

Monica Gilbey
NEPC Service Corporation
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Adelaide SA 5000
Email: mgilbey@ephc.gov.au

19 May 2005

Dear Monica,

**Re: Boomerang Alliance comment on Regulatory Impact Statement
to a new draft National Packaging Covenant.**

Please find attached a submission in four parts to the Regulatory Impact Statement (RIS) for a new draft National Packaging Covenant (NPC) from the Boomerang Alliance.

The Boomerang Alliance (BA) is comprised of all major environment groups campaigning on waste in Australia with membership and support from Local Government Associations nationally, and receiving additional advice and support from various entities in the packaging services (supply, collection and waste) chain. The Alliance has been established to translate stated policy objectives of zero or toward zero waste into reality, in the first instance by tackling packaging waste through reforming the NPC so that it can achieve clear outcomes.

The BA is disappointed that the RIS chose a position that service providers and local government associations have previously rejected – including, for instance, making incorrect assumptions around costs associated with gaining further effort out of kerbside.

We were also disappointed that the deliberations of the targets working group were ignored (for instance, the need for new reprocessing facilities) and that the RIS failed to undertake further consultation subsequent to the important intervention of Ministers at the December 2004 EPHC meeting establishing the need for targets.

Broadly, the BA believes the RIS's stated preferred option of a Covenant with disaggregated material-specific targets is acceptable, though note this approach still falls far short of either a voluntary or regulated EPR model to deal with packaging.

Finally, the enhanced Covenant and the RIS both identify litter as key policy objectives, then fail to address the crucial issue of how to achieve reductions in this area. Nor do they identify or discuss costs of dealing with this worsening waste management problem.

The Alliance looks forward to continued industry, government and public engagement on this issue to ensure Australia begins to approach world's best practice in recycling and packaging waste management.

Sincerely,



Dave West

on behalf of the Boomerang Alliance:

