

19 July 2024

To: ACCC

Regarding: ResiLoop Application

To whom it may concern,

I am writing to express strong support of ResiLoop's application for ACCC authorisation, including for Interim authorisation. The key reasons for this support are:

- ResiLoop begins to address the 9000 tonnes annually of resilient flooring offcuts that are being sent to landfill, a significant problem with no current operational solution
- The scheme is an enabler of compliance of waste management in construction, which is gaining ground
- A very diverse set of industry stakeholders has demonstrated support for the scheme and contributed to its design
- ResiLoop delivers an industry led and industry funded solution
- ResiLoop is a first for the flooring industry and is a program that should lead to further industry developments
- The product levy is a very small in relation to product prices, therefore the impact on competitiveness would be negligible
- Founding members of the scheme do not account for the majority of resilient flooring supplied in Australia, around 30%
- Authorisation gives certainty to levy transparency, the benefit being greater visibility and consistency to all stakeholders

Furthermore, Karndean strongly supports the application for Interim authorisation. This is because the flooring industry is fragmented, with thousands of stakeholders, this scheme is a first for the industry and it will therefore provide the immediate commencement of the scheme the certainty and consistency it requires in the market. The consistency of approach by the Founding Members of ResiLoop that Interim authorisation would enable would reduce the risk of greenwashing, and increase the likelihood that the only current end market for the waste is kept supplied with the required quantities of collected material.

For transparency, in addition to my role as Managing Director of Karndean ANZ (a Founding Member of ResiLoop), I am also President of the Australian Resilient Flooring Association (ARFA) and a current Director of ResiLoop Inc. This position of support is endorsed by Karndean ANZ's Board of Directors.

Yours sincerely,

Dan Lovell  
Managing Director