



Edited for clarification: 2 October 2025

24 September 2025

To: Australian Competition and Consumer Commission (ACCC)
Re: Authorisation Application AA1000695 — Soft Plastic Stewardship Australia (SPSA)

**Submission to the ACCC in Response to
Zero Waste Victoria’s Concerns on the SPSA Authorisation**

Introduction

iQRenew welcomes the opportunity to contribute to the ACCC’s consideration of the SPSA authorisation. We acknowledge the concerns raised by Zero Waste Victoria (ZWV) and share the commitment to ensuring that any stewardship scheme for soft plastics delivers genuine, measurable, and transparent environmental outcomes.

Over the past six years, iQRenew has invested heavily in infrastructure, research and development, and community-based trials to address the absence of recycling solutions for soft plastics. We have built Australia’s first large scale post consumer soft plastic processing facility, ‘SPEC’ facility. We have successfully processed the REDCycle legacy stock from three States, and are working closely with the retailers to recommence return to store programs. In recent weeks over 100 guests including federal, state and local government officials attended an Open Day at the iQRenew facility, here’s a [Video of Opening Day](#). In addition we collaborate with a wide range of manufacturers who are using our products in their packaging and products. Here are some examples of our [Post Consumer Soft Plastic Products](#), which are proudly GRS certified.

Our practical experience in this space, positions us to respond to some of the issues raised by ZWV, and to demonstrate how SPSA, under appropriate conditions, can deliver a net public benefit.

zwv Concern 1: Levy funds may subsidise Coles and Woolworths through the \$16 million “REDCycle Stockpile Cost Set-off,” undermining competitive neutrality.

We agree that stewardship levies must be applied transparently and for environmental purposes. iQRenew supports SPSA’s levy being directed toward:

- Investment in recycling infrastructure (such as our SPEC Plant, capable of processing 14,000t

annually — exceeding REDcycle’s national collection volumes).

- Research and development for new end-markets that displace virgin plastics, supported by Global Recycling Standard (GRS) certification.
- Collection and processing continuity to meet public expectations and avoid a repeat of REDcycle’s collapse.

We recommend the ACCC ensure that levy funds cannot be applied retrospectively to members’ Commercial (NON soft plastic recycling) costs, and are strictly allocated to soft plastic recycling activities that demonstrably advance environmental and public outcomes.

ZWV Concern 2: SPSA’s board structure is dominated by retailers and brand owners, with limited independent oversight.

While industry leadership is necessary for funding and operational efficiency, we support stronger independent representation on the board to build trust and avoid conflicts of interest. iQRenew endorses:

- A minimum of 40% independent/Association directors, with expertise in environment, recycling, government, and community engagement.
- A robust conflict-of-interest policy, requiring directors with declared conflicts to abstain from decision-making on relevant matters.

This balance ensures both industry commitment and independent accountability, consistent with best-practice stewardship governance.

ZWV Concern 3: Without measurable recovery targets and independent reporting, SPSA risks “the appearance of progress.”

iQRenew strongly supports SPSA’s time-bound, verifiable targets for recovery and end-market development. Through the use of the [Curby Smart Recycling Platform \(SRP\)](#), iQRenew can already trace material inputs and outputs, providing end-to-end transparency and independently verifiable data. Our experience shows that infrastructure + traceability + markets = credible circularity. SPSA should adopt this framework nationally, with independent audits reported publicly.

ZWV Concern 4: SPSA may be used as a reputational tool without delivering genuine impact.

We agree that reputational claims must be matched by outcomes. iQRenew has demonstrated this through:

- Delivering the first commercial-scale SPEC Plant, processing material volumes above REDcycle’s capacity.
- Achieving GRS certification, ensuring SPSA recycled outputs meet global standards.
- Developing real market applications for soft plastics in construction and manufacturing, creating demand-pull for recycled material.



We recommend SPSA members be required to align marketing with independently verified results, to avoid reputational “badges” unsupported by evidence.

ZWV Concern 5: SPSA may entrench industry-led priorities during ongoing government reforms.

SPSA is committed to being complementary and a catalyst to national packaging reform, not a substitute. By piloting infrastructure and market development now, SPSA can provide evidence to inform government regulation. ACCC approval should be conditional and revocable, ensuring SPSA adapts as stronger national frameworks emerge.

In conclusion, iQRenew acknowledges the concerns raised by ZWV’s, particularly around governance, levy use, and transparency. However, based on our operational experience and infrastructure investment, we submit that: with strengthened governance safeguards, with levy funds ring-fenced for infrastructure, collection, and R&D, and with independent verification of outcomes, SPSA can and will deliver a net public benefit by accelerating the transition from landfill to circular soft plastics recovery.

We recommend that the ACCC grant authorisation subject to enforceable conditions addressing the issues above. This approach balances the urgency of community demand for recycling solutions with the safeguards necessary to maintain trust, prevent greenwashing, and secure genuine environmental progress.

Yours Sincerely,



Danny Gallagher – CEO iQRenew

24th of September, 2025

