SUBMISSION

Australasian Paper Industry Association
represented under Secretariat agreement and Association alliance of
The Real Media Collective

Submission to National Waste and Recycling Taskforce, Department of the Environment and Energy to the COAG Waste Export Ban enquiry.

Submission date:	10th December 2019
Lodged electronically:	coagwasteexportban@environment.gov.au
Lodged by mail:	National Waste and Recycling Taskforce Department of the Environment and Energy GPO Box 787 CANBERRA ACT 2601

THE REAL MEDIA COLLECTIVE / AUSTRALASIAN PAPER INDUSTRY ASSOCIATION
Suite 6, 151 Barkly Avenue, Richmond VIC 3121
ABN: 13 540 235 566 **T:** 03 9421 2206 **W:** therealmediacollective.com.au   1

Commercial in Confidence

Table of Contents

THE REAL MEDIA COLLECTIVE / AUSTRALASIAN PAPER INDUSTRY ASSOCIATION
Suite 6, 151 Barkly Avenue, Richmond VIC 3121
ABN: 13 540 235 566 **T:** 03 9421 2206 **W:** therealmediacollective.com.au   2

Commercial in Confidence

1.0 About the Organisation

What does your organisation do? Which sector/material stream (s) are you involved in? Which part (s) of the supply chain are you involved in (e.g. producer, processor, supplier, transport, exporter or local government)?
Where is your organisation based and across which states/territories does it operate? What is the size of your operation? For peak organisations, please provide details about the members you represent.

The Australasian Paper Industry Association (APIA)
The Australasian Paper Industry Association Ltd (APIA) is the industry association representing the interests of the Australasian Paper Industry. The membership includes paper manufacturers, paper importers (including mill agents) and paper merchants/distributors.

In 2018, APIA determined a stronger partnership with the broader industry would provide a wider vision and unified position on matters before Government and other Stakeholders to advance and strengthen the paper and print industry collectively. To that end, APIA holds a Secretariat partnership with 'The Real Media Collective'.

The Real Media Collective (Collective)
The Collective provides thought leadership, education and protection of the effectiveness, relevance, versatility, power and sustainability of consumer marketing and the letterbox advertising channel. All activities and communications are delivered in a considered, researched, balanced and verifiable manner offering a sophisticated industry voice across producers, distributors, buyers and end-users.

The Collective was formed in 2018 under a merger from the Australian Catalogue Association and TSA Limited as well as a Secretariat partnership with APIA, as aforementioned.

Pertinent to this submission is our representation of the Australian Paper industry, however the Collective also represents the commercial print, mail and graphic packaging industry sectors, including the two largest print media companies in Australia, IVE Group and Ovato Limited and the largest publisher, Bauer Media Group.

The Collective, including APIA, has 324 member companies across Australia and New Zealand. Within Australia our members operate nationally across all States and Territories. Our member company's size by turnover ranges from $250,000 to $100million + turnover.

Across the Board and Member companies of the organisation, we represent $5.4B of the $7.5B industry (these figures exclude Australia Post and Publishers). Collectively the

THE REAL MEDIA COLLECTIVE / AUSTRALASIAN PAPER INDUSTRY ASSOCIATION
Suite 6, 151 Barkly Avenue, Richmond VIC 3121
ABN: 13 540 235 566 **T:** 03 9421 2206 **W:** therealmediacollective.com.au   3

Commercial in Confidence

industry, across paper, ink, print, publishing, mail and distribution employs over 251,000 Australians across full-time, part-time and independent contractor arrangements with mixed skilled and unskilled labour supply across metropolitan and regional locations.

We work within a collaborative and like-minded industry landscape with other industry associations including, but not limited to:

Association for Data-Driven Marketing & Advertising (ADMA)
The Association for Data-driven Marketing & Advertising (ADMA) is the principal industry body for data-driven marketing and advertising. ADMA is also the ultimate authority and go-to resource for effective and creative data-driven marketing across all channels and platforms, providing insight, ideas and innovation for today's marketing industry.

