



Environmental Defenders Office

16 December 2022

Rami Greiss
Executive General Manager
Consumer and Fair Trading Division
ACCC
23 Marcus Clarke St
CANBERRA ACT 2601

By email: rami.greiss@accc.gov.au

Complaint about misleading Ocean Plastic labelling

1. We act for Tangaroa Blue Foundation. Tangaroa Blue Foundation is an Australia-wide not for profit organisation dedicated to removal and prevention of marine debris- one of the major environmental issues worldwide.
2. We write on behalf of Tangaroa Blue to request that you investigate various representations made by several companies in relation to products that state that they are made from '100% ocean plastic' or other similar claims in relation to ocean plastic. Details of the claims are set out below and in the Annexures.
3. Tangaroa Blue is concerned that the representations relating to ocean plastic are potentially misleading or deceptive when:
 - a. in the absence of a definition of 'ocean plastic', consumers are likely to assume that 'ocean plastic' is removed from the ocean whereas most 'ocean plastic' is not removed from ocean;
 - b. it is impossible to generate a plastic container made of 100% ocean plastic recycled feedstock
 - c. there is no evidence that recycling plastic that is removed from the ocean improves the marine environment
 - d. there is no evidence that recycling plastic that is removed from the ocean benefits marine life; and
 - e. There is no evidence that ocean bound plastic items recovered for processing into ocean bound plastic feedstock, would have ever ended up in the ocean during their lifecycle.

(Claims)

Tangaroa Blue is referring this matter to the Australian Competition and Consumer Commission (**ACCC**) for investigation because of your Compliance and Enforcement Priorities for 2022-2023 which includes "consumer and fair-trading issues in relation to environmental claims and sustainability". We note Delia Rickard, the ACCC Deputy Chair, emphasised the importance of this priority during a speech to the Sydney Morning Herald Sustainability Summit on 20 September 2022. She said, "False or misleading sustainability

claims undermine consumer trust in all green claims and reduces confidence in the market – something the ACCC is keen to guard against”¹

Representations

4. Several companies have made representations about the use of ‘100% ocean plastic’ in their products.
5. Moo Yoghurt made the following representations on its yoghurt tubs in relation to its packaging being ‘100% ocean plastic’.
 - a. “100% ocean plastic recycled tubs” with an image of a turtle below the text;
 - b. A trademark with the text ‘100% ocean plastic waste’ around a recycling sign with a wave in the middle;
 - c. “Each tub has saved the equivalent of 2 plastic bottles from the ocean- our tubs and lids are made from 100% ocean bound plastic”; and
 - d. “Every time you buy our delicious Australian yoghurt you actively remove plastic from oceans, beaches and ocean bound waterways”.

(Annexure A)

6. Moo Yoghurt made the following representations on its website:
 - a. “Using our ocean plastic tubs, we are on track to saving the equivalent of 439, 277 bottles of plastic bottles entering the ocean this year and helping transform the lives of those living in underprivileged coastal communities around the world;”² and
 - b. Moo Yoghurt uses tubs made from 100% ocean plastic washed up on beaches in Malaysia.³

7. Zero Co made the following representations about its packaging being ‘ocean plastic’ on its social media:
 - a. “Our dispensers are made from plastic waste removed from the ocean. So every hero who joins the Zero Co crew are literally funding real world ocean clean-ups. Our first order of Zero Co dispensers will remove 6,000 kgs of plastic from our oceans”; and
 - b. “One of our favourites is that each Zero Co dispenser is made from plastic rubbish that's been pulled out of the ocean. When you receive your bottles in October, you'll be able to find out which part of the ocean you've cleaned by entering the tracking code into the TRACE YOUR CLEAN-UPS section of the Zero Co website”.

(Annexure B)

8. Lo Bros made representations on its drinks packaging that drinks cans for its “not soda” product:
 - a. “Removes two x plastic bottles from our oceans”; and
 - b. “We’re on a mission to free our oceans of plastics bottles and hydrate everyone with tasty drinks just like this one!”

(Annexure C)

¹ <https://www.accc.gov.au/speech/speech-to-smh-sustainability-summit>

² Moo Premium Foods, accessible at: [Impact — Moo Premium Foods](#)

³ <https://www.packagingnews.com.au/latest/aussie-first-food-pack-from-100-ocean-bound-plastic>

9. There are several other companies promoting ‘100% ocean plastic’ including Better Packaging Co and Ocean Bound Plastics which prominently depict images of turtles in their marketing material and make similar representations about the benefits of ocean plastic to the marine environment.

(Annexure D)

10. The representations listed at [5]-[10] above carry the following imputations:

- a. that 100% ocean plastic is made entirely of recycled plastic recovered from the ocean;
- b. that purchasing ocean plastic products directly removes plastic from the ocean;
- c. that ocean plastic is a product that helps reduce marine plastic pollution worldwide;
- d. that purchasing ocean plastic products improves the marine environment; and
- e. that purchasing ocean plastic products reduces the impact of plastic pollution on marine life (such as turtles).

11. The representations are potentially misleading or deceptive for the reasons set out at [3] above.

Law on misleading or deceptive conduct

12. Section 18 of the *Australian Consumer Law* states:

A person must not, in trade or commerce, engage in conduct that is misleading or deceptive or is likely to mislead or deceive.

13. The representations are likely to also raise concerns about potential breaches of s29 of the ACL. Section 29 states:

(1) A person must not, in trade or commerce, in connection with the supply or possible supply of goods or services or in connection with the promotion by any means of the supply or use of goods or services:

(b) make a false or misleading representation that services are of a particular standard, quality, value or grade;

14. Conduct is misleading or deceptive or likely to mislead or deceive if “the impugned conduct viewed as a whole has a tendency to lead a person into error”.⁴ Courts have also looked at the general impression made by the representations. As Burley J said in *Homart Pharmaceuticals Pty Ltd v Careline Australia Pty Ltd* [2017] FCA 403, because misrepresentations focus is on the “overall impression”, it is erroneous and artificial to take an unduly analytical approach to the consideration of the question of the misrepresentation.⁵

15. The representations are potentially misleading because they provide the general impression that the product is made of ocean plastic when, for the reasons set out at [19]-[33] below, that

⁴ *Campbell v Backoffice Investments Pty Ltd* (2009) 238 CLR 304, 319 [25] (French CJ)

⁵ *Homart Pharmaceuticals Pty Ltd v Careline Australia Pty Ltd* [2017] FCA 403 at 188.

is not the case. All of the claims are what we would describe as headline claims on consumer products which increases the likelihood consumers are misled.

16. The ACCC Guide 'Green marketing and the Australian Consumer law' (**Guide**) states that there should be a good faith basis for making an environmental representation which may require scientific or test data.⁶ The Guide also says that pictures can be representations, and that environmental images may be capable of making a sweeping environmental claim of environmental benefit that may be misleading and says that claims using endorsement or certification should be used with caution.⁷ The Guide also discusses claims about recyclable products, although it does not directly address the issue of products that are claimed to be made from a '100% recycled ocean plastic' feedstock.⁸ This may be an issue the ACCC can consider in updating its Guide to address emerging environmental claims.
17. The audience for the representations relating to ocean plastic is a wide group of consumers, particularly those who are environmentally conscious and want to ensure their purchases are contributing to a sustainable marine environment. There is significant community awareness of the global environmental issues associated with marine pollution: there are around 14 million tons of plastic that end up in the ocean every year, and plastic makes up 80% of marine debris found in surface waters and deep sea beds,⁹ and the 'Great Pacific Garbage Patch' is a 1.6 million square kilometre of rubbish floating in the ocean, comprised of around 79,000 tonnes of plastic debris and 1.8 trillion plastic pieces, made from fishing nets and other plastic debris.¹⁰ The claims also target investors and potential investors in these companies.

Claim 1: In the absence of a definition of 'ocean plastic', consumers are likely to assume that 'ocean plastic' is removed from the ocean, whereas most 'ocean plastic' is not removed from the ocean.

18. There is no government accepted definition of 'ocean plastic' or 'ocean bound plastic'. Scientific studies originally considered ocean plastic to be waste located within a certain distance of the ocean that had the potential to end up in the ocean or become 'ocean bound through wind or water transport or mismanaged'.¹¹ The plastics industry has accordingly defined 'abandoned plastic waste' or 'ocean bound plastic' as any plastics located within **50km** from shores where waste management is inefficient and therefore could end up in the ocean.¹² There is however no science or substantiation of this claim or definition.

⁶ <https://www.accc.gov.au/system/files/Green%20marketing%20and%20the%20ACL.pdf>, p 8

⁷ <https://www.accc.gov.au/system/files/Green%20marketing%20and%20the%20ACL.pdf>, p 11-12

⁸ <https://www.accc.gov.au/system/files/Green%20marketing%20and%20the%20ACL.pdf>, p 13-14

⁹ International Union for Conservation of Nature (IUCN) Issues brief on Marine Plastic pollution at [Marine plastic pollution - resource | IUCN](#)

¹⁰ Lebreton et al, "Evidence that the Great Pacific Garbage patch is rapidly accumulating plastic", Scientific reports 8, (March 2018) article 4666 at [Evidence that the Great Pacific Garbage Patch is rapidly accumulating plastic | Scientific Reports \(nature.com\)](#)

¹¹ Jambeck et al, "Plastic waste inputs from land into the ocean" Science, v.347, issue 6223 at: [Plastic waste inputs from land into the ocean | Science](#)

¹² Ocean Bound Plastic Neutral at: [What Is Ocean Bound Plastic \(OBP\)? - Ocean Bound Plastic Certification \(obpcert.org\)](#)

19. This is quite different to the ordinary consumer's understanding of the term 'ocean plastic' or 'ocean bound plastic'. Most consumers are likely to assume that the term 'ocean plastic' includes plastic in the ocean or washed up on adjacent beaches but would not understand that it also captures other environments, including freshwater and drainage systems up to 50km from the shore. As such, we would argue that 'ocean bound plastic' is better defined as 'post-consumer plastic waste'.
20. Furthermore, the industry definition of 'ocean plastic' (being plastics located within 50km from shores which could end up in the ocean) makes it difficult to determine what is, in fact, 'ocean plastic'. Very little ocean plastic is collected and processed in Australia. Much of it is sourced from locations such as Indonesia or Malaysia where there is little regulation of the industry. Investigative reporters explored the issue of what is ocean plastic and determined that it is almost impossible to claim to be 100% or even 50% ocean plastic.
21. For example, an investigation into Zero Co, which sells dispensers for household goods called 'Forever Bottles', found that its suppliers, PackTech, could not provide an audited certification of the amount of ocean plastic in its plastic resin. Zero Co's first project claimed that the production of its "Forever Bottle" resulted in the removal of 6000kg of plastic waste from the ocean.¹³ This was despite a later statement on its blog that "neither PackTech nor Zero Co know the exact percentage of ocean plastic in our first generation Forever Bottles. It could be 50%. It could be 49%. It could be 3%.¹⁴ We do not know". To add to the confusion, Ocean Plastic Waste, a movement established by PackTech, discloses on its website that "we underline that there is no plastic from the oceans and rivers in our current packaging".¹⁵
22. For two years, Kevin Murphy claimed to be using 100% ocean waste plastic packaging for its hair products. After being informed by its plastic supplier that the plastic was not made from 100% ocean waste plastic, Kevin Murphy issued an apology for making misleading claims about its products.¹⁶
23. Similarly, recent discussions between consumers and Bunnings reveal that Bunnings pulled the ocean bound plastic Tech Bin because it could not be satisfied that the plastic used to make the product was wholly recovered from the ocean (**Annexure F**).
24. Environmental scientist and campaigner, Dr Kieran Kelly, said that many organisations claiming to be collecting 'ocean bound plastics' do so in dubious ways.¹⁷ Mr Kelly described how one organisation collected plastic bottles from resorts and sold the bottles to be recycled, charging \$3000-\$4000 a tonne. Technically this would meet the industry definition if the resort

