



AUSTRALIAN
**FOOD &
GROCERY**
COUNCIL

AFGC SUBMISSION

*20-YEAR WASTE AND RESOURCE
RECOVERY STRATEGY*

NEW SOUTH WALES | SEPTEMBER 2019

Sustaining Australia

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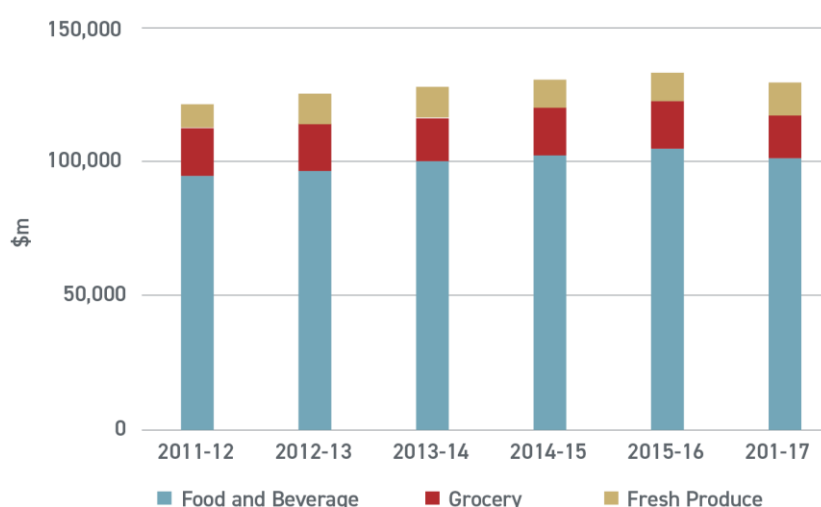
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1. AFGC OVERVIEW

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

The membership of AFGC comprises more than 180 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.

Figure 1.1: Composition of the defined industry's turnover (\$2016-17) (million)



With an annual turnover in the 2016-17 financial year of \$131.3 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity.

The diverse and sustainable industry is made up of over 36,086 businesses and accounts for over \$72.5 billion of the nation's international trade. These businesses range from some of the largest globally significant multinational companies to small and medium enterprises. Industry made \$2.9 billion in capital investment in 2016-17 on research and development.

Food, beverage and grocery manufacturing together forms Australia's largest manufacturing sector, representing 36 per cent of total manufacturing turnover in Australia.

The food and grocery manufacturing sector employs more than 324,450 Australians, representing almost 40 per cent of total manufacturing employment in Australia.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost 42 per cent of the total persons employed being in rural and regional Australia.

It is essential to the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

2. AFGC COMMITMENTS

COMMITMENT TO DEVELOPING A CIRCULAR ECONOMY

The Australian Food and Grocery Council (AFGC) believes the grocery industry's largest contribution to achieving the aims set out in the circular economy discussion paper are in the areas of food waste avoidance and packaging recycling within the municipal solid waste sector. To further increase diversion of waste from landfill, the AFGC will continue its collaborative working partnerships with the Commonwealth Department of Environment and Energy Food Waste Steering Committee, The Fight Food waste CRC, APCO and the Waste and Resource Recovery Industry with the aim of contributing to a local circular economy.

COMMITMENT TO THE NATIONAL PACKAGING TARGETS

In recent months, many of our members have made commitments to the National Packaging Targets as well as New Plastics Economy Global Commitment¹ supporting the Ellen MacArthur Foundation (EMF) in collaboration with the United Nations Environment Programme. We believe this highlights the food and grocery industry's commitment to increased recyclability and recycled content of packaging to stimulate a circular economy. While these larger companies take a global leadership position we understand that not all local manufacturers have the product mix, financial capability or resources to move as quickly and urge the Government to take this into consideration in the development of the circular economy policy.