The largest marketing and advertising association in Australia, ADMA has over 600 corporate members including major financial institutions, telecommunications companies, energy providers, leading media companies, travel service companies, airlines, major charities, statutory corporations, educational institutions and specialist suppliers to the industry including advertising agencies, software and internet companies.

Fundraising Institute of Australia (FIA)
The Fundraising Institute Australia (FIA) is the national peak body representing professional fundraising in Australia. Its network of more than 200 volunteers across Australia helps them service their members through their expertise, advice and oversight.
FIA champions and facilitates best practice, with its code for ethical fundraising and achieves this through professional development, networking and advocacy for all its members.

Visual Connections
Visual Connections is the premier association for the suppliers of hardware, software, consumables and ancillary services for the print, graphics and signage industries in Australia. It supports its members and promotes a sustainable and successful future for the industry through education, exhibitions, sponsorship, grants and networking opportunities, and have the largest trade show portfolio in the industry with PrintEx, PacPrint, Visual Impact and Label+ Packaging Expos under its banner.

Specifically related to the COAG Waste Export Ban discussion paper, we work with the Australian Forest Products Association.

Australian Forest Products Association (AUSFPA / AFPA)
The Australian Forest Products Association is the peak national industry body representing the resources, processing, pulp, paper and bioproduct industries covering the forest products value chain.

THE REAL MEDIA COLLECTIVE / AUSTRALASIAN PAPER INDUSTRY ASSOCIATION
Suite 6, 151 Barkly Avenue, Richmond VIC 3121
ABN: 13 540 235 566 **T**: 03 9421 2206 **W**: therealmediacollective.com.au   4

Commercial in Confidence

AFPA's membership falls under four chambers (Growers, Hardwood Processing, Softwood Manufacturing, Pulp, Paper and Bioproducts) representing the core business of organisations at different points in the value chain.

Why do we work together?
The Associations by the nature of their commonality – commitment to achieve growth across the graphic communications industry from supply to design to production to delivery – have alignment in projects and vision for our Industry. Further, with common executive management via a shared paid Executive, Management team, Board and Member synergies, working together assists in a united approach and a commitment to respond to the industry's requirements to protect and promote.
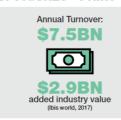
THE REAL MEDIA COLLECTIVE / AUSTRALASIAN PAPER INDUSTRY ASSOCIATION
Suite 6, 151 Barkly Avenue, Richmond VIC 3121
ABN: 13 540 235 566 **T:** 03 9421 2206 **W:** therealmediacollective.com.au   5

Commercial in Confidence

2.0 Industry Snapshot

AUSTRALIAN PAPER, PRINT & MAIL INDUSTRY

SNAPSHOT

KEY FIGURES - PRINT

Annual Turnover:	Employs:	In:
$7.5BN		
$2.9BN	**30,587**	**5,294**
added industry value (Ibis world, 2017)	Australians (Ibis world, 2017)	businesses (Ibis world,2017)

KEY FIGURES - PULP & PAPER

Annual Sales Income:	Employs **60,820** of which	**73.70%**
$9BN (AFPA, 2016)	**18,000** direct employees (AFPA, 2016)	paper products are recycled (AFPA,2017)

PRINTING INDUSTRIES INCLUDE:
books, magazines, sandwich boards, clothes labels,street signs, t-shirts, catalogues, envelopes, billboards,packaging, labels, signs.

RELATED INDUSTRIES INCLUDE:
packaging, signage, marketing, design, media, communications, paper production, mail and related services, and distribution.

PULP, PAPER, PRINT & MAIL DISTRIBUTION
PEOPLE BREAKDOWN BY SECTOR

MAIL & RELATED SERVICES (mail processing direct & indirect) **121,389*** (ACIL Allen, 2015)	PAPER **60,820** (AFPA, 2016)	
LETTERBOX DISTRIBUTION **33,742** (ACA, 2017)	PRINT / PUBLISHING / PRINT DESIGN **35,049**	TOTAL AUSTRALIANS EMPLOYED **251,000** *[Note: this is excluding the Mail advertising services Group C – as entire print industry is reported within the Print/Prepress/ Print design figure from Ibisworld, 2016].

