



To: The Productivity Commission  
From: Australasian Bioplastics Association (ABA)  
Subject: Adoption of International Standards and Harmonisation of Regulated Standards

5 June 2025

Re: **Submission to the Productivity Commission – National Competition Policy 2025**

Dear Commissioners,

The Australasian Bioplastics Association (ABA) appreciates the opportunity to contribute to the Productivity Commission's review of National Competition Policy (NCP) 2025, specifically in relation to the role of international standards in Australia's regulatory frameworks and the harmonisation of regulated standards across jurisdictions.

*Support for Efficiency and Harmonisation*

The ABA supports reforms that enhance regulatory efficiency, reduce unnecessary burden, and improve national consistency. Alignment with well-established international standards—such as those developed by ISO (International Organization for Standardization), ASTM International, and CEN (European Committee for Standardization)—can bring significant benefits, including access to global markets, faster product approvals, and reduced compliance duplication.

*The Role of International Standards in ABA-Endorsed Standards*

In the field of compostable plastics, the ABA has long supported standards that are grounded in internationally recognised benchmarks. Two key Australian Standards—AS 4736-2006 (Industrial Compostability) and AS 5810-2010 (Home Compostability)—are both excellent examples of local standards that are based on, and harmonised with, international standards:

- AS 4736 draws from EN 13432 (Europe) and ASTM D6400 (United States).
- AS 5810 incorporates criteria from EN 13432, ISO 14855, and other global sources, tailored to home composting conditions.

*Local Adaptation for Australian Conditions*

One critical example is the inclusion of a worm toxicity test in both AS 4736 and AS 5810. At the time of their development, none of the international equivalents included such a requirement. However, Australian soils, and the organisms within them, are uniquely sensitive and form a crucial part of our agricultural and ecological systems. After extensive consultation within the Standards Australia process—including with environmental scientists, soil experts, industry stakeholders, and regulators—it was determined that a vermicomposting (earthworm) toxicity assessment was essential to protect our local composting systems and soil biodiversity.

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This addition exemplifies the value of maintaining Australia's trusted, consensus-based standards development infrastructure, which allows us to:

- Leverage international work to reduce duplication.
- Enhance relevance through expert local input.
- Ensure that standards reflect Australian regulatory, environmental, and market-specific needs.

#### *Maintaining the Integrity of the Standards System*

We respectfully caution against bypassing the existing Standards Australia process in favour of blanket adoption of international standards. While global benchmarks can and should inform regulatory development, they are not always sufficiently tailored to local requirements. The ABA believes that the trusted, independent Standards Australia model—and the stakeholder-driven ecosystem that supports it—is not only fit for purpose but essential for future-proofing Australian regulation.

#### Recommendations

We recommend that the Productivity Commission:

1. Support the use of international standards as foundational references, not wholesale replacements, within Australia's regulatory frameworks.
2. Preserve the role of Standards Australia and its consensus-based processes as the appropriate mechanism to contextualise and adapt international standards.
3. Ensure national harmonisation efforts allow for justified variations based on local conditions—especially where environmental, health, or safety concerns are at stake.

We thank the Commission for considering our submission and reaffirm our commitment to working collaboratively to enhance Australia's regulatory effectiveness and competitiveness, while ensuring environmental protection and scientific integrity.

Yours sincerely,

**CEO**

**Australasian Bioplastics Association**

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