¹³ Luke Stacey, "Ocean Waste: how plastic recyclers downplay their use of new plastics", Michael West Independent Journalists at [Ocean Waste: how plastic recyclers downplay their use of new plastics - Michael West](#)

¹⁴ Ibid.

¹⁵ Ocean Waste Plastic website at: [What is OWP? \(oceanwasteplastic.com\)](#)

¹⁶ Kevin Murphy website at: [Ocean Waste Plastic - kevinmurphy.com.au](#)

¹⁷ Paul Harvey blog, "Ocean bound plastic: the marketing campaign fooling conscious consumers" at: [Ocean bound plastic: the "marketing campaign" fooling conscious consumers - Dr Paul Harvey - The Plasticology Project \(docpiharvey.com\)](#)

is within 50km of the shore, and if there is a possibility that the bottles would end up in the ocean, but this is not consistent with the ordinary consumer's likely understanding of 'ocean plastic' (being plastic that is removed directly from the ocean or adjacent beaches).

25. In light of the above, there is considerable uncertainty surrounding what constitutes 'ocean plastic', with the industry definition far broader than that likely to be understood by the average consumer or understood by looking at broad claims on packaging. Furthermore, there is also uncertainty as to the quantity of 'ocean plastic' found in products that claim to be made of either 50 to 100% ocean plastic, with those claims often being unsubstantiated. The result is that there is a real possibility that consumers of products which claim to be made of ocean plastic have been misled about the constitution of that product.

Claim 2: It is impossible to generate a plastic container made of 100% recycled ocean plastic feedstock.

26. Ocean plastic products cannot be produced from 100% ocean plastics. Many ocean plastics are damaged through their journeys and interactions in the ocean and break up into small plastics that are difficult to collect. Because plastics do not biodegrade, they remain in the marine environment. During the different stages of a plastic's long life there is the potential for chemicals to latch on to, and leach out of, the plastic, even if it is able to be collected later. Old and degraded plastic is particularly susceptible to leaching and has surface area for chemicals to cling on to. Banned chemicals which are known to be toxic, like pesticide DDT, have been found on marine plastic and in sensitive ecosystems.¹⁸
27. There are also restrictions on being able to recycle plastic for food grade packaging. Most manufacturers follow the US Food and Drug Administration standards which provide guidelines about the use of recycled plastics to avoid packaging being contaminated.¹⁹ As there are strict rules in relation to contamination even from food, it would be difficult for ocean plastic to meet the criteria needed for re-use in food grade plastic. The FDA criteria require strict source control and thorough cleaning efficiency of the recycling process with testing for contaminants.²⁰ It is for this reason that most plastics collected in kerbside recycling schemes are recycled into plastic furniture, carpet, panelling, fibre cables and polar fleeces rather than reused to make more bottles. To be reused for bottles, the PET plastic bottle needs to be kept in a very good state, and therefore it is unlikely most ocean plastic collection would allow for such recycling. In fact, most plastic collected from the ocean is incinerated for this reason.²¹
28. As such, it is only possible to generate recycling from plastic found on the shore or that is prevented from entering the ocean.²² Many of these schemes should not be described as 'ocean plastic' but rather collection or clean up based systems in developing countries designed to

¹⁸ <http://www.pelletwatch.org>

¹⁹ <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-use-recycled-plastics-food-packaging-chemistry-considerations>

²⁰ <https://www.fda.gov/food/packaging-food-contact-substances-fcs/recycled-plastics-food-packaging>

²¹ <https://www.preventedoceanplastic.com/four-need-to-knows-about-ocean-plastic-recycling/>

²² <https://www.preventedoceanplastic.com/spectra-make-prevented-ocean-plastic-commitment>

collect post-consumer plastic waste and prevent plastic reaching the ocean, which is why some plastic collection programs describe this as “prevented ocean plastic”.

29. The term ‘ocean bound plastic’ is misleading in this context, particularly where most of the plastic is not generated in Australia with the requisite checks and balances to verify where it has been collected. Furthermore, there is no proof that any of the items that are called ‘ocean bound’ would have ended up in the ocean if not collected.
30. The process of recycling itself often requires the addition of virgin plastic resin to any recycled product to ensure that it is sufficiently durable for use in food and other packaging; often virgin plastic will be required as an inner layer designed to prevent interaction with the recycled product to meet the various food standards.
31. Recent discussions between consumers and Zero Co have also confirmed that the manufacturing of the bottles happens in Australia, but with a resin imported from overseas. Their response claims 50% ocean bound plastic, but not what the other 50% consists of in their products (**Appendix B**).
32. In light of the above, companies that claim that their products are made from 100% ocean plastic are likely to mislead the average consumer because it is not possible for any product to be made from 100% recycled ocean plastic material.

