



## **Proposed Authorisation for voluntary Soft Plastics Stewardship Scheme (Soft Plastics Stewardship Australia Ltd)**

The Boomerang Alliance is broadly supportive of this soft plastics stewardship scheme and that it operates separately from APCO. It is proposed to be national in scope, involves the major supermarkets in providing collection and funded entirely by soft plastic producers and packagers, with the requirement to recycle all collected soft plastics. It is an example of extended producer responsibility. Whilst current recovery predominantly means recycling of soft plastics, to be genuinely sustainable and consistent with circular economy practices, the scheme should be actively seeking to manage soft plastics, according to its highest resource value.

Achieving highest resource value inevitably means the elimination and reduction in unnecessary plastic materials, the design (at the manufacturing stage) of products so they can be cost-effectively recovered, and the manufacture of products that can be reused in preference to being recycled.

This is an essential component. The Boomerang Alliance and many, many others have raised concerns about the expansion of chemical recycling of mixed plastics. In our view, solving the plastic waste crisis is not simply about increasing recycling capacity, longer term goals will be achieved by reducing the amount of plastic that needs to be recycled in the first place. Elimination, reduction and reuse will significantly reduce the need to recycle and should be prioritised ahead of building more recycling capacity.

We understand that the scheme will include collection from supermarkets, kerbside (subject to local council approvals) and self-haul where no collection services are available or are less accessible. These collection options should collectively be able to meet consumer needs.

The SPSA application outlines a number of items such as B2B packaging and soft plastic labels as currently out of scope. These exceptions undermine the desired outcomes of the scheme. As a condition of allowing this authorisation, we believe the SPSA should undertake a process of continuous improvement to progress these matters and include in annual reporting. The goal should be to remove all exemptions and have all soft plastics used, collected through the scheme.

Consumers of soft plastics have often been misled by packaging labelling. The Boomerang Alliance has requested that accurate ARL labels be used, as a condition of allowing this authorisation. ARL consumer information labels on reuse or recycling, should only be used when that product will be recovered in practice.

Whilst this is a proposed voluntary scheme, how will SPSA ensure that all producers are involved and contributing to the scheme? A mandatory Commonwealth regulation is the only ultimate approach.

In the event that this is not quickly established, we believe it is important that consumers are made aware of which products and manufacturers that are not participating in the scheme. These products must not be labelled as reusable or recyclable. Supermarkets and other collectors should ensure that consumer information is provided to clarify this.