

Brief comments received

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1	Progressing the circular economy and right to repair in Australia is super important even amongst all the other issues of national importance like cost of living.
2	The Commission and its research team should refer to the extensive resources, research and data featured on the Product Stewardship Centre of Excellence website: https://stewardshipexcellence.com.au/
3	<p>The Circular Economy (CE) is defined by three key pillars (as derived from the Ellen MacArthur Foundation): 1. Reduce pollution and toxicity in material and products 2. Improve the longevity and circularity of products and materials 3. Restore and Regenerate Nature. The majority of current CE initiatives and policies focus only on pillar Number 2. Given the Australian Government and International focus on Nature Positive, Pillars number 1 and 3. need to be embedded into any CE policy and this review to ensure not only that the CE does not result in a worsening of climate change and biodiversity loss, but indeed contributes to climate repair and biodiversity and ecological systems (nature) repair. Net positive climate and nature outcomes are needed as parallel actions with resource circularity. CE outcomes are typically measured with Life Cycle Impact Analysis (referred to as LCA). Traditional LCA methodologies only measure negatives and often CE product LCA metric are worse than virgin derived products because none of the positives (benefits) are measured in traditional LCA. The Evah Institute has developed a Life Cycle Benefit Analysis methodology based on LCA and this can uniquely be used to measure 'avoided impacts', of CE practices like recycling, reuse, refurbishment, repair, and remanufacturing. Global GreenTag uses this methodology in publishing 'Benefit Addendums' to the summary LCA reports known as Environmental Product Declarations (EPDs), as well as having developed a full set of metrics combined into a NaturePositive+Standard and NaturePositive+Declaration product certification scheme. Global GreenTag is a third party certification body that operates both a Type 1 Ecolabelling and Type 3 EPD Program, and is recognised as such by the Australian Government's Sustainable Procurement Guide, The Green Building Council of Australia, the International WELL Building Standard and the US Green Building Council's global rating tool LEED, amongst others. We would be happy to share the details of this Standard with the Commission and explain it should it be considered useful.</p>
4	I would like to see regulatory levers examined. Businesses will innovate when 'room is made'. If regulations change to encourage and incentivise more 'deconstruction' rather than 'demolition' in the construction industry new waste processing solutions will grow up around this opportunity. An exploration of this concept can be found in the following paper - 'Transformation towards a circular economy in the Australian construction and demolition waste management system' by Salman Shooshtarian et al.
5	What can Australia learn from the EUs producer responsibility, extended producer responsibility, and circular economy initiatives given their long experience with all three while recognising Australia's unique context. What lessons can be learned from elsewhere rather than reinvent the wheel? Significant investment is required to meet upfront costs associated with driving a circular economy - rather than come from government, how can businesses contribute? Another consideration is to radically revolutionise some industries. Pre-fabricated housing generates far less waste than other construction methods - how can this approach be encouraged across all states (rather than

