



Mr Dean Knudson  
Deputy Secretary  
Department of Climate Change, Energy, the Environment and Water  
GPO Box 3090  
Canberra ACT 2601

Email: [iChEMS.enquiry@dcceew.gov.au](mailto:iChEMS.enquiry@dcceew.gov.au)

8 November 2023

Dear Mr Knudson

**Re: IChEMS short chain chlorinated paraffins decisions**

Thank you for the opportunity to provide feedback on the proposed Industrial Chemicals Environmental Management Scheme (iChEMS) short chain chlorinated paraffins (SCCPs) decision. The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$15.8 billion waste and resource recovery (WARR) industry. With more than 2,200 members from over 400 entities nationwide, we represent the breadth and depth of the sector, within business organisations, the three (3) tiers of government, universities, and non-government organisations.

WMRR recognises the addition of SCCPs to Schedule 7 of the IChEMS Register aligns with the requirements to ratify the Stockholm Convention. However, WMRR would argue that the approach to date has been painfully slow (noting that this chemical has been of concern for many years) and the IChEMS approach of simply banning a select few chemicals at a time, in the absence of a comprehensive regime, leads to a 'whack a mole game' as they are replaced by similar non-banned variants that can have equally deleterious impacts. In WMRR's view, the current controls need to extend ensuring that there is a holistic system in place for such registrations. It is noted that this chemical is not currently being produced in Australia, however we must ensure that we have an appropriate response for legacy materials including waste that may already be circulating.

In WMRR's view it is highly problematic the government continues to not require manufactures to alert consumers to the fact their products contain chemicals that are of such concern globally they have been banned for over a decade. WMRR is also seeking the development of a national program that requires all manufacturers – local and import – to report and identify hazardous chemicals within the products they produce and supply. Both these required initiatives are similar to, for example, the EU's Register, Authorisation and Restriction of Chemicals (REACH) program as well as the Classification Labelling and Packaging (CLP) initiative, which requires identification of all material to enable consumers to make an informed choice.

The federal government must take an urgent lead to turn off the tap supplying these chemicals to Australia, as well as ensuring that there is a commonsense approach taken to downstream operators who are already feeling the legacy waste burden of managing these materials. There is also a real risk, given the lag in Australia of implementing restrictions on these chemicals that Australia will be a dumping ground for such materials and products that cannot be supplied into other markets. Under the current proposal the end-of-life fate for any replacement chemicals needs also to be considered. It cannot be assumed that the WARR industry has the capability to constantly develop new recovery/ processing/ disposal pathways for a rolling list of newly introduced and subsequently banned *moles* (i.e., chemicals).

Mandatory extended producer responsibility schemes or in the absence of this a strong framework like that employed in the European Union (*Waste Framework Directives*) establishing clear measures for addressing the

**WMRR NATIONAL OFFICE**  
57 ST JOHNS ROAD  
GLEBE NSW 2037  
  
(02) 8746 5000  
INFO@WMRR.ASN.AU

**WMRR.ASN.AU**



adverse impacts of the generation and management of waste on the environment and human health, and for improving efficient use of resources which are crucial for the transition to a circular economy must be implemented in Australia, or we will be forever chasing our tail! It is vital that Australia act comprehensively to ensure that manufacturers and importers have greater responsibility for ensuring that the product they place on market is safe and is in fact capable of being recovered. As well as being required to be financially responsible for the products end of life pathway, ideally including returning to the productive economy.

It is important to note in Europe, the Stockholm Convention is part of a holistic system that manages the generation, design and management of materials, including those containing hazardous materials through to end-of-life. The Stockholm Convention, unlike IChEMS, forms part of a holistic system including the Waste Directives, the Register of Hazardous Substances (RoHS), the CLP and REACH programs. WMRR continues to advocate that Australia needs a consistent and comprehensive national framework on how to manage these POPs across the supply chain given that we know the WARR sector will have to manage these materials for the foreseeable future. It is deeply disappointing that with positive comprehensive examples of how to implement effective policies overseas, Australia continues with such a limited approach. This fails to assist consumers understanding what they are purchasing, nor requires manufacturers/ importers to ensure that their products are in fact safe for consumption.

Please do not hesitate to contact the undersigned to discuss further.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Gayle Sloan', positioned below the text 'Yours sincerely'.

Gayle Sloan

**Chief Executive Officer**

Waste Management and Resource Recovery Association of Australia

**WMRR NATIONAL OFFICE**  
57 ST JOHNS ROAD  
GLEBE NSW 2037  
  
(02) 8746 5000  
INFO@WMRR.ASN.AU  
  
**WMRR.ASN.AU**