

TO:

The Hon. Bob Carr
Premier, NSW

The Hon. Clare Martin
Chief Minister, NT

The Hon. Peter Beattie
Premier, Queensland

The Hon. Mike Rann
Premier, South Australia

The Hon. Paul Lennon
Premier, Tasmania

The Hon. Steve Bracks
Premier, Victoria

The Hon. Dr Geoffrey Gallop
Premier, Western Australia

Mr Jon Stanhope MLA
Minister for Environment, Chief Minister ACT

The Hon. Robert John Debus, MP
Minister for the Environment NSW

Ms Marion Rose Scrymgeour 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

Dr Maxine Cooper, Executive Director
Environment ACT

Ms Lisa Corbyn, Director General
Department of Environment and Conservation

Mr Michael Lawton, Director, Waste and Pollution
Management, Office of Environment & Heritage

Mr James Purtill, Director-General
Environmental Protection Agency

Dr Paul Vogel, Chief Executive
Environment Protection Authority

Dr Warren Jones, Director Environmental Management,
Dept of Primary Industries, Water & Environment

Mr Mick Bourke, Chairman
Environment Protection Authority

Mr Noel Davies, Chairman
Waste Management Board

17 November 2004

Re: NPC not acceptable

We are writing to request that your Government reject the redrafted National Packaging Covenant (NPC). Key environment groups have formed the 'Boomerang Alliance' with a specific focus on developing a ongoing public response to the National Packaging Covenant Council (NPCC) proposal and are alerting industry and the community to the need to stop the NPC and consider effective alternatives.

The NPC is both out of date and inadequate. As Australian jurisdictions increasingly embrace the goal of major resource recovery, 'zero waste' and principles of sustainability and Extended Producer Responsibility (EPR) - any decision to commit to a further five years of the NPC will lock out real progress on eliminating packaging-related waste at least until next decade. Allowing the packaging sector to avoid its responsibility will, we believe, make it increasingly difficult to require companies in the computer, mobile phone, automotive and other industries with priority waste streams to reform existing practice.

Failure to adequately address the NPC means more pressure on landfills, new landfills being created, more litter, polluted waterways, and less recovery and reuse or recycling of packaging materials. Recycling and recovery rates for all Australian states, aside from SA, are unacceptably low, and in most states have either declined or remained static at best. This will not change by locking into a further five years of the NPC.

Key deficiencies of the NPC models include:

- Can't deliver minimal or zero waste
- Address neither sustainability nor EPR
- Lack any hard and/or numerical targets
- Exclude relevant community representation
- Are dominated by vested interests from industry, *and*
- Impose waste and litter clean up costs on local government and ratepayers.

Over the past year a number of environment groups have participated in the lengthy consultation process for a new NPC in good faith and, in spite of deep reservations, have made constructive submissions seeking to improve on an inherently flawed model.

The proposed draft for a next-generation NPC, however, has betrayed both the process and the positive role we sought to play as stakeholders. It demonstrates the determination of industry to push for a lowest common denominator approach that falls a long way short of the community's expectations on waste.

As a consequence, we are now compelled to reject the entire process and call for it to be suspended or abandoned. This will allow initiation of genuine stakeholder process to develop an alternative model that can provide a platform for real progress on waste.

We simply cannot afford to delay such action into next decade by signing up for another NPC.

We ask for your support, when you and your EPHC Ministerial colleagues meet next month to consider progress towards the proposed new NPC.

The community will accept and support constructive and simple actions to protect the environment and meet sustainability challenges. People seek clear direction from government and business on what to do and why.

In conclusion, we ask that all states and territories reject the NPC model and its soft approach on waste. You have an opportunity to show national leadership in tackling the waste problem by saying no and helping stop the NPC.

Yours sincerely,



Jeff Angel
Director, Total Environment Centre

On behalf of the Boomerang Alliance Members:

