

TO:

Mr Jon Stanhope MLA
Minister for Environment, Chief Minister ACT
The Hon. Robert Debus, MP
Minister for the Environment NSW
Ms Marion Rose Scrymgour MLA
Minister for the Environment and Heritage NT
The Hon. Desley Boyle MP
Minister for Environment QLD

The Hon. John Hill, MP
Minister for Environment and Conservation SA
The Hon. Judy Jackson
Minister for Environment and Planning TAS
The Hon Johnstone William Thwaites
Minister for Environment VIC
The Hon. Judy Edwards MLA
Minister for the Environment WA

20 December 2004

The Boomerang Alliance would like to commend you for your stance to improve the draft NPC at the EPHC meeting on 3 December 2004, through the implementation of targets, strengthened system, mechanisms and community representation.

Our position remains that the draft NPC was out of date, inadequate and would not achieve real progress in the elimination of packaging waste. The packaging industry would continue to avoid responsibility for waste generation whilst imposing significant economic, social and environmental costs onto the broader community. Also, the consultative process highlighted the complete disregard for the submissions of environmental groups (and other stakeholders) for the draft proposal and industry's attempt to push for an approach that would not meet the community's expectations on waste.

Our understanding, based on the EPHC communiqué and official environment ministry media releases, is that the new Covenant to be considered at the April 2005 meeting will include:

- quantifiable targets for an expected reduction in total packaging going to landfill; increase in total packaging recycled; increase in recycled content of new products; and a reduction in usage of non-recyclable packaging;
- targets to be developed in consultation with NGOs, local government and industry;
- the appointment of a community representative to the Council as a full participatory member;
- the phasing out of plastic bags; and
- a mid term independent review to assess progress to targets.

The Alliance commends the introduction of quantifiable targets. We expect these targets will be high – by 2010 a recovery for recycling or reuse rate of at least 80% on a range of the most prevalent and collectible items. We believe targets should be backed by appropriate financial and other mechanisms such as landfill bans, recycling refunds or incentives, refillable requirements or advanced disposal fees. In this regard, we support and would expect to see a full process of investigation and decision making regarding applicable Extended Producer Responsibility style mechanisms that will realise these targets. The targets should be reinforced by penalties for failure.

We consider that the approach outlined above would result in substantial environmental outcomes. They would at least lead to real and sustainable reductions in waste to landfill, terrestrial and marine litter and the introduction of a truly closed loop, resource-based approach to packaging. We also believe Ministers have the full backing of the community for such an approach and we will, over the coming months, be campaigning to highlight this community support.

The Boomerang Alliance has also recently welcomed the NSW Local Government and Shires Association (NSW LGSA) as a partner and looks forward to its valuable input into the issue of packaging and the NPC.

We will continue to foster and build healthy relationships with all stakeholders to achieve tangible outcomes for reducing the environmental, social and economic burdens of packaging. We look forward to engaging constructively in the process devised to achieve a consensus on the next phase of the National Packaging Covenant and welcome further discussions with your offices.

Please find enclosed the Boomerang Alliance's report 'Say No to the Waste Club – A Review of the NPC' which provides a critical analysis of the problems arising from packaging flows in the economy and recommends an agenda for action to deliver a best practice approach to sustainable packaging management in Australia.

Yours sincerely,



Jeff Angel

Director

Total Environment Centre

On behalf of the Boomerang Alliance:



GREENPEACE

NATURE CONSERVATION COUNCIL OF NSW Inc.

Local Government
Association of NSW



Shires Association of NSW

