



**Australian Information Industry Association**

**Submission on**

**Environmentally Sustainable Procurement Policy  
Phase 2 Implementation: ICT Goods**

**5 November 2024**

## Introduction

The Australian Information Industry Association ('AIIA') appreciates the opportunity to provide feedback on the implementation of Phase 2 of the Environmentally Sustainable Procurement Policy (ESPP) as it relates to ICT goods. We commend the Department of Climate Change, Energy, the Environment and Water's ('Department') efforts to address sustainability in government procurement, recognising the unique environmental challenges presented by ICT products. This submission seeks to provide constructive recommendations that will help ensure the policy is both practical and impactful, fostering sustainable outcomes across the ICT supply chain while supporting industry adaptability and compliance.

## Sustainability Issues

*Would you like to provide any comments on the sustainability issues and their prioritisation?*

The consultation paper highlights that approximately 80% of the carbon footprint for most ICT products is associated with embedded emissions. While the AIIA recognises the importance of addressing these embedded emissions, we recommend that energy efficiency should be prioritised more prominently, particularly for products such as imaging equipment that are not currently covered under the Greenhouse and Energy Minimum Standards (GEMS). Prioritising energy efficiency through targeted metrics, such as estimated power usage over the product life cycle, would provide a valuable means of differentiating product performance. By doing so, the policy can encourage the selection of products that not only have lower embodied emissions but also contribute to ongoing operational sustainability through reduced energy consumption.

## Ecolabels

*The discussion paper identified tools for verifying sustainability claims. Would you like to provide further comment on tools for verifying sustainability claims?*

The discussion paper outlines several tools for verifying sustainability claims, with a strong emphasis on ISO 14024-compliant ecolabels like EPEAT and TCO Certified. However, given the limited adoption of ISO 14024-compliant ecolabels in Australia's ICT market, obtaining these certifications can be time-consuming and resource-intensive for local companies. Additionally, with the EPEAT criteria currently undergoing a significant [review](#)—requiring all products to meet new standards by April 2026—achieving EPEAT or TCO certification by the proposed July 2025 deadline would be challenging for those companies that do not yet have it.

The AIIA recommends that the Department broaden its accepted certification criteria to include any ISO 14024 Type 1 ecolabel recognised by the Global Ecolabelling Network (GEN), the international federation of ecolabelling bodies. Type 1 programs are particularly robust, employing a third-party certification process to confirm that products or services meet a comprehensive set of sustainability criteria. Additionally, we recommend that third-party certification to an accredited standard that addresses the relevant sustainability claim (e.g. greenhouse gas emissions tracking/improvements, product longevity) also be accepted. Allowing a wider range of Type 1 and accredited standard certifications would alleviate the cost and complexity of compliance, as most ICT companies already hold some form of certification.

If the Department decides to mandate EPEAT or TCO certification exclusively, AIIA suggests that the deadline be extended to December 2026. This extension would provide companies with adequate time to meet the revised criteria, ensuring a more feasible path to compliance for the Australian ICT market.

### **Proposed Metrics**

*The discussion paper proposed metrics for tracking the sustainability of procurements in the ICT goods category. Do you agree with these metrics?*

While the AIIA supports the establishment of clear metrics, we recommend that the Department consider flexibility in acceptable certifications. Accepting certifications from equivalent international accredited standards or supplier declarations would facilitate compliance and broaden the options available for demonstrating sustainability.

*Would you like to provide any comments on the proposed metrics?*

Regarding goods containing recycled content or recycled materials, we recommend that the Department include the proportion of renewable content – materials that can continually be sourced without depleting the Earth’s natural resources – in addition to use of recycled materials.

*Would you like to provide any comments on the proposed approach to verifying sustainability claims?*

Table 4 suggests that manufacturer declarations be verified to prevent potential greenwashing. The AIIA recommends that the Department provide explicit guidance on the required evidence for such verification, ensuring clarity for both suppliers and evaluators.

Additionally, references to R2-certified facilities should be expanded to include Australian and European standards for recyclers. For example, recyclers certified under AS 5377 (Management of electrical and electronic equipment for re-use or recycling) or the WEELABEX program in Europe should be equally recognised. This broader approach would allow for a more inclusive framework that accommodates reputable certifications across different regions, ensuring a robust and internationally relevant standard for sustainable recycling practices.

We also reiterate our earlier comments regarding ecolabels. We recommend that the Department accept certifications from equivalent international accredited standards or supplier declarations.

### **Reporting Template**

*A draft reporting template was included in the discussion paper. Please provide any additional comments on the draft reporting template and guidance required.*

The AIIA notes that Table 2 (End-of-Life Reporting Template) requires identification of the destination for each product. In practice, ICT products may be disassembled into individual components and materials, which may be processed at multiple facilities and sent to various destinations for recycling or disposal. To accurately capture this complexity, we recommend that the template be adapted to allow flexibility in reporting multiple destinations for different components of a single product.



Additionally, we reiterate our earlier comments regarding R2 certification. While R2-certified facilities are referenced in the current template, it would be beneficial to include other recognised certifications, such as AS 5377 and WEELABEX.

### **Conclusion**

The AIIA appreciates the opportunity to provide feedback to the Department of Climate Change, Energy, the Environment and Water. We believe that a flexible, inclusive framework that accommodates diverse certifications and recognises the complexities of ICT product life cycles will foster greater industry participation and drive meaningful environmental outcomes.

Should you require further information, please contact Ms Siew Lee Seow, General Manager, Policy and Media, at [siewlee@aiaa.com.au](mailto:siewlee@aiaa.com.au) or 0435 620 406, or Mr David Makaryan, Advisor, Policy and Media, at [david@aiaa.com.au](mailto:david@aiaa.com.au).

Thank you for considering our submission.

Yours sincerely  
Simon Bush  
CEO, AIIA

### **About the AIIA**

The AIIA is Australia's peak representative body and advocacy group for those in the digital ecosystem. Since 1978, the AIIA has pursued activities to stimulate and grow the digital ecosystem, to create a favourable business environment for our members and to contribute to Australia's economic prosperity. We are a not-for-profit organisation to benefit members, which represents around 90% of the over one million employed in the technology sector in Australia. We are unique in that we represent the diversity of the technology ecosystem from small and medium businesses, start-ups, universities, and digital incubators through to large Australian companies, multinational software and hardware companies, data centres, telecommunications companies and technology consulting companies