

Senator the Hon. Ian Campbell  
Minister for the Environment and Heritage  
Parliament House  
Canberra  
ACT, 2600 Australia

August 2005

Dear Minister,

We the undersigned are writing to inform you to of the growing international concern being generated over the actions of the chemical company, Orica Australia Pty Ltd and their proposal to export 11,000 tonnes of highly toxic hexachlorobenzene waste to Europe for incineration. .

We are aware that in 1996 the Australian National Advisory Body (NAB) on Scheduled Waste released the national Management Plan for Hexachlorobenzene (HCB) to oversee the destruction of the HCB waste stockpile. This plan recommended that the waste should be destroyed as “close to the source as possible” in the light of the significant risk in transporting such a large stockpile of persistent organic pollutant (POPs) waste and Australia’s proven ability to destroy hazardous waste in an environmentally sound manner.

We believe Orica’s current proposal to export its 11,000 tonnes of HCB waste to an incinerator overseas is in breach of both the intention and spirit of the HCB Management Plan and contravenes the principles of environmentally sound management of hazardous waste as developed by the UN Secretariat of the *Basel Convention on the Control of Transboundary Movements of Hazardous Wastes & their Disposal* (1989).<sup>1</sup>

These include :

f) the self-sufficiency principle – management and disposal of waste in the country where it was created

g) the proximity principle - the disposal of hazardous waste as close as possible to their point of generation

h) the least transboundary movement principle - transboundary movements of hazardous waste reduced to a minimum

While the waste holder may argue exceptional circumstances require export, we do not consider that this is the case. After many years of failing to address its hazardous waste responsibilities, the company rejected the well tried, community supported technology,

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<sup>1</sup>[1] The Secretariat, Basel Convention Disposal, *Guidance in Developing National & all Regional Strategies for the Environmentally Sound Management of Hazardous Waste*, Basel Convention Highlights No. 96/001, Geneva 1995

ECOLOGIC Gas Phase Chemical Reduction (GPCR) Process. Its choice instead of an untried, semi incineration vitrification process led to local community concern and the rejection of its Environmental Impact Statement.

There is strong international opposition to any attempt to export this waste and we wish to inform you that national and international NGOs are already mobilising to challenge the import of this stockpile into Europe for incineration.

We believe the actions of this one company are putting at risk Australia's reputation in the area of environmentally sound chemical management. This would be particularly unfortunate given Australia's recent role as the Chair of the Stockholm Convention COP1 Committee of the Whole.

We ask you as the Australian Minister for the Environment to accept the principle that Australia takes responsibility for the environmentally-sound destruction of its own HCB waste, as it has done for all previously generated POPs waste. We also request that you work with all stakeholders including State governments, the wasteholder, NGOs and the community to find an environmentally sound solution to the destruction of the HCB waste stockpile in Australia.

Yours Sincerely,