INDUSTRY REPRESENTATION:
The industries represented above include paper, print, publishing, mail and distribution all reprsented by The Real Media Collective in partnership with the Australasian Paper Industry Association and Australian Forest Products Association. The Real Media Collective membership represents $5.4B of the $7.5B industry.

THE REAL MEDIA COLLECTIVE / AUSTRALASIAN PAPER INDUSTRY ASSOCIATION
Suite 6, 151 Barkly Avenue, Richmond VIC 3121
ABN: 13 540 235 566 **T**: 03 9421 2206 **W**: therealmediacollective.com.au

3.0 Impact on Industry

What will the COAG export ban mean for your organization/members and day-to-day business operations?
If it results in a change to your business, what does that change look like?
Will these changes require your business to invest? If so, what is the approximate dollar value of the investment? What would be the main focus of this investment (for example, new infrastructure or hiring new staff)? What is the investment expected to result in (for example, increased capacity from X to Y, new products being developed)?
Are there any impediments to investment and how can these be overcome?
Could these changes create jobs in your business? If so, approximately how many?
What are the other challenges and/or opportunities for your business/industry as a result of the export ban?

Industry position
APIA nor The Collective support Government regulation to ban the export of mixed paper waste to international markets. There are several mitigating factors for this position, however the key areas include:

1. **Fixed local capacity**
   There is more waste paper from commercial output produced in Australia than there is local capacity to re-use or recycle. This means should the Australian Government implement a waste export ban on paper and paperboards, then this waste stream would be sent to Australian landfill, increasing the environmental footprint over export solutions.

2. **Industry, and employment, at risk for negative environmental gain**
   In addition to the environmental impact of paper to landfill, the waste export ban on paper also creates a serious cost impediment to Australia's largest manufacturing industry employer. Local manufacture is already under enormous pressure from cost competitiveness across international labor markets, these legislative impacts with negative environmental and economic benefits seem misguided and to the detriment of all parties desired outcomes, including Commonwealth, State and Local Governments.

3. **Environmental credentials are strong and established**
   The paper and print industry across Australia, and globally, has a well-established and commercially viable recycling sub-industry which sees paper and paperboard waste applicable for recycling or other re-use initiatives being sold locally, and if not, internationally for recycling solutions. Any ban on these export solutions would lead

THE REAL MEDIA COLLECTIVE / AUSTRALASIAN PAPER INDUSTRY ASSOCIATION
Suite 6, 151 Barkly Avenue, Richmond VIC 3121
ABN: 13 540 235 566 **T:** 03 9421 2206 **W:** therealmediacollective.com.au   7

Commercial in Confidence

to reduced profitability to Australian manufacturers, a loss of Australian jobs and an increased environmental impact.

Background

The war on waste is one that continues to demand discussion and in particular there is a focus on recycling and waste to landfill. APIA and the Collective membership, support recycling and waste reduction commitments and as a broader local and international industry have developed strong commercial models that deliver improved environmental footprint and most specifically reduced waste.

Since January 2018, with China's global ban on receiving the world's waste there is a recognised crisis that has hit Australia, as well as many other countries. As an industry we too are impacted, at times positively with the switch from plastics to paper our industry has realised some opportunities with paper straws, bags and more. However, our industry is challenged with other significant matters that do place pressure on the longevity of a longer-term paper manufacture and print industry within Australia.

Despite China's bans, this has not significantly impacted the export of our paper and paperboard waste as industry has developed other international opportunities which will deliver ongoing recycling percentage levels well into the future, assuming Government does not impede current operating models.

The global recycling industry is large, with much opportunity for Australia. With World Bank estimates reporting that 2.01bn tons of municipal solid waste were generated in 2016 – a figure expected to grow to 3.40bn tons by 2050, fuelling what is already a $433bn industry. More than 270M tons of waste are recycled across the world each year. Every year there are at least 700M tons of waste recycled globally as 'secondary commodities' – such as plastic, textile and paper – in what is now a $200bn business[1]. How we work with Government, our local mills and other organisations will be important on our journey and industry is keen to work in partnership to grow existing models, rather than be included in regulation which reduces opportunity.

Not unlike other manufacturing sectors, the Australian print industry is seeing volume and margin erosion whilst labour and energy costs are increasing. Whilst these are being reviewed and mitigated, regulatory imposts from Government on areas already achieving strong environmental outcomes seems misguided.

---

[1] Assemble *Papers*, Michele Acuto, University of Melbourne.

THE REAL MEDIA COLLECTIVE / AUSTRALASIAN PAPER INDUSTRY ASSOCIATION
Suite 6, 151 Barkly Avenue, Richmond VIC 3121
ABN: 13 540 235 566 **T:** 03 9421 2206 **W:** therealmediacollective.com.au   8

Commercial in Confidence

Fixed local manufacture

Across Australia there is a fixed local paper manufacturing capacity that accepts mixed paper waste. Present day, this is currently being fully utilised. Export agreements currently in place and to be continually developed are private agreements with printers and paper mills throughout the world who have capacity to utilise paper waste generated from commercial print, within their paper manufacturing.

With the recent closure of the Norske Skog Albury site it is expected in 2020 alone there will be some 100,000 to 120,000[2] tons of mixed paper grades no longer able to sold within a local market. Should a waste export ban be implemented across mixed paper sources this will lead to this entire volume of mixed paper grades being shifted to landfill in Australia.

The carbon footprint of paper to landfill is 2.9 tons for every ton of paper (0.78 metric tons of carbon equivalent/ton × 44 kg CO_2/12 kg C = 2.87 metric tons CO_2 equivalent/ton of waste recycled instead of landfilled)[3], a far greater environmental impact than export solutions and this needs to be avoided at all cost.

It will always be within industry's best interests to sell mixed paper grades locally and despite the immediate pressure of Norske Skog closure, there is exploration across industry of the differences between Old Newsprint (ONP) and Old Magazine Grade (OMG) grades and the possibility of some local supply solutions – Boyer for OMG, Fibre Cycle (Kitty Litter) and Australian Paper for OMG and possibly ONG in the energy development plant.

However, these options will not recover the entire volume, if any at all. The Australia Paper energy plant options, currently in progress, must be understood by the Taskforce, as not all waste papers are created equal. Whilst still being developed the expectation is that the requirement from Australian Paper will look to household waste streams redirecting from landfill, to ensure burn temperatures are achieved (plastics burn higher than paper), rather than from commercial print generated mixed paper grades.

Government can be reassured, should any local demand for mixed paper grade waste increase due to investment or other projects, it will be more cost effective and therefore more profitable for commercial printers to sell mixed grade waste paper to local manufacturers than export solutions. This alone provides a strong argument against Government intervention or regulation for this sector, as the industry already has an established environmental solution that is commercially viable and able to flex to local and international markets as required.

---

[2] Norske Skog, 2019
[3] EPA, 2016, Waste Reduction Model (WARM), Version 14.US Environmental Protection Agency

THE REAL MEDIA COLLECTIVE / AUSTRALASIAN PAPER INDUSTRY ASSOCIATION
Suite 6, 151 Barkly Avenue, Richmond VIC 3121
ABN: 13 540 235 566 **T:** 03 9421 2206 **W:** therealmediacollective.com.au   9

Commercial in Confidence

Industry, and employment, at risk for negative environmental gain

Currently the largest print groups, including publishers and catalogue producers, receive a revenue of ~$18.87M[4] per annum for recovered mixed paper waste (Note: This includes the Old Newsprint and Old Magazine Grades only and all other paper and paperboard sectors must be added to this figure for a total Australian impact.).

Local manufacture provides the best pricing structure for recovered waste papers of both grades OMG and ONG, however, as discussed above, given a fixed capacity of paper manufacture within Australia there will be surplus which requires international agreements.

These agreements are expected to dramatically reduce the revenue opportunity with some industry expectations forecasting the revenue of ~$18.87M[3] per annum will reduce to less than ~$5M[3], for the entire industry sector, annually.

Despite this reduced income opportunity, the cost to move to landfill, should a Waste Export Ban be applied to paper and paperboards, as currently scheduled, printer groups and publishers could be hit with an industry cost of $5.724M[3].

This cost would be an impost to an industry already facing significant challenges, specifically to industry's operating cost increases over the recent period. And whilst the above figures highlight the largest industry players, the impact will be deployed across small and medium businesses across the country with further devasting impact.

The broader paper, print, mail and distribution industry is the largest manufacturing industry employer in Australia, employing 251,000[5] Australians across metropolitan and regional areas. Over the past five years the industry has seen significant volume declines with a shift of advertising revenue to digital solutions. Ibis World reports that "price pressures and slowing demand have placed downward pressure on industry profitability. Rising competition from digital alternatives has reduced average per-unit prices, as firms have lowered prices to acquire client contracts"[6].

Across 2017 to 2019, Paper, the largest raw material cost component of print manufacture, realised price increases across all origin, grades and grammages of ~18-25%[7]. Whilst the expectation throughout 2020 is that these prices will stabilise, there is always risk of the Australian Dollar fluctuation. Should the Australian Dollar drop, pricing pressure will apply, further as graphic paper production globally is converted to other grades due to over-supply, there is some industry thought that Pulp prices may increase throughout 2021 and this could also threaten pricing stability.

---

[4] The Real Media Collective, PORTA™ Industry Metrics, 2019
[5] The Real Media Collective, Industry Snapshot – Australia, 2018-19
[6] Ibis World, Printing in Australia, 2018
[7] APIA, 2019

THE REAL MEDIA COLLECTIVE / AUSTRALASIAN PAPER INDUSTRY ASSOCIATION
Suite 6, 151 Barkly Avenue, Richmond VIC 3121
ABN: 13 540 235 566 **T:** 03 9421 2206 **W:** therealmediacollective.com.au   10

Commercial in Confidence

In addition to paper increases, energy costs have increased by ~20-30%[3] over the past two years and look to continue to increase in the immediate term for our mid-tier and large member organisations. With decreased profitability and increasing operating costs Government regulation that places further financial pressure may well be the final catalyst to send the largest manufacturing industry employer off-shore with significant job losses across Australia.

Environmental credentials are strong and established

The paper and print industries have established environmental credentials for the recovery of paper and paperboard products for recycling purposes operating nationally. These programmes are operating successfully with organisations such as VISY and Australian Paper, among others, building strong buy-back models for the raw material from printers and other operators. Australian Paper reports they purchase some $20M of waste paper which defers some 80,000 tons of papers from landfill[8].

As an industry we can stand by our environmental credentials and, more specifically in this current market, our recycling qualifications. The National Waste Report, 2018, states that about 5.6 Mt of paper and paperboard waste was generated in 2016-17, or 229 kg per capita. Of this, about 60% was recycled and 40% was sent to landfill. Compared to other waste outputs this is an outstanding achievement and the paper industry should not be penalized for having a strong environmental and recycling record.

The paper industry's performance should be recognized and applauded when compared with other waste streams. The plastic recycling rate in Australia is only 12% with 87% sent to landfill and 1% sent to an energy from waste facility[9]. If we look to e-waste of the 15.7 million computers that reached their 'end of life' in Australia in 2007-08, only 1.5 million were recycled - less the 10%[10]. Governments are building solutions to e-waste and plastic recycling problems; however, paper recycling plants and programs are well-established and delivering strong recycling outputs for our industry today and therefore should not be regulated. Regulation suggestions currently tabled create greater confusion, increased pressure on industry and negative environmental outputs.

Right now, one of the world's most sustainable and environmentally friendly industries is paper and print. Along with glass, paper is the world's most recycled material. The proportion of waste paper recycled in Australia increased from 28% in 1990 to 85% in 2016, with around 87% of all paper and paperboard currently consumed in Australia being recovered[11].

---

[8] Australian Paper, 2019.
[9] National Waste Report, 2018.
[10] Total Environment Centre 2008, Tipping Point: Australia's E-Waste Crisis.
[11] CEPI Sustainability Report, 2019.

