches.



5. Government Relations

We are strengthening APCO's voice with governments, so member priorities are clearly understood and reflected in future policy and regulation.

Ministerial letter on packaging reform

APCO will draft a ministerial letter on packaging reform for members to review, endorse and co-sign, presenting a clear, united industry position to government.

Brand owner and government meetings

Work is underway to create more direct engagement between brand owners and key government decision-makers through targeted meetings and briefings. Members will be invited to join delegations, provide case studies and data, help shape key messages, and receive summaries and next steps so they can see how their input is influencing the agenda.

Ongoing policy engagement and submissions

APCO works with federal, state and territory governments on packaging and recycling policy through submissions, consultations and advisory forums. Members will be invited to provide input on key positions and kept informed of outcomes via briefings and updates.

5. Government Relations (continued)

Compliance Project with state EPAs

APCO is working with key state EPAs to design and test a joint compliance model to strengthen Covenant enforcement, increase brand owner participation and build confidence in the national co-regulatory framework. Members will be kept informed and benefit from a more consistent, efficient compliance approach that reduces free-rider risk and supports a stronger national regulatory system. Opportunities for direct participation will be shared as the project is scoped.

Advancing Plastics Recycling in Australia (APRA) with ACOR

To support the important role that domestic recyclers have in delivering circular outcomes for members packaging, APCO is partnering with the Australian Council of Recyclers (ACOR) on the Advancing Plastics Recycling in Australia (APRA) project. This work analyses how export bans, historic low virgin plastic resin prices and regulatory uncertainty are affecting domestic recyclers and evaluates policy options for government. A final report will recommend priority actions to support a viable domestic plastics recycling industry.

Members insights will be used to inform the findings enabling industry to use the outcomes to support their own policy engagement.



YOUR VOICE IN THE ROOM



As Australia's packaging system shifts, APCO is reshaping how we support our members. A key part of this transition is the creation of a dedicated Member Engagement Manager, a tangible step in our commitment to being consistently member value driven in how we plan, deliver, evolve, and report on our work.

The Member Engagement Manager, will represent the member perspective within APCO, ensuring your needs, challenges and ideas are reflected in our priorities, programs and deliverables.

The role has been designed to strengthen proactive engagement with members, ensuring APCO listens and responds consistently between our formal forums of engagement. The Member Engagement Manager works across APCO's programs to:

- Make it easier to access the right support at the right time.
- Bring member insights directly into APCO planning and decision-making.
- Maintain a clear feedback loop that demonstrates how member input informs APCO's actions and priorities.
- Promote opportunities for recognition and involvement in APCO-led case studies, events and initiatives.

You can contact the Member Engagement Manager, for general enquiries about getting more value from your APCO membership, mapping out how APCO can support your business over the year, and providing candid feedback on what is working and what you need next.

MemberEngagementManager@packagingcovenant.org.au



DATA THAT UNDERPINS OUR DIRECTION

To support clearer decisions and credible stewardship, APCO releases the Australian Packaging Consumption & Recovery Data 2023-24 report, providing a national view of packaging flows – what is being placed on market, how much is recovered, how much recycled content is being used, and where recycling potential is strong or weak. In 2023-24, the data shows packaging placed on market (POM) was 6.84 million tonnes, with a 59% recovery rate, and 86% of packaging classified as having good recycling potential, with plastics remaining a key challenge.

This publication is a core input to our standards, guidance and advocacy, and gives members a shared evidence base to benchmark progress and plan investments over the next 36 months.

[VIEW THE LATEST DATA](#)



NEW NATIONAL MATERIAL FACTSHEETS

APCO has developed a new suite of 2023–2024 material factsheets that bring together the latest data on packaging production, use and recovery for paper and paperboard, glass, metals, plastics (rigid and flexible) and wood. Each factsheet gives a clear snapshot of how that material is performing in the Australian system, including tonnes placed on market, recovery rates, recycling potential, reprocessing capacity, recycled content and key trends over time.

Together, the factsheets show where the system is working well, such as strong recovery and recycled content for materials like glass and paper and paperboard, and where more focus is needed, particularly for plastics. They are designed to help members brief internal teams, inform packaging design and procurement, support reporting, and guide conversations with customers, suppliers and governments as we move towards a more circular packaging system.

[VIEW THE LATEST DATA](#)



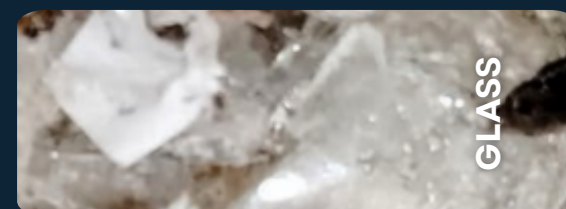
RIGID
PLASTIC



FLEXIBLE
PLASTIC



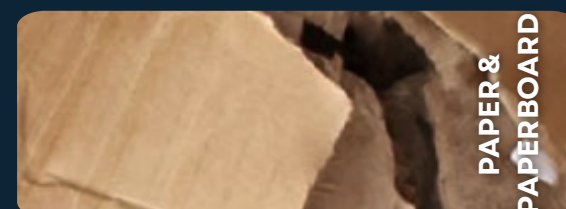
METAL



GLASS



WOOD



PAPER &
PAPERBOARD

YOUR APCO SUPPORT TEAM

APCO@APCO.ORG.AU ✉

(02) 8381 3700 📞

MEMBER SERVICES AND COMPLIANCE

- General enquiries about membership and obligations.
- General enquiries and reporting support.
- Questions about reporting requirements and due dates.
- Help with the Reporting Tool, PMU or OCT.
- Clarifying processes if you are running behind or unsure what to do next.

TOOLS TO SUPPORT ANNUAL REPORTING

To make APCO Annual Reporting simpler and more consistent, members have access to a suite of practical tools and guides, including the Brand Owner Welcome Pack, Sustainable Packaging Guidelines, Quick Start Guides, checklists, templates, Excel planners and online training. If you would like any assistance using these tools, please contact our Member Services team.

ARL PROGRAM SUPPORT

- General enquiries on labelling and ARL reporting
- Joining the ARL Program and understanding eligibility
- ARL artwork questions and “right label, right place” guidance
- PREP and ARL competency training



EXPERT SUPPORT FROM APCO PACKAGING TECHNOLOGISTS

- Applying the Sustainable Packaging Guidelines (SPGs)
- PFAS, compostability and reusable packaging queries
- Input into technical guidance and standards
- Technical and design support – MSCs and packaging technologists
- Detailed packaging design and recyclability questions



THANK YOU

Thank you to our members, stakeholders and partners for your commitment to improving Australia's packaging system. Your data, insights and contributions through consultations, reporting, working groups and day-to-day conversations have directly shaped this Business Plan and the work APCO will deliver in the years ahead.

We value the time and effort it takes to stay engaged and do not take your support for granted. We look forward to continuing to work with you to build a more consistent, effective and circular packaging system for Australia.



Every step we take now
builds a cleaner, smarter
packaging future for the
next generation.

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