



To: The Productivity Commission  
From: Australasian Bioplastics Association (ABA)

19 August 2025

Dear commissioners,

**Re: Submission in Response to the Productivity Commission's Interim Report: National Competition Policy Analysis 2025**

Dear Commissioners,

The Australasian Bioplastics Association (ABA) welcomes the opportunity to respond to the Productivity Commission's Interim Report on National Competition Policy Analysis 2025. We commend the Commission for recognising both the benefits of international standards harmonisation and the need for local adaptation.

**Balanced Approach to Standards**

The ABA strongly supports alignment with international standards such as EN 13432, ASTM D6400, and ISO 14855, which underpin the bioplastics sector. However, one size does not fit all. Some international standards can be adopted as they stand, but others must be adapted to reflect Australian conditions and ecological requirements. The inclusion of worm toxicity testing in AS 4736 and AS 5810 is a strong example of this.

**Australian Leadership in Standards**

Australia has often been ahead of other jurisdictions in identifying needs and developing standards. For example, the Australian Home Compostability Standard AS 5810-2010 was later adopted as a model by European countries. This demonstrates the importance of allowing Standards Australia to respond quickly where international processes, such as ISO, ASTM, or EN, may take years to finalise.

**Key Recommendations**

1. **Support Local Adaptation:** Preserve the ability to amend standards to suit Australian conditions or unique requirements.
2. **Recognise Australian Innovation:** Maintain capacity for Standards Australia to lead where international standards lag.
3. **Ensure Accessibility:** Provide free or low-cost access to mandated standards, including conformity assessment protocols, to remove compliance barriers for small businesses.
4. **Focus on Environmental Needs:** Treat environmental standards as a special case, ensuring alignment does not compromise ecological protection.
5. **Encourage Innovation:** Avoid over-standardisation that could stifle local R&D and circular economy initiatives.

The ABA supports reforms that enhance competitiveness and international alignment while safeguarding Australia's environment, consumers, and scientific integrity.

We remain available for further consultation and welcome continued engagement.

Yours sincerely,

**Chief Executive Officer**  
**Australasian Bioplastics Association**

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