COMMITMENT TO INCREASING LANDFILL DIVERSION

Further to supporting the development a circular economy, food and grocery manufacturers have implemented strategies and action plans to increase the landfill diversion at manufacturing facilities across the nation. The results published in manufacturer Annual Sustainability Reports highlight companies are **achieving national diversion rates up to 96.5² per cent, with many individual facilities achieving 100 per cent diversion in 2017.**

COMMITMENT TO PRODUCT SAFETY AND REDUCING FOOD WASTE

Members advise that a barrier to increasing the recycled content of packaging to create demand in a circular economy is partially due to a current lack of availability of fit for purpose food grade recycled packaging material. As recycled material has been exported to Asia for processing over the last 10-20 years, there are few remaining local packaging companies providing material with high recycled content. In short, demand for fit for purpose recycled packaging material currently exceeds supply and we believe investment in local secondary recycling processing should be prioritised over EfW infrastructure to avoid recyclable material be used as fuel versus supplying a circular economy .

COMMITMENT TO LOCAL MANUFACTURING AND EMPLOYMENT

As local food and grocery manufacturers are facing unprecedented rising electricity, gas and trade spend costs in a market where it is difficult to pass on cost increases to the retail sector, our members caution the Government on implementing policies that may result in negative unintended consequences. Securing the supply and local processing of recyclable material will increase supply to meet demand and minimise prices for industry and the community in the long term.

¹ <http://www.packagingnews.com.au/sustainability/industry-giants-pledge-plastic-pollution-crackdown>

² Confidential information available upon request

3. EXECUTIVE SUMMARY

The AFGC appreciates the opportunity to provide input to the NSW Government's 20-year Waste and Resource Recovery Strategy and supports the long-term vision for reducing waste and driving sustainable recycling markets, with consumers at the centre of waste service design.

Due to the recent reduction of Asian recycling markets and the pending restrictions to the exportation of mixed plastics, glass, rubber and paper under the COAG agreement, we recommend that particular focus and investment be made on plastics secondary processing. Specifically, we believe that local processing infrastructure is required to produce food grade rPET, rHDPE and chemically recycle plastics #3-7 and/or increased usage of soft plastics in roads. This investment would increase recycling rates, recycled content in packaging driving a circular economy.

Additionally, the AFGC recommends the NSW Government consider introducing separate glass or paper kerbside collections. As glass fragments embed in paper and cardboard and MRF glass contains paper fragments, the quality of both commodities is downgraded and devalued. As together they account for 70-75% of commingled collection material, separating glass or paper will dramatically increase the quality and value of the material and reduce pressure to stockpile low grade materials. Again, this will increase recycling rates, enable increased recycled content in packaging and drive a circular economy.

To support the implementation of the above infrastructure the AFGC believes the following key enablers are required. Firstly, a whole of supply chain approach is required, with collaboration between all levels of government and jurisdictions, APCO, and all stakeholders along the packaging supply chain from packaging companies, brand owners, retailers, collectors, MRF's to secondary processors. This will ensure that a coordinated action plan is agreed and supported by complementary investments in infrastructure, versus separate industries moving in opposing directions.

Secondly, minimum MRF standards are required to establish a national acceptable product list so that brand owners can confidently design products that can be recycled in all MRF's. Similarly, minimum quality standards for sorted MRF material would produce consistently high quality outputs from all MRF's for recycling in secondary processing facilities, again reducing stockpiling pressures.

Thirdly, community education to reduce contamination is essential; however, we recognise considerable behaviour change is required in this space. As brand owners have expertise in developing marketing and educational campaigns designed to change consumer behaviour we wish to collaborate and share our industries consumer behaviour expertise.

Finally, to provide industry with the confidence to invest in recycling infrastructure, the AFGC believes a waste to energy policy framework must be developed. Industry is unlikely to invest while there is risk waste to energy facilities may be built in the future consuming recycling feedstock. A waste to energy policy framework would eliminate this risk and provide industry with confidence to invest in recycling infrastructure.

4. SCOPE

Due to the broad nature of the 20-year Waste and Resource Recovery Strategy the AFGC submission is limited to the following relevant input areas:

1. Container deposit scheme (CDS),
2. Circular economy development,
3. Energy from waste (EfW), and
4. Unnecessary and problematic single use plastics.

As the Minister has raised specific questions in the on-line questionnaire, the AFGC has endeavoured to answer these within each of the above focus areas. To enable the reader to quickly review the following content and focus on areas of interest, the responses have been tabulated, with the first column answering questions 1 and 2:

1. What are the key issues facing the NSW waste system?
2. What are the main barriers to improving the NSW waste system?

The right hand column provides recommendations in response to questions 3 to 5:

3. How can we best reduce waste?
4. How can we recycle better?
5. What are the main opportunities for improving the NSW waste system?

5. RESPONSE TO DISCUSSION PAPER

5.1 CONTAINER DEPOSIT SCHEME

The AFGC is supportive of the NSW Return and Earn Container Deposit Scheme (CDS) and its impact on reducing litter and increasing the quality of recyclate. As the scheme is funded by many of our members we wish to ensure the scheme is well run to reduce the cost to the community. Therefore, please find below several areas we believe could be reviewed to increase the positive community outcomes.

Issues and barriers	Opportunities to improve recycling
<ol style="list-style-type: none"> 1. What are the key issues facing the NSW waste system? 2. What are the main barriers to improving the NSW waste system? 	<ol style="list-style-type: none"> 3. How can we best reduce waste? 4. How can we recycle better? 5. What are the main opportunities for improving the NSW waste system?
<p>Low comparative redemption rate The current redemption rate is comparatively lower than that of other jurisdictions that have exceeded or achieved similar redemption rates in shorter periods of time</p>	<p>Increased collection point choice The AFGC understands that state specific demographic and geographic idiosyncrasies such as high population density, traffic conditions and access to low cost sites in urban areas can result in variances between the states. However, from experience in other jurisdictions increasing the collection point options has proven popular with the community and enhanced redemption rates. The AFGC recommends NSW consider the inclusion of collection depots and bag drop facilities in the scheme in coming years to increase community engagement in the scheme.</p>
<p>Lack of competition and collection options In the current NSW CDS there is a lack of competition for CDS collection sites and a lack of collection options for NSW residents versus those in other jurisdictions.</p>	
<p>Commingling of collected recyclables The AFGC understands that plastic, glass and aluminium containers are being commingled when collected in regional NSW. Whilst we understand this provides collection efficiencies, it also results in low grade recyclables being delivered for recycling. Essentially, this replicates kerbside collection methods and results in similar low material quality outcomes.</p>	<p>Separated collections To maximise recycling rates, the AFGC recommends that glass, plastic and aluminium are collected separately to maximise material quality, commodity values and ultimately recycling rates.</p> <p>Additionally, the AFGC believes there is an urgent need for investment in local rPET and rHDPE recycling facilities to produce high quality food grade packaging material, which will in turn increase recycling rates.</p> <p>Note: Greater detail is provided below in the Circular Economy section.</p>
<p>Low recycling rate Recent research undertaken by APCO has highlighted that actual plastic, glass and aluminium recycling rates are well below the redemption rates of the CDS, meaning not all material collected under the scheme is being recycled.</p>	

Issues and barriers	Opportunities to improve recycling
<p>Lack of competition for clean glass</p> <p>Currently there is a lack of competition for clean CDS glass in NSW. In competitive markets, clean CDS glass has a significantly higher value than MRF glass. However, in NSW, as supply exceeds demand and there is only one glass furnace, we are informed that CDS glass is being stockpiled due to low prices.</p>	<p>Exportation of beneficiated glass</p> <p>To restore competition to the NSW glass market, it would be advantageous to permit the exportation of colour sorted CDS glass or beneficiated MRF glass to allow clean high quality glass to be traded at competitive market rates. Additionally, this reduces the risk of stockpiling, increases revenue from the sale of the commodity and ultimately reduces scheme costs for the community.</p>
<p>National duplication</p> <p>Due to each jurisdiction operating independent schemes there is currently duplication across the states adding to the running costs of each scheme and ultimately creating an inflationary effect for consumers.</p>	<p>Scheme harmonisation</p> <p>The AFGC recommends that over time the following items be harmonised where possible:</p> <ul style="list-style-type: none"> • Aim of scheme – Litter or litter and recycling • Product ranges • Rules & regulations – First supplier definition, MRF protocols, Interstate Export protocols, Audit protocols • Payment options for consumers. Accounts and invoicing for brand owners • Single national product database • Scheme management, auditing, accounting, invoicing • Marketing of collected materials • Scheme name to enable national promotion and advertising
<p>Lack of protection for suppliers with retailers refusing to pay scheme costs</p> <p>In recent months, it has been reported to the AFGC that some retail customers are refusing to reimburse first suppliers for scheme costs. While this is currently limited, it highlights there is no protection for suppliers to ensure retailers reimburse suppliers for legitimate scheme costs.</p>	<p>Retailer Protocol</p> <p>The AFGC recommends that the EPA considering introducing a retailer protocol similar to the MRF protocol. This would provide protection to first suppliers as the MRF protocol does for MRF operators.</p>

5.2 CIRCULAR ECONOMY

The AFGC supports the development of a local circular economy and the implementation of the Prime Ministers and Premiers commitment to ban the export of recycled plastic, paper, rubber and glass. To assist in the development of the circular economy, brand owners are currently reviewing and redesigning their product packaging in order to achieve the National Packaging Targets. However, several barriers have been identified that are currently impeding brand owners initiatives to achieve the targets and develop a circular economy. These are detailed below with recommendations provided to assist overcoming the present barriers.

Issues and barriers	Opportunities to improve recycling
<p>Food Waste</p> <p>Despite often being over shadowed by reports on global recycling issues, organics diversion from landfill remains one of NSW's largest opportunities to increasing landfill diversion.</p> <p>As a member of the National Food Waste Steering Committee, the AFGC is aware that the greatest opportunity is to increase the diversion of household food and organic waste from landfill. The current barrier to achieving this is a lack of organics processing infrastructure within the state.</p>	<p>Fast-track FOGO</p> <p>To increase the diversion of food organics from landfill, the AFGC recommends the NSW EPA fast-track its current investment in organics processing infrastructure supported by household collections across the state.</p> <p>Once established in local council areas, the economies of scale will enable the business community to increase its participation in food waste collections diverting additional organic material from landfill.</p>
<p>Lack of quality recycling materials</p> <p>The reliance on China to accept and process contaminated Australian recyclate for the last 10-20 years that culminated in the introduction of the National Sword policy, now presents Australia with the same processing dilemma. How do we process contaminated recyclate?</p>	<p>Increase MRF sorting capability</p> <p>The pathway to increasing the quality of Australian recycling and hence the recycling rate has two key steps:</p> <ol style="list-style-type: none"> 1. Establish minimum national MRF product acceptance. By establishing a mandatory minimum level of acceptable items/materials in MRF's nationwide would allow brand owners to design products with confidence in recycling labelling and reduce the use of materials currently contaminating commingled recycling. 2. Increase MRF sorting capability. Creating a minimum quality standard of sorted materials would ensure the output of high quality material. For example, this may include specifications such as all PET, HDPE plastic must be separated from mixed plastics which would enable local reprocessing and support the ban of plastic exports.

Issues and barriers	Opportunities to improve recycling
<p>Low recycled content in glass</p> <p>Currently the contamination in kerbside glass is preventing higher recycled content levels. In Australia, the recycled content in glass is reported to be approximately 25-30%, whereas in New Zealand, where glass is collected separately, the reported recycled content can be as high as 70-75%. The economic effect is the glass is devalued.</p> <p>Similarly, the cross contamination of glass embedded in paper, reduces the quality, value and recycling rates of paper.</p>	<p>Source separate paper or glass</p> <p>In order to reduce the contamination found in kerbside commingled recycling, the AFGC understands it would be beneficial to introduce a 4th bin to collect either the paper or glass. We are informed there is a greater economic incentive to source separate paper as it would benefit from the greatest increase in value as there is greater competition for paper in the Australian market, whereas there are limited local purchasers of glass.</p> <p>As the volume of materials being collected would remain unchanged, we recommend a 4 bin, 3 truck system to minimise collection costs. This could be achieved via alternate fortnightly collections of recycling. For instance, paper could be collected on week 1, with all other recycling collected on week 3.</p> <p>The only additional cost would be the 4th bin, which at approximately \$45 amortised over 25 years use, would be offset by the increase in glass and paper values.</p>
<p>Lack of availability of recycled plastics</p> <p>Currently, our members are reporting a severe shortage of local recycled food grade plastic. Due to this, our members are reliant on imported recycled packaging to achieve the National Packaging Targets</p>	<p>Invest in plastic processing infrastructure</p> <p>Due to the shortage of local recycled content, the AFGC recommend investment in the following plastics processing infrastructure:</p> <ol style="list-style-type: none"> 1. rPET food grade processing 2. rHDPE food grade processing 3. AWT for plastics #3-7 <p>The AWT for plastics #3-7 could include the use of end of life plastics in roads or railway sleepers as being trialled in other jurisdictions. Alternatively, the commercialisation of chemical recycling to convert end of life plastics to oil for use in manufacturing new items would dramatically increase the plastic recycling rate and stimulate a circular economy.</p>

Issues and barriers	Opportunities to improve recycling
<p>Lack of traceability of recycling</p> <p>Currently there is limited traceability of recyclate once it is exported. This provides a major barrier for brand owners to purchase recycled material due to risks of:</p> <ol style="list-style-type: none"> 1. Child labour in foreign sorting facilities that contravene of the Modern Slavery Act, 2. Lack of confidence in reported recycled content percentages. Therefore, brand owners are unable to report against the National Packaging Targets or include recycled content percentage claims on pack. 	<p>Mandate traceability of all recyclate</p> <p>As it is compulsory under the Food Standards Code for brand owners to be able to trace food ingredients from the packet back to the source of supply (farm), tracing recyclate from MRF to new packet must also be compulsory.</p> <p>Without this traceability, the local utilisation of recycled content will be stifled, hindering brand owner demand and ultimately the development of a circular economy.</p>
<p>Imbalance between supply and demand</p> <p>Due to the current lack of availability of local packaging with high levels of recycled content, demand far exceeds supply, creating a sellers' market with high pricing.</p> <p>The high pricing creates a barrier for brand owners to purchase local materials, especially in a duopoly controlled market where price rises are difficult/rare to obtain. In the case where a price rise is accepted and it is passed onto the consumer as a higher retail price, this presents a barrier to consumer purchase, hence limiting product demand through the entire supply chain.</p> <p>In short, the imbalance between supply and demand is a massive barrier to developing a circular economy.</p>	<p>Phased incentives</p> <p>To overcome the barriers created by the supply and demand imbalance, the AFGC recommends the introduction of 3 phases of incentives:</p> <ol style="list-style-type: none"> 1. R&D incentives to assist brand owners covers costs incurred in redesigning packaging and/or packaging plant and equipment 2. Capital incentives for brand owners who need to modify or replace existing packaging plant and equipment to facilitate a change in packaging materials. 3. Price subsidies to reduce the inflated cost of recycled packaging to parity with standard packaging until supply and demand are in balance. <p>We believe these three phases will support brand owners through this process and ultimately hasten the development of a circular economy.</p>

5.3 ENERGY FROM WASTE

The AFGC supports the introduction the development of an Energy from Waste (EfW) policy framework, as this will provide industry with clarity, certainty and therefore confidence to invest in recycling and resource recovery infrastructure knowing that minimum feedstock volumes underpinning capital investments are secure.

