

TO:

ACI Glass Packaging	ACI Plastic Packaging	ALDI Stores	Amcor	Ardmona Foods
Arnott's Biscuits	Berri	Blue Scope Steel	Bonlac Foods	British American Tobacco (Aus)
BRL Hardy	Cadbury Schweppes	Cerebos (Aus)	Coca-Cola Amatil	Coles Myer
Colgate-Palmolive	Coopers Brewery	Dairy Farmers Group	Diageo	Foster's Group
George Weston Foods	Golden Circle	Goodman Fielder	J Boag & Son Brewing	Johnson & Johnson (Aus)
Kellogg (Aus)	Kimberly-Clark Australia	Kraft Foods Asia Pacific	Lion Nathan	McCain Foods (Aus)
McDonald's Australia	Murray Goulburn Co-op Co.	National Foods	Nestlé Australia	Procter & Gamble (Aus)
Reckitt Benckiser (Aus)	Sanitarium Health Food Co.	Simplot Australia	Southcorp Wines	SPC Ardmona
Smith's Snackfood Co.	Tetra Pak Marketing	Unilever Australia	Visy Industries	Woolworths

17 November 2004

Re: NPC not acceptable

We write in response to the National Packaging Covenant Council's draft document "*A Commitment to the Sustainable Manufacture, Use and Recovery of Packaging*" (NPC MkII), October 2004.

Environment groups, many local authorities, and the community generally are frustrated by Australia's manifestly inadequate recovery rates for packaging waste. This waste continues to litter our cities, countryside and waterways. Recovery rates for recycling are static at best and must be greatly improved. The journey to sustainability requires continual improvement supplemented by significant leaps - the NPC offers neither.

While we know there are companies that take a positive approach to these issues, it appears waste packaging generated by the Fast Moving Consumer Goods industry remains a largely unaddressed environmental and social problem.

Environmental groups cannot allow this to continue.

To this end, we advise that the undersigned groups have formed the 'Boomerang Alliance' with a specific focus on developing an ongoing and high profile public response to the NPCC proposal. Letters have been forwarded to State and Territory Environment Ministers with a call to abandon the current draft NPC and consider effective alternatives.

Recent national action on supermarket plastic bags, supported by positive community engagement and increased industry participation with tangible outcomes, has only scratched the surface of Australia's massive consumer product and packaging waste challenge.

The community increasingly recognises producer responsibility associated with waste avoidance and enhanced recovery. The community can be forgiven for thinking that packaging manufacturers make little real effort to collect rubbish (lost resources) from waterways, parks beaches or roadsides. There is even less evidence of effort to recycle packaging waste.

The Alliance believes responsible companies can gain from positive positioning around these issues. Companies should consider whether continued support of an ineffective mechanism like the NPC is worth the reputational risk.

In particular, the Alliance opposes the packaging industry and other relevant sectors getting an easy ride via another NPC, especially when companies in other industry sectors – driven by NSW's EPR legislation, international initiatives and community expectations – are already starting to embrace far more rigorous waste recovery and reuse/recycling schemes.

As you will see from the attached critique of the outline NPC MkII, this newest proposal seeks to follow the first Covenant. We cannot support a framework that:

- Betrays the broad consultation process that preceded it
- Fails to ensure that the necessary reductions in packaging waste will be delivered

- Fails to set targets for recovery
- Curtails jurisdictions' abilities to regulate minimum standards of performance
- Limits the introduction of broader EPR-based approaches
- Offers zero community group representation, and
- Has inadequate local government representation.

A serious national commitment to approaching minimal or zero waste and litter requires robust targets as well as a strong EPR mechanism. The starting point should include major improvements to recovery, reuse and recycling of items currently subject to kerbside collection including:

- A minimum 80% recovery of materials within 5 years (by 2010)
- 90% or greater within 10 years (by 2015)
- 95% or greater within 15 years (by 2020)

As a signatory of the NPC, and as a company that makes a significant contribution to the packaging waste challenge, we call on you to show leadership on addressing Australia's waste problems.

Our Alliance welcomes the opportunity to work with progressive companies, enlightened jurisdictions and other stakeholders towards developing a strategy that builds on international developments including the latest waste processing technologies, proven efficient and cost effective systems for recovery and reuse/recycling, and emerging industry-based producer-responsibility models.

The Alliance is aware of the stated positions of specific industry groups regarding the NPC. It is important for us to understand your company's position – in particular, regarding mandatory and challenging targets – and EPR more broadly.

As an initial step, we invite representatives of your company to meet with the Alliance so we can better understand your perspectives and needs in order to develop constructive approaches that deliver an agenda toward zero waste and litter solutions.

Yours sincerely,



Jeff Angel

Director, Total Environment Centre

On behalf of the Boomerang Alliance Members:



NATURE CONSERVATION COUNCIL OF NSW Inc.