Claim 3: There is no evidence that recycling plastic that is removed from the ocean improves the marine environment

33. Ocean plastic pollution is having a significant impact on the marine environment. Many sources of plastic come from land, stormwater and littering as well as inadequate waste management facilities. Ocean based plastic also comes from the fishing industry, shipping and aquaculture.
34. Under the influence of solar radiation, wind and currents, plastic breaks into smaller particles called microplastics. Around 92% of plastics found on the surface of the ocean is microplastic, and the concentration of microplastic found on the ocean floor is increasing. Because microplastic is so small, it is more likely that marine life ingests it accidentally which causes injury and death. It can also limit their ability to reproduce, resulting in smaller population.²³
35. Much ocean plastic also settles on the ocean floor, with only 1% floating on the surface, causing permanent damage to the ocean environment.²⁴ Scientists involved in studies of ocean plastic have highlighted the importance of policy interventions to limit the future flow of plastics into natural environments to minimise impacts on ocean ecosystems.²⁵ Plastic pollution threatens food safety, human health, coastal tourism and contributes to climate

²³ American Oceans -Everything you need to know about microplastics in the ocean-

<https://www.americanoseans.org/blog/microplastics-in-ocean/>

²⁴ <https://www.manchester.ac.uk/discover/news/scientists-find-highest-ever-level-of-microplastics-on-seafloor/>

²⁵ <https://www.manchester.ac.uk/discover/news/scientists-find-highest-ever-level-of-microplastics-on-seafloor/>

change. The solutions to ocean plastic are likewise complex and require better regulation and waste management systems, including preventing dumping at sea, but also less plastic being used and generated in the first place.

36. There is no evidence that systematic removal of ocean plastic through ocean clean ups to produce ocean plastic improves marine pollution. Research undertaken by the Pew Trust found that the removal of a certain quantity of plastic from the environment is insufficient to address the scale of the problem. It is estimated there is around 14 million tonnes of plastic entering the oceans a year, and at the current rate of production, that number will increase to 29 million tonnes by 2040. That is equivalent to 50kg of plastic on every metre of coastline around the world.²⁶
37. The solutions proposed by the Pew Trust's research include a dramatic drop in production and use of plastics by avoiding our throw away culture, as well as reusing and recycling plastic. In relation to microplastics, new technologies are required to avoid these plastics in the manufacturing process, as they are too small to collect and recycle once they enter the ocean. As such, encouraging consumers to use more plastic by buying "ocean plastic" products will not improve the marine environment; rather it adds to the problem. More fundamental reforms are needed.
38. Considering the above, there is a strong likelihood that representations that give the overall impression that products made from ocean plastic improve the marine environment will mislead the average consumer of those products. This will be particularly the case with packaging or websites that include brief headline claims.

Claim 4: There is no evidence that recycling plastic that is removed from the ocean benefits marine life

39. Many of the companies' packaging or marketing campaigns use iconic images and symbols of marine species such as turtles, oceans, clean beaches or waves to market their environmental credentials. This is shown in the advertising featured in **Annexure C, D and E**. For example, Moo Yoghurt tubs depicts an image of a turtle under the text "*100% ocean plastic recycled tubs*" which links the product with reducing the impact of marine plastic on marine turtles and other marine life (**Annexure A**)
40. Environmental images such as turtles, when placed alongside text relating to '100% ocean plastic' are potentially misleading because of the suggestion of a clear link between buying products made from ocean plastic and a benefit to marine species and the marine environment.
41. For the reasons provided at [31]-[35] above, there is no evidence that recycling plastic that is removed from the ocean improves the marine environment and is of benefit to marine species

²⁶ Pew Charitable Trust, Confronting Ocean Plastics Pollution at <https://www.pewtrusts.org/en/trust/archive/fall-2020/confronting-ocean-plastic-pollution>

such as turtles; representations that it does are likely to mislead the average consumer of 'ocean plastic' products.

Claim 5: There is no evidence that ocean bound plastic items recovered for processing into ocean bound plastic feedstock, would have ever ended up in the ocean during their lifecycle.

42. As indicated above, a number of companies are using representations around the impacts on the marine environment of their use of ocean plastic or ocean bound plastic, including using turtles and dolphins in their advertising. For the reasons outlined above, there is no clear evidence that the plastic being used would have ended up in the ocean in the first place. In many cases, waste pickers are removing plastic from the environment in Malaysia, that is then processed in a non-regulated plastic factory and shipped to Australia for manufacturing. In the absence of trackability of which country the plastic was removed from the environment, processed and transported from and to for manufacturing, there is no evidence that this process improves the marine environment, compared to using virgin plastic feedstock or non-OBP/OP feedstock. As **Annexure E** illustrates some companies are also going further and citing the carbon benefits of using ocean plastic, again a claim that is difficult to justify.

Harm associated with the conduct

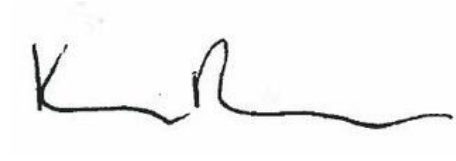
43. This type of misleading conduct is of concern. Given the wide public concern about marine pollution, environmentally conscious consumers are more likely to buy a product if it contains ocean plastic. This disadvantages companies who are not using 'ocean plastic' claims on their packaging. There is also a consumer detriment as consumers are also paying a premium price for these products for a benefit that does not necessarily exist. For example, Moo Yoghurt is 77cents per 100 grams, compared to 45 cents for Woolworths yoghurt brand or 60c per 100 grams for Farmers Union. Similarly, Zero Co laundry detergents are \$9.90 per litre compared to \$3 per litre for Earth Choice brand.

