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## PACKAGING EXPOSE - VOL 2/2008

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### Green Marketing - Legal Boundaries

05/02/2008



Sharon  
Givoni

***As Australian consumers are becoming increasingly concerned with the environment, manufacturers are keen to position their products as environmentally friendly. Words such "biodegradable", "recyclable," "green" and "eco-friendly" are some common examples of claims that are regularly made on packaging. Such claims can be problematic from a legal perspective if the claim is not true and accurate in all respects.***

This article canvasses some of the main legal considerations that packagers and brand owners need to consider in order to avoid legal liability for misleading claims.

#### **What does the law say?**

The main law in Australia that governs environmental or "green" claims on packaging and labelling is the *Trade Practices Act 1974* (Cth).

In essence, the Act prohibits any sort of conduct that is or is *likely* to be misleading and deceptive and the making of false representations that a product has performance characteristics that it does not in fact have.

***Rule - green claims must be the truth, the whole truth and nothing but the truth***

#### **The ACCC**

The Australian Competition and Consumer Commission (ACCC) is the consumer watchdog that polices consumer complaints. Late last year, the regulator announced plans to put environmentally friendly marketing claims to the test after being swamped with complaints about the widespread "greenwashing" of consumer and industrial products.

#### **What sort of claims do you need to be careful about?**

Basically, any claim that you make about a product needs to be the truth and the whole truth in *all* respects. Claims that are particularly risky to make are using unqualified broad terms such as "environmentally friendly", "green", "nature's friend", "eco safe" and "fully recyclable."

The rules don't just apply to words. Symbols, company logos and even a pattern on packaging can imply that a product has certain "eco friendly" characteristics.

***Rule - A picture can tell a thousand words - be careful with images and symbols***

#### **Even subtle claims can send the wrong message**

Its not just overt statements that can be misleading. Phrases such as "nature's friend", "why don't you go green", "eco Shoes" and "Please recycle me" can also be misleading and not accurate and verifiable.

Even your own brand or logo could be misleading if it gives a false impression. For example, if a cleaning product has a green logo called "Eco Earth" with a version of the chasing arrows symbol in the background, this is likely to be misleading if the product is not environmentally friendly and the container has not been recycled.

Sometimes, a brand or image on packaging may have a number of possible interpretations. The laws provide that all possible interpretations must be

correct.

**Rule: Even if only some consumers are misled, this can still be misleading**

### Half truths

Another thing to bear in mind is that claims might be true in some respects but the context might make them misleading. For example, if batteries imported from Europe are labelled "recyclable" when they can be recycled in Europe but not Australia this will be a half truth and therefore misleading. Another example might be a printer cartridge that states the cartridge is refillable when it is only refillable in some States in Australia or if there are no facilities *in Australia* that are available to refill them.

**Rule: A statement might be literally true but in practise misleading**

### Ignorance is no excuse

You might be wondering at this point what the situation is if you genuinely believed at the time of making the claim that it was true and accurate. This is not enough to avoid liability. This might mean you need to make more extensive enquiries from your suppliers and even have systems in place to monitor changes that might make a statement that was once true, misleading if the circumstances change, for example if there is no longer a recycling facility in the local area.

### Disclaimers and fine print

Sometimes, you might wish to qualify your green statement with an explanation. Take the example of a food container that displays a large recyclable symbol on it and a small explanation at the back that states "Recyclable only in South Australia". If consumers have to go looking for the fine print, the chances are they won't see it at all, or at least not at the time of making the actual purchase. This will make the whole claim misleading in the eyes of the law.

**Rule: If you are going to shout out a claim don't whisper the fine print**

### Who can be liable?

Under the *Trade Practices Act* it is not just the product manufacturer that can be liable. The packaging manufacturer, or anyone else involved in making the claim (even an advertising agency) can also be liable if they have been "knowingly concerned" with making the claim. To take a hypothetical example, if a packaging manufacturer specifically knew that a drink can is not recyclable in any State other than South Australia, but nevertheless agreed to manufacture cans labelled "please recycle me" which they knew would be sold in Victoria this might attract liability.

### What happens if you breach the law?

The ACCC can order companies to publish corrective advertising and implement extensive compliance programs and offer refunds to customers, amongst other things. The courts can enforce such orders and impose substantial fines.

### Anyone can be caught out

As the following summaries of real life recent case studies show, the ACCC takes action against all companies big and small - whether a business is marketing 'green' motor vehicles, 'green' toilet paper or 'green' air conditioners.

