



The Australian Industry Group  
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Department of the Environment and Energy  
GPO Box 787  
Canberra ACT 2601  
Australia

By email: [coagwasteexportban@environment.gov.au](mailto:coagwasteexportban@environment.gov.au)

Dear Sir/Madam

### **Banning exports of waste, plastic, paper, glass and tyres**

The Australian Industry Group (Ai Group) welcomes the opportunity to make a short submission regarding the banning of exports of waste plastic, paper, glass and tyres.

Ai Group is a peak employer organisation representing traditional, innovative and emerging industry sectors. We are a truly national organisation which has been supporting businesses across Australia for more than 140 years.

Ai Group is genuinely representative of Australian industry. Together with partner organisations we represent the interests of more than 60,000 businesses employing more than 1 million staff. Our members are small and large businesses in sectors including manufacturing, construction, engineering, transport & logistics, labour hire, mining services, the defence industry, civil airlines and ICT. Due to our broad membership, we represent businesses with interests across the supply chain, operating in all states of Australia.

There are many challenges for industry associated with the export ban time frames. The current consultation period is extremely short, and Ai Group will need more time to get a complete picture of impacts, opportunities and practicalities from our members. There will need to be ongoing discussion with government on these topics.

Currently, we identify the following as some of the largest barriers to industry improving waste management:

#### **Market Challenges**

The lack of markets for recycled products in Australia is well documented. Simply applying a waste export ban does not change this, just as the import bans already imposed by major destination countries (starting with the China Sword policy) have not led to expanded Australian waste and resource management options. There are currently substantial challenges associated with recycling contaminants and a comparatively small market for recycled input material in Australia.

Although the need to stimulate markets (without creating market distortion) has been acknowledged, governments have yet to provide clarity around what that will look like. Sustainable markets for recovered materials will require effective public policy to be closely coordinated with industry through consultation and partnership.

Industry will need further clarity around how COAG expect to meet market challenges before providing detailed comment.

## Costs

Even in the absence of detailed policy directions, significant costs will be involved in establishing sustainable markets for recovered materials. These include the investments needed in infrastructure, processing capacity, and innovation to develop new and improved ways of incorporating waste into new products. There may also be ongoing gaps between the price of virgin materials and the cost of recovered materials.

Policy makers will need to confront this reality; estimate costs as accurately as possible (and update these estimates regularly in light of experience); and allocate costs fairly and sustainably across all levels of government, the community and industry.

## Regulation

State Governments must be prepared to deploy more resources to regulators for fair and effective enforcement on any market participants that don't comply with export bans. This will prevent competitive disadvantages for businesses actively doing the right thing and ensure that the foundations are laid for increased recycling and recyclability over time.

Clear and fairly applied regulation will be essential to support businesses to deal more effectively with waste, as well as innovate and produce or import products that are better suited to Australia's waste goals and targets.

## Standards

To facilitate increased use of recycled materials as inputs to new products, changes to current standards may be required. This is because standards directly influence the recycling sector, including the type and quality of outputs as well as the potential markets for them.

Ai Group supports a harmonised approach and encourages all governments refer to, and work with, Standards Australia to amend or create the required Australian standards, or where appropriate, adopt relevant international standards. This would promote continuity and confidence in the area.

Should you wish to discuss the matters raised, please contact our adviser Rachael Wilkinson on 03 9867 0225 or [rachael.wilkinson@aigroup.com.au](mailto:rachael.wilkinson@aigroup.com.au).

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Peter Burn'.

Peter Burn  
Head of Influence and Policy