



**SUBMISSION TO THE AUSTRALIAN GOVERNMENT  
DEPARTMENT OF THE ENVIRONMENT, WATER, HERITAGE AND  
THE ARTS ON  
THE DISCUSSION PAPER ENTITLED**

*Draft National Waste Policy Framework - less waste more resources*

30 July 2009

## Introduction

CropLife Australia (CropLife) welcomes the opportunity to provide comment on the *Draft National Waste Policy Framework: Less waste more resources* discussion paper.

CropLife is the voice and advocate of the plant science industry in Australia. As the industry peak body, CropLife progresses the interests of member companies by engaging with decision makers and other stakeholders and influencing the development and implementation of government policies. This submission represents CropLife member's views with respect to the discussion paper.

CropLife notes that AgStewardship Australia Limited has also provided a submission to the task force on the discussion paper. CropLife fully supports and agrees with all the comments and positions expressed in that paper. The views contained within this submission are exclusively those of CropLife member companies.

## Issues

CropLife fully supports the ten elements of the vision by 2020, and notes that its members are already contributing to achieving many of these outcomes through their participation in the *drumMUSTER* and ChemClear® stewardship programs, as outlined in our submission of 20 May 2009.

Key Principle 3 of the paper states that:

3. Market, regulatory and governance failures, duplications and inconsistencies are addressed and issues dealt with holistically.

CropLife fully supports this as a key principle. Duplication of existing successful stewardship programs should be strictly avoided. Imposing regulatory requirements in circumstances where industry stewardship is already effective merely serves to increase costs to industry with no corresponding benefit to the community, government or the environment.

CropLife is already experiencing this through the application of the National Packaging Covenant (NPC). Many of our members are regularly approached by state agencies requesting that they participate and contribute to the covenant, despite having an effective and efficient packaging stewardship scheme that takes into account the unique aspects of pesticide packaging.

The NPC is ill equipped to handle the necessary inspection requirements and recycling into only specific products that is necessary for the potentially hazardous nature of pesticide container waste. As the NPC is currently administered through eight different Australian jurisdictions, there is no clear mechanism to address key policy questions such as this.

The National Waste Policy should clearly state that where industry stewardship schemes are already effectively managing a waste stream, additional government regulations are unnecessary. The National Waste Policy should recognise existing schemes to prevent perverse outcomes such as would occur through requiring the NPC to manage used pesticide containers. This is consistent with the holistic approach to issues highlighted in the policy paper.

## Conclusion:

CropLife is committed to the responsible stewardship of its products from inception, testing and development right through to their eventual disposal. This ensures the risks from unintentional human health and environmental impacts from these chemicals are minimised.

Regulatory stewardship schemes must not be imposed over existing industry stewardship where those schemes are operating effectively to the benefit of human health and the environment. To do so will result in perverse outcomes.

CropLife welcomes the opportunity to further discuss this issue with the Waste Policy Taskforce if required. If you would like to discuss this matter further, please contact CropLife's Assistant Director for Environment and Stewardship, Mr Ben Stapley on 02 6230 6399 or at [ben.stapley@croplifeaustralia.org.au](mailto:ben.stapley@croplifeaustralia.org.au)