### Examples of ACCC Action - it's not easy being green

Last year, the ACCC announced that it would start making a more focussed effort to target green claims. Here are some examples of the recent ACCC investigations and actions:

#### **Headline: Green groups see red over degradable bags (January 2008)**

Recently, a Sydney company was accused of making misleading environmental claims about its "Bio Bags". The company marketed its plastic bags as being "totally degradable plastic" claiming they "break down" naturally after two years in chemical landfill. Green groups complained that the bags' name could convince consumers the product is biodegradable.

At the time this article was written, the ACCC was investigating the matter. The topic is timely - it has been estimated that Australians use as many as four billion plastic bags annually with most of them ending up in landfill.

### **ACCC takes action against GM Holden Ltd over Saab 'green' claim (Jan 2008)**

Earlier this year, GM Holden Ltd was accused of making misleading 'green' claims in its media campaign for Saab. It used statements such as "Grrrrreen", "Every Saab is green", "Carbon emissions neutral across the entire Saab range and Switch to carbon neutral motoring to promote the green credentials of its motor vehicles."

The ACCC took the view that the advertisements represented to consumers that:

- the net amount of carbon dioxide released into the atmosphere by any Saab vehicle, over the life of that vehicle, would be zero; and
- Saab vehicles have some attribute or attributes which contribute to reduced carbon dioxide emissions by those vehicles compared with Saab vehicles supplied prior to the publication of the advertisement.

The ACCC alleged that the statements were misleading in breach of the law because, amongst other things, there would, in fact, be a net release of carbon dioxide into the atmosphere by the operation of any motor vehicle in the Saab range.

[Click here](#) for more information.

### **ACCC scrutinises Origin green power television advertisement (December 2007)**

Late last year, the ACCC challenged Origin Energy for claiming that switching to Origin GreenPower would be the same as 'not driving your car for two years'.

The ACCC considered that this wording did not clearly explain to consumers the underlying averaging basis for the claimed environmental benefit of switching to Origin 100 per cent GreenPower. The ACCC was concerned that consumers were not adequately informed in the advertisement that there was a choice of two Origin GreenPower products and that choosing Origin's 20 per cent GreenPower, instead of its 100 per cent product, would not achieve the same result.

As a result of the ACCC's action (amongst other things) Origin promised not to air such advertisements in the future and send a clarification letter to those 100 per cent and 20 per cent GreenPower customers who signed up during the period that the advertisement was being broadcast.

[Click here](#) for more information.

### **Conclusion**

The laws relating to misleading conduct are very broad sweeping and it is easy to inadvertently get caught out. Next time you make any sort of "green" claim on your labelling or packaging, the sorts of questions you need to ask are:

- What overall impression does the claim give consumers?
- Is it correct in all respects?
- Is it appropriate for the geographical area in which the product is sold?
- If a claim is on product packaging, is the product itself recyclable? Is it made from recycled material? Or is only the packaging recyclable, and if so in what States?
- Remember that if the representation is open to a number of interpretations, all interpretations need to be correct.

The consequences of getting it wrong can be quite severe. Leaving aside the legal implications, perhaps the biggest risk is the impact of bad media publicity which can leave a long standing stain on a brand owner's reputation.

**Disclaimer - The contents of this article are of a general nature only and not to be relied on as a substitute for legal advice.**

## **Retailers - Competitive Issues**

05/02/2008



**Andrew  
Seth**

***Retailers are always in the news - with much of the commentary being negative. The recently announced ACCC inquiry into grocery prices will address the competitive issues involving Australian retailers. Andrew Seth looks at the British Competition Commission's report into supermarkets in the UK and its finding that fundamentally British supermarkets "are a good deal for consumers". He also comments on Tesco's move into the west coast of the United States and the challenge it represents to Wal-Mart.***

**Andrew will be addressing PCA functions in April. He will speak in Melbourne and Sydney on 8 and 10 April, respectively. Full details will be on the PCA website shortly.**

### **Supermarkets, Competition and Consumers**

"The British are a funny race. Nobody gets more involved when their national teams play in world competitions - the desire to win verges on the frantic, even in the more sedate sports. Meanwhile in areas where you might assume winning was a shade more important to national performance, we behave quite differently.