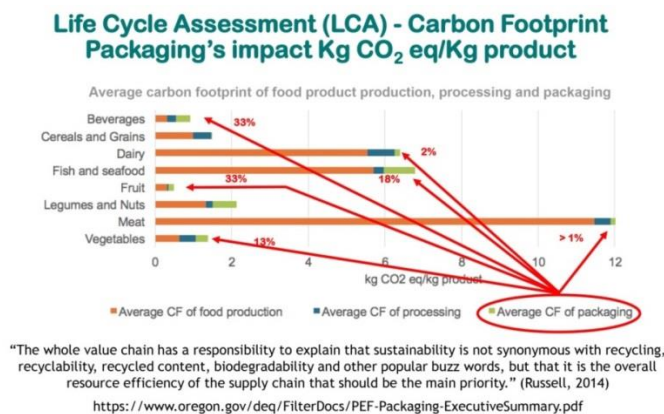
Issues and barriers	Opportunities to improve recycling
<p>No Energy from waste policy framework As detailed above in the Circular Economy section, there is currently a lack of secondary processing infrastructure within Australia. The absence of a clear EfW policy framework that prioritises recycling over EfW creates investment uncertainty as investors cannot accurately forecast the available recycling feed stock in the medium to long term.</p> <p>The recent COAG announcement that all exports of waste plastic, paper, glass and rubber will be banned in the coming years, highlights the need to develop secondary recycling processing infrastructure in Australia prior to the construction of EfW facilities. The lack of secondary recycling infrastructure may heighten the risk that unscrupulous operators seek to incinerate difficult to recycle materials rather than process them locally.</p>	<p>Energy from waste policy framework A NSW EfW policy framework that restricts EfW to end of life material only will provide industry with clarity, certainty and therefore confidence to invest in mechanical or chemical recycling and resource recovery infrastructure knowing that minimum feedstock volumes underpinning capital investments are secure.</p>
<p>Chemical recycling classification As detailed above in the circular economy section, there is currently a lack of processing options for plastics #3-7. The AFGC understands that chemical recycling innovations are currently being stifled due to the uncertainty surrounding the classification of the technology and the lack of a clear innovation pathway.</p>	<p>Chemical recycling classified as recycling The AFGC supports the inclusion of chemical recycling as a potential solution to maximise the value and recycling rate of plastics #3-7. The AFGC believes chemical recycling should not be classified as EfW but as recycling in cases where the process produces oil that can be utilised to remanufacture new items.</p>

5.4 UNNECESSARY AND PROBLEMATIC SINGLE USE PLASTICS

The AFGC and our members are committed to achieving the National Packaging Targets including phasing out unnecessary and problematic single-use plastics (SUP) to reduce the environmental impacts of irresponsible littering are keen to collaborate with the Minister.

The food and grocery industry believes any proposed action to reduce the impacts of unnecessary and problematic single-use plastics requires an evidence based assessment process to deliver overall environmental and community benefits and ensure perverse outcomes are avoided. Considerations include:

1. Ensuring clarity of policy aims. Is the aim to reduce the impacts of marine litter, terrestrial litter or increase recycling as each aim requires unique actions, collection systems and substitute products.
2. Ensuring food safety, consumer safety or product hygiene are not compromised by using packaging with inferior air and moisture barrier properties.
3. Ensuring environmentally superior substitutes and collection systems are available. Manufacturers and retailers need to assess the whole of life cycle environmental impact of packaging from manufacturing to disposal ensuring product substitutes have a lower overall impact on the environment including access to the relevant collection and processing.
4. Ensuring food waste does not increase.



The adjacent diagram highlights the energy consumed in the food production supply chain from farm to fork and that the greatest carbon impact occurs during the agricultural stage.