THE REAL MEDIA COLLECTIVE / AUSTRALASIAN PAPER INDUSTRY ASSOCIATION
Suite 6, 151 Barkly Avenue, Richmond VIC 3121
ABN: 13 540 235 566 **T:** 03 9421 2206 **W:** therealmediacollective.com.au   11

Commercial in Confidence

When developing regulation for paper and paperboard waste being recovered or recycled it should be noted that some paper products can never be 100% recovered for recycling because they are kept for long periods of time (books) or archived (records); others are destroyed or contaminated when used for security purposes[12]. It is in this capacity that paper products sit as solid carbon stores, a stronger environmental advantage than landfill options.

The industrial processes that create paper are also among the most environmentally friendly in the world, with the paper, paper products and printing sector being one of the lowest emitters of industrial greenhouse gas. As part of a global manufacturing industry that emits 24% of the world's greenhouse gases, paper and print products only account for 0.9% of this number. And thanks to a major investment at Australia's largest catalogue and magazine paper producer - catalogue, brochure, magazine and newsprint production results in 20% less direct CO_2 emissions[13].

As an industry, with the world rightfully debating recycling claims, we can stand proud and confident with our environmental record. Paper is a renewable resource, it is 100% recyclable and, when compared to other channels has a commercially viable industry of recycling that continues to feed into the circular nature of paper and paperboard.

A waste export ban on paper will lead to increased cost to industry with lower environmental gain, cost Australians jobs and potentially collapse an industry already facing challenges. Waste paper streams available to export under commercial agreements would be lost and paper would be sent to Australian landfill with higher environmental impact.

---

[12] National Waste Report, 2018.
[13] Two Sides, 2019.

THE REAL MEDIA COLLECTIVE / AUSTRALASIAN PAPER INDUSTRY ASSOCIATION
Suite 6, 151 Barkly Avenue, Richmond VIC 3121
ABN: 13 540 235 566 **T:** 03 9421 2206 **W:** therealmediacollective.com.au   12

Commercial in Confidence

4.0. Proposed ban timetable and definitions

Are there any additional waste plastic, paper, glass or tyre materials that should be included in the proposed timetable? Please detail why and in what circumstances.

Are there any waste plastics, paper, glass or tyre materials you consider should be excluded from the ban? Please detail why and in what circumstances?

How ready is our business/industry/local government to meet the proposed start dates for banning the exports of different types of waste plastic, paper, glass and tyres?

Three key considerations for exclusion to the Waste Export Ban:

1. Any and all waste paper and paperboard generated from the commercial printing industry is well-prepared and graded product. Given the clean line of manufacture, the waste paper and paperboards are free of contaminants and highly sort after for export markets. Commercially generated mixed paper waste, at the very least, should the Taskforce not agree to this submission and exclude paper and paperboard under the Waste Export Ban, then these waste products should be included under the exportable 'value-added' waste definitions for all aforementioned facts. Industry welcomes the opportunity to assist Government in this definition development.

2. The paper and paperboard recycling industry is a true circular economy. From forestry regeneration, planted tree harvest, paper production to recycling and re-use, all operating under a renewability umbrella this industry has a strong and growing future economy that current Waste Export Ban inclusion plans would destroy.

3. Given local paper manufacturing capacity has 100% supply, the excess should be sent overseas to continue to develop this growing and new waste recycling economy. Therefore, paper and paperboards must be excluded from the Waste Export Ban.

THE REAL MEDIA COLLECTIVE / AUSTRALASIAN PAPER INDUSTRY ASSOCIATION
Suite 6, 151 Barkly Avenue, Richmond VIC 3121
ABN: 13 540 235 566 **T:** 03 9421 2206 **W:** therealmediacollective.com.au   13

Commercial in Confidence

5.0 Industry and Government actions

What could industry do to help your business or sector ensure the waste export bans are effective and adverse consequences are avoided? (Please be as specific as possible)
What could government do to help your business or sector to ensure the waste export bans are effective and adverse consequences are avoided? (Please be as specific as possible)
What actions can industry and government (Commonwealth, state, territory and local) take to drive demand for the use of recycled materials?
What do you consider is the largest barrier to improving waste management and recycling in Australia?