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	driving components from say Melbourne to Sydney) to reduce waste and reduce environmental footprint. Is this more efficient than applying a circular economy over existing construction methods?
6	Nuclear energy is a sustainable source of energy that produces a small volume of radioactive waste. From the perspective of a circular economy the inclusion of nuclear energy in Australia's energy transition may produce less volume than renewable sources of energy and thereby contribute to a more effective circular economy. The current legislation prohibiting nuclear energy should not be used to prevent evidence-based consideration of nuclear power in the circular economy, especially as Australia will be responsible for management and disposal of nuclear waste arising from the AUKUS pillar 1 nuclear powered submarine program.
7	Dear Commissioners I have already made a submission 17 September 2024. Would like to follow up by drawing your attention to my article published in the Conversation on 1 October 2024. https://theconversation.com/enough-already-why-humanity-must-get-on-board-with-the-concept-of-sufficiency-235013
8	I support this inquiry and the Australian Government's transition to a Circular Economy in general. My main comment to the PC is related to :- 1. Circular Contracts - Historically waste was a problem for the recycling industry to deal with. To transition to a CE we need Circular Contracts (CC's). A CC is where the waste generator or the brand responsible for the waste is contracted to a shared commitment to the sale of products made from their waste. A good example is a CC we (CtL) have signed with City of Greater Bendigo. see www.closestheoop.com.au/products 2. Packaging Reform - As APCO and others work on reforming the management of packaging waste in Australia, I strongly urge the inclusion (mandates) for recycled content to include the use of recycled packaging materials in non-packaging products. The insistence on food grade to food grade is driving a perverse outcome in the form of chemical recycling which is not commercially or environmentally viable. The 2nd pillar of the CE is to keep products and/or materials in circulation for as long as possible. If Mechanical recycling companies can do that by using plastic packaging waste to make wheelie bins, shipping pallets or performance additives for asphalt then these solutions should be included along with packaging to packaging.
9	Moving Beyond Inquiries ~ Action for a True Circular Economy We appreciate the work being done by the Ministerial Advisory Group and the Productivity Commission in addressing the circular economy transition through this inquiry. These efforts are essential in building a strong foundation of research and policy recommendations. However, while inquiries and reports are important steps in developing a circular economy framework, there is an increasing need to move beyond discussions and into concrete, practical action. The concept of the circular economy is not new, but we still find ourselves in a landscape largely dominated by the traditional linear model—where products are manufactured, consumed, and disposed of with limited thought given to repair, reuse, or material recovery. Recycling, while valuable, has become the default solution, and this alone cannot address the broader environmental and economic challenges we face. The current focus on recycling rather than repair and reuse illustrates the depth of the entrenched linear economy model. Many innovative solutions already exist, and repair, in particular, offers one of the most direct paths to enhancing materials productivity and reducing waste. Initiatives such as community repair groups, right to repair movements, and product stewardship schemes demonstrate that action can take place now, without waiting for further inquiries. These initiatives show that circular economy principles can thrive at the grassroots level, engaging the public and small businesses in meaningful ways. However, the challenge lies in scaling these efforts and integrating them into broader policy frameworks. This is where government support, funding, and legislative action are needed to break the inertia of the current system. While inquiries are a step forward, they should not delay the implementation of existing circular economy solutions that have proven effective. For instance, right to repair legislation can help to empower consumers and extend the life of products, reducing the need for new resources and minimizing waste. Supporting repair training programs could create jobs while building local repair economies, contributing to economic growth and sustainability. Establishing dedicated repair and reuse hubs could centralize these

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	<p>efforts, making it easier for consumers and businesses to access repair services and keep products in circulation longer. The role of repair in the circular economy cannot be overstated. It is a practical, achievable action that can reduce waste, promote sustainability, and provide economic benefits through new business models and job creation. The time has come to shift our focus from planning to implementation. In conclusion, we encourage the Productivity Commission to consider how we can prioritize action-oriented strategies that embed circular economy principles into everyday life. The urgency of environmental challenges demands that we move swiftly from inquiries to implementing policies and initiatives that will help break the cycle of the linear model. The circular economy should be about doing, not just planning.</p>
10	<p>As a manufacturer of product produced from 100% post-consumer waste plastic, we have discovered that whilst initial large project intent is to support the circular economy, this message becomes lost. The organisation I represent would be considered tier 3 or 4 in the supply chain. The further the supply chain process moves down from the head contractor the more diluted sustainability, Australian made and local jobs becomes in the decision making process. Price at this level drives decision making.</p>
11	<p>Good morning I'm not sure what is correct process but I wanted to suggest a start to help every individual to be more accountable for there waste. I think education and full frontal exposure to what is already sitting in landfill and what continues to go into landfill. Circular economy is fabulous but perhaps a constant reminder will get more involved more quickly. Regular footage live streamed and advertised on television, radio and social media will stop the landfill problem being whitewashed and hidden. Our future generations are going to be left with this waste and that is not fair. I have more to add but I thought this is a small start to my comment thank you</p>
12	<p>Local government across Australia continues to identify and implement initiatives where practical policy or strategy solutions remain vague and difficult to implement with on-ground solutions. While Climate Change is well documented, responding to the widely declared Climate Emergency remains problematic across the sector. Circular Economy is a case in point where after decades of attempting enhancements on waste management, recycling and resource recovery, local government now finds itself attempting to define, communicate, understand and implement principles of circularity within their boundaries. This is often in spite of competing and more laissez faire or ad hoc adjustments imposed by State and Commonwealth jurisdictions on the way local government manages waste. Local governments across Australia are creating Circular Economy frameworks in the absence of funding resources and clear strategic demarcation between their efforts and those directed upon them by their policy 'masters'. A classic example involves reforms proposed by the Victorian Government on Local Councils around food organic recovery and other elements of the household waste stream. The Commission's work will go a long way in ensuring integration and improved listening by State jurisdictions on how Local Councils can contribute to the very important elements and principles of delivering circular economy principles on the ground in a more coordinated and sensible approach.</p>
13	<p>It is vital that systematic changes are made to legislation and regulation by the Australian government to favour circular business models over linear business models. Two businesses had told me that insurance is set up in a way to make circularity and waste avoidance prohibitive for 2 different businesses. One was a business that was renting tents for festivals - they would set up and pack down tents for attendees. The insurance for this business was so cost prohibitive that they changed the business model to selling the tents, which result in lots of waste when they are left at the site and become landfill. Likewise, another consulting business was only allowed to bring individually wrapped (plastic sealed) food to share at a training day, as her</p>

