



Thursday 10th April, 2025

Mr Mick Keogh  
Deputy Chair, Competition Exemptions Committee  
Australian Competition & Consumer Commission  
GPO Box 3131  
Canberra ACT 2601  
Email: [exemptions@accc.gov.au](mailto:exemptions@accc.gov.au)

RE: Support for Soft Plastics Stewardship Australia (SPSA) Limited – Application for Authorisation (AA1000695).

Dear Mr Keogh,

I am writing on behalf of Australian Paper Recovery (APR) to express our strong support for the Soft Plastics Stewardship Australia (SPSA) Limited Application for Authorisation (AA1000695).

As an active investor and operator in Australia's recycling and resource recovery sector, we recognise the critical role a coordinated and authorised stewardship model plays in enabling the successful recovery and recycling of soft plastics. The SPSA framework provides the certainty, structure, and collaboration required to scale infrastructure and secure the investment necessary for delivering end-to-end circular economy solutions.

APR is currently investing in the construction of Australia's first commercial-scale pyrolysis plant, which will reprocess 3,500 tonnes per annum of fit-for-purpose, end-of-life soft plastic packaging. Scheduled for commissioning in September 2025, this facility will convert hard-to-recycle soft plastics back into a synthetic crude oil using advanced pyrolysis technology. This oil can then be refined for use in the manufacture of new food-grade plastics.

This project is the foundation of a broader national expansion. A scaled facility capable of processing 33,000 tonnes annually is planned for commissioning by 2028, backed by an anticipated \$150 million investment. However, the future of this project—and its ability to contribute meaningfully to Australia's recycling targets—depends on the implementation of an authorised stewardship framework that can guarantee a consistent, reliable feedstock supply. The viability of end markets has already been proven. Viva Energy, for example, committed in May 2023 to accept up to 50 million litres of pyrolysis oil produced in Australia, and other major downstream partners are making similar offtake commitments. While the offtake is secure, the feedstock supply remains the greatest barrier to progress.

Currently, large volumes of recoverable soft plastics are still ending up in red-lidded landfill bins. Without coordinated action, these valuable resources may be lost to energy-from-waste solutions rather than being recycled into new materials. To achieve true circularity, we must prioritise recovery and reprocessing into new plastics over incineration or landfill.

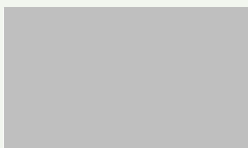
APR has partnered with the AFGC in the kerbside collection trial and pilots and therefore supports the request for interim authorisation to (1) transition their operations to SPSA, providing continuity for councils and recyclers, and (2) introduce a levy per tonne enabling scheme participant recruitment which is vital for recycling expansion.

We believe the SPSA model provides a clear, practical, and timely solution. It offers the structure and oversight needed to unlock feedstock, support new infrastructure, and ensure that Australia continues to lead in sustainable plastic recovery and innovation.

We strongly encourage the ACCC to approve the SPSA Authorisation and support the transition toward a truly circular soft plastics economy.

Thank you for your consideration.

Yours sincerely,



Darren Thorpe  
Managing Director  
Australian Paper Recovery Pty Ltd