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TO: ACCC
Subject: Resiloop Application

Objective:

ResiLoop's application for ACCC authorisation seeks to allow them to operate an industry scheme and indicate a product levy transparently on sales of in-scope resilient floorcovering products in the market. ResiLoop, funded by a government grant in 2022, was an initiative of the Australian Resilient Flooring Association to design an industry-supported product take-back scheme. It now has 15 Founding Members, representing about 30% of the market of targeted products committed to the scheme.

They are seeking Interim Authorisation so that the scheme can commence immediately with a transparent levy passed onto customers. This will enable them to fund the recovery of waste materials required by a Victorian manufacturer who is commencing production of a new product developed specifically with recycled resilient flooring feedstock.

BVT Flooring Solutions Pty Ltd:

BVT Flooring Solutions deliver project management and installation of quality commercial flooring solutions to a wide range of valued clients. We have over 25 years industry experience, and the company is owned and run by knowledgeable industry professionals who are leaders in installations. We are Supply Nation certified.

Approval of this submission will benefit our customers and we will be environmentally sound.

Submission:

We are seeking to support Resiloop's application on the basis of the following strengths of the scheme:

- As a product stewardship scheme, ResiLoop enables management of a difficult construction waste stream, floorcoverings, for which there are currently very limited recycling options
- The construction sector is increasingly seeking ways to divert waste from landfill, and contracts and tenders include waste minimisation and management in performance requirements. ResiLoop will help provide a compliance pathway.

- 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.
- Major flooring contractors have expressed interest in seeing a solution for the waste generated in floor laying so that the material doesn't end up in landfill.
- Acting individually, product distributors or others in the value chain are unlikely to achieve meaningful scale in recovery and recycling of this material – it takes collaboration to achieve progress and scale.
- ResiLoop has been designed as an industry-supported scheme which will commit funding to research and develop reuse and recycling solutions locally, as well as make recovery of waste from construction sites economically viable.
- Interim authorisation will strengthen ResiLoop's ability to build momentum for the scheme to recover waste by supporting the start-up of manufacturing of the new garden edging product designed specifically to use this waste stream, 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 send a strong signal to other product distributors 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 the 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.