Expanded Plastic Packaging

Fact Sheet

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Disclaimer: *This fact sheet provides general guidance based on the AMA's interpretation of current regulatory advice and discussions with relevant authorities. It is intended to assist stakeholders in understanding the application of certain regulations and possible exemptions. However, this information is not legal advice and should not be relied upon as such. While some situations may be clear-cut, others require case-by-case assessment. The AMA does not accept responsibility for decisions made based on this information. For authoritative guidance, please consult the relevant legislation and official government resources, or seek professional legal or regulatory advice.*

Expanded Plastic Packaging Ban & Music Products

Background

Expanded plastics such as EPS are lightweight materials, easily transported by wind and water when littered. EPS breaks into pieces in the environment and poses a threat to wildlife. Foamed plastics like EPS are not suitable for recycling in kerbside bins because of their tendency to break up. Nationally, only 19% of EPS packaging is recycled, with the majority from commercial and industrial sources.

Expanded plastic includes, but is not limited to EPS (Expanded Polystyrene, aka 'Styrofoam' / EPS foam), EPE (Expanded Polyethylene), EPP (Expanded Polypropylene) and EVA (Ethylene-Vinyl Acetate.

In this resource we use the longer term 'expanded plastic packaging' as per the regulation, but EPS is the most typical material and what we sometimes refer to colloquially or as shorthand for these materials.

Expanded plastics are used in packaging of various kinds of music products including keyboards, guitars, drums, pro audio equipment, brass and wind instruments and accessories.

The Western Australian Ban

The ban, in effect from 1st July 2025, applies to moulded or cut packaging made from any form of expanded plastic.

The ban on expanded plastics applies to all Western Australian businesses, manufacturers, retailers and distributors that sell or supply goods requiring protective packaging.

This fact sheet illustrates which materials are (and aren't) included in the ban, how exemptions apply, and how members can manage their compliance responsibilities.

Advice & Support

The Western Australian Department of Water, Environment & Resources is leading the rollout of the expanded plastic packaging ban, and the National Retail Association has been leading the industry engagement on plastic reduction including this ban. The Australian Music Association has discussed the implications for music products with both organisations and prepared this summary.

General information about the ban can be found at https://plasticsbanwa.com.au/

Specific enquiries about the WA ban can be addressed to plastic-action@dwer.wa.gov.au

When can expanded plastic packaging be used?

Expanded plastic packaging may be used to protect items that have been identified by the manufacturer as **being fragile and requiring protective packaging** that complies with a standard specified by the manufacturer.

The manufacturer does not need to seek an exemption to operate under this provision. If expanded plastic is used, the Department of Water and Environmental Regulation would expect the manufacturer to be able to provide documentation that demonstrates:

- A decision has been made that the product could be functionally damaged in transit and/or present a safety risk without protective packaging;
- The standard of protection that is required.

If at least two compliant packaging alternatives (e.g. moulded cardboard, hybrid card and air pillow wrap) fail to provide the standard of protection, this would be sufficient evidence that expanded plastic packaging is required.

In addition, there are some product types which are identified as fragile due to the nature of their weight and precision equipment.

Note: When testing alternative packaging, consider the alternative designs and materials that can be introduced in existing manufacturing processes and transport logistics. For some items, viability of alternative packaging may require further innovation, research and volume prior to becoming comparable to existing process efficiency in an automated factory.

Where expanded plastic is deemed necessary for the packaging of a product, retailers, suppliers and distributors are encouraged to seek written confirmation and relevant documentation from manufacturers.

Retailers should seek and retain such documentation from 1 July 2025. In keeping with APCO's product stewardship, evidence should also be available on request to identify a means of collection recovery for the consumer.

Fragility testing of alternatives is not intended to be duplicated or repeated for different models or like products. For example, testing for one type of product (e.g. an electric guitar) would not need to be repeated for all model types.

First, consider if your goods require protective packaging at all or if expanded plastic can be replaced with reusable protective packaging and wraps.

Then, consider if you can use paper or pulp based protective packaging, such as moulded pulp or cardboard, honeycombed paper, wool or straw. Soft plastic air pillows and bubble wrap are allowed but we recommend considering plastic-free options first.

Official Information

This general advice is based on research and discussion surrounding the implementation of the Western Australian ban on expanded plastic packaging. Refer to official government information for up to date and complete information about current regulations.

Primary sources:

- WA Government Guidance on Expanded Plastic Packaging (May 2025)
- APCO (Australian Packaging Covenant Organisation) Roadmap for the National Phase Out of Business-to-Consumer EPS Packaging
- ISTA (International Safe Transit Association) Test Procedures
- Current WA legislation

Recycling

Expanded plastics can be recycled, in some circumstances, but are not accepted in a typical recycling bin. There are recycling options for EPS and other expanded plastic packaging.

Styrocycle coordinates paid and free recycling options for clean EPS materials

1. Bulk recycling is available, charged by volume. This is the most efficient and affordable option for large volumes of EPS that does not include other recyclables. See styrocycle.com.au/ for more information.
2. For smaller, irregular drop-offs of EPS packaging waste, individual retailers can take material directly to their nearest StyroCycle bin. A list of locations is available at https://styrocycle.com.au/where-to-recycle/

RecycleSmart is a recycling service that includes EPS and other 'tricky recyclables'.