44. The ACCC previously took action against Woolworths Ltd in relation to 'biodegradable and compostable' packaging in *ACCC V Woolworths Ltd* [2020] FCAFC 162 because there is a public interest in companies substantiating such claims prior to making them. We are of the view that it is important that the ACCC similarly take action to ensure that potentially misleading or false claims relating to ocean plastic area do not continue to grow.

45. If you have any further queries, please do not hesitate to contact me by email on kirsty.ruddock@edo.org.au or by phone at (02) 2 7229 0031.

Yours faithfully

Environmental Defenders Office

A handwritten signature in black ink, appearing to read 'KR', with a long horizontal flourish extending to the right.

Kirsty Ruddock

Managing Lawyer

Safe Climate (Corporate and Commercial)

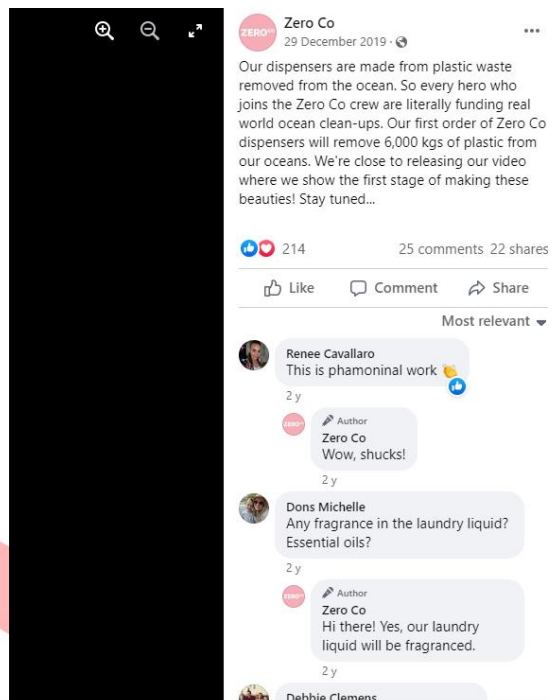
Annexure A – Moo Yoghurt

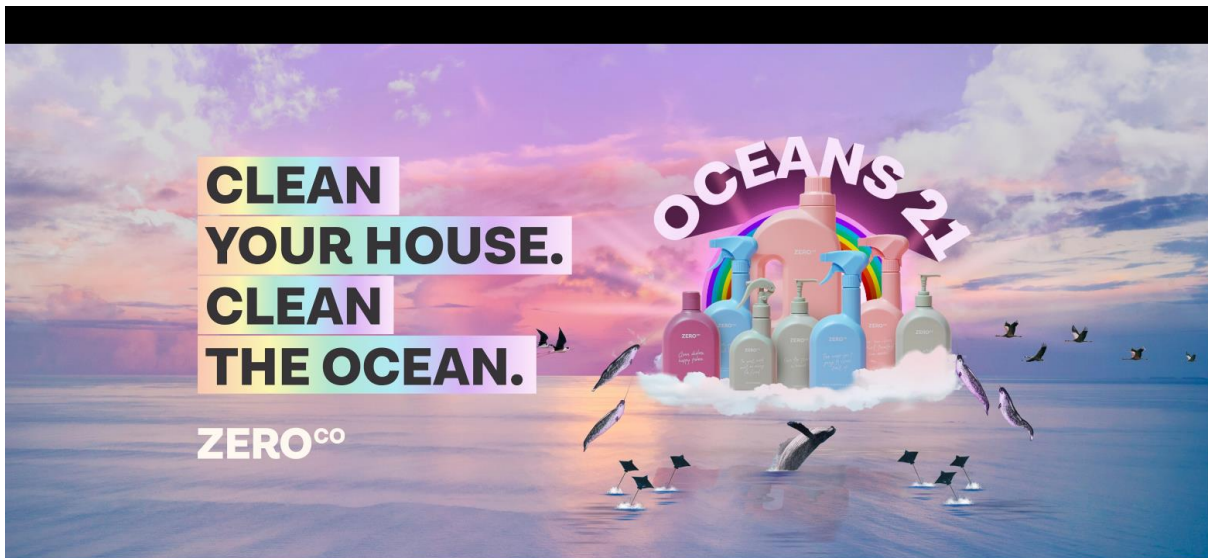
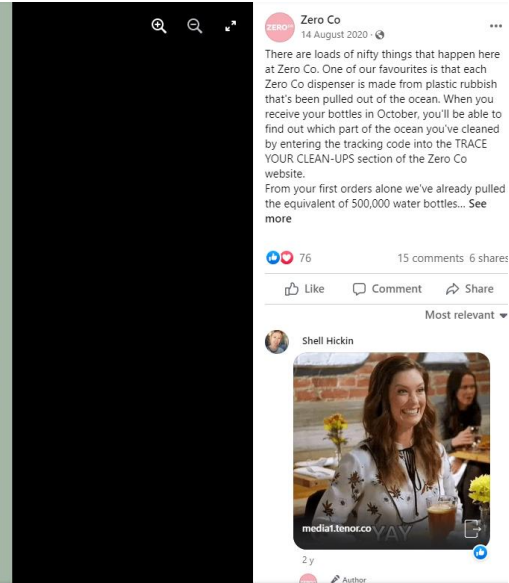






Annexure B: Zero Co







zeroco.com.au 

Instagram

79K followers · 802 posts

You don't follow each other on Instagram

You both follow davidattenborough
and 1 other

[View Profile](#)



Who makes your forever bottles made in Australia?
And what types of clean up plastic are used to make bottles?

