

Submission by TOTAL ENVIRONMENT CENTRE-19 August 2024

Total Environment Centre has had a long history in assessing proposed product stewardship schemes, both voluntary (with limited coverage of a sector) and mandatory (full coverage of liable parties and obligations). Invariably, the voluntary schemes fail to achieve meaningful results for the circular economy and become a means to delay genuine action. The latest examples are packaging (APCO) and tyre stewardship. The proposal to only recover 3,000t (compared to 48,000t reaching end of life each year) in six years is farcical and should not allow members of ResiLoop to claim environmental credence. It will be greenwash. The ACCC should prohibit the use of any markings that imply membership of ResiLoop accords environmental respectability. Further while a period of investigation is necessary for any scheme to develop - the ACCC should telescope the timeline and ensure the investigation process includes an independent assessment whether a voluntary scheme will achieve meaningful levels of recycling (for example, a 50% recovery rate by year 3). At that point the ACCC should consider if it is worthwhile providing further authorisation and recommend mandatory product stewardship instead.