In a small handful of industries our performance is world-beating, and we set the pace for bigger markets and competitors. One such is supermarkets. We take on America's best - Tesco are about to validate this on the US West coast - and now compete in the critical markets of Eastern Europe and Asia-Pacific. Does the great British public like this? - apparently not. Three enquiries had already happened in the supermarket industry, at huge cost (ours!).

Nonetheless the Association of Convenience Stores forced a new investigation, claiming supermarkets were destroying their livings. To their chagrin the Competition Commission (CC) insouciantly concluded that far from destroying c-stores their number had increased! "Dodgy data" was the plaintiff's considered response. Meanwhile The Forum for Private Business felt "severely let down" by the Commission's conclusions. Other special-issue groups talked of "a complete and absolute whitewash" and "of a gold-plated template to destroy our high streets". Right across cosy middle-class Britain you could hear irritated complaining from our chattering classes thoroughly disquieted by the inability of the Competition Commission's reporters to recognise their deeply-felt desire to bring these overweening bastions of retail strength to their knees. ("Did you know darling, Tesco now have five stores along our own Kings Road?")

So from the outset we congratulate the Commission for recognising that fundamentally British supermarkets are "a good deal for consumers" and in so doing, note we detect that somewhere deep in the modern British psyche there now lurks an incipient appreciation that competition might even be good for us; and an attempt to secure a position of global market strength for British business is indeed a goal worth pursuing. (The same thing happened to the British detergents, again with one strong British competitor, itself subjected to three enquiries between 1970 and 90). Here despite widespread "establishment" mutterings, the conclusion held that this was a deeply competitive market.) Slowly a philosophical conversion may be happening to Britain, and improbably, it has been led in this instance by separate government investigations.

So if investigators see few problems, presumably there's not much need for government action? Well broadly speaking, yes. Land hoarding has been a business tactic - so some companies may have to sell land where it's blocking competition. Suppliers, unable to counter an alleged "climate of fear" in dealing with the biggest retailers, are to be helped to articulate their worries through interposing an ombudsman - no doubt right and proper. Retailers surely recognise that bully boy tactics are inherently wrong. The CC noted other criticisms levelled at supermarkets; their impact on the nation's health, the social impact of low-priced alcohol sales, the importance of the high street and rural shops, the future of UK farming, the issue of self-sufficiency in food, the environmental impact of the grocery supply chain. These are significant matters but the issues they raise cannot all be levelled at the door of supermarkets. Grocers respond to social trends, they don't create them. The rise of car shopping and the decline of some (but by no means all) town centres and villages are complex matters that will not be solved by simple minded attacks on supermarkets as villains.

Most media commentators were comprehensively wrong-footed, having

seen the investigation as likely to focus on Tesco, the clear leader and therefore the target of most criticism. While giving the company a generally clean bill of health the Commission indicated that "it will keep an eye on Tesco". This is surely nanny-state finger-wagging at its worst. How many world-class companies exist in the UK? Terry Leahy's is one of the precious few, and he needs encouragement not constraint. Though a genuine world class competitor ( see Supermarket Wars, Seth and Randall 2005, Palgrave Macmillan) Tesco remains small - perhaps one fifth of Wal-Mart in size, and just over half France's (hitherto nationally featherbedded) competitor, Carrefour. Leading worldwide competitors rely on a large and profitable home market to fund overseas expansion and Tesco is no exception. Leave well alone.

So give the Competition Commission seriously high marks for threading its way through the hubbub of national "we know best " interfering chatter and reaching a sensible and balanced view of a British industry that has served its consumer well but managed to make money in one of the world's most fiercely competitive markets."

### **Tesco v Wal-Mart**

"Home advantage matters - to every team. Companies are the same. Take P&G in the US, British Unilever, French L'Oréal. Retailers are similar - it's axiomatic. 'Don't leave home if you can't win here.' Wal-Mart built its huge home base before leaving the US; German ALDI and French Carrefour are home market leaders. Sainsbury, was the UK leader when it bought Connecticut Shaws. It has since lost leadership and its US stores.

Retailers do not always travel well. Outside the US, Wal-Mart is weak. Ahold, the powerful Dutch leader, collapsed after making inroads in eastern US states. Carrefour started early but failed in big developed markets, the US included. ALDI is successful outside its homeland but does not match its domestic performance. None has yet staked a serious claim to China and India, though everybody's trying! But here comes Tesco - not content with a decade of rapid country expansion, which has given it a strong presence in central Europe and Asia - now seemingly staking its all on an ambitious plan to conquer America's west coast. Hubris perhaps?

