

17 April 2025

## **Productivity Commission**

Circular Economy Opportunities Inquiry

GPO Box 1428

Canberra City ACT 2601

### **RE: Submission – Australia’s Circular Economy: Unlocking the Opportunities**

Dear Commissioners,

Standards Australia welcomes the opportunity to respond to the *Australia’s Circular Economy: Unlocking the Opportunities* interim report. We commend the Commission for its comprehensive and forward-looking analysis, which provides a strong foundation for coordinated national action. The report’s focus on regulatory harmonisation, implementation tools, and the strategic use of standards directly aligns with our mission to support Australia’s economic, environmental, and innovation goals through consensus-based standardisation.

#### **Supporting Regulatory Efficiency Through Performance-Based Standards**

Standards play an important role in reducing regulatory barriers and enabling circular economy practices. As Australia’s national standards body, we are committed to advancing performance-based, forward-looking approaches that support circular economy goals. In partnership with governments, industry, and experts, we can help facilitate the development of guidance, frameworks and standards that foster innovation, ensure consistency across jurisdictions, and align with Australia’s sustainability and productivity objectives.

#### **Enhancing National Consistency in Recycled Content Standards**

Standards Australia acknowledges the Productivity Commission’s recognition of the inconsistencies in recycled content specifications across jurisdictions, particularly in relation to road construction. As noted in our work with the Australian Council of Recycling (ACOR), variation in recycled content limits, despite common reference to the same Australian Standards (AS 1289 *Methods of testing soils for engineering purposes*), creates unnecessary complexity and uncertainty for industry. We reaffirm our recommendation that greater national consistency can be achieved through the development or refinement of standards informed by evidence and supported by industry consensus. We remain committed to working with industry, government, and road agencies to support the safe integration of recycled materials into infrastructure, and to advance harmonised specifications through our collaborative processes.

#### **Our Recommendations**

To support the opportunities identified in the *Productivity Commission’s interim report*, Standards Australia proposes three key recommendations to support circular economy uptake across sectors, reduce barriers and accelerate the transition to a more sustainable future.

##### **1. Measuring What Matters: Circular Economy Metrics**

A significant barrier to uptake is the lack of consistent, credible ways to measure progress. We support the interim report’s call for improved tools and propose developing a measurement and reporting guide that leverages international standards such as ISO 59020:2024 *Circular economy – Measuring and assessing circularity performance* for the Australian context. These tools will provide Government as well as Australian businesses including SMEs, industries and organisations with guidance on how to set targets and track progress towards a circular economy. By helping businesses

confidently assess, compare and report their circular performance, we can enable better investment decisions and support national circular economy accounting.

## **2. Translate Circular Economy Principles into Practical Guidance**

The interim report highlights the critical need for clearer, sector-specific guidance to enable circular design, material use, and waste reduction. Standards Australia has proposed the development of sector-specific and precinct-level guidelines that offer practical frameworks for industries such as construction, manufacturing, food and agriculture, and mining to integrate circularity into product design and repairability, facilitate resource efficiency and enable businesses to effectively transition to circular practices. Place-based guidelines are especially important for enabling regional innovation, shared infrastructure, and circular transition pathways aligned to a Net Zero future.

## **3. Build Capability Through Skills and Engagement**

A recurring theme in the report is the need for better tools and guidance to support business readiness. A recurring theme in the report is the need for better tools to and guidance to support business readiness. The interim report rightly notes that businesses, particularly small to medium enterprises, need clearer, lower-risk entry points to adopt circular models. We propose to develop a training suite that responds directly to this by building familiarity with circular economy standards and business models across multiple user groups ranging from boardrooms to small businesses.

### **About Standards Australia**

Standards Australia is the nation's peak standards development body, responsible for facilitating the creation of consensus-based standards that support industry, government, and the broader community. We represent Australia as a member of the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC) and hold leadership positions on key technical committees. This includes active participation in **ISO/TC 323 Circular Economy**, where Australia contributes to the development of globally aligned standards on circular principles, metrics, and implementation frameworks. Our international engagement ensures that Australian perspectives inform global best practice, and that local industry is well positioned to compete and lead in emerging circular markets.

In addition to our international role, Standards Australia has contributed to advancing the circular economy domestically through several targeted initiatives. We partnered with CSIRO to develop a circular economy standards mapping tool, providing a central resource for identifying domestic and international standards relevant to plastics circularity. We also led the development of an APEC report on barriers and opportunities to circular economy adoption across member economies and collaborated with the Australian Council of Recycling (ACOR) to examine the use of recycled content in road construction, highlighting opportunities for greater national consistency. These efforts reflect our commitment to enabling practical, standards-based solutions that support Australia's circular economy transition.

## **Further Contact**

Standards Australia welcomes the Productivity Commission's interim report as a timely and considered contribution to Australia's transition towards a more circular and sustainable economy. The report's emphasis on regulatory harmonisation, practical implementation, and the strategic use of standards, aligns closely with our mission and capabilities as the nation's peak standards development body.

We recognise the critical role that standards can play in reducing complexity, supporting innovation, and enabling consistent application of circular economy principles across sectors and jurisdictions. Standards Australia stands ready to partner with governments, industry, and technical experts to support the recommendations from the Productivity Commission's interim report.

We thank the Commission for the opportunity to contribute to this important work. We look forward to ongoing engagement and welcome the opportunity to discuss our submission in further detail.

For any questions or further information on the matters raised in this submission, please contact Emelia Addo-Appiah, Strategic Initiatives Manager,

Yours Sincerely

Adam Stingemore  
Chief Development Officer  
Standards Australia