[Send](#)

  **Zero Co** 
Active now  

Our Forever Bottles are made from our very own specially created material called OBL (it's a combo of Aussie Ocean, Beach and Landfill HDPE plastic waste).

The bodies of our Forever Bottles are currently being made from 50% OBL and we are fully committed to manufacturing our dispensers as close to 100% OBL as possible in the future. And they are made by an Aussie manufacturer!

Unfortunately we cannot share who we work with as this is a pretty unique and innovative creation and process that we have worked super hard to get right, and we're in a tricky position of brands blatantly copying us

 Message...   



Zero Co's post



Zero Co

Sponsored ·



Clean Hands, Clean Planet!

Every Zero Co purchase funds epic cleanup projects in Australia and around the world, like the one we're doing right now in Egypt, pulling 1 MILLION water bottles of rubbish from the Nile River. 🌊

The plastic from our Aussie cleanups gets turned into our Forever Bottles that you keep at home and refill for life, stopping single-use plastic and funding cleanups at the same time.

Huzzah for Handwash! 🙌

Check out our range of home-cleaning and personal products now 🙌 www.zeroco.com.au

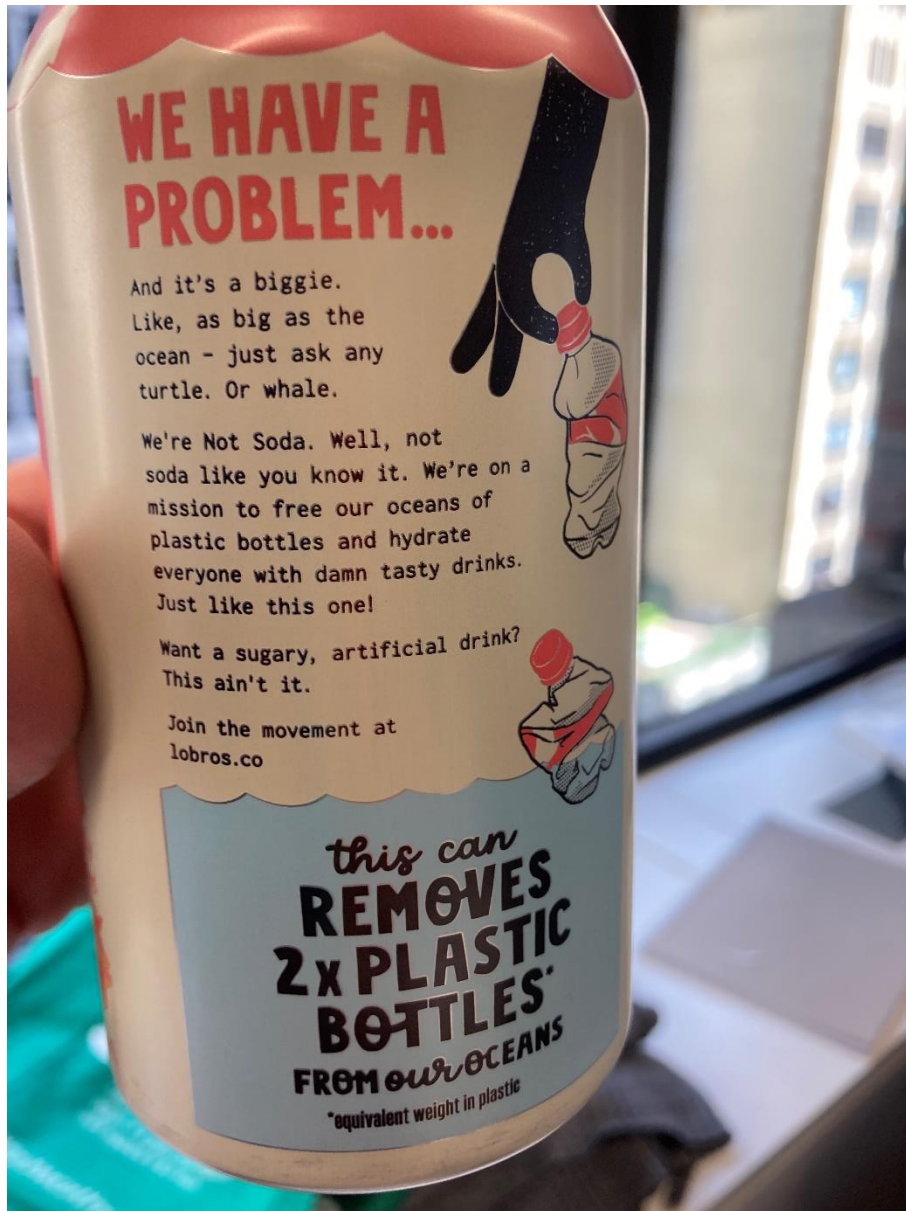


Write a comment...