Hence, brand owners need to be conscious of increasing food waste by choosing packaging that inadvertently shortens the product shelf life and increases food waste.

5. Ensuring access to services for all Australians so that disadvantaged groups are not discriminated against.

The AFGC also recommends that a nationally consistent list of unnecessary and problematic single-use plastic items is developed to provide industry with certainty, clarity and confidence to invest in selecting environmentally superior substitutes.

To assess many of the above considerations, the AFGC, in collaboration with the NSW EPA, APCO, and National Retailers Association (NRA) is developing a project where a defined list of problematic single-use plastics will be phased out of all fast food and take-away outlets in a regional NSW town in order to measure the impacts on litter reduction and work through any in-store operational issues.

The AFGC recommends NSW collaborate with APCO as they lead the whole-of-supply-chain project to develop the National Waste Policy Implementation Action Plans that include plans to phase out problematic and unnecessary single use plastics by 2025.

6. KEY ENABLERS

In addition to the recommendations above, the AFGC believes the following key enablers are essential to achieving the National Packaging Targets and broader waste strategy objectives.

6.1 WHOLE OF SUPPLY CHAIN COLLABORATION

- a. Government:** Where practical, harmonise State Government policies to increase industry confidence, reduce barriers, provide scale and optimise triple bottom line outcomes, and
- b. Industry:** All Industry sectors including packaging, brand owners, retailers, collectors, MRFs and secondary processors, to collaborate with APCO to develop evidence based implementation action plans to support the National Waste Policy targets and milestones and to deliver beneficial triple bottom line outcomes.

The AFGC supports the current APCO projects which are assessing the current usage of packaging materials and mapping infrastructure capacity (Project 1.1 and 1.2) and assessing alternate collection systems and their impact on end markets (Project 1.3). Importantly, all developments in problematic packaging and processing need to be evaluated through a life cycle assessment (LCA) to ensure positive environmental outcomes (Project 9 and 11).

Once actions plans and recommended are developed for each material type, then the relevant changes to packaging, collection and/or processing can be researched and implemented with the necessary investments in infrastructure.

6.2 COMMUNITY EDUCATION

- a. Build perceived value prior to driving behaviour change:** The AFGC believes it is necessary to move from binary messaging (good and bad actions) to aspirational messaging to build perceived value in recycling and drive community behaviour change. As understanding consumer behaviour is a core skillset of brand owner marketing departments, the sector understands that to change consumer or community behaviour, you must first create perceived value of an item or, in this case, recycling. Simply informing householders of 'correct' and 'incorrect' actions (correct product in correct bin) does not build the perceived value of recycling and food waste. The AFGC is keen to collaborate with Government and the waste sector and share marketing expertise.
- b. National approach:** The AFGC recommends a national education campaign, like Life be in it, or Slip, slop, slap is required to build the community's perceived value of recycling and therefore drive community behaviour change. These campaigns were simple, consistent, memorable, and aspirational, hence increasing the community's perceived value and driving behaviour change.

7. SUMMARY OF RECOMMENDATIONS

The AFGC appreciates the opportunity to provide input to the NSW Government's 20-year Waste and Resource Recovery Strategy and supports the long-term vision for reducing waste and driving sustainable recycling markets, with consumers at the centre of waste service design.

As AFGC members support the development of a circular economy and have embraced the National Packaging Targets, securing high quality food grade recycled packaging must be prioritised over EfW. We believe an efficient and cost effective CDS supports a local circular economy by providing clean uncontaminated recyclate while simultaneously minimising litter. Similarly, phasing out problematic and unnecessary single use plastics will reduce the impact of irresponsible littering.

Thanks again for the opportunity to contribute to this discussion paper and I look forward to collaborating with the Ministers office at the upcoming round table discussions and workshops. Should you require any additional information, please do not hesitate to contact me on 0413 263 249 or barry.cosier@afgc.org.au

Regards



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