

14 April 2025

Director, Competition Exemptions Branch, Mergers,
Exemptions & Digital Division
Australian Competition & Consumer Commission
Canberra ACT 2601

Dear Ms Macrae,

RE: Sustainability Victoria (SV) supports increased circularity for flexible plastics

SV acknowledges the ongoing challenges associated with the recovery of flexible plastics in Australia. Whilst light in weight, flexible plastics come with high embedded environmental impacts and as such we welcome moves from industry to increase the recovery and recycling of this material.

SV notes the application for an industry led soft plastic stewardship scheme, aimed at improving and future proofing soft plastic management in Australia.

It is the view of Sustainability Victoria that product stewardship can be an effective mechanism for “difficult to recycle” products and materials, particularly where a levy is applied that directly supports the recovery and recycling of that material, in turn driving investment in new infrastructure and markets for end products. When effective, product stewardship schemes can be an economically effective way to ensure that suppliers, such as manufacturers and importers, have a shared responsibility for the products they place on the market, from design through to end-of-life disposal.

It is essential however that any new stewardship scheme is designed around clear and measurable performance indicators; regular and transparent reporting regimes; and adequate governance, to ensure those who are paying the levy are getting value for money outcomes.

Similarly, SV notes ongoing parallel discussions related to packaging stewardship and regulatory reforms at national level. It is essential that stewardship interventions in the packaging sector will complement broader national packaging reforms which are critical to Victoria’s and Australia’s circular economy targets and goals.

We are pleased to support schemes that provide a strong framework on which to build better soft plastic recovery and diversion away from landfill.

Yours sincerely,



Matt Genever
Chief Executive Officer
Sustainability Victoria