

Tuesday, 16 July 2024

To Whom it May Concern,

On behalf of Andersens Floor Coverings Pty Ltd, Franchisor to the Andersens retail flooring network of 53 stores, I respectfully make this submission in support of the positions advocated by the group, ResiLoop Limited and the scheme they propose so that they may obtain Interim Authorisation to commence a first stage in September 2024 with confidence and transparency. Importantly, this will enable funding of the recovery of waste materials as feedstock for the production of a new (non-flooring) product. Andersens concurs with these aspects of the ResiLoop application under review:

- As a product stewardship scheme, ResiLoop enables management of a difficult construction waste stream, floorcoverings, for which there are currently very limited recycling options
- Resilient floorcoverings such as vinyl sheet and Luxury Vinyl Tiles, account of an estimated 60,000 tonnes of waste in landfill a year. Nine thousand tonnes of this have never been walked on – these are the offcuts and left-overs from laying new floors
- Landfilling this waste represents a missed opportunity to keep useable resources in productive use
- A wide range of industry stakeholders have expressed interest in seeing a solution for the waste generated in floor laying so that the material doesn't end up in landfill
- ResiLoop has been designed as an industry-supported scheme which will commit significant funding to research and development of local reuse and recycling solutions, as well as make recovery of waste from construction sites economically viable
- It takes collaboration to achieve meaningful scale in recovery and recycling of this material – acting individually, product distributors or others in the value chain have been unable to achieve this
- Interim authorisation will strengthen ResiLoop's ability to build momentum for the scheme to support the start-up of manufacturing of the new garden edging product, being sold through a national retailer. It will also give the sector confidence to commence funding R&D into further end market development and onshore solutions
- As a voluntary scheme, it will not restrict competition in the market as the levy is a very small component of price, yet may signal to other product distributors the need to address the end of life of their products through ResiLoop, or through other industry or company initiatives
- Levy transparency provides greater accountability, certainty and consistency of scheme operation, reduces risk of 'greenwashing' and offers opportunity to educate the value chain about the waste impacts of these products
- It is in the public's interest to authorise this voluntary scheme to deliver improved environmental outcomes, support transitioning to a circular economy, and send a strong signal to all distributors in the floorcovering sector to commence addressing end of life of their products.

Yours faithfully,



Rowan Hodge
CEO Andersens Floor Coverings Pty Ltd
Franchisor to the Andersens network