- RecycleSmart collects a range of 'tricky recyclables' including soft plastics, e-waste, some textiles, and other materials.
- Collections are available at different volumes from 60L up to a semi-trailer at a time
- Standard pickup price for 60L bin is $14 + GST
- RecycleSmart operates in the following areas: https://www.recyclesmart.com/where-we-collect

RecycleSmart also offers paid recycling solutions, and free dropoff solutions in some areas in partnership with local councils.

- See https://www.recyclesmart.com/commercial-waste#commercialpack for business packages
- See https://www.recyclesmart.com/where-we-collect for commercial pickup locations and council-subsidised locations (currently in parts of NSW)

Scope

What is **not** included in the ban?

- Moulded packaging for fragile and precision products
- Moulded packaging for products weighing more than 45 kg
- Flexible plastic wraps and sleeves
- Packaged products with a manufacturing date before 1 March 2025
- If in double, examples can be provided to the National Retail Association (sustainability@nationalretail.org.au) or DWER (plastic-action@dwer.wa.gov.au) for advice.

The following materials are understood to be **'out of scope'** for the WA ban

Thin EPS sheets used to wrap around a product	**Hard moulded plastic packaging**	**EPE wrap**
EPS packaging for products that weigh more than 45kg	**Bubble wrap**	**Expanded plastic or foam that forms part of the product's permanent case**

What is included in the ban?

These images are not an exhaustive list of all materials but illustrate the kind of packaging that is **'in scope'** for the WA ban:

The packaging materials used in music products that are **in scope** for the WA ban are typically moulded pieces of EPS, either to support the product or case inside a box or moulded around the shape of a product or the most fragile part of the product (eg. brass instrument bell, guitar neck) during transit.

AMA Fragility Assessment Tool

Exemptions from the WA ban on expanded plastic packaging are generally self-assessed, for example by the manufacturer. The Australian Music Association is not able to assess products for an exemption but has developed a tool for businesses to use.

This tool has been seen by representatives of the WA department, but the WA government does not publish or endorse specific forms or advice such as this. The purpose of this document is to:

- **Assist** companies in collecting evidence to justify that a product is fragile and therefore needs to have some form of moulded / expanded plastic packaging (such as EPS).
- **Guide** companies through the relevant questions and evidence, including
    - identifying the kind of fragility,
    - identifying the basis of the decision making,
    - noting alternative packaging types that have been considered/tested, and
    - identifying 'like products' to avoid repeating the process for multiple products with essentially the same characteristics.
- **Maintain evidence** in a simple format that can be produced on request (for example by a wholesaler, retailer, consumer, or the WA government).
- **Prompt** manufacturers to provide evidence to retailers and/or wholesalers, or prompt retailers/wholesalers to request evidence, in a simple format. We understand that manufacturers are typically not based in Australia or interacting directly with Australian state-based regulations.

Companies may develop their own format for collecting evidence based on this tool or their own interpretation of the regulations.

The **Product Fragility Self-Assessment** tool is available as a separate document.

How to use this tool

- Collect information and assess the product packaging & fragility, test alternatives
- Complete the form with as much information as possible.
- Include a list of 'like' products (eg. electric guitars) to avoid unnecessary duplication of evidence.
- Where possible, take photos and/or save test results, documentation about product fragility or any other information related to this self-assessment.
- Save a copy. This form does not need to be submitted to the AMA or the WA government.

Questions and feedback

This document was written by Alex Masso and published in July 2025. Please send questions and feedback to alex.masso@australianmusic.asn.au / 0424 902 321.

Product Fragility Self-Assessment Tool

Manufacturer				
Who is completing this assessment?		Manufacturer		Distributor
		Retailer		Other (specify)
Product type (eg. 'Electric guitar')				
Product/s covered by this assessment (Model numbers/names, including 'like' products)				
Brief description of packaging (eg. 'Cardboard box with EPS corners')				
What part/s of the product are fragile?		Assembled parts (eg. Guitar neck)		Electronics
		Small parts (eg. Keys)		Surface or Screen
		Delicate materials (eg. Thin brass)		Speaker, microphone or delicate membrane
		Other (specify)		
What are the specific risks?		Dropping		Vibration
		Rough handling		Crushing
		Other (specify)		
On what basis have you assessed these products as being fragile and susceptible to the risks listed above?		ISTA test/s (drop, vibration, rough handling)		Other tests (by manufacturer)
		Australian Standard transport tests (drop, vibration)		Evidence of product damage
		Manufacturer experience		Technical understanding of product components
		Other (specify)		
Have two alternative packaging solutions been tested?		Moulded cardboard		Hybrid card
		Air pillow		Bubble wrap
		Loose fill (eg. Shredded cardboard)		Other wrap
Additional notes on fragility, testing or assessment:				

Assessment:				
Has the manufacturer determined that the product could be functionally damaged in transit and/or present a safety risk without protective packaging?		Yes		No
Has the manufacturer determined that the packaging described here is necessary?		Yes		No
Date:	Name:			