Three key considerations for opportunity within Australia:

1. With current review into Australian energy producers and future opportunities across bio-fuel solutions, Government could consider engagement with the paper and print industries and major energy providers to build and co-invest in biomass power generation by incineration of the waste paper. However, there are limitations to this and there are already State Government and industry projects underway. The main inhibitor for this solution would be the limited heat supply able to be generated from mixed paper grades only and this type of power generation would require a mix of household waste and industry mixed paper waste streams to ensure some plastics and metals were included to generate the appropriate level of heat. Studies by the relevant industry sectors would need to be explored to determine viability and environmental impact of this concept over current export solutions in place.

2. Australia does have local paper manufacturing capabilities in Maryvale, Victoria (Australian Paper) and Boyer, Tasmania (Norske Skog). Australian Paper is working on energy conversion currently, however a second solution could be with Norske Skog to invest in a deinking and pulping facility at the Boyer, Tasmania site. This could potentially utilise the overflow of the mixed waste papers. However, the investment is significant, with limited commercial viability, and would require Government funding assistance to build and develop.

3. Given the industry is established, locally and internationally, the model is commercial and efficient whilst also holding strong environmental credentials, the largest barrier presented to industry currently, and respectfully, is inclusion of paper and paperboard within the Waste Export Ban.

THE REAL MEDIA COLLECTIVE / AUSTRALASIAN PAPER INDUSTRY ASSOCIATION
Suite 6, 151 Barkly Avenue, Richmond VIC 3121
ABN: 13 540 235 566 **T:** 03 9421 2206 **W:** therealmediacollective.com.au   14

Commercial in Confidence

6.0 Conclusion

It remains unclear to industry as to why paper and paperboard generated from commercial print is included within the Waste Export Ban. The rationale for the waste export banning strategy to improve environmental footprint and develop future circular economies, will have the reverse effect on an industry that is already established. Rather than regulation and/or ban imposts, the paper and print industry should be looked to as an example of how other industries can achieve such successful and commercially resilient models.

Any inclusion of paper and paperboards generated from commercial print within the Waste Export Ban will lead to loss of jobs, waste paper to landfill and increased operating cost to an already challenged manufacturing industry.

When determining policy in regards to paper and print sectors, there appears to be critical factors that have been overlooked and we hope this submission provides strong insight into the industry landscape and welcome further discussion with all levels of Government to ensure mutual awareness of the paper and print industry landscape and Government future initiatives and targets.

Key stats to reference:

- The Australian paper, print, mail and distribution industry employs 251,000 Australians across skilled and unskilled labour models across regional and metropolitan locations. *The Real Media Collective, 2019.*

- Paper generates 2.9 tons of CO_2 for every ton of paper to landfill. *EPA, Waste Reduction Model (WARM), 2016.*

- Currently the recycling of catalogue, magazine and newspaper mixed paper grade waste generates an income of ~$18.87M per annum. Export solutions may reduce this income, however planned inclusion of paper and paperboard waste under the Waste Export Ban would shift an income stream to print manufacturers to a cost of ~$5.724M. *The Real Media Collective, 2019.*

- Paper is a renewable resource, with the majority of paper produced for the Australian market coming from sustainably forested plantations, certified forests (83%) or ISO14001 or EMAS certified (91%). *Two Sides, 2019.*

- Paper is 100% recyclable and its recyclability is key to the ongoing supply of pulp in an industry facing global pulp shortages. *Two Sides, 2019.*

THE REAL MEDIA COLLECTIVE / AUSTRALASIAN PAPER INDUSTRY ASSOCIATION
Suite 6, 151 Barkly Avenue, Richmond VIC 3121
ABN: 13 540 235 566 **T**: 03 9421 2206 **W**: therealmediacollective.com.au   15

Commercial in Confidence

- Paper recycling rates in Australia are amongst the highest in the world with over 87% of all paper and paperboard consumed being recovered. *Australia's State of the Forests Report, 2018.*

