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**Submission on:
SPSA Application for authorisation from ACCC**

The Boomerang Alliance welcomes, subject to the concerns below, the formation of Soft Plastics Stewardship Australia and its proposals to establish a national soft plastics collection service aiming to collect the majority of the material and merge it into a government mandated scheme. Since the demise of REDcycle-which in itself only collected about 5% of household soft plastics - there has been no nationally available collection service for soft plastics. It has been estimated that about 450,000 tonnes of soft plastics are placed on the Australian market each year, with an estimated 150,000 tonnes used by households.

Virtually all of these discarded soft plastics are being wasted via landfill or as litter or stockpiled by household consumers.

The Boomerang Alliance supports the introduction of a national EPR collection scheme for soft plastics, based upon producers being responsible for the full cost of recovery.

With respect to the SPSA Application:

We welcome this initiative by SPSA on the basis that:

- 1. Producers must be responsible for the full cost of recovery** across the life cycle of products placed into the Australian market. That means being accountable for all costs from design and production, through retail, consumer awareness, collection, sorting, recovery and secondary resources being reused.
- 2. The proposed soft plastic collection and recycling service should be based upon a circular economy approach.** We recommend, in the first instance, that R&D investment be focussed on producing more sustainable products and eliminating unnecessary plastics where possible. Investments should ensure soft plastic products are designed to meet best practice recyclability standards and that can be cost-effectively recycled.
- 3. Products designed to be recyclable, must be recycled in practice.** Any labelling of soft plastics must reflect this. The Australian Recycling label (ARL) should only be used on products where collection and recycling services are available and where collected plastics will be recycled.

4. A circular economy approach also recognises a hierarchy of best practices, **where recycling is the least option**. In the longer term, developing alternative options to soft plastic packaging which eliminate, reduce or reuse or replace soft plastics should be prioritised.

5. **Collection services should be nationally available and accessible** to all consumers. We understand that SPSA intend to provide in-store, kerbside and self-haul services, based upon the circumstances of each region

- In-store collection from retail should be comprehensively implemented.
- To meet the expected volumes of soft plastics collected, kerbside services will be required. We understand that trials have shown that the approach of a special bag for soft plastics overcomes contamination and MRF concerns. Producers and government will need to resolve any implementation issues from councils.
- For locations where council collections are not available or are not accessed, self-haul to designated locations, offers a solution for consumers

6. **Secondary resource infrastructure and markets must be developed to meet expected demands**. Currently, we accept that some collected soft plastics will still need to be exported for recycling in order to grow the collection system as soon as possible (rather than solely rely on domestic capacity and entrench landfilling). In this instance, these exports must be fully monitored to ensure that plastics are being recycled in practice and that overseas recycling operations are worker and community safe, and at a standard we would accept in Australia. As soon as practical, domestic infrastructure and markets need to be prioritised for all collected soft plastics.

7. To support an EPR/circular economy approach, **government and businesses should initiate procurement practices** that will stimulate secondary markets for recycled soft plastics or reusable alternatives. Recycled content rules will be required.

8. **Two soft plastics processing systems are proposed**. The first, mechanical processing is widely available and has been practised for many years – this can be upgraded through application of optical sorting. The second, chemical recycling, is more problematic. Concerns have been raised about increased emissions, the generation of toxic waste and the potential for fires. It is considered by many as the dirty option compared to mechanical recycling. An alternative option may be to continue to support mechanical recycling for soft plastics and not allow the expansion of chemical recycling. In this circumstance, any required food grade soft plastics would be derived from virgin resources, with priority given to the expanded use of non-plastics and reusable alternatives-with the goal of eliminating single use soft plastics within the timeframe of this proposal.

9. Whilst a voluntary scheme is being proposed for the start up - and involving the major supermarkets and consumer brands - we note that a **regulated Extended Producer Responsibility (EPR) scheme should be mandated as soon as possible and that SPSA states it would be cooperative**. SPSA research indicates that only 15% of soft

plastics are purchased through supermarkets and other retailers. The remaining 85% is used in a variety of other sectors that includes construction, hardware, fashion, takeaway and product packaging for transport purposes. With a goal to collect an estimated 4000,000 tonnes of soft plastics before 2030, a regulated EPR scheme that includes all producers and suppliers to participate in the scheme will be essential.

10. The scheme **fee should always be set at a level to ensure full cost of recovery and all associated services**. Most littered soft plastics are often bought from takeaway outlets. It is important that this sector is brought into the scheme as soon as possible.

11. We support the 8 year authorisation timeframe and an independent and public review at 3 and 6 years to ensure it is on track and whether milestones can be brought forward.

Jeff Angel
Director
8 April 2025