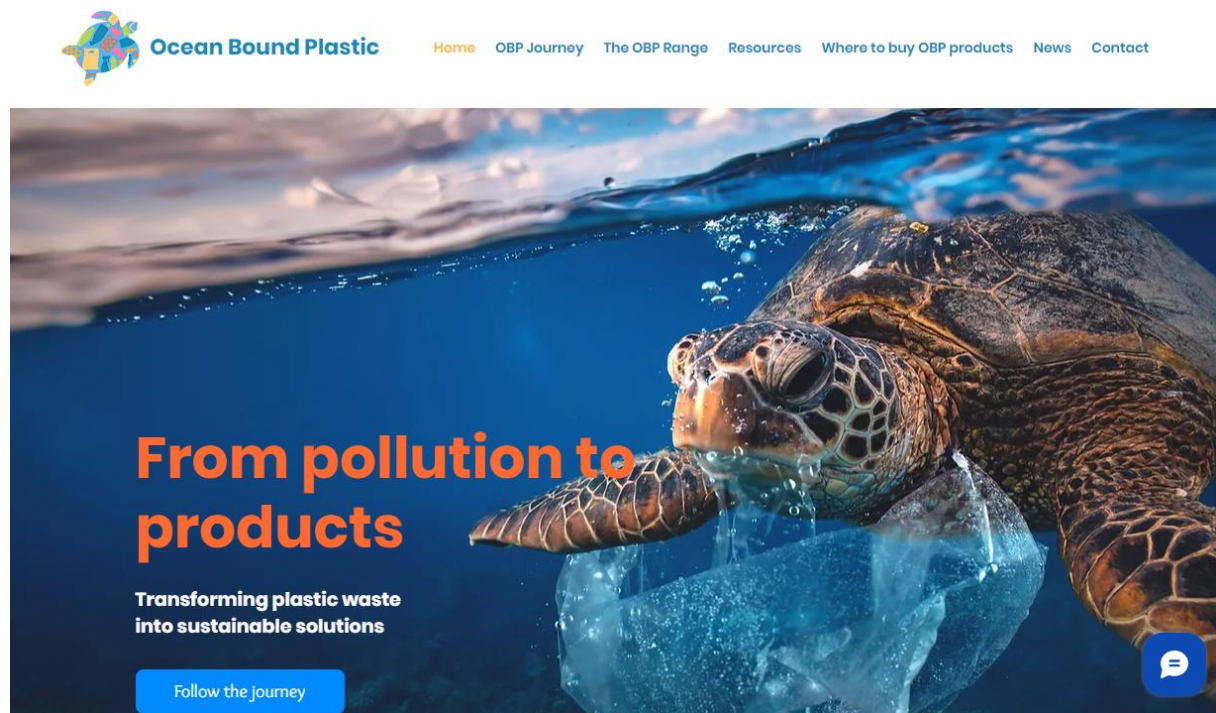


Annexure C: Lo Bros packaging





Annexure D: Marketing for general ocean plastic products at <https://www.oceanplastic.com.au>



Why buy products made from ocean bound plastic?



Diverts plastic from landfill

In Australia, 84% of plastic waste is sent to landfill and takes thousands of years to decompose. To put this into perspective, that's 2.1 million tonnes or 42 million 600ml PET water bottles EVERY SINGLE YEAR. Collecting waste before it hits the ocean and ends up in landfill helps to reduce the amount of waste overall and reduces the environmental impacts of landfill.



Impacts environmental awareness

By buying ocean bound plastic, talking about it to friends and family, posting about it on socials or advocating for its use in your business or workplace, you broaden the conversation about the environmental impact of how we live and work. As stakeholders of our environment, community, Government and business sectors all have a part to play.



Individuals can make a BIG difference

Our individual choices send a message and create change in our world. Through the purchase of products made from ocean bound plastic, you not only reduce the amount of plastic waste polluting the environment, or create safer spaces for ocean wildlife, you support the recycling and reuse of plastic in sustainable ways.

THANK YOU.



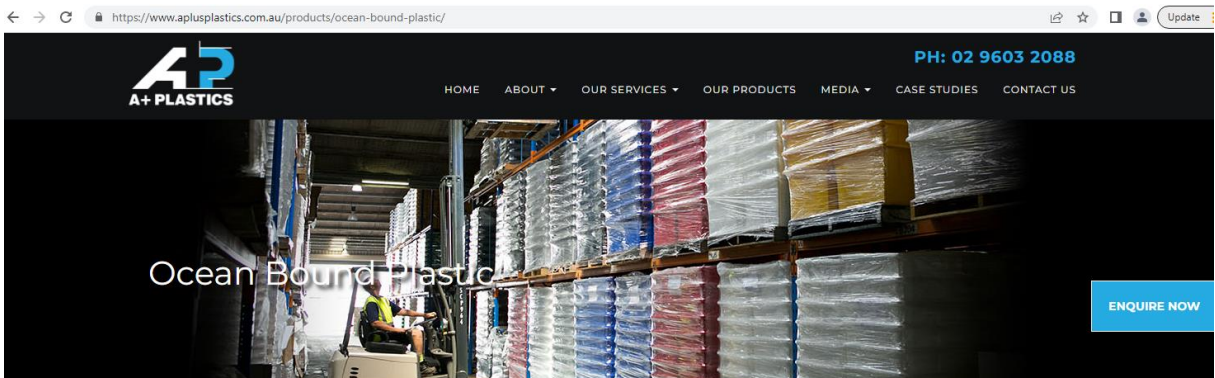
Where can I buy ocean bound plastic products from?



The full OBP Range is available from Australian made and owned A Plus Plastics. Custom moulding options also available.