Brave it certainly is. 'Compelling,' says Citibank. Risk-free it is not. But this is no 'gamble', as some would have us believe. Tesco is too considered and thorough to 'gamble' for big stakes. I recall, when writing *The Grocers* seven years ago, suggesting to Sir Terry Leahy that Tesco might find things different if it chose to confront US competition in its home territory - Wal-Mart was then maybe eight times Tesco's size. The slightly bristly response was 'Well, Andrew, we don't have to do everything Wal-Mart does, do we?' Point made. It doesn't; it hasn't. This is not market entry on the 'after you Claude' model.

The move is strategic. To my knowledge this has been on Tesco's mind for many years. Of course, it is also both ambitious and dangerous. This company has recently entered China and is about to tackle India. Success could propel Tesco to genuine world leadership, alongside Wal-Mart itself. The costs of failure, however, would be immense, threatening the fast-growing Tesco business outside the UK, which now delivers revenues of £10 billion annually with profits growing. Tesco thoroughness and accountability is much in evidence. Sir Terry Leahy has a personal Board-written incentive plan with tough US-based targets - an unusual step for a worldwide CEO to take. You can tell he is deadly serious for a start. Tim Mason, the US designated leader from day one, has been Leahy's right-hand man for years and is the most experienced character Tesco could finger for this assignment. Other experienced Tesco players followed. It will not perish for lack of talent.

Tesco is known for carefully managed store planning and if ever that was needed it is here, where its vision was radical and deliberately innovative. Its store development and testing plans were conceived and executed with dedication and in secrecy as it evaluated the model. When it encountered apparent consumers it tested and established new solutions to deliver the required consumer offer - making its own fresh food, for example. The competitive strategy framework in California was debated in detail and actionable conclusions reached. Tesco targets Wal-Mart costs, Whole-Foods freshness, Walgreen convenience and ALDI brand range - a remarkable combination of attributes.

What is particularly striking about the Tesco move, however, is its radical counter-cyclical nature. 10,000ft<sup>2</sup> or less stores in a market where Wal-Mart has been driving 200,000ft<sup>2</sup> superstores hell for leather. Self-service at the

checkout in small-town US where, since time immemorial, customers have wanted their bags packed, taken out to the car and the time-of-day passed while it is happening. Wrapped fruit and vegetables - didn't US Safeway make stunning fruit display the store norm half a century ago? Limited brands and focus on store's-own branding in the most brand-conscious country in the world. Hard discounting in a country that has treated this as Sam Walton's personal inheritance. It seems Tesco sought and implemented every differentiating mechanism it could lay its hands on - isn't this what drives innovation? But don't imagine it's some wild-eyed venture into the unknown - the changes are here for a reason, providing consumers with unassailable food quality at costs matching the very lowest. In this sense Tesco's US approach is just another turn of the retail screw - best quality at best prices. Isn't this what everyone does?

'We didn't come here to do what the others are doing,' said Tesco's US commercial director, Mr Bury. Say it again, Mr Bury. Will it work? Nobody knows. But Bentonville will be tracking its progress. I'd risk some depreciating US\$ on its succeeding."

## The Covenant and Sustainability - Where to Next?

05/02/2008



Pam Allan

***Pam Allan, the former NSW Minister for the Environment, examines the outlook for the Covenant in the run-up to the mid-term review and recommends industry needs to convey clearer messages, embrace sustainability and engage in a period of "intense activity" to communicate achievements.***

The packaging industry is in a unique position - the Covenant represents the most significant product stewardship agreement in place in Australia.

My general feeling for the future of the Covenant is that government will not easily or quickly ditch something which represents a real and voluntary commitment from a significant industry and a number of significant companies.

Both government and industry have a stake in the Covenant's success. Neither will want to waste this investment.

But, at the same time, neither industry or government have done enough to emphasise the importance of the Covenant or to promote its potential. The messages need to be clearer.

In addition, community stakeholders have not been effectively engaged in the process. While not overestimating community interest or awareness in packaging I think we can recognise that there is some interest - usually expressed in calls to ban plastic bags.

The current climate change debate provides both an opportunity and a threat to the packaging industry.

The **opportunity** is now ripe for the industry 'to communicate a positive, robust environmental vision for packaging.'

The **threat** is that while industries such as coal are feeling the full brunt of the climate change debate at present the packaging industry will not be immune indefinitely because:

- a) The packaging process uses energy ('embodied energy') and,
- b) Methane from landfill is a greenhouse gas

Packaging is also threatened by its pole position in the litter debate and its very accessibility to consumers. With consumers currently struggling with the question of what they can do to mitigate climate change, reduced packaging consumption is a common response.

Australians may find it easier to reduce packaging than reduce holiday flights in an intense climate change debate. The fledging movement to reduce consumerism is also building in Australia.

### **A Strategy for the Way Ahead**

The mid-term review of the Covenant returns government focus to the Covenant. The lead up to the review should be a period of intense activity by industry to reaffirm the achievements of the Covenant.

### ■ Communicating Achievement

Industry needs to communicate its achievements more widely, creatively and with greater vigour. There is a lack of understanding in government and bureaucracy, let alone the general community, about packaging and its role. The Industry needs to build a case, underpinned by quality case studies and data, which demonstrates how packaging is already contributing to sustainability.

There are many opportunities to explore. Perchard recommends the sort of messages offered by INCPEN in the UK and Europe. If, as the climate change debate suggests, world diseases will spread then the health benefits of packaging should be promoted.

Where practicable, the packaging industry should emphasise its links with renewable energy projects. If it's good enough for governments to promote desalination this way, it's good enough for industry.

The packaging industry's vision of sustainability and the effectiveness of the Covenant should be communicated directly to every relevant Minister and Head of Agency.

### ■ Building Alliances

Traditional friends and foes, including retailers, industry groups, public servants, corporate unions, environmental groups, local and regional governments need to be communicated with. The industry needs to strengthen its credibility and defuse opposition. While other industry sectors are under greater pressure, it's also a good time to establish the packaging industry's sustainability credentials.

### ■ Entrenching Sustainability

The aim should be for the industry to take ownership of the sustainability issue. The industry needs to get its message out there.

The industry should continue to reject container deposits as both inadequate and reactive. Such policy proposals are piecemeal and reflect community frustration that no matter how much recycling occurs, litter remains a highly visible problem.

While these debates will continue to occur, it is important that they do not distract companies from delivering sustainable packaging or deflect governments from supporting an effective Covenant.

At the same time there is a need to develop new imagery and language which reflects industry respect and ownership of the Covenant.

This will involve data collection and research but the emphasis should be on 'short-term, results-oriented projects' because, frankly, the industry hasn't got the time to do otherwise.

Government support will grow exponentially with an increased effort by industry to promote its sustainable packaging achievements.

## Imports

05/02/2008



Gavin Williams

***The ABS statistics for the calendar year 2007 covering the importation of "empty" packaging again shows the growth – substantial in some cases - and significance of this trade. There are two key points to make here. Clearly, Australian packaging manufacturers face significant and increasing competition from foreign manufacturers, particularly those in Asia. That competition has resulted in certain types of raw materials for packaging no longer being produced in Australia. Secondly, brandowners operating in Australia are increasingly sourcing their packaging from Asia.***

Compared with 2006, the imports of corrugated grew by nearly 20%, folding cartons by over 50%, glass bottles (not wine or beer) by over 15% and certain types of tanks and drums by a massive 65%.

The recent release of the latest Australian Bureau of Statistics figures for the December quarter 2007 yet again illustrates the extent of the competition faced by Australian packaging manufacturers from overseas suppliers. In many packaging categories, the quantity of imports of "empty" packaging (as distinct from packaged products) has increased substantially.

Details for selected packaging materials are as follows:

- **Corrugated**

A total of 18.95 million kilograms of cartons, boxes and cases of corrugated paper or paperboard were imported in 2007 which is a 19.5% increase on the 2006 figure of 15.86 million kilograms. The principal sources of supply during the December quarter 2007 were China, Indonesia, Malaysia, Singapore and India.

- **Folding Cartons**

A total of 16.30 million kilograms of folding cartons, boxes and cases of non-corrugated paper or paperboard were imported in 2007, a substantial 51% increase on the figures for calendar year 2006 (10.75 million kilograms). The principal sources of supply in the December 2007 quarter were China, Taiwan, New Zealand and Indonesia.

- **Stoppers, Lids, Caps and other Closures of Plastic**

A total of 14,431,291 kilograms were imported in 2007, a slight (2.2%) increase on the 2006 figure of 14,116,977 kilograms. China continued to be major supplier in the December 2007 quarter.

