

FROM INSIGHT TO IMPLEMENTATION

Shaping Australia's Packaging Future

Australia's packaging system is in a period of transition and opportunity.

Packaging reform remains a work in progress. Shifting markets, evolving policy settings and rising community expectations mean the way we design, recover and recycle packaging must continue to evolve, and industry must lead that change.

In 2022–23, APCO's review of the 2025 National Packaging Targets (NPTs) revealed both progress and persistent gaps: structural, economic and systemic.

To shape the next phase, APCO consulted widely between March and May 2025 to strengthen Australia's Extended Producer Responsibility (EPR) approach for packaging under the existing NEPM and Covenant framework.

Consultation at a Glance



550+ participants at three nationwide Town Hall events



210+ survey respondents, incl. large industry members (>\$100m revenue)



30+ structured interviews with system operators, brand owners and government representatives

Industry needs a nationally consistent, practical, fair and credible packaging system, one that delivers the intent of the NEPM while protecting brand owners' revenue, reputation and right to operate.



APCO's role is to connect Australia's packaging system, bringing together industry, governments and the community to enable coordinated, practical and measurable solutions.

A consistent national framework delivers clarity and efficiency, reducing red tape, duplication and cost.

By connecting systems and driving national consistency, APCO protects business from unnecessary complexity and ensures packaging policy supports both environmental outcomes and commercial performance.

THE YEAR AHEAD

FY26 is about visible progress. Providing direction, support and confidence in an evolving policy environment.

MEMBER FEEDBACK IDENTIFIED THREE PRIORITIES TO GUIDE OUR WORK:

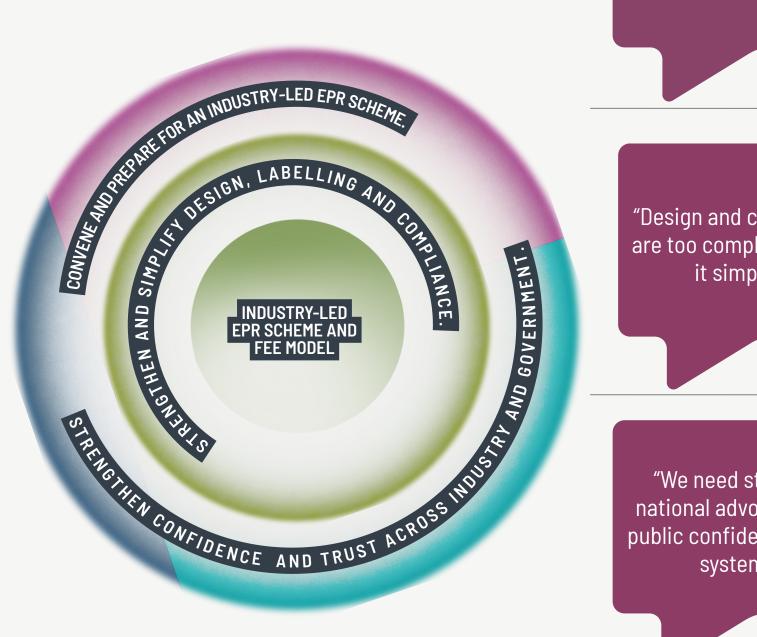
Convene and prepare for an industry-led EPR scheme.

Strengthen and simplify design, labelling and compliance.

Strengthen confidence and trust across industry and government.

UNDERPINNED BY REGULATORY CERTAINTY

FROM INSIGHT TO IMPACT. **SHAPING THE SYSTEM** TOGETHER.



Focus Areas for **System Change**

PACKAGING DESIGN

ARL

ANNUAL REPORTING AND DATA

EPR (FOCUSED ON SOFT PLASTICS)

GOVERNMENT RELATIONS

"We need a clear pathway to an industryled EPR scheme."

- Developing an EPR modelling tool and fee methodology that enables scenario planning for future costs, while maintaining integrity and remaining adaptable to evolving regulatory and target settings.
- Launching a Stewardship Assurance Framework to strengthen accountability and national alignment.
- Partnering with SPSA to advance industry readiness and leadership on EPR.

We're proving that industry can lead, building confidence and protecting you from fragmented state regulation.

"Design and compliance are too complex — make it simpler."

- Introducing simpler templates, integrated dashboards and a refreshed website to centralise tools and member reporting.
- Updating the Sustainable Packaging Guidelines (SPGs) to provide clearer, more practical tools and enable alignment with future national design standards.

Saving you time, reducing duplication and making it easier to comply with confidence.

"We need stronger national advocacy and public confidence in the system."

- Future proofing the ARL label to align with global best practice and launching a national consumer awareness campaign.
- Implementing a government engagement framework to advocate for consistent, industry-led reform.

Protecting your brand, building consumer trust and ensuring one national voice on packaging policy.

FY26-FY28 DELIVERY & ENGAGEMENT TIMELINE









FY26 | RESET

- Effective EPR fee methodology developed that has integrity and can adapt to regulatory and target settings.
- EPR tool scoped and designed for scenario testing; Stewardship Assurance Framework developed (concept stage).
- Strengthened compliance and participation activities to protect members and support fair, nationally consistent enforcement.
- ARL alignment with global best practice and strengthened governance. Consumer awareness campaign launched via social media.
- Convene industry on agreed positions to assist the government advance regulatory reform.
- Updated SPGs released for testing, preparing industry for eco-modulation and future obligations.
- SPSA partnership announced, demonstrating industry-led EPR in action.
- Test SPG usability via surveys and workshops.
- Provide feedback on the EPR tool and reporting templates.
- Nominate representatives for advocacy working groups and forums.
- Contribute priorities to the national advocacy framework and align plans with FY27.

FY27 | SCALE

- Refreshed SPGs embedded across industry design processes and Material Pathway Plans scaled across key materials.
- National consumer awareness campaign launched; ARL recognised as Australia's trusted label.
- Enhanced data platform live, with improved analytics and compliance validation.
- Assist states and territories to leverage programs that deliver jurisdictional outcomes that are nationally aligned.
- Support SPSA activation and expand producer engagement under the Stewardship Assurance Framework to support alignment with national system objectives towards a circular economy for packaging.

FY28 | DELIVER

SUBJECT TO REGULATORY CERTAINTY

- Stewardship Assurance Framework scaled and embedded across EPR initiatives.
- SPGs formally adopted as national design standard underpinning EPR.
- ARL integrated into national policy as the preferred evidence-based labelling program.
- Regulation-ready data platform delivers verified metrics and benchmarking reports.
- Final steps in place to enable a smooth transition to the new regulatory framework.
- First Regulation Readiness Report published to demonstrate member impact and compliance leadership.

- Participate in and contribute to SPSA via APCO's billing and data management systems, ensuring SPSA-led scheme fees and reporting are not duplicated for participating APCO members.

- Apply SPGs to portfolio design and share results and case studies.
- Use APCO's EPR tool to estimate potential impacts on your packaging portfolio and take action.
- Align internal systems for accurate reporting and benchmarking.
- Amplify ARL campaign through brand channels.
- Join Member Reference Groups to help shape key policies and practices impacting issues like data, reporting, EPR fee methodologies, design and materials.

- Submit verified data through new reporting systems.
- Demonstrate EPR readiness and improved recyclability outcomes across portfolios.
- Adopt national design and labelling standards across packaging
- Showcase impact case studies in APCO's Regulation Readiness Report and other advocacy materials.
- Engage in FY29 policy expansion consultations and provide evidence-based feedback.

Strengthen foundations.

Clarity, consistency and trust.

Embed change.

Scale systems and build capability for the future.

Deliver outcomes.

Proving industry capability and readiness to operate within a strengthened regulatory framework.

ACCOUNTABILITY & FEEDBACK

CLOSING THE LOOP. ON PACKAGING AND ON PROGRESS.

MECHANISM	PURPOSE	FREQUENCY
Quarterly Member Feedback Survey*	Measure satisfaction, value delivery and confidence in APCO's progress.	Quarterly
APCO Annual Report	Publicly report progress against strategic priorities, member outcomes and national packaging targets.	Annually
Collective Action Group	Provide C-suite and government oversight to shape a strengthened EPR approach and guide system-wide packaging solutions.	Linked to milestones
Material Stewardship Committees	Validate and guide material-specific actions that advance circularity and improve packaging design, recovery and labelling (including ARL).	Linked to milestones
Member Reference Groups**	Co-design and review initiatives to ensure delivery reflects member needs and industry realities.	Bi-Monthly
Policy & Reform Roundtables (EPR & Government Relations)	Joint engagement with members and governments to guide advocacy and regulatory alignment.	Linked to milestones
Reporting Feedback Snapshot	To capture quick member feedback on the annual reporting experience and improve future reporting and support.	Annually
The APCO Member Portal (Online)	Central access to tools, dashboards, resources and feedback channels.	Continuous

^{*}The Quarterly Member Feedback Survey will be newly redesigned to include a Net Promoter Score (NPS).

FROM INSIGHT TO IMPACT

Over the past year, we've listened carefully.
You asked for clarity, confidence and real progress on the priorities that matter most to industry.

That's what our FY26 business plan delivers.

We bring together industry, government and community, turning policy ambition into practical outcomes that strengthen stewardship and protect business performance.

FY26 is about results:

- Simplifying packaging design and reporting.
- Future proofing the ARL to protect brands and build trust.
- Leading on soft plastics through partnership with SPSA.
- Building the evidence base for a fair, nationally consistent framework.

Our role is to make stewardship work, for business, for government, and for the environment.

Over the next three years we will be strengthening alignment, demonstrating outcomes, building confidence, and showing that industry can lead lasting change.

From insight to impact. Shaping Australia's packaging future, together.



Chris Foley | CEO

^{**}Member Reference Groups are a new initiative introduced in FY26

APPENDIX | FY26 SUMMARISED

PACKAGING DESIGN

- Updated Sustainable Packaging Guidelines (SPGs): Clear, practical tools aligned with emerging National design standards to simplify compliance and anticipate EPR settings.
- National design standards advocacy: Using industry data to shape realistic, mandated standards that reflect business conditions.
- Material pathway insights: New recovery data and pilots for fibre, soft plastics, and carton board.
- Technical member support: Access to APCO technologists for PFAS, compostables and recyclability guidance.
- Policy and market development: Advocating for harmonised packaging and domestic recycling investment.

Clearer design rules • Reduced compliance risk • Real data-driven decisions

ARL

- Future-Proofed ARL framework: Aligned with global best practice and strengthened governance.
- Enhanced guidance and streamlined approvals: Faster, clearer assessment pathways and updated technical advice.
- National consumer awareness campaign: Educating Australians to recycle with confidence and strengthen trust in member brands.
- Member training and support: Practical sessions to embed the updated framework across packaging teams.

Brand protection • Global credibility • Public trust in sustainability claims

ANNUAL REPORTING AND DATA

• Advancing a simplified Annual Reporting Template and supporting tools to deliver clearer, easier-to-understand reporting with reduced duplication.

- Refreshed website: Centralised access to reporting tools, guidance and dashboards.
- Data governance improvements: Strengthened integrity and transparency in data management.

Easier reporting • Time saved • Better insights • Reliable evidence base

EPR (FOCUSED ON SOFT PLASTICS)

- Effective EPR fee methodology developed that has integrity and can adapt to regulatory and target settings.
- Member Engagement Program: Readiness sessions and data collection to inform EPR design and participation.
- SPSA partnership: Demonstrating an industry-led model for soft plastics recovery and EPR in action.

- EPR tool: A tool for members to model future scenarios, fees and cost impacts.
- Stewardship Assurance Framework: Defining accountability, consistency and confidence across programs.
- Evidence Base for EPR Design: Data-driven analysis to shape national policy and future obligations.

Policy influence • Cost clarity • Reform readiness • Proof of industry leadership

GOVERNMENT RELATIONS

- Government Engagement Framework: Coordinated national advocacy approach to unify industry representation and avoid fragmentation.
- Member-Led Advocacy Forums: Direct engagement with government to align reform priorities and share evidence from members.

- Final steps in place to enable a smooth transition to the new regulatory framework.
- Policy submissions and alignment statements: Evidence-based contributions to key regulatory decisions, grounded in member data and experience.

Unified advocacy • Policy certainty • Fair, practical regulation

