

## **Submission by Port Phillip EcoCentre-25 August 2025**

The EcoCentre has conducted a number of multi-year studies on the quantity, types, hotspots and pathways of plastic pollution across Greater Melbourne, VIC. Clean Bay Blueprint (2017-2020) assessed the status of plastic and microplastic pollution in Melbourne's rivers, coasts, and Bay. The study found that 2.5 billion items were travelling on the surface of two urban rivers, with 85% of these being microplastics ( $\leq 5\text{mm}$ ). Current research including the Plastic Free Bay project indicate that soft plastic fragments remain in the top 3 microplastic pollution categories on river surfaces, beaches and in stormwater drains. This environmental data shows it is critical to reconsider the use and lifecycle of soft plastics, and we support extended product stewardship. While the proposed scheme objectives are commendable, we hold concerns about the scheme design, funding, impact accountability, and possible perverse effects.

1. The proposed intervention appears to be designed unstrategically, with an emphasis on funding collection points. The REDcycle scheme did not collapse based on collection capacity, but rather on lack of end-markets leading to stockpiles. The prior scheme also did not collect the majority of soft plastics - how will this be different?
2. The scheme as outlined does not incentivise innovation, nor reduction of soft plastic packaging as a first principle. This means there is no control to prevent ongoing increases to the overall volume of soft plastics, constantly outgrowing the scheme capacity. (One analogy is struggling to mop up flooding bathwater, rather than turning off the tap.)
3. Given supermarket profits, if SPSA partners are prepared to invest \$16M perhaps that is better spent on R&D to reduce soft plastics usage, or to scaffold circular end-markets for what is collected.
4. The REDcycle logo still appears on many packages. This is greenwashing. Integrity, real impact targets and transparency is crucial before any scheme is approved by the ACCC.