6 June 2025

To: Productivity Commission

RE: National Competition Policy Analysis 2025

As Chair of the Australian New Zealand Biochar Industry Group (ANZBIG) Policy & Regulatory Working Group, I am writing in support of Standards Australia's "Briefing Note: National Competition Policy Analysis 2025 – Productivity Commission". I also support feedback on the Briefing Note provided separately on behalf of ANZBIG's Standards and Certification Working Group.

We represent an industry that has seen its value rise to potential for generating an estimated $13 billion by 2030 (see below) and delivering significant public and environmental benefit despite not receiving any significant Australian Government funding to date.

We refer to our November 2024 submission to the Commission on Biochar Opportunities in the Circular Economy for the tremendous economic and environmental benefits that theAustralian biochar industry provides, and note that Denmark's Government has invested the equivalent of AUD2.2 billion in biochar development for agriculture. As we noted in our 23 May 2025 follow-up discussions with the Commission, we are seeking an investment of AUD150 million in the Australian biochar sector to implement the Australian Biochar Industry 2030 Roadmap (See https://anzbig.org/biochar-industry-2030-roadmap/); this amounts to less than 7% of the Danish Government's investment in part of their biochar industry.

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. ANZBIG is cooperating with Standards Australia to develop an Australian Standard for biochar and biocarbon products.

We reiterate Standard Australia's position that "Strengthening domestic harmonisation first" is the key priority. 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.

ANZ BIOCHAR INDUSTRY GROUP

We therefore concur with our Standards and Certification Working Group's 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,

Russ Martin

Chair of Policy & Regulatory Working Group

Don Coyne

CEO

Melissa Rebbeck

Chair

Australian New Zealand Biochar Industry Group (ANZBIG)

Multi Billion Dollar Industry by 2030

Indicative potential for converting Australia's >50 Million tpa of biowastes into biochar to assist Australian agriculture:

- $5-$7.5 Billion pa – Biochar value (physical commodity)
- $3.5 Billion pa – Biochar carbon dioxide removal (CDR) value
- $2 Billion pa – Agricultural productivity gains
- $16.5 Million pa - Renewable energy savings
- $90 Million pa - Soil carbon growth value
- (plus 12-50% reduction in other GHG's (N2O etc) released from ag soils)
- •$32 Million pa - Water savings (through 0.5% increase in soil carbon in 10% of Ag land)

The theoretical sequestration potential for biochar and bioenergy in Australia is estimated to be 30-60 Mt carbon dioxide equivalents (CO2-e) per year

(CSIRO, 2022)

Total Value $13 billion dollars annually