



PO Box K61, Haymarket. NSW 1240  
ACNC Registered Charity. ABN 33484952023  
55 environment NGOs - [www.boomerangalliance.org.au](http://www.boomerangalliance.org.au)

## **SUBMISSION TO ACCC – POST SPSA HEARING**

Boomerang Alliance appreciates the ACCC process in assessing the SPSA authorisation request and submits these consolidated comments.

1. The collection, recycling and reduction of soft plastics is of significant concern to the community, both as a result of the environmental impacts of plastic pollution and the failure of REDcycle. The implementation of a mandatory best practice producer responsibility scheme as soon as possible, covering the life cycle of plastics, polluter pays and reduction strategies (redesign, reuse and alternative materials) is a high priority. We note that Boomerang and industry stakeholders have agreed mandatory action should occur in 2026.
2. The proposal to authorise a voluntary scheme (with limited industry coverage) for 8 years is strongly opposed as it will stymie the timing of introduction of a mandatory scheme covering all producers, reducing the urgency of action by government and business.
3. Governance is a critical issue and the SPSA proposal lacks measures to achieve independence to limit the influence of narrow financial interests. As stated in our contribution to the hearing, the SPSA argument based on other schemes such as the container refund scheme (CRS) or existing voluntary ones, is invalid. The CRS boards are particularly governed by detailed legislation and Ministerial oversight and others like MobileMuster or Paintback are failures with low return rates.

Rather than create the current planned Board, it would be more efficient to appoint a better balanced board that could more easily transition to a board under a regulated scheme.

4. The SPSA are initially covering just 15% of soft plastic usage, when there should be a vigorous program at scheme commencement to embrace the bulk of the rest of the market such as business-to-business and agricultural uses. While the SPSA have a vague ambition to expand, a mandatory scheme will better assist this.
5. Investor confidence in reprocessing or alternative materials is much better served by a mandatory scheme. The voluntary SPSA plan will lead to an unacceptable level of slow take-up, in the absence of regulated targets such as recycled content and reuse underlying a scheme.
6. We urge the ACCC to assess the public benefit in terms of what should and can be achieved by a regulated, mandatory scheme comprising all producers (that should be put in place quickly). This is the 'status quo' to which the SPSA should be compared, rather than the current absence of any stewardship approach.
7. We acknowledge the work done to date by the SPSA and its members and their support for a mandatory scheme. As such they should be incorporated into a regulated scheme as fast as possible. This is further enhanced by keeping the SPSA separate from APCO, which would slow down and complicate future action.

Jeff Angel  
Director  
26/9/2025