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	insurance was null and void if food was shared that was home made or in reusable containers. These are just two small examples of the systems in place that drive the business market to linear business models, due to regulation and legislation.
14	A circular economy should ideally encapsulate how land is used. This would prevent wastage of precious inner urban land to unsustainable, undesirable and non climate resilient development. Similarly, a circular economy in land use should ideally curb unnecessary sprawl and leave virgin nature land and landscapes intact, preserving environmental values and discourage greenfield expansion. The above principles should be applied to water resources, in addition to land. Finally a circular economy is never truly circular. There will always be gaps in the loop. A circular economy will need to have checks in balances in place, to legitimise its value. It also needs to achieve enough broad and diverse participants, resources and infrastructure to ensure it can self sustain. Unintended consequences and harm can stem from a poorly designed circular economy model. A circular economy be designed and delivered with the SDG goals in sight to help bring about justice, peace, safety and prosperity for the planet.
15	A lot more products need to be covered by compulsory product stewardship schemes. Starting with products that are frequently illegally dumped, then expanding to many more products. A prime example is mattresses. They are very often illegally dumped, are expensive to recycle properly, and cause issues for landfills. Local governments need more grant funding and more resources to ensure materials are recycled and reprocessed locally - particularly for regional areas.
16	Practical Suggestions that can improve the CE: 1. Improving the timeliness of DA approvals for CE Projects. Introduce Category Approval Frameworks for CE initiatives such as Micro Grids. These frameworks would outline all required documentation and all areas that must be considered for DA processing. Compliant Applications will then be granted a response within a timely basis, say 6-months. In order to provide uniform outcomes, applications are to be processed and approved by either a State or Federal Agency. 2. Create a national pilot for developing circular economies. Centred on the National Circulatory Centre in Bega NSW, the Bega Valley is ideal for such a project given the Valley's relative isolation and limited transport access (road, sea and air). This pilot is to be created via a Special Activation Precinct designed for the development of a Circular Economy. The Precinct will measure the outcomes of all circular activities, identify the life of economic assets and measure the usage of single-use materials. The National Circularity Centre will then use this data to develop policies for all levels of Government and act as a national advisory body. 3. Increase the economic life of low emission vehicles. Amend current legislation which requires all motor vehicle distributors to provide parts and service support for 10 years to 15 years. 4. Increase the economic life of the built environment. Develop a set of criteria that can be used in the design phase of all buildings to estimate the building's economic life. Require all DA's to include this estimate. Also identify the design parameters that can increase the economic life of a building. Once this criteria is understood an appropriately constructed panel can advise all levels of Government on how this information can be used to increase the economic life of the built environment.
17	I forgot to add to my submission that I think there needs to be financial incentives to drive the CR. Raise the GST to 15% for products that must be disposed of in landfill. Build in exemptions like Ten Year Warranties on Parts and Labour with a Repair Guarantee exempts the manufacturer. Make it clear exemptions are not intended to be permanent and will be wound back when appropriate. Rebates could also be built in based on EPR evidence that manufacturers successfully reclaim their end of life

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	products and manage their material separation and reuse in new production. Government can't keep handing out cash incentives for business to move towards CE. It's time to get the stick out. Financially speaking.
18	<p>Sharing platforms and in particular Libraries of Things (LoTs) and Tool Libraries offer a simply yet highly effective way for anybody and everybody to engage in circular economy activities within their community and daily lifestyle. We have 30+ LoTs and Tool Libraries around Australia allowing people to borrow items instead of purchasing them outright. If the first principal of CE is Design out Waste and Pollution, Tool Libraries design out the purchase phase of many items all together by sharing one item between many, there by greatly reducing the consumption of resources and associate embodied carbon emissions. Monash Uni's Behaviour Works Roadmap to Circular consumption report outlines of the eight core behaviours, borrow and rent were in the top three of having the biggest impact. LoTs and Tool Libraries fill this space and are masters at reactivating dormant goods sitting idle in peoples garages and home storage, and circulating them within their community. Funding is required to grow this sector and to release the full potential of these valuable and much loved community sharing platforms. Most are 100% volunteer run and rely on sponsorship, Council spaces and goodwill to keep operating. Benthg Cymru - the LoT network in Wales have grown from 1 LoT to 24 LoTs in 4 years through substantial government funding from the waste levy, allowing them to employ full time staff and develop many Libraries of Things around their country. This amazing growth would not have been able to be achieved without full time paid staff. A similar growth curve has also occurred in Scotland, once again through government funding and support. The Australian Library of Things Network can help deliver this sort of sector growth in Australia, if suitable funding would be made available.</p>
19	<p>Government could help build the circular economy and grow innovation by : - More aligned regulatory policies across states. - Looking at sandboxes for new technologies with controlled regulations, so new 'riskier' technologies can be trialled in a relevant environment. We are seeing barriers due to the growing risk aversion within Australia and continuously wanting to be followers of technologies from other countries that have been proven, rather than leaders in innovative technology development and deployment. Singapore does a bit in this space: https://techforgoodinstitute.org/wp-content/uploads/2024/02/Full-Report-Sandbox-to-Society.pdf - Another option is to partner with the private sector and set up challenges to solve real world issues, similar to what Singapore has done in the past: https://www.jurongislandinnovationchallenge.sg/#:~:text=About%20the%20Jurong%20Island%20Innovation,water%20management%2C%20and%20waste%20management. - Working more with current industry, including SMEs and startups, and looking beyond the universities for innovation and technologies. A key barrier we have is the universities are often developing competing technologies that they wish to commercialise but they are being provided privileges that us as a SME cannot access. A key for the circular economy is the need to scale in real world environments, which many SMEs and startups are trying to achieve. - Clear regulation that can be used by technology suppliers to have guidance on what they need to meet which will in turn provide confidence in companies wanting to buy technologies, that will be accepted by regulators.</p>
20	<p>My comment is on behalf of Green Collect, a social enterprise based in Melbourne. We urge the Commission to ensure that any new framework, regulations or incentives include social enterprise. Social enterprises are among the most innovative circular economy experts in Australia. Their products and services enable other organisations to meet their environmental and social goals. Social enterprises also create meaningful, quality training and employment opportunities for people who stand to benefit the most from expected jobs growth resulting from the transition to a circular economy. One challenge most</p>

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	<p>social enterprises face is that while they can access government and other grants to establish new projects or run temporary employment programs, there is a gap in support for fully establishing these initiatives, consolidating the lessons from grant-funded pilots, and making them financially sustainable in the longer term. In addition to offering different types of grants, government support for social enterprise could be in the form of incentives or regulations that drive more business towards choosing their services and products, ultimately making them less reliant on grants. In terms of education and training, there is an urgent need to embed a circular mindset and ways of working, ideally integrated into the courses training people to work in sectors that are key to the transition. There is a need for rapid upskilling across the spectrum from design through to repair, refurbishment etc, and across all industries, for both current and future employees. We know that much of the employment growth will be on a practical level, for workers dealing directly with resources and materials. We need quality, entry-level training of these skills to ensure that more people can benefit from the employment opportunities. Green Collect recently developed a new TAFE-level accredited Course in Circular Economy Practices, which is widely supported by industry, but there has been no additional funding to develop the course for delivery by several TAFEs that are keen to offer it. Government has an opportunity to fund initiatives like this on a national level.</p>
21	<p>I am concerned about the WA local government trend to move away from bulk curb side collections. Moving away from this model reduces concentrated community efforts to reuse and salvage items, locally. Furthermore, I am not convinced that offering multiple ad-hoc collections reduces emissions or landfill. The societal role of what are colloquially referred to as 'verge goblins' is undervalued, under quantified and under researched. Council statistics relating to ad-hoc collection services 'reducing landfill' are bogus: they do not, and probably cannot, quantify/compare 'verge goblin' activity. These statistics also fail to capture ad-hoc/'on demand' collection services to result in: A) illegal dumping B) people taking loads to the tip on their own accord/ engaging private services because they cannot wait over one month for an 'on demand' collection service. Not everyone has the administrative wherewithal to use buy nothing pages. It can be overwhelming to deal with concurrent no-shows. Op shops are not a suitable outlet for bulky, quality items such as surplus building materials. It would be fantastic to see more Councils commit infrastructure to tip shops or similar: providing a profitable outlet for management of quality items that fall outside the remit of op-shops.</p>
22	<p>The big opportunity is to reverse the increasing use of booked hard rubbish collection in favour of hard rubbish nights. I suspect the amount diverted from landfill from a single night where everyone puts their stuff out is huge whereas booked hard rubbish pickups are individual and it would go to the tip. There needs to be cost benefit on this to inform councils.</p>