

## **Submission on Draft Determination, Council of Mayors (South East Queensland) Pty Ltd, AA1000721**

I am a resident of the (specify local government area, eg Scenic Rim), one of the eleven councils covered by this application.

I support the ACCC's draft determination not to authorise this application, and want to raise a further concern about the nature of the commitment being sought: a 35-year authorisation to lock in infrastructure and waste volumes at a moment when the policy and technology settings for waste management are changing rapidly.

The timeframe does not match the pace of reform. The Productivity Commission's January 2026 inquiry into Australia's circular economy recommended strengthening product stewardship obligations and found that regulatory reform, not new processing infrastructure, is where the most significant public benefit lies.

In March 2026, Commonwealth, state and territory Environment Ministers committed to a nationally consistent product stewardship framework covering packaging, with a draft intergovernmental agreement due back at their next meeting.

The Australian Government's National Packaging Targets, expected to become mandatory regulation in 2026, aim for all packaging to be reusable, recyclable, or compostable, with brand owners and producers carrying shared responsibility for what they put into the market.

Extended producer responsibility, container deposit expansion, and mandatory recycled-content rules are all active, moving parts of this picture right now. Committing regional waste infrastructure and volumes for 35 years ahead of this reform landscape setting risks locking councils into a processing model designed for a linear economy just as national policy shifts to reduce the waste stream at its source.

Coordinated regional investment should build circular economy capacity, not disposal capacity. If SEQCoM and its member councils return with a revised proposal, I would ask the ACCC to consider whether genuine public benefit is better served by regional coordination on:

- resource recovery and materials reprocessing infrastructure (for example, glass, soft plastics, organics and textiles) that keeps materials in productive use rather than converting them to energy or landfill,
- shared procurement that favours suppliers meeting product stewardship and recycled-content obligations, incentivising upstream design change rather than downstream processing capacity, and
- collaboration with the Australian Packaging Covenant Organisation and emerging producer responsibility schemes, so regional infrastructure investment is aligned with where packaging and product design is heading, not built to process a waste stream that policy is actively trying to shrink.

Processing infrastructure sized and contracted for a 35-year horizon has the effect of guaranteeing a feedstock volume to justify the investment. That creates a direct disincentive to the waste avoidance and product stewardship outcomes national

policy is now pursuing. Regional coordination has real merit, but it should be structured to build a circular economy, not to protect the economics of disposal infrastructure against the success of waste reduction policy.

I would ask the ACCC to weigh this mismatch between infrastructure timeframes and the pace of national circular economy reform when assessing any future application from SEQCoM.

Yours sincerely,

Name

Address

**Sources:**

- Productivity Commission's *Australia's circular economy: Unlocking the opportunities* report (tabled 23 January 2026), and the
- Environment Ministers' Meeting communique of 27 March 2026 on national product stewardship reform (packaging and batteries).