[Visit the APP website](#)

[Request a quote](#)

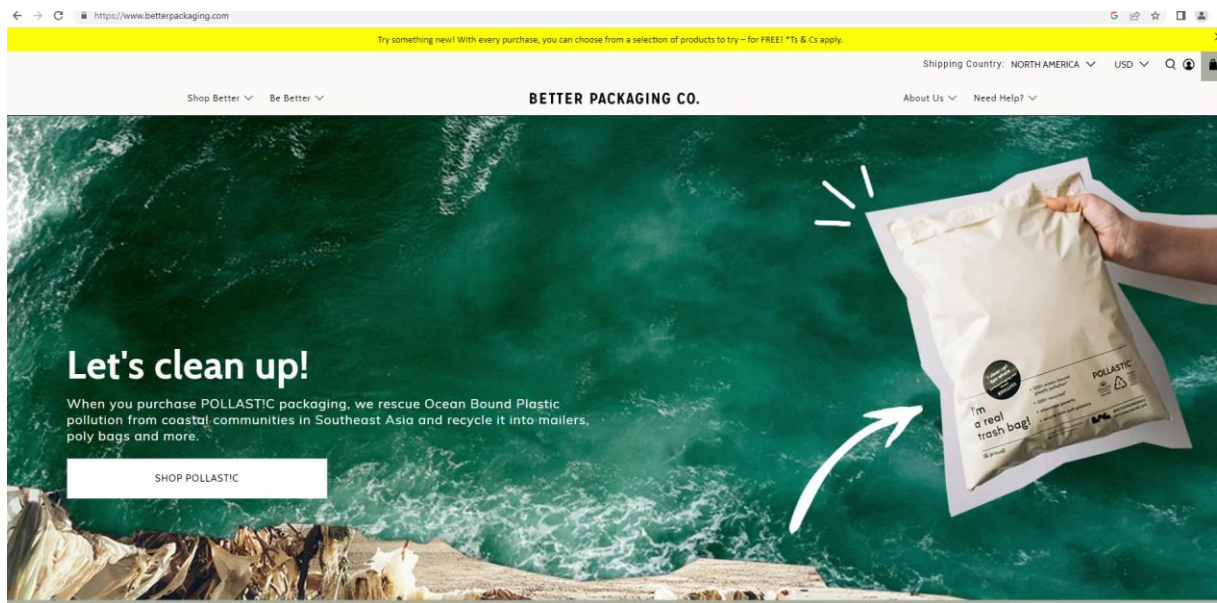


- Select from a category below
- Ocean Bound Plastic
- Bulk Handling
 - Lock & Save
 - Collapsible Bins
 - Lids
- Materials Handling
 - Clear Crates
 - Enviro Crates
 - Fish Crates



Annexure E

Better packaging co- www.betterpackaging.com



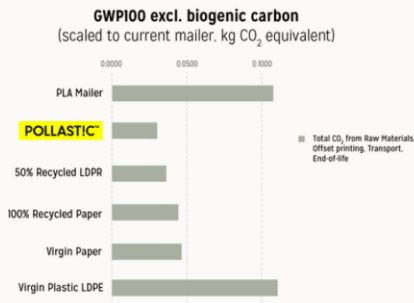
POLLASTIC™

A range of packaging made from recycled Ocean bound Plastic pollution rescued from coastal communities throughout Southeast Asia.

KEEPING PLASTIC POLLUTION OUT OF OUR OCEANS

An estimated **5-13 million tonnes** of plastic enters our oceans every year and this is expected to **triple by 2040**.

Over 70% of that plastic enters oceans via land and over 80% of that comes from Asia. That's why we focus our collection efforts in Southeast Asian coastal communities.



Independent Comparative LCA 2021 Conducted by Sphers Consulting Compared BPO POLLASTIC Mailers to other sustainable packaging solutions

©2021 Sphers

SUPER LOW CARBON FOOTPRINT

Independent Life Cycle Analysis has shown POLLASTIC mailers to be the lowest carbon form of packaging currently commercially available.

They have a CO₂ footprint 75% less than that of a traditional plastic mailer and 30% less even than 100% recycled paper.

Intro


Providers of revolutionary, customised packaging solutions for the new eco-nomy. A circular economy

 Page · Product/Service

 (02) 8073 8343

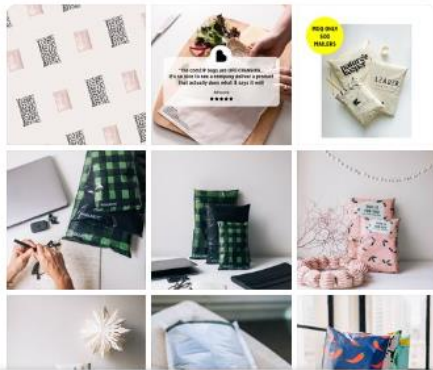
 hello@betterpackaging.com


 betterpackaging.com


 Rating · 4.8 (24 reviews) 

Photos

[See All Photos](#)



 **Better Packaging Co**

11 November at 08:00 · 

It's all about impact with these stunning custom mailers made for Nature's Keeper, [Leader Denim Co](#) and [Cavela Coffee](#). How good would your brand look on some of these too?!?!

- ✓ MOQ 500 pieces
- ✓ Made from 100% Ocean Bound Plastic
- ✓ Recycle with soft plastics
- ✓ Unlimited shelf life so you can take as long as you need to use them

Last date to place an order this year is November 20th, so get in pronto!

ORDER HERE: <https://bit.ly/3fWWyHI>



Connect with Better Packaging Co on Facebook

[Log in](#)

or

[Create New Account](#)

Annexure F- email to Tangaroa Blue re Bunnings sales of A& P Tech bins (seen at Annexure D) dated 6 December 2022

Good Morning Heidi,

Thanks for your email. We have been working with the supplier of these storage bins to review in detail the materials used in production. While this work has confirmed that the product contains recycled materials we are not satisfied the chain of custody establishes that it is wholly recovered from oceans. We are in the process of placing new labels on the products before returning them to sale.

Thanks again for bringing this matter to our attention.

Regards,

*Sonya Rand
Head of Sustainability*