- In 2015–16, 1.7 million tons of recycled paper were used for domestic paper and paperboard production in Australia, contributing to 53% of paper and paperboard produced. *Australia's State of the Forests Report, 2018.*

- A total of 1.4 million tons of recycled paper were also exported in 2015–16. *Australia's State of the Forests Report, 2018.*

- Altogether, in 2014–15 Australia recycled 60% of the 5.3 million tons of paper and cardboard waste generated. *Australia's State of the Forests Report, 2018*

THE REAL MEDIA COLLECTIVE / AUSTRALASIAN PAPER INDUSTRY ASSOCIATION
Suite 6, 151 Barkly Avenue, Richmond VIC 3121
ABN: 13 540 235 566 **T:** 03 9421 2206 **W:** therealmediacollective.com.au   16

Commercial in Confidence

7.0 References

1. APIA, 2019

2. Assemble *Papers*, Michele Acuto, University of Melbourne.

3. Australia Bureau of Statistics, 2019, 6202.0 – *Labour Force. Australia. Jun 2019*: (Online),
   Available from:
   https://www.abs.gov.au/AUSSTATS/abs@.nsf/Latestproducts/6202.0Main%20Features2Jun%202019?opendocument&tabname=Summary&prodno=6202.0&issue=Jun%202019&num=&view=

4. Australian Forest Products Association (2019), *About AFPA*: (Online), Available from:

5. https://ausfpa.com.au/about/

6. Australian Forest Products Association (2019), *IPCC Report Backs Sustainable Forest Industries to Help Tackle Climate Change:* (Online), Available from:

7. https://ausfpa.com.au/media-releases/ipcc-report-backs-sustainable-forest-industries-to-help-tackle-climate-change/

8. Australian Forest Products Association (2019) *Quick Facts*: (Online), Available from:

9. https://ausfpa.com.au/quick-facts/

10. Australian Paper, 2019.

11. Australian Paper Print & Mail Industry (2019), Snapshot: Employment Breakdown by Sector, Pulp, Paper, Print & Distribution Industry.

12. Australian State of Forests Report, 2018

13. CEPI Sustainability Report, 2019.

14. EPA, 2016, Waste Reduction Model (WARM), Version 14.US Environmental Protection Agency

15. Demographic Resources: .idcommunity (2016), *Australia Employment Status*: (Online), Available from: https://profile.id.com.au/australia/employment-status

THE REAL MEDIA COLLECTIVE / AUSTRALASIAN PAPER INDUSTRY ASSOCIATION
Suite 6, 151 Barkly Avenue, Richmond VIC 3121
ABN: 13 540 235 566 **T:** 03 9421 2206 **W:** therealmediacollective.com.au   17

Commercial in Confidence

16. Greenhouse Gas Account Factors -

https://www.environment.gov.au/system/files/resources/cf13acc9-c660-445e-bd82-3490d74e9d09/files/national-greenhouse-accounts-factors-august-2019.pdf

17. Ibis World, Printing in Australia, 2018

18. Landfill cost - https://www.environment.gov.au/system/files/resources/2e935b70-a32c-48ca-a0ee-2aa1a19286f5/files/landfill-cost.pdf

19. National Waste Report, 2018.

20. Norske Skog, 2019.

21. The Real Media Collective, PORTA™ Industry Metrics, 2019.

22. The Real Media Collective, Industry Snapshot – Australia, 2018-19.

23. Total Environment Centre 2008, Tipping Point: Australia's E-Waste Crisis.

24. Two Sides – www.twosides.org.au

25. Waste recovery - https://www.environment.gov.au/protection/waste-resource-recovery/publications/full-cost-landfill-disposal-australia

THE REAL MEDIA COLLECTIVE / AUSTRALASIAN PAPER INDUSTRY ASSOCIATION
Suite 6, 151 Barkly Avenue, Richmond VIC 3121
ABN: 13 540 235 566 **T:** 03 9421 2206 **W:** therealmediacollective.com.au   18

Commercial in Confidence