



Australian
Forest
Products
Association

AUSTRALIAN FOREST PRODUCTS ASSOCIATION

Submission to the Productivity Commission:
National Competition Policy Review.

June 2025



About Australian Forest Products Association (AFPA)

The Australian Forest Products Association (AFPA) is the peak national industry body representing the Australian forest, wood and paper products (forestry) industry's interests to governments, the general public and other stakeholders on matters relating to the sustainable development and use of Australia's forests and associated manufacturing and marketing of wood and paper products in Australia.

Australia's Forestry Industries directly employ approximately 80,000 people and another 100,000 indirect employees and is a major employer in many regional towns. Australian Forest Industries contribute \$24 billion to the Australian economy each year.

6 June 2025

Chair, Danielle Wood
Australian Government Productivity Commission

AFPA welcomes the opportunity to provide this submission into the Productivity Commission's review of the National Competition Policy (NCP) 2025, as requested by the Hon Jim Chalmers MP, Treasurer, on 27 March 2025. Our submission focuses on the proposed reform to adopt international and overseas standards in regulatory frameworks and harmonise regulated standards across Australia.

As a key stakeholder, on behalf of our members, AFPA supports the current system and development of a wide range of Australian Standards that underpin our forest products supply chain, our markets, and the built environment.

AFPA supports efforts to improve regulatory efficiency and reduce burden, particularly as it relates to enhancing national consistency and competitiveness. However, we also believe it's important that any changes are built on, and not bypass, the trusted, independent system that has been shaped by scientific review and technical contribution from industry experts and stakeholders over many years.

Whilst the Treasurer's request for advice signals an expectation of an analysis towards adopting international and overseas standards in harmonisation, APFA raises its concerns in relation to the current gaps in compliance monitoring of timber products imported into Australia against any standard, whether they be international or domestic. In other words, it's fine to have standards but introducing new ones should not be a burden and should be monitored.

AFPA submits any review needs to address current policy and regulatory gaps, such as the lack of country of origin labelling for timber products, the high percentage of imports of either inconsistent species, or from unclear origin or of both¹. Current opaque supply chains lead to questions of the ethical and environmental standards of imported timber and its origins as well as potentially impacting the quality of building products and consumer awareness and choice.

¹ <https://www.agriculture.gov.au/about/news/timber-origin-trial>

AFPA suggests that any standards reform needs to include a monitoring and compliance system that addresses these current risks.

AFPA also submits the following points under any NCP review.

- When a new standard or revision of an existing standard is being proposed, Standards need to be developed by relevant technical experts using a scientific basis.
- There is already a provision to consider international standards which we continue to support however any move to simply adopt international standards that ignores local scientific and technical factors and any standards developed by compromised agreement or consensus without appropriate scientific rigor should not be eligible for consideration.
- Any standard development needs to suit Australian conditions such as climate, technical differences, and local/regional practices. An example is Australian Standard AS 3959, 'Building in Bushfire Prone Areas', which specifically acknowledges the risks of building in Australia's unique environment.
- Under the current process, Standards Australia already requires for new or revised standards initial consideration of the adoption of existing credible international standards such as the International Organization for Standardization (ISO), the European Standards (EN) or the American Society for Testing and Materials (ASTM) either in full or in part.
- Types of standards are very broad, examples include design, product, consumer, and test methods.
- Any definition of international standards should be broader than just ISO and include other credible standards such as EN and ASTM.
- The Forest Product industries already adopt international standards where and when relevant. Recent manufacturing and product examples include the I-beams test method and high-pressure laminates.
- Decisions on adoption and any necessary amendments should be considered and reviewed by local stakeholders and subject matter experts. For example, through relevant Standards Australia technical committees. Part of the review should be consideration of the scope and equivalence between Australian and international standards.
- Public and consumer access to all standards, including international standards, is an essential consideration including availability and costs to access and use.
- The ongoing sustainability and commercial viability of Standards Australia should be considered in any decision making around the standard development framework.
- Complexities of demonstrating compliance of any introduced international standards should be considered to minimise regulatory burdens that could consequently increase the costs of products and services.

Thank you for providing AFPA with the opportunity to provide this submission. If you have any questions regarding this submission, please contact Richard Hyett, Director of Policy via email



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AFPA is the peak national industry body representing the resources, processing, and pulp and paper industries covering the forest products value chain.

AFPA represents all elements of the value chain from the sustainable harvesting of plantations and multiple use natural forest resource including forest establishment and management, harvesting and haulage, processing of timber resources and manufacture of pulp and paper.

