Design Institute of Australia

ABN 12 004 412 613
GPO Box 355
Melbourne, VIC 3001

Submission to the Department of Climate Change, Energy, the Environment and Water on:

Designing the Remade in Australia brand

February 2023

Design Institute of Australia

The Design Institute of Australia is the peak professional association for designers in Australia, representing professionals in all design disciplines for around seventy years. Our policy and advocacy priorities reflect the environment designers are operating in, for example embedding circular economy principles and protecting intellectual property. We are headquartered in Melbourne, with active branches in each state and territory and representation on international design bodies.

Australia has a vibrant and engaged design community that has achieved international recognition for its creativity in a broad range of fields.

The design industry is also important to our economy. IP Australia estimates that the contribution to Australia's GDP of design-related industries and workers was approximately $67.5 billion per annum by 2018, or more than 3.5% of GDP – equivalent to the size of the construction industry[i].

The role of designers in reducing waste

Designers and the design industry have a key role to play in transitioning to a circular economy, where the life, value and functionality of products and materials is prolonged.

This includes selecting benign and renewable materials, avoiding waste and designing for re-use, repair, remanufacturing and recycling.

Design for durability, repair and reuse should be the starting point when considering solutions and preventative measures to avoid and reduce waste. This approach means that waste is designed out from product inception. Good design necessarily strives to create products that are fit-for-purpose, safe to use, durable, life-enhancing, repairable, accessible and affordable without impacting on human health and the environment.

When considered from the outset, design can help to prevent premature product obsolescence and early or unnecessary disposal of products that could otherwise last longer. This is especially relevant to product classes such as electronic devices, which are

proliferating in society and constitute one of the fastest growing waste streams in the world. Thankfully, consumer intolerance of premature and planned obsolescence is increasing and will start to influence product development.

ReMade in Australia should include Remanufacturing/Upcycling

The DIA's key point in response to the discussion paper is to highlight the missed opportunity to promote the valuable role of remanufacturing in reducing waste.

In the accepted hierarchy of preferred options for reducing waste the concept of remanufacturing is placed ahead of recycling. Recycling is the least preferred option and should be pursued only after other options have been explored.

Good product design will incorporate consideration of the end of the product's useful life. Products will be designed for durability, reuse, repair and remanufacturing before recycling.

DIA responses to questions in the discussion paper

Proposed rule No. 4: The ReMade in Australia brand should be expanded to include remanufactured products. A definition for remanufactured in Australia products could be adapted from the Australian Standard for Waste and Resource Recovery Data and Reporting.

Proposed rule No. 6: The last substantial transformation requirement would suit remanufacturing.

Proposed rule No. 7: A product that is remanufactured in Australia could also meet the standard of containing at least 50% recycled content collected and processed in Australia if it was expanded to include reused, repurposed or remanufactured content.

Box 6 Q 23 Should the ReMade in Australia brand include a different requirement where recycled content products can achieve outcomes that are higher on the waste hierarchy than recycling? Yes.

Proposed rule No. 10: Allowing flexibility with regard to verification of claims will be important to support the greatest uptake of circular economy principles.

Licencing: The goal of reducing waste should be maintained as the primary objective of the brand. Government should not require the scheme to be self-supporting, at least initially, as high cost access to the brand would undermine the intended outcome by deterring widespread take-up. For example, the pricing model for Australian standards anecdotally discourages innovation and experimentation in the product mix available to consumers because of excessive testing costs. A user-pays approach to verifying content or process claims could result in costs that far exceed any advantages derived from using the brand. Tiered licencing is supported as it could alleviate these concerns.

Box 10 Qs 42 and 43: In some markets some applicants may be motivated to do whatever they can to achieve the mark, and thereafter exaggerate their claims at renewal to retain their green credentials. Compliance should seek to balance the burden on applicants with effective maintenance of standards. The scheme should include a well-resourced audit function.

Partners program: Planning for the partners program or the main brand should also consider measures to support and incentivise design innovation, for example by broadening the requirement for recyclability to recognise products that are designed to minimise waste.

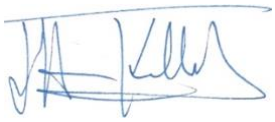
Conclusion

A good design is inherently sustainable and plans for waste and carbon footprint reduction both during production and in use, as well as for recyclability. Part of our approach to a better future needs to be better recognition of and support for sustainable design.

While the ReMade in Australia brand is likely to contribute to resolving our current recycling failures, we also need to incentivise designing products for reuse, repair and remaking wherever possible, and recycling only after those options have been pursued.

In addition to remanufacturing, creating products with greater longevity and allowing prolonged product life through repairability is also an important step toward achieving a circular economy. It will divert end-of-life products from landfill and maximise their functionality, value and environmental benefit.

Thank you for the opportunity to comment.



Jo-Ann Kellock FDIA (hon)
CEO

Prepared by Denise Ryan, Senior Policy Advisor

[i] Falk, M. R., Campbell, M. et al. 2020. Design's Role in the Australian Economy. IP Australia, Canberra