

17/07/2024

**To:** ACCC

**Subject:** ResiLoop

ResiLoop's application for ACCC authorisation seeks to allow them to operate an industry waste recovery and take back scheme. ResiLoop seeks to be exempt from the potential competition risks of industry working together to deliver a product take-back scheme funded by a transparent product levy on sales of in-scope resilient floorcovering products.

ResiLoop, was initially funded by a government grant in 2022, and was an initiative of the Australian Resilient Flooring Association. It now has 15 Founding Members, representing about 30% of the market of targeted products committed to the scheme.

ResiLoop are seeking Interim Authorisation so that the scheme commences immediately with confidence and transparency via a levy not more than 15cents per m2. This will enable ResiLoop to fund the recovery of waste materials required by a Victorian manufacturer who is commencing production of a new (non-flooring) product developed specifically with recycled resilient flooring feedstock.

### **Newfurn Floorcoverings Ltd**

Newfurn Floor Coverings Ltd has become one of the largest private companies in Australia with Retail stores in Australia and New Zealand operating in over 165 different locations under the Choices Flooring Brand of retail stores, and Style Flooring Interiors brand of retail stores. Newfurn continues to go from strength to strength and also includes the Chillingworth Training Academy a Registered Training Organisation operating through Australia as a leading training organisation accredited to train the next generation of Floorcovering Technology Installation Professionals as part of its stable.

### **Submission**

Newfurn are in support of 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
- 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 usable 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.