

2 Sept 2025

**Productivity Commission  
via online survey**

To the Productivity Commission,

**Re: National Competition Policy analysis 2025 Interim report**

Veolia is a global leader in water, waste and energy management. The group has nearly 220,000 employees worldwide, including 7,000 employees in Australia and New Zealand across 300 locations. With more than 170 years of experience, Veolia makes a significant contribution to Australia, bringing quality investments, technology, and know-how, with over \$3.75 billion in annual revenue, circa \$300m invested as BAU every year, as well as several multi-billion-dollar projects.

Veolia welcomes the Commission's interim report and strongly supports its findings that aligning standards and improving labour mobility could deliver material productivity and GDP gains. We also attach our earlier submission to Treasury's *Reforms to improve the use and recognition of standards in regulation*.

**A circular economy is fundamentally about productivity: producing more economic value from fewer raw inputs.** But Australia must lift its game: currently, we only generate US\$1.20 of GDP for every kilogram of material consumed — less than half the OECD benchmark of US\$2.50.<sup>1</sup> CSIRO modelling for the national Circular Economy Framework found that doubling circularity by 2035 would add \$26 billion to GDP annually, reduce emissions by 14%, and divert 26 million tonnes of materials from landfill.<sup>2</sup>

Fragmented and outdated standards hinder businesses, with circular projects often delayed due to unclear approvals and regulatory uncertainty. Without reform, Australia risks becoming a dumping ground for products that cannot be recirculated, as trading partners lift their standards. Harmonised rules would unlock investment and productivity, delivering the full economic, environmental and social benefits of circularity. The following should be prioritised for reform:

---

<sup>1</sup> [Productivity Commission: Australia's circular economy: Unlocking the opportunities Interim report](#)

<sup>2</sup> [DCCEEW: Australia's Circular Economy Framework Doubling our circularity rate](#)



- **Waste market fragmentation – harmonise levies, export rules and product stewardship.** Australia is failing to meet national waste targets due to inconsistent state rules and voluntary schemes. Landfill levies vary sharply between jurisdictions, encouraging interstate transport, stockpiling and even illegal dumping. Product stewardship remains patchy and mostly voluntary. The export ban has added red tape for high-quality recycled materials without ensuring enough domestic reprocessing capacity. Together, this patchwork deters investment, raises costs and undermines the viability of circular economy markets. Standardisation would deliver the National Waste Plan, protect the **\$4bn recycle export industry** and grow **thousands of jobs**; give companies like Veolia (**>\$3.75bn revenue, \$300m annual investment, 7,000 jobs**) certainty to expand; and avoid duplication, lowering costs for business and households.
- **Energy-from-Waste (EfW) – adopt proven EU standards nationally.** Veolia has faced years of delay for two of Australia's most advanced EfW projects — Woodlawn (NSW) and Maryvale (VIC) — due to bespoke, inconsistent state regulations. Despite embedding best-practice EU standards, both projects have undergone repeated technical reviews, deferring investment and jobs. Together, these projects represent **over \$1bn private capital**, diversion of **>600,000 tonnes/year of residual waste from landfill**, **~800 construction jobs** and **~500 ongoing jobs**, and reliable energy for **40,000+ homes**. National adoption of EU standards would end duplication, restore investor confidence, and allow these benefits to flow within two years.

**The Commission is right: fragmented standards are suppressing productivity.**

Veolia's experience shows the cost in real projects — billions in private capital delayed, jobs on hold, and resources wasted. By adopting proven international standards now, governments can deliver measurable gains in competition and productivity through a circular economy within two years.

Thank you again for the opportunity to provide feedback. We would be glad to meet with the Commission to share further our insights. Should you have any questions or require clarification on our submission, please be in touch with Monica Tan, Veolia's Policy Advisor on [monica.tan@veolia.com](mailto:monica.tan@veolia.com).

Yours faithfully,

**RICHARD KIRKMAN**  
Chief Executive Officer & Managing Director