

6 August 2015

Mr Hubert Wu

Senior Project Officer (A/g) – Adjudication Branch
Mergers and Authorisation Review Division
Australian Competition & Consumer Commission

By email to: Hubert.Wu@acc.gov.au adjudication@acc.gov.au

Dear Mr Wu

A91504 – APMF & Ors – submission

Infoactiv Australia welcomes the opportunity to provide a short submission in support of the application for authorisation from the Australian Paint Manufacturers' Federation (APMF) and Ors.

The need to design, fund and operationalise a national collection and disposal scheme for waste paint is an essential step towards maximising resource recovery, ensuring the safe management of potentially hazardous substances and improving overall quality environmental quality. Many other benefits have been clearly outlined in the authorisation application.

A very strong stewardship approach underpinned by industry support, resources and expertise heralds a new era of environmentally sound waste paint management that is timely and necessary in Australia. Product Stewardship and shared responsibility approaches are now common place across diverse product categories, and the inclusion of waste paint reflects a mature and environmentally responsible outlook by paint manufacturers in Australia.

The envisaged scheme has the support of key industry stakeholders as well as other relevant organisations, associations and agencies. The founding companies have invested considerable resources, and this should be acknowledged as a major contribution towards effectively addressing an important waste issue in Australia.

The scheme and all associated elements including the proposed levy, the organisational structure of Paint Stewardship Limited, and the various activities related to research, market development and consumer awareness, have been carefully considered and addressed. APMF & Ors are to be commended on their efforts to design a scheme that is robust, timely and supported by key stakeholders.

The need for producers, manufacturers and brands to work cooperatively to deliver the scheme, will achieve significant environmental benefit, and secure widespread community and consumer uptake. Importantly, it should be noted that the Australian Government has clearly identified waste paint as a priority target for stewardship action, and the application by APMF & Ors highlights the optimal solution towards addressing this official priority.

It is our view (based on nearly two decades of stewardship experience), that the environmental and public health benefits associated with the proposed scheme are noteworthy and unprecedented in an Australian context.

Furthermore, the scheme's ability to remove the financial burden from local councils and state agencies is a vital step towards internalising externalities associated with effectively managing end-of-life paint and associated packaging. This cost-shifting outcome is overdue.

Infoactiv is specialist business that is focused on the design and implementation of Product Stewardship schemes and producer responsibility solutions for global brands, industry associations, corporates and government agencies. More information describing our expertise and capabilities related to Product Stewardship and product recovery can be found on the company website:

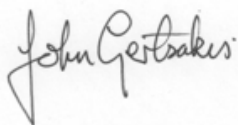
www.ecoactiv.com.au

We are intimately familiar with the rigour and planning required to achieve high performance Product Stewardship schemes. Consequently, there is no doubt that the application for authorisation submitted by APMF & Ors reflects these characteristics, and that effective implementation will follow.

In summary, Infoactiv strongly supports the authorisation application and can see that the public benefits are extensive, diverse and necessary. We do not see any negative aspects or detrimental outcomes associated with the application.

Please feel free to contact me directly on T (03) 8892 3929 if you have any questions or require additional information.

Yours sincerely



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