

6 June 2025

**To: Productivity Commission**

**RE: Advice on National Competition Policy Advice**

Dear Productivity Commission

The Australian New Zealand Biochar Industry Group (ANZBIG) is writing to lend evidential support to the arguments outlined in the Standards Australia's

*"Briefing Note: National Competition Policy Analysis 2025 – Productivity Commission".*

ANZBIG concurs with the key discussion points and proposed reforms in Standards Australia's Briefing Note. We urge the Australian Government to prioritise investment in developing and maintaining robust Australian Standards, rather than defaulting to the automatic adoption of international (ISO) standards.

As an example of this need, ANZBIG is cooperating with Standards Australia to develop an Australian Standard for biochar and biocarbon products—a vital initiative which is a key element in the development of an emerging industry in Australia, which is on track to delivering multiple Sustainable Development Goal (SDG) impacts in the coming decades (See <https://anzbig.org/biochar-industry-2030-roadmap/> for more details)

We reiterate Standard Australia's position that **"Strengthening domestic harmonisation first" is the key priority**. For example, with the development of the Australian Standard for Biochar we must contend with the fact that there are different threshold levels among the States for contaminants allowed in soils and derived from different waste streams. If a biochar company is to scale and offer products nationwide, they need to know that their product is firstly safe to legally be sold in more than one state. Without this assurance capital investment is at risk. Importing an ISO standard on biochar would not solve the issue of harmonization of regulation among states. In saying that, we do make reference to international standards on biochar in our standard but we don't assume that will address all of the needs for Australian conditions.

As the Briefing Note states, over 6,500 committee members and numerous nominating organisations contribute to the current Australian Standards system that reflects national priorities. Automatically adopting international standards undermines this expertise and risks compromising the quality, safety, and public trust in regulated products.

We also echo the concerns about maintaining sovereign decision-making and Australia's ability to shape global standards from a position of strength. Weakening our domestic standard-setting processes will not only diminish our ability to respond to emerging technologies and environmental needs, but also reduce our influence in international forums, especially in key sectors like bioeconomy, clean technology, and regenerative agriculture.

We therefore call for:

- Continued investment in developing Australian Standards that reflect our unique environmental, legal, and industry context and a "one size fits all" ISO approach may not serve our county's best interests
  - Preservation of expert oversight and stakeholder input in standard adoption.
  - Consistent rules and review processes for all standards, whether local or international.
  - Financial support for key experts to devote time and energy to standards development

Yours sincerely,

Dr. Adam O'Toole

Chair of Standards and Certification Working Group

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Don Coyne

CEO

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Melissa Rebbeck

Chair

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[Melissa Rebbeck \(Jun 6, 2025 15:04 GMT+9.5\)](#)

Australian New Zealand Biochar Industry Group (ANZBIG)