

Deputy Chair Mick Keogh  
Chair, Competition Exemptions Committee  
Australian Competition & Consumer Commission  
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Canberra ACT 2601  
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Submission via online portal

Dear Mr Keogh

My name is (redacted), I am the (redacted) at Liverpool City Council in Sydney. I write to you to express my deep concerns about the application from Soft Plastics Stewardship Australia (SPSA) Limited, for Authorisation (AA1000695). This application has been done with no consultation with, or permission from, the majority of councils in the Sydney region. It attempts to co-opt councils into taking plastics bags into their yellow-lid bins, which is something that we have been fighting for 20 years to ensure that our residents DON'T DO. We have no arrangements in our current recycling contracts for this to happen, and no certainty that if recycling contracts were to be re-negotiated to allow this, that our residents wouldn't be left with considerably higher costs as a result. Furthermore, it's my understanding from the documents provided, that little work has been done by SPSA in making sure that the off take of materials that would be generated will actually have sufficient processing capacities to deal with them, and a viable end-market, providing the materials with a tangible value and a way into the economy. There does not seem to be any firm commitment to buying back and re-using this post-consumer plastic on the part of any of the businesses that are pushing this solution – the members of the AFGC.

In general, as a waste professional, I am thoroughly in favour of good quality stewardship schemes that 'join the dots', and ensure that an item or material is thought about and dealt with from the planning done before it is manufactured, to when it reaches the end of its 'first life' and is re-aggregated and reprocessed so that it can have its second, third, fourth life, etc. I recently leant my enthusiastic support to the stewardship scheme proposed to the ACCC in respect to household batteries. However, in this instance, there is no 'joined up' thinking, just an attempt to strong-arm councils into doing the wishes of the AFGC, and incurring a bunch of extra costs along the way. The proposal currently under consideration does not represent a good quality, well thought out stewardship proposal, and Liverpool Council definitely does not agree to being drafted into this. It is suspected that many Sydney Councils will feel likewise. Far more work needs to be done to make this proposal supportable.

If you wish to contact me for any further clarification, you would be most welcome to do so via my e-mail address, which is (redacted).

Yours Sincerely, (redacted)