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ACT Legislative Assembly, London Circuit, Canberra ACT 2600

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Australian Competition & Consumer Commission
Australian Capital Territory

Dear ACCC,

The ACT Greens welcome activity from the major supermarkets to recover soft plastics via a Soft Plastics Taskforce to process the stockpile left over from the collapse of REDcycle. Any activity that genuinely and safely recycles that stockpile will deliver an environmental benefit. Please go ahead and authorise this activity.

The ACT Greens also welcome intentions to set up a new pilot scheme for soft plastics under a new Soft Plastics Stewardship Australia scheme. However, we have significant concerns about the structure of the scheme [as proposed here](#) and whether it will deliver the claimed environmental benefits.

The most important goal for any new product stewardship, recycling or circular economy scheme should be to reduce waste in the first place. Avoidance has always been the first and most important goal in the traditional waste hierarchy, and avoidance and reduction are key in circular economies.

The ACT Greens are particularly concerned that this proposed scheme does not appear to contain any incentives to reduce waste from the outset, design out unnecessary packaging and ensure that any packaging used is made from recycled material. We also have the following specific concerns.

1. The scheme should be mandatory, not voluntary

Soft Plastic Stewardship Australia is seeking authorisation to operate a **voluntary** industry-led product stewardship scheme. Voluntary schemes are not effective.

If retailers, manufacturers and brand-owners are not required to comply and pay recycling levies, many will not do so. Non-participation has a negative impact on those who do participate. Voluntary participants cannot compete with freeloaders.

Voluntary schemes also undermine public confidence in the scheme itself and in recycling generally. The public is already confused about the different systems and labels about recycling that appear on products and packaging.

Many of those labels bear no relationship to whether a person can actually recycle the item in their local recycling system. It is a poor idea to add to this confusion with a new multi-playered scheme in which some participate, some do not, some items can be dropped off in store, some cannot, and much of the material is still sent to landfill.

Given the state of the climate and waste crisis, we should not be establishing more voluntary product stewardship schemes. We need simple mandatory schemes that apply to all packaging and all industry players with clear and consistent labelling, education and enforcement.

2. The scheme should have avoidance and recycled materials goals

The scheme proposed does not appear to include any avoidance goal to design out soft plastics in the first place, or to use packaging materials made from recycled material that can be easily recycled in municipal recycling facilities. This is a serious limitation.

Avoidance, requiring a minimum amount of recycled material and designing for ease of end-of-life recycling are all key components in government Circular Economy strategies in place all around the country (including here in the ACT). They should be part of any new product stewardship recycling scheme.

3. The scheme should offer household systems as well as in-store collections

The scheme appears to only contemplate in-store collections. Past experience with REDCycle and other drop-off collections show that only a small section of the population will take their packaging back to a shop for recovery. That means the recycling and environmental benefits are limited to that small group.

Drop-off collections can work well for items that are infrequently purchased and disposed of, but common items of packaging should be recyclable in the household yellow-topped recycling bins or in another simple at-home recycling solution.

We already have multiple options for packaging. For instance, people can recycle their bottles and cans in Container Deposit Return-It bins or via their yellow-topped household bin.

If the supermarkets find it cheaper to run their own in-store collections and encourage recycling that way, in addition to paying for recycling via household municipal recycling bins, we could run both systems.

But we should not allow industry to only offer their own small in-store scheme and to dodge the much greater cost of the bulk of soft plastics that will end up in council recycling and waste bins and go to landfill. We must have both.

Requiring industry to pay for the recycling of soft plastics via recycling bins at home has the added benefit of incentivising industry to use less soft plastic and to design packaging which is more cheaply and easily recycled.

Thank you for the opportunity to contribute these views.

Kind regards,

A handwritten signature in black ink, appearing to read 'Jo Clay', with a stylized flourish at the end.

Jo Clay
Deputy Leader of the ACT Greens