- **Glass Bottles (excluding Wine and Beer)**

The total number of such imported glass bottles in 2007 was 442,183,836 which is a 17% increase on the 2006 figure (377,607,340). The major sources of supply in the December quarter were the United Arab Emirates, Saudi Arabia, China and Indonesia.

- **Glass Jars**

The total number imported in 2007 was 128,383,953 which is a small reduction (1.3%) on the 2006 total of 130,112,797. The major sources of supply in the December 2007 quarter were the Philippines, Malaysia, United Kingdom, Taiwan and China.

- **Tanks, Casks, Drums, Cans, Boxes and Similar Containers of Iron and/or Steel**

The total number imported during 2007 was 30,438,043, a massive 65% increase on the 2006 total of 18,356,284. The major sources of supply were China, Hong Kong, New Zealand and Thailand.

**If you wish to discuss this issue, please contact Gavin Williams at the PCA on Tel: 03 9690 1955 or Email: [gavin@pca.org.au](mailto:gavin@pca.org.au)**

## **PCA News and Updates**

### **Divisional Functions**

05/02/2008



**Full details for dinner meetings in February and March for New South Wales, Victoria and Queensland are now available.**

### **New South Wales Dinner Meeting**

**"The Influence of Sustainability - Retail and Industrial Packaging"**



#### **Guest Speakers**

- **Armineh Mardirossian**  
Group Sustainability Manager  
**Woolworths Limited**
- **Les Amy**  
General Manager  
**Australian Inhibitor**

The focus of this dinner meeting will be on sustainability in a retail and industrial packaging context.

**Tuesday, 19 February 2008**

6pm for a 6:30pm start  
Ryde-Parramatta Golf Club (new venue)

**Click here** for further event and registration details:

Contact:  
Alex Doran  
Tel: 03 9690 1955  
Email: [alex@pca.org.au](mailto:alex@pca.org.au)

### **Victoria Dinner Meeting**

**"Packaging Change & Innovation - Sustainable Packaging in Australia"**



#### **Guest Speakers:**

- **Matthew Anelli**  
Senior Group Leader - R&D Packaging/Specification Management  
**Kraft Foods Australia**
- **Wes Bray**  
National Agri Business Market Manager  
**Ancor Fibre Packaging**
- **Peter Anstice**  
Manager  
**Perseco Australia (representing McDonald's)**

The above speakers will cover the following topics:

- Packaging development - environmental considerations, how important are they?
- How the Covenant has affected their business? Has it helped with innovation and supply chain issues?

## Other Matters

05/02/2008

***The ACCC will be conducting an Inquiry into Grocery Prices. A proposed update is underway for packaging requirements for child-restraint packaging of medicines. Call for nominees for a subcommittee to discuss matters relating to the packaging of therapeutic goods.***

- **ACCC Inquiry into Grocery Prices** - The Australian Government has directed the Australian Competition and Consumer Commission (ACCC) to hold a public inquiry into the competitiveness of grocery prices in Australia. An Issues Paper will be distributed shortly by the ACCC on relevant matters before calling for public submissions . For more information, [click here](#) .
  
- **Packaging Requirements for Child-Resistant Packaging** - Comments from stakeholders are being sought on a proposed update to requirements for the child-resistant packaging (CRP) of medicines for human use. It is proposed that the Therapeutic Goods Order (TGO 80) will supersede TGO 65 as a standard made under section 10 of the *Therapeutic Goods Act* 1989. To read a draft of TGO 80 and the accompanying guidance document [click here](#) . Stakeholders are invited to provide comments on TGO 80 and should be submitted by Friday, 22 February 2008.
  
- **Establishment of Subcommittee on Packaging Requirements for Therapeutic Goods** - The Therapeutic Goods Committee have recommended the establishment of a specialist subcommittee to provide advice on matters relating to the packaging of therapeutic goods. Areas of expertise of the subcommittee come from a range of packaging sectors (materials and components; technologies including blister and foil strip packaging, tamper evident etc. Should you be interested in joining this subcommittee, please contact Lyn Lewis the Secretary of the Therapeutic Goods Committee on Tel: 02 6232 8444 by Friday, 15 February 2008.

**If you wish to discuss any of these matters, please contact Jen Salem at the PCA on Tel: 03 9690 1955 or Email: [jennifer@pca.org.au](mailto:jennifer@pca.org.au)**

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