

25th August 2025

I am writing to provide comment on the ACCC's draft determination regarding the proposed voluntary scheme for soft plastics recycling.

At Elanora State High School (ESHS), we trialled a school-based soft plastics recycling program in 2022, prior to the collapse of REDCycle. In just three months, our school community collected and recycled 8 kg of soft plastics, primarily from packaging covering items delivered to the school. While small in scale, this experience demonstrated both the demand and willingness of communities to reduce waste when practical systems are in place.

However, the scale of the challenge nationally is immense. According to *The Conversation* (August 2024), product manufacturers were responsible for 540,000 tonnes of soft plastic packaging in Australia between 2022 and 2023—yet only 6% was recovered for recycling. The ACCC's own draft report notes that under the proposed scheme, recovery would remain extremely limited, from less than 1% in FY25 to just 4.5% by FY33, while the overall volume of plastics placed on the market is projected to increase by 25% in the same period. This trajectory makes it clear that soft plastic pollution will continue to worsen.

While authorising a voluntary scheme may provide a pathway to restart collection, the current proposal is inadequate because:

- **It lacks mandatory requirements** for reduction of soft plastic use at the source. Without reduction targets, recycling alone cannot keep pace with increased production.
- **The projected recovery rates are negligible**, and would barely dent the problem even by 2033.
- **Markets and technology remain limited**, meaning that even collected plastics may not be transformed into durable, circular products at scale.
- **Responsibility rests disproportionately on consumers and community programs**, rather than mandating accountability for manufacturers and retailers who create the waste.

For genuine impact, a future-focused scheme must include:

- Binding targets for reduction of soft plastic packaging.
- Clear, enforceable commitments from manufacturers and retailers, not just voluntary pledges.

- Government investment into developing local recycling infrastructure and markets for recycled materials.
- Transparency and accountability through annual public reporting on progress.

Our experience at ESHS showed that schools, households, and communities want to participate in reducing plastic waste. But without strong leadership, binding targets, and systemic change, voluntary schemes risk giving the appearance of action without addressing the root problem.

I urge the ACCC to strengthen the scheme by incorporating enforceable reduction and recycling targets, and by requiring producers and retailers to take direct responsibility for the waste they generate.

Sincerely,

Taya Lindner

Senior Experienced Teacher

Visual Arts + Media Arts

tlind49@eq.edu.au

EVERY STUDENT IS EXCEPTIONAL

Acknowledgement of Country
 Elanora State High School acknowledges the Kombumerri People of the Bunjalung nations, for they are the Traditional Custodians of the land on which our school is built. We pay our deep respects to all Aboriginal and Torres Strait Islanders people, Elders, past, present and emerging and acknowledge their continuing connection to land, waters, language and culture. We recognise the Kombumerri connection to Country and their role in caring for and maintaining Country over thousands of years. Together, we will uphold these values and continue learning in the spirit of these values.

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