



**6 April 2025**

**Re: Application for Authorisation AA1000695 – Interested Party Consultation**

We write in response to the application for authorisation submitted by Soft Plastic Stewardship Australia (SPSA) on 18 March 2025. Our organisation wishes to contribute to a viable, cost-effective, and widely available solution for the collection, sortation and recycling of soft plastics, and we appreciate the opportunity to engage in these important conversations.

**Who we are and our impact**

At RecycleSmart, we have built a strong reputation in soft plastics collection, sortation, and public education.

We have developed robust partnerships with local councils and actively engage with communities across Australia. Our database includes over 60,000 committed individuals, and we work with 27 councils nationwide to collect soft plastics and other hard-to-recycle items from residents' doorsteps, sort them and dispose of them with approved recyclers.

Since 2019, our work has resulted in the collection and diversion from landfill of over 318 tons of soft plastics, demonstrating our operational capability and commitment to making a positive environmental impact. Additionally, while not directly related to this submission, we tackle other challenging recyclables—having collected and disposed of over 1.3 million kilograms of valuable resources that would otherwise have ended up in landfill.

Through our extensive educational content on social platforms and regular newsletters, we raise public awareness about the importance of recycling and responsible plastic use, fostering community involvement and driving local action towards a sustainable recycling ecosystem.

Our achievements to date have reinforced confidence in our approach and inspired us to pursue a larger and collaborative recycling model.

**Our vision and approach**

Our primary objective is to support the SPSA framework by offering a tried-and-tested approach to the soft plastics recycling challenge. We seek to be an integral part of the SPSA collaborative model, working with supermarkets, soft plastics manufacturers, recyclers, and councils to become a collection and sortation partner. By integrating our logistics expertise and resident

doorstep solution already in place at 110 Local Government Areas, we can immediately support a successful implementation of the kerbside collection. We also provide reporting on the quantity of soft plastics collected and disposed of with approved recyclers. This allows us to quantify in real time the diversion of soft plastics from landfill.

### **Rationale for funding and financial considerations**

We recognise that many councils face stringent budget constraints, and individuals are increasingly impacted by cost-of-living pressures. In light of these challenges, it is crucial that the funding mechanism for soft plastics recycling is both equitable and sustainable. Allowing SPSA to start collecting a levy directly addresses the operational costs that are currently very limited. By ensuring that manufacturers contribute to the overall cost of collection, sortation, and recycling, the scheme can relieve financial pressures on local councils and individuals, while promoting a more robust recycling infrastructure.

### **Conclusion**

Incorporating our operational model within the SPSA scheme will offer a pragmatic and collaborative solution to the soft plastics recycling challenge. Our direct engagement with stakeholders, proven track record, and innovative approach are assets that can effectively complement SPSA's objectives. We respectfully request that the ACCC consider our submission in support of SPSA's application for authorisation.

Thank you for considering our views on this important matter. We remain available to provide further details or to discuss our submission at your convenience.

Yours sincerely,

Alvaro Rodas Fernandez  
RecycleSmart