

Wildlife Queensland submission to ACCC's draft determination on the Soft Plastics Stewardship Australia voluntary scheme

Background

Plastic pollution is one of the most significant and growing threats to Australia's wildlife and ecosystems. Australians generate more than 2.5 million tonnes of plastic waste annually, yet less than 15 per cent is recovered for recycling. Soft plastics, in particular, are among the most problematic: they are lightweight, easily dispersed by wind and water, and frequently escape waste management systems to enter natural environments. Marine turtles, dugongs, seabirds, dolphins, and many terrestrial species are at risk of ingesting or becoming entangled in soft plastics, leading to injury, starvation, or death. The collapse of previous collection programs, including REDcycle, has further highlighted both the scale of the challenge and the urgent need for a robust, transparent, and accountable solution. A well-designed stewardship scheme offers an opportunity to reduce these risks, build community trust, and move Australia closer to a circular economy in which plastics are designed out of the environment and kept in productive use.

This submission responds to the Australian Competition and Consumer Commission (ACCC)'s draft determination regarding the authorisation of the Soft Plastics Stewardship Australia (SPSA) voluntary scheme (Authorisation AA1000695). Wildlife Queensland welcomes the opportunity to contribute to this process to ensure that any approved scheme delivers meaningful outcomes for wildlife protection, community confidence, and Australia's waste reduction goals.

Introduction

Wildlife Queensland (Wildlife Preservation Society of Qld) is one of the Australia's most respected environmental organisations. Established in 1962, Wildlife Queensland has over 18,000 members and supporters. Our mission is to protect wildlife and habitats in Queensland through advocacy, education, and on-ground conservation. Wildlife Queensland, with our colleagues the Boomerang Alliance, successfully campaigned (2017—2023) to ban single use plastic bags in Queensland and we welcome the opportunity to provide input on the proposed Soft Plastics Stewardship Scheme (SPSA) and commend the ACCC for enabling public consultation on this important initiative.

Plastic pollution is a cruel, pervasive and escalating threat to Australia's biodiversity and human health. It endangers wildlife through ingestion by marine turtles and seabirds, entanglement of freshwater species, and the insidious spread of microplastics that infiltrate ecosystems and accumulate in food chains. Mounting evidence also links microplastics to disruption of human endocrine systems and the ability to breach the blood–brain barrier, raising serious health concerns. The impacts on wildlife and people are profound and well-documented. To address this, Australia urgently needs a credible, transparent, and effective soft plastics stewardship scheme that reduces waste, drives recycling, and safeguards the environment and community health.

Our Position

Wildlife Queensland supports in principle the establishment of an industry-led stewardship scheme for soft plastics, but urges that authorisation by the ACCC be conditional on strong safeguards to ensure the scheme is not merely a voluntary industry exercise but a genuine, accountable system that delivers measurable outcomes for the environment and community.

Key Considerations

1. Transparency and Accountability
 - The SPSA scheme must include independent oversight with public reporting of collection volumes, recycling outcomes, and leakage rates.
 - Past failures, such as the collapse of REDcycle, underscore the need for robust governance and auditing to maintain public trust.
2. Clear and Ambitious Targets
 - Collection and recycling targets must align with the National Packaging Targets and Australia's waste reduction commitments.
 - Extend beyond recycling to absolute reductions in plastic use, with timelines for phasing out unnecessary and hard-to-recycle plastics.
3. Extended Producer Responsibility (EPR)
 - The scheme should embody genuine EPR principles, ensuring producers and retailers bear the cost and responsibility for collection and end-of-life management.
 - Costs should not be shifted to the community or local governments.
4. Equity and Accessibility
 - Regional and remote communities, including Indigenous communities, must have equitable access to collection points and services.
 - A whole-of-supply-chain approach is needed to prevent urban bias in recycling opportunities.
5. Innovation and Market Development
 - Investment in advanced recycling infrastructure is welcome, but priority must remain on waste avoidance and reuse over recycling.
 - Market development for recycled materials must be embedded, with government procurement playing a leading role in driving demand.
6. Biodiversity Protection
 - The scheme should be explicitly framed as a biodiversity protection measure, recognising that soft plastics are a major contributor to wildlife injury and death.
 - Monitoring of environmental leakage must be required, with corrective actions built into the scheme's framework.

Recommendations

Wildlife Queensland recommends that the ACCC:

1. Grant conditional authorisation to SPSA subject to strict governance, transparency, and independent auditing requirements.
2. Require the scheme to establish and publicly report against clear, measurable, and enforceable performance targets, including phased reduction of problematic plastics.
3. Ensure genuine Extended Producer Responsibility by placing the onus of cost and responsibility squarely on producers and retailers.

4. Introduce provisions for equitable access across Australia, particularly in regional, rural, and Indigenous communities.
5. Actively encourage, incentivise, and facilitate the development of businesses and products that incorporate recycled soft plastics and reduce waste.
6. Require the scheme to explicitly address wildlife and biodiversity impacts as part of its environmental performance reporting.

Conclusion

Wildlife Queensland supports the intent of the SPSA application but stresses that weak or voluntary measures risk repeating past failures and eroding public confidence. With strong conditions attached, the scheme could play an important role in reducing plastic pollution, supporting circular economy principles, and protecting Australia's unique wildlife and habitats.

We thank the ACCC for the opportunity to comment and would welcome the chance to engage further as the scheme develops.



Emeritus Professor Marc Hockings

President, Wildlife Queensland

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