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Esther Richards
Assistant Director, Department of Climate Change, Energy, the Environment and Water
John Gorton Building
King Edward Terrace, Parkes ACT 2600
Via email: RecycledContentTraceability@dcceew.gov.au

30 August 2023

Dear Esther,

Re: National Framework for Recycled Content Traceability

Engineers Australia (EA) welcomes the opportunity to prepare a response to the proposed *National Framework for Recycled Content Traceability Discussion Paper*.

Engineers Australia is the peak body for the engineering profession in Australia. We are a professional association with over 115,000 individual members, constituted by Royal Charter to advance the science and practice of engineering for the benefit of the community. Our members represent every discipline of engineering and work across all sectors of the economy impacting the lives of Australians every day.

Traceability as a means of understanding materials provenance is an inherent part of Lifecycle Assessment Analysis (LCA). LCA's are a valuable evaluation method not only for materials procurement, but emissions data gathering and point source emissions determination. It is one of the key tools available for industry and government to gauge the volumes of materials and emissions mass inherent in an operation and in aggregate, by sector. EA supports introducing traceability measures as a first step in LCAs becoming more widely undertaken.

Working towards a circular economy has become an important issue for EA, with our CEO, Romilly Madew, participating in the Circular Economy Ministerial Advisory Group (CEMAG), and presenting on circular economy for infrastructure. As part of this process, EA hosted an industry roundtable with nearly 60 representatives to gather perspectives on circular economy and net zero in both the built environment and infrastructure. One of the key issues identified in this process has been a lack of access to information and in particular, supply chain data.

In context of the discussion paper for recycled content traceability, EA supports the proposed framework as an initial measure. The voluntary nature of the proposal will provide a framework that enables greater awareness and education of materials traceability. As part of introducing the framework government should consider:

- Providing education and training support to industry to enable better update of the framework. This will also provide greater awareness of circular economy principles and practices, which will enable a quicker transition.
- Immediately establishing senior engineering roles within government to enable greater 'in-house' technical support in areas of circular economy and recycled content traceability.

EA supports the above measures being established during the first four-year period, or review period, as otherwise determined.

Engineering House
11 National Circuit, Barton ACT 2600
Phone: +61 2 6270 6555 | Facsimile: +61 2 6273 1488
engineersaustralia.org.au



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In the medium-long term, EA sees opportunity to expand the framework to include:

- Virgin materials: Recycled content is only one half of the materials equation and understanding materials flows throughout the entire supply chain is of paramount importance.
- Mandatory compliance requirements: While a voluntary approach in the short term offers much needed education and awareness opportunities, the current absence of a nationally harmonised framework for circular economy coupled with the current 'business as usual' construction and manufacturing paradigm, does not provide confidence that a voluntary recycled content tracking framework with no apparent incentives will be materially effectual over time. Much of the feedback gathered from the industry roundtable for the CEMAG process outlined a need for greater and stronger regulation on this topic.

The above measures would also support industry in adopting more rigorous emissions data capture and reporting mechanisms such as Scope 3 emissions data, which can be linked to NGERs reporting regimes.

Further, EA notes the Australian Academy of Technological Science and Engineering (ATSE) submission on this discussion paper. EA supports the themes and the recommendations outlined in their submission.

Engineers Australia stands ready to participate in future opportunities to discuss any of the issues raised in the discussion paper. Please do not hesitate to reach out if you would like clarification or to discuss anything further. You can contact Simon Koger, Senior Policy Adviser - Climate Change at skoger@engineersaustralia.org.au.

Sincerely yours

Jenny Mitchell
General